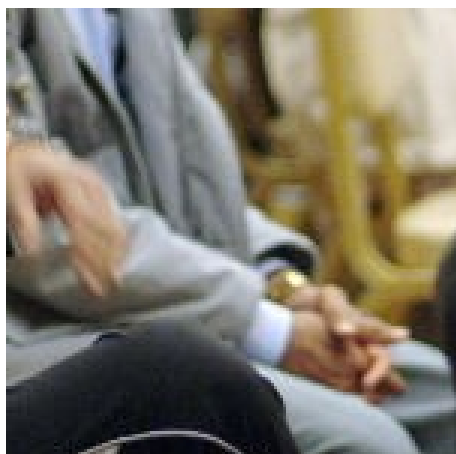
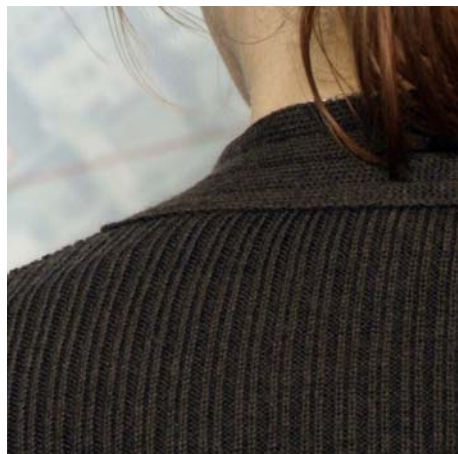
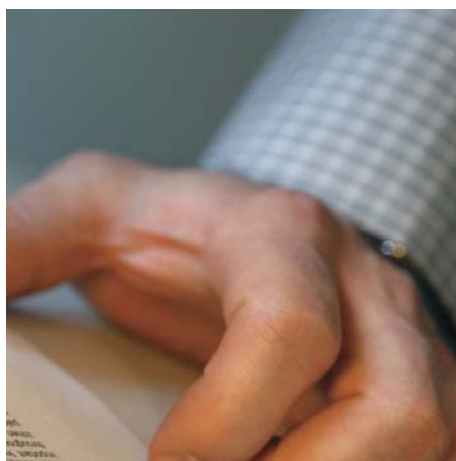
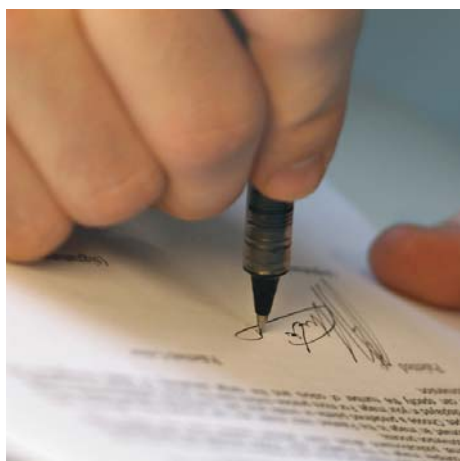


Preparing a Local Plan for Pendle



Core Strategy Further Options Report Consultation Statement

September 2014



For an alternative format of this
document phone 01282 661330



Contents

Introduction.....	5
Engagement and Consultation.....	5
Representations	7
What happens next?.....	7
Publication	8
Submission	9
Examination	9
Other Considerations.....	10
Published Plans and Strategies	10
Evidence Base	10
Sustainability Appraisal.....	11
Habitat Regulations Assessment	12
Equalities Impact Assessment	13
Pendle Local Plan Part 2: Site Allocations and Development Policies.....	14
Appendices (after page)	15
Appendix 1	
Consultation comments, officer responses and recommendations – Core Strategy (Further Options Report)	
Appendix 2	
Responses to petitions: Lidgett & Beyond / Barrowford Road, Colne	
Appendix 3	
Consultation comments, officer responses and recommendations – Policy WRK3: Strategic Employment Site - Lomeshaye	
Appendix 4:	
Schedule of proposed changes – Core Strategy (Further Options Report)	
Appendix 5	
Consultation comments, officer responses and recommendations – Evidence base documents	
Appendix 6	
Schedule of proposed changes – Evidence base documents	
Appendix 7	
Consultation events and publicity – Core Strategy (Further Options Report)	
Appendix 8	
Sustainability Appraisal Matrix – Core Strategy (Further Options Report)	
Appendix 9	
Summary of previous public consultations	

Introduction

- 1.1 As part of the Council's commitment to continuous and meaningful engagement with interested parties, a Consultation Statement, similar to this document, has been made available following each formal public consultation, so that consultees can see how their comments have helped to shape successive versions of the Core Strategy.
- 1.2 Between Friday 10th January and Friday 21st February 2014, Pendle Borough Council held a six-week public consultation on the Pendle Core Strategy (Further Options Report), in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 This statement has been prepared, to illustrate the following:
- (i) Which bodies and persons were invited to make representations under Regulation 18.
 - (ii) How those bodies and persons were invited to make such representations.
 - (iii) A summary of the main issues raised by those representations.
 - (iv) How these representations have been taken into account.
- 1.4 The main body of the document considers the consultation process [i.e. items (i) and (ii) above], whilst the appendices (listed below) address points (iii) and (iv):
- Appendix 1: Consultation comments, officer responses and recommendations – Core Strategy (Further Options Report)
- Appendix 2: Responses to petitions – Lidgett & Beyond, Colne and Barrowford Road, Colne
- Appendix 3: Consultation comments, officer responses and recommendations – Policy WRK3: Strategic Employment Site (Lomeshaye)
- Appendix 4: Schedule of proposed changes – Core Strategy (Further Options Report)
- Appendix 5: Consultation comments, officer responses and recommendations – evidence base documents
- Appendix 6: Schedule of proposed changes – evidence base documents
- 1.5 Appendices 7-8 set out the publicity and sustainability appraisal process, whilst Appendix 9 summarises earlier formal public consultations, which helped to shape the Core Strategy (Further Options Report).

Engagement and Consultation

- 1.6 Pendle Council adopted its Statement of Community Involvement (SCI) on 29th March 2007. This document sets out how members of the local community and partner organisations are to be engaged in the preparation of new planning policy documents. Since its adoption public consultation and engagement associated with the preparation of the Core Strategy and other planning policy documents has been carried out in accordance with the SCI.
- 1.7 Preparation of the Core Strategy has taken place over a number of years. It has benefited from early and continuous engagement with both key stakeholders and members of the public.

- 1.8 Much of this preparatory work has taken the form of ongoing, informal consultation with key stakeholders. More structured engagement has taken place as necessary; most often in the form of meetings with key partners, in order to comply with the requirements of the Duty to Cooperate, which was introduced in Section 110 of the Localism Act 2011, and set-out in paragraphs 178-181 of the National Planning Policy Framework [“The Framework”].
- 1.9 At key stages prescribed in the regulations, formal six-week public consultations have been held to provide members of the public with the opportunity to comment (see below). For each of these consultations, the consultation documents and representation forms are made available on the Pendle Council and Feedb@ck websites and at a number of ‘deposit locations’ (Table 1.1).

Table 1.1: Venues at which consultation documents are available for inspection

M65 Corridor	West Craven	Rural Pendle
NELSON <ul style="list-style-type: none"> • Number One Market Street • Library COLNE <ul style="list-style-type: none"> • Town Hall • Library BARROWFORD <ul style="list-style-type: none"> • Library BRIERFIELD <ul style="list-style-type: none"> • Town Hall² • Library 	BARNOLDSWICK <ul style="list-style-type: none"> • Council Shop • Library EARBY <ul style="list-style-type: none"> • Council Shop • Library 	TRAWDEN <ul style="list-style-type: none"> • Library WHEATLEY LANE <ul style="list-style-type: none"> • Library OTHER <ul style="list-style-type: none"> • STAN The Van¹ • Mobile Library

- 1.10 Details of these venues and their opening times are included in the correspondence sent out to consultees (see below), advertised online and in the local press. Publicity materials are also sent to a wide range of venues (Table 1.2).³

Table 1.2: Spatial summary of deposit and publicity locations, 2013

Locations	NEL	BRF	BFD	BLK	CLN	EAR	OTH	PEN
Council Shops / Libraries	2	1	1	2	2	2	3	13
Parish Councils	1	1	1	1	1	1	13	19
Doctors Surgeries / Health Centres	1	1	1	1	2	1	1	8
Pendle Leisure Trust Venues	3	0	0	1	3	0	0	7
Totals	7	3	3	5	8	4	17	47

Key: NEL (Nelson), BRF (Brierfield), BFD (Barrowford), CLN (Colne), BLK (Barnoldswick), ERB (Earby), PEN (Pendle / Total)

- 1.11 In advance of the six-week public consultation for the Further Options Report the 1,433 organisational contacts and members of the public (this figure includes 30 agents), included on the planning policy database were notified by either email (53.3%) or letter (46.7%).
- 1.12 All statutory consultees specified in the regulations were notified, including 40 parish councils (within or adjoining Pendle) and 10 neighbouring authorities (including those authorities in the Pennine Lancashire sub-region not sharing a boundary with Pendle and the county councils in Lancashire and North Yorkshire).

¹ STAN (Services to a Neighbourhood) was a fully accessible mobile vehicle used to take services to remote rural locations. Operations in Pendle ceased in 2013 when funding was withdrawn.

² The Council Shop at Brierfield Town Hall closed during 2013.

³ These usually comprise of an A3/A4 poster together with a copy of the Framework newsletter, or leaflet.

- 1.13 Four drop-in sessions were held in the second week of the consultation. These took place in the late afternoon/early evening at venues in Nelson, Colne, Barnoldswick and Barrowford. A fifth drop-in session, during the penultimate week of the consultation, was held at Nelson Town Hall between 10:00am and 4:30pm. These sessions were attended by a total of 34 people. When not in use, the display boards from these events were left on permanent display at Number One Market Street in Nelson.

Representations

- 1.14 The six-week public consultation on the Further Options Report represented a step-back in the preparation process.⁴ This was necessary to provide interested parties with an opportunity to comment on some significant changes to the Core Strategy, which had been made in response to new information arising from the updating of key evidence base documents during 2013.⁵
- 1.15 A total of 128 valid representations were received and these raised 326 separate issues for consideration (Appendix 1). Two ‘petitions’ were also submitted (Appendix 2) in respect of the following:
- Land at Castle Road / Skipton Old Road / Lidgett, Colne – 489 individual letters of support for the submission from the Lidgett and Beyond Group.
 - Land off Barrowdford Road, Colne – The representation submitted by Mr. John Metcalfe (Ref. 326) was supported by a petition signed by 210 individuals.
- 1.16 In total, valid representations were received from 828 organisations and individuals.
- 1.17 In addition to the petitions, many of the representations to Policy WRK3: Strategic Employment Site Lomeshaye, incorporated comments from a document circulated at a residents meeting held in Fence. As these letters addressed some, or all of the issues, in much the same way, a collective response has been provided (Appendix 3).
- 1.18 To address some of the issues raised in the above representations, planning officers are recommending a number of changes to the Core Strategy before it goes forward to the Publication stage. The schedule at Appendix 4 summarises these changes in document order.

What happens next?

- 1.19 The comments and officer recommendations were reported to the Council’s Executive on Tuesday 25th March 2014. At this meeting, councillors took the decision to hold a Special Council meeting to consider the officer recommendations in more detail and to allow members of the public to speak, should they wish to do so.
- 1.20 As it was not possible to identify a suitable date for this meeting, ahead of the Council elections in May, the Core Strategy will now be considered in accordance with standard Council procedures at the following meetings:
- Executive: 7:00pm Thursday 26th June 2014 Wilson Room, Nelson Town Hall
 - Full Council: 7:00pm Thursday 17th July 2014 Council Chamber, Nelson Town Hall

⁴ The previous public consultation on the Core Strategy (Publication Report) was conducted in accordance Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

⁵ Further information on the reasoning behind the Council’s decision to ‘delay’ submission of the Core Strategy to the Secretary of State was set-out in our regular newsletter Framework (Issues 24 and 27).

1.21 This report forms the basis for the discussions that will take place at these meetings. The procedure to follow to speak at a Council meeting is set out below:

- Executive – Tell the Council by no later than midday on the day of the meeting that you wish to speak (for up to 5 minutes).
- Full Council – Individuals and those representing an organisation can ask one question, which must be sent to the Council, either in writing, or by email, by no later than midday on the day before the meeting.

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1.22 The changes agreed at Full Council will be incorporated into the Core Strategy. This revised version, known as the Publication Report, must then be made available for a further six-week public consultation before it can be submitted to the Secretary of State.

Publication

1.23 The Core Strategy (Publication Report) represents what Pendle Council considers to be the final version of the Pendle Core Strategy.

1.24 Unlike earlier public consultations, which helped to shape the content of the Core Strategy, that carried out under Regulation 19 is concerned only with the 'soundness' of the document (see below).

What is soundness?

The local planning authority (Pendle Council) should only submit a plan for examination, which it considers to be 'sound'; in other words that it is:

- **Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

Submission

- 1.25 In accordance with Regulation 22, following the close of the consultation period, Pendle Council will submit copies of the Publication Report, all supporting documents and the representations received, to the Secretary of State. This represents the start of the Examination process.

Examination

- 1.26 The Secretary of State will ask the Planning Inspectorate to appoint an inspector to conduct an independent examination of the plan. The purpose of this examination is to consider the soundness of the Core Strategy and whether it complies with the requirements of the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and associated regulations. The presumption is that the document is sound, unless it can be shown otherwise.
- 1.27 The Inspector will carry out a preliminary assessment of the Core Strategy and other submitted material. If there is any concern about the soundness of the document, the Inspector may call an exploratory meeting.
- 1.28 A Pre-hearing Meeting will be held approximately eight weeks after the date of submission, to consider how the examination is to be managed.
- 1.29 The purpose of the Pre-hearing Meeting is to:
- advise those who have asked to be present and heard at the examination, how their representations will be dealt with (i.e. written representations, formal hearings etc.);
 - consider who else might need to be invited to the examination to help the inspector consider the soundness of the plan;
 - identify the issues that need to be considered at the examination in order to determine the soundness of the plan;
 - consider how those issues relate to one another and the most logical order for their examination;
 - identify the nature of the evidence to be brought to the examination and to set the timetable for the submission of that evidence; and
 - establish the programme for the examination and the timetable for any hearing sessions.
- 1.30 Shortly after the Pre-hearing Meeting, the Inspector will publish a list of Matters for Examination. This will provide a brief description of the issues to be covered, with the names of those who have asked to be heard in person. It will form the basis of the programme for the hearings or round table sessions led by the Inspector, which will be published at the same time.
- 1.31 It should be noted that the hearing sessions arranged by the Inspector will not seek to address every representation. Written representations will carry exactly the same weight with the Inspector as those pursued by a personal appearance at the examination.
- 1.32 Hearing sessions will normally commence 14 weeks after the date of submission. Following the end of any hearing or round table sessions the Inspector will retire to produce a report. This may, or may not, recommend changes to the Core Strategy, based on the evidence presented at the examination.
- 1.33 The Examination formally ends on receipt of the Closure Letter from the Planning Inspectorate, which will accompany the Inspector's Fact Check Report and appendices. Following consideration of the Council's comments on the Fact Check Report, the Inspector will issue a Final Report and appendices approximately 29 weeks after the date of submission.

- 1.34 The Final Report is not binding on the Council, but under normal circumstances the Inspectors recommendations will be incorporated into the final version of the Core Strategy to be put forward for adoption at Full Council.

Table 1.3: Provisional timeline for adoption of the Pendle Core Strategy

Stage	Regulation(s) ¹	Timing
1. Full Council meeting		17 th July 2014
2. Publication	19	1 st August 2014
3. End of public consultation	20	12 th September 2014
4. Submission to the Secretary of State	22	26 th September 2014
5. Appointment of Programme Officer	23 / 24	26 th September 2014
6. Appointment of Inspector	23 / 24	10 th October 2014
7. Pre-hearing Meeting		21 st November 2014
8. Hearing Sessions		2 nd January 2015
9. Draft Inspectors Report issued	25	27 th March 2015
10. Final Inspectors Report issued		17 th April 2015
11. Adoption (Full Council)	26	28 th May 2015
12. Opportunity to request judicial review		

¹ Town and Country Planning (Local Planning) (England) Regulations 2012

Other Considerations

- 1.35 Public consultation has helped to shape the Core Strategy and provide a local distinctive policy response to the issues we need to address in Pendle.
- 1.36 Our chosen strategy must also be in general conformity with national planning policy, reflect the strategic priorities of key stakeholders and be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics of the area.

Published Plans and Strategies

- 1.37 Although the long-term future of *Our Pendle Our Future: Pendle's Sustainable Community Strategy* is uncertain, helping to deliver its eight priority goals remains the primary objective for the Core Strategy.
- 1.38 The priorities of key stakeholders are an important consideration when drawing up plans and policies. Although these are embodied in the sustainable community strategy, a review of the action plans and strategies published by other organisations is an integral element of the sustainability appraisal process (see below).

Evidence Base

- 1.39 The National Planning Policy Framework (paragraph 14) makes it clear that “a presumption in favour of sustainable development is a golden thread running through plan-making and decision-taking.”
- 1.40 Local planning authorities are required to use their evidence base to ensure that their Local Plan meets objectively assessed needs (i.e. development and infrastructure requirements) with sufficient flexibility to adapt to rapid change (paragraphs 14, 47 and 182).
- 1.41 The analysis of published data considering both past trends and future projections, together with new empirical research to address gaps in our knowledge, are all important components of the evidence base underpinning the Pendle Core Strategy. The key evidence base documents, prepared or commissioned by Pendle Council, are listed below in order of preparation:

1. Pendle Strategic Flood Risk Assessment (ENTEC, October 2006)
2. Pendle Open Space Audit (Pendle Borough Council, November 2008)
3. Pendle Sustainable Settlements Study (Pendle Borough Council, November 2008)
4. Pendle Biodiversity Audit (Pendle Borough Council, September 2010)
5. South Pennine Renewable & Low Carbon Energy Study (Maslen Environmental, December 2010)
6. Pendle Retail Capacity Study (Nathaniel Lichfield & Partners, May 2007) (Update: Nathaniel Lichfield & Partners, July 2012)
7. Lancashire Sub-Regional Gypsy and Traveller Accommodation and Related Services Assessment (The Salford Housing and Urban Studies Unit of the University of Salford, May 2007)
Burnley & Pendle Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (The Salford Housing and Urban Studies Unit of the University of Salford, August 2012)
8. Pendle Infrastructure Strategy (Pendle Borough Council, December 2013)
9. Burnley & Pendle Strategic Housing Market Assessment (Fordham Research, April 2008) (Update: Nathaniel Lichfield & Partners, December 2013)
10. Pendle Strategic Housing Land Availability Assessment (Pendle Borough Council, May 2008) (Update: Pendle Borough Council, December 2013)
11. Pendle Employment Land Review (Pendle Borough Council, March 2008) (Update: Pendle Borough Council, December 2013)
12. Pendle Development Viability Study (Colliers International, December 2013)

1.42 All of these documents have been through appropriate levels of public consultation and where appropriate approved or adopted by Pendle Council.

1.43 Documents 8-12 inclusive in the above list were either updated or published for the first time in 2013. As such they were also made available for public consultation alongside the Further Options Report.

1.44 Any comments relating to these evidence base documents are listed in Appendix 5, with a schedule of proposed changes at Appendix 6.

Sustainability Appraisal

1.45 Sustainability appraisal is integral to the plan making process. Its purpose is to consider the economic, social and environmental effects of a plan from the outset and performs a key role in providing a sound evidence base for the plan.

1.46 Pendle Council determined that, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, that the Core Strategy DPD was likely to have significant environmental effects and that a Strategic Environmental Assessment (SEA) would be required.

1.47 In 2006, AMEC Environment and Infrastructure UK Ltd. (formerly ENTEC) was appointed by Pendle Council to carry out sustainability appraisal work on the Core Strategy, incorporating the requirements of the European Directive on Strategic Environmental Assessment (SEA) (Directive 2001/42/EC).

- 1.48 Scoping represents the first stage in the process. Through a process of consultation, literature review and data analysis, it establishes:
- the baseline economic, social and environmental issues;
 - the key sustainability issues and objectives; and
 - the methodology for undertaking the sustainability appraisal.
- 1.49 The baseline provides the basis for the prediction and monitoring of significant environmental or other sustainability effects that may arise from the introduction of the Core Strategy and other local development documents.
- 1.50 AMEC published their Scoping Report on 29th September 2006. Members sitting on the Council's Executive agreed that this report should be placed on the Council's website and sent to the three statutory consultation bodies for comment at their meeting on 19th October 2006. In accordance with the published guidance on SEA/SA this consultation ran for a period of five weeks from 30th October to 4th December 2006. The final version of the scoping report comprises the submitted scoping report and consultation responses on the submitted report.
- 1.51 AMEC then published their Sustainability Appraisal Toolkit on 20th April 2007. Detailed sustainability appraisal reports for the Pendle Core Strategy, based on this toolkit, have been prepared to consider the implications of proposals contained in the Issues and Options Report, the Preferred Options Report, the Publication Report and the Further Options Report.

Habitat Regulations Assessment

- 1.52 In October 2005 a European Court of Justice ruling directed that land use plans are subject to the provisions of Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive).
- 1.53 The purpose of a Habitats Regulation Assessment (HRA) is to assess the potential impacts of a plan or policy against the conservation objectives of a Natura 2000 site and to determine whether it would adversely affect the integrity of that site, either alone or in combination with other plans and projects. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects.
- 1.54 In the UK the network of Natura 2000 Sites are protected by the following:
- The Habitats Directive (EC Directive 92/43/EEC) protects habitats and non-avian species of European importance and applies to Special Areas of Conservation (SACs).
 - The Birds Directive (EC Directive 79/409/EEC) is concerned with the conservation of wild birds and applies to Special Protection Areas (SPAs).
- 1.55 In addition Government guidance states that globally important wetlands protected under the Ramsar Convention (1971) should be given the same level of protection as SAC and SPA designations.⁶

⁶ Guidance on Habitats Regulations Assessment (Department of Communities and Local Government, August 2006).

- 1.56 The current European Commission guidance details a four-stage process for the production of a HRA, although not all stages are necessarily required, depending on the outcome of each stage in the process:
1. Screening: This identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.
 2. Appropriate Assessment: This stage assesses the likely impacts against the conservation objectives of a European Site, in order to identify whether there may be any adverse effects on the integrity of the site or its features. Where adverse impacts are identified, it also includes an assessment of the potential mitigation for those impacts.
 3. Assessment of alternative solutions: Where significant negative effects are identified at the appropriate assessment stage, alternative solutions should be examined to avoid any potential damaging effects to the integrity of a European Site.
 4. Assessment where adverse impacts remain: An assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed. The Secretary of State for Communities and Local Government will inform the European Commission about the compensatory measures adopted.
- 1.57 For the Pendle Core Strategy, separate HRA reports have been prepared to consider the implications of proposals contained in the Issues and Options Report, the Preferred Options Report, the Publication Report and the Further Options Report.

Equalities Impact Assessment

- 1.58 In accordance with the Race Relations Act 1976, Race Relations (Amendment) Act 2000, Disability Discrimination Act 1995 and 2005, Equal Pay Act 1970, Sex Discrimination Act 1975 and Equality Act 2010, Pendle Council has a legal requirement to assess the impact of all its existing and proposed plans and policies.
- 1.59 The Equality Act, which came into force from October 2010, introduced a new public sector equality duty effective from 5th April 2011. It states that local authorities have a public duty to have due regard to:
- eliminating unlawful discrimination;
 - promoting equality of opportunity; and
 - promoting good relations between people of different groups.
- 1.60 The equality duties placed on local authorities previously covered gender, disability and race. Under the Equality Act 2010 these have been extended to cover age (younger and older), faith (religion or belief), sexual orientation, gender reassignment and pregnancy/maternity. Local authorities must also exercise their functions in a way that reduces any inequalities that may arise from socio-economic disadvantage.
- 1.61 Pendle Council's Service Impact Assessment was redesigned in April 2011 to meet these new requirements and has been used to assess the implications that the Core Strategy, and the individual policies within it, may have on different groups in the local community. The use of this standard template helps the Council to anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group.

- 1.62 For the Pendle Core Strategy an EqIA has been prepared to consider the implications of proposals contained in the Preferred Options Report, the Publication Report and the Further Options Report. The EqIA will be updated to consider the implications of changes made prior to publication of the Pre-Submission Draft.

Pendle Local Plan Part 2: Site Allocations and Development Policies

- 1.63 Joint public consultations informed the preparation of the Sustainable Community Strategy and the Core Strategy (Issues and Options Report). Consultation on the Core Strategy and the Land-use Allocations DPD continued in parallel up to the Preferred Options stage.
- 1.64 As it is not possible to allocate sites for development before the strategic direction for future growth has been established in the Core Strategy, further public consultations on potential site allocations, will not take place until the Core Strategy has been through its Examination.
- 1.65 The Pendle Local Plan (Part 2): Site Allocations and Development Policies will set out detailed planning policies to be used by officers to guide day-to-day decisions on planning applications and identify:
- Sites to be allocated for future development – i.e. for employment, housing etc.
 - Areas to be protected from future development – e.g. SSSI.
 - Areas where development will be restricted – e.g. Green Belt.
 - Areas where development will be required to meet higher standards of design – e.g. Conservation Areas.

Appendix 1

Consultation comments, officer responses and recommendations – Core Strategy (Further Options Report)

Pendle Core Strategy Further Options Report

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>648731</div> <div>MsLaoiseMagennis</div> <div>National Airport Traffic Service (NATS)</div> <div></div> <div></div> <div></div>			3				NATS has no comments to make on the LDF	<div>Comments noted.</div> <div>No change proposed in response to this comment.</div>	
<div>327913</div> <div>MrsEdithSheldrick</div> <div>Let's Walk & Talk</div> <div></div> <div></div> <div></div>			4				Does not feel that the content of the Core Strategy affects the group. Mrs Sheldrick asked that this comment was noted and thanked Pendle Council for thinking of the group and asking for its views.	<div>Comments noted.</div> <div>No change proposed in response to this comment.</div>	
<div>327509</div> <div></div> <div>Health & Safety Executive</div> <div></div> <div></div> <div></div>			11				Thank you for your letter of9 January 2014, seeking HSE's observations onyour core strategy six-week public consultation. HSE is a statutory consultee for certain developments within the consultation distance(CD) of major hazard sites and major accident hazard pipelines, and has provided planning authorities with access to PADHI+, an online software decision support tool, through the HSE Extranet website https://extranet.hse.gov.uk/ , for them to use to consult HSE and obtain our advice. I should therefore be grateful if you would arrange for PADHI+ to be used to consult HSE for advice. To help planning authorities to use PADHI+,a User Guide has been produced, which is available at http://www.hse.gov.uk/landuseplanning/padhi/index.htm The Guide provides information and advice on HSE's role inland use planning and how to use PADHI+, along with several video examples of planning applications being put through PADHI+, showing how it should be used to obtain HSE's advice in each case. The applications range from a straightforward development involving houses near to one major hazard site, to more complicated developments with mixed-uses, or which lie in the	<div>Comments noted.</div>	

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Pendle Core Strategy Further Options Report

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						vicinity of several different major hazards.	No change proposed in response to this comment.
379222		12				<p>BACKGROUND ON THE COAL AUTHORITY The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining. The Coal Authority set up a Planning and Local Authority Liaison Department in 2008 to re-engage with the three planning systems across England, Scotland and Wales. The main areas of planning interest to the Coal Authority in terms of policy making relate to: the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales; and ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework in England, Scottish Planning Policy in Scotland, and Planning Policy Wales and MTAN2 in Wales. COMMENTS ON THE PENDLE CORE STRATEGY - FURTHER OPTIONS REPORT Surface Coal Resources and Prior Extraction As you will be aware, the Pendle Borough Council area contains coal resources which are capable of extraction by surface mining operations. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Coal Mining Legacy As you will be aware, the Pendle Borough Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities. Within the Pendle Borough Council area there are approximately 184 recorded mine entries and around 20 coal mining related hazards have been reported to The Coal Authority. Coal mining legacy within the defined ‘Development High Risk’ area affects approximately 3% of the plan area. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively</p>	Comments noted.
Miss Rachael Bust	The Coal Authority						

Pendle Core Strategy Further Options Report

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
								addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required. The previous Publication version of the Pendle Core Strategy had responded positively to the issues of interest to The Coal Authority. From our perspective we were content with the previous Publication version and we are therefore pleased to see the content of interest to us brought forward unchanged.	
									No change proposed in response to this comment.
327801			22					Please accept this email as a formal representation to the Pendle Core Strategy further options report consultation. Having considered the consultation document, Ribble Valley do not wish to make any specific representations on the consultation document. Many thanks for consulting us on the document.	Comments noted.
Mr. John Macholc Ribble Valley Borough Council									
									No change proposed in response to this comment.
328043			23					Natural England has no further comments to make.	Comments noted.
Ms Julie Thompson Natural England									
									No change proposed in response to this comment.

Pendle Core Strategy Further Options Report

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
816823			30	Yes	No	It is not justified.	Yes	The whole core strategy is based of an unsubstantiated population increase offered by government statistics. These figures do not appear to take fully into account that there has been no increase in the population within the Pendle area between the two last census results 2001-11. Also, where the Lancashire County Council has stated there has been no increase in 2012 the government estimates show a rise. Therefore, if the population change were estimated over the past 12 years there would be zero increase. This would result in the proposed Pendle Strategy being totally unfounded and reduced to an "aspiration" rather than a robust well constructed plan based on proven fact. I hope you will consider this fact very carefully before embarking on a programme of industrial expansion and house building on incorrect data.	The National Planning Policy Framework requires local planning authorities to base their plans on adequate, up-to-date and relevant evidence ... taking full account of market and economic signals (NPPF, paragraph 158). For housing, the full objectively assessed need must meet household and population projections (NPPF, paragraph 159). The Planning Inspectorate has made it clear that Councils are expected to use the latest projections published by the Office for National Statistics, as the basis for their calculations. These projections are founded on the most recent evidence available for births, deaths and migration. The projections used in the Pendle Core Strategy are based on the 2011-based Interim Sub-National Population Projections (SNPP), with further modelling carried out by consultants Nathaniel Lichfield & Partners (NLP) to extend these beyond 2021 to the end of the plan period. The Council consider this to be the most appropriate, up-to-date and relevant evidence available and fully compliant with the plan making requirements set out in the NPPF. The Office for National Statistics (ONS) released a new set of population projections in May 2014 (the 2012-based sub-national population projections (SNPP)). These projections indicated a much lower level of population growth. NLP were commissioned to prepare a Housing Needs Study Update report to identify the impact of the new projections on the housing requirement figure. This new evidence has been taken into account in the revisions made to the Core Strategy.
Mr	Kenneth	Whinney							
To make the document "sound" the population increase as offered by the government should be challenged and made to fall in line with actual fact rather than some blanket increase. The plan should be considering an organised decline rather than continuing with a build programme that will further degrade the existing housing stock and leave Pendle with numerous speculative industrial developments that will never be taken up.									
No change proposed in response to this comment.									

816865			31		No	It is not justified.	Yes	I wish to object to the proposal to increase the area of Lomeshaye Business Park contained within the Core Strategy document section 11. I wish to object on the grounds that the land on which the proposed development will take place is Green Belt and development of it will have a serious detrimental effect on the visual amenity of the area. Already the estate is highly visible from elevated parts of the Borough, and whilst it is currently situated in the valley bottom, growth up the hillside toward Fence will make it much more visible, and will significantly impact on the views towards Pendle, which is both the trademark and landmark of the Borough. Loss of farmland on this scale will also seriously adversely affect the bio-diversity of the area. Also, in the light of recent and very prominent flooding in numerous areas of the country, questions are being raised about rapid water run-off from hillsides due to sheep pasture and deforestation. Covering such a large area of hillside with hard surfacing will surely exacerbate peak discharge rates into Pendle Water, increasing the possibility of flooding and bank erosion downstream. I also understand the proposal will require additional traffic access and egress	Comments noted.
Mr	Paul	Kirkup							

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Pendle Core Strategy Further Options Report

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
								onto the Padiham-Barrowford by-pass, which is an already busy and dangerous road, as witnessed by the large number of accidents over the years and the gradual reduction in the speed limit in an attempt to reduce these. This additional traffic (not generated only by the new development, but which will surely include some existing traffic which suffers congestion when leaving the estate at peak times via the M65 junction 12) will be exacerbated by additional traffic levels which will arise from the further proposal for strategic housing at Trough Laithe, Barrowford, also contained within the Core Strategy proposal. In short, I can see no need for an allocation of Green Belt land on this scale and the document offers no compelling argument for it, with very significant disbenefits should it be adopted.	See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.
817496			33	Yes	No	It is not justified.		No	With regards to the environmental impact, the majority of the site has not been identified as an area of ecological interest. Policy LIV2 requires the site to be developed using a high quality landscaping scheme which incorporates the natural features of the site. It also requires open space to be provided. These measures are intended to help mitigate against any negative impacts. The reduction of the number of empty homes has already been factored into the housing requirement for the borough and therefore additional sites are required. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a serve cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The siting of the access point off Riverside Way is to limit the impact the development of the site could have on Church Street and the junction with Gisburn Road. With regards to infrastructure and service provision, the Council has engaged with the utilities and service providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a
Mrs	Carly	McLoughlin							

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Pendle Core Strategy Further Options Report

Person Details		Comment ID		Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
<div>Remove the proposed development site off Warren Drive and instead encourage the redevelopment of empty homes throughout the borough.</div> <div>Why where we not made aware of these possible developments in such a close proximity? We only purchased our house last February and we wanted a semi rural local to bring up our young family. If we were aware of such plans for a development of such size we would have definitely looked elsewhere.</div>										<div>requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site.</div> <div>No change proposed in response to this comment.</div>
713082		37	Yes	No	It is not effective.		Yes	1.1 These document is submitted on behalf of Dalesview Developments Limited and forms an integral part of the company's representation to the Further Options Report. It should be read in conjunction with the standard Representation from and the comments made previously to the Core Strategy Publication Report. 1.2 We are still of the view that many elements of the emerging Core Strategy are well considered and much of it is supported. We do, though, still have some reservations about some aspects of it which may impact on the effectiveness of it and in turn, its soundness.		Comments noted.
Mr G Wilkinson										
Dalesview Developments Ltd										
713089										
Mr Andrew Rollinson										
Rollinson Planning Consultancy Ltd										
										Policy specific issues are dealt with under the appropriate heading.
807418		76						We are supportive of the plan in relation to biodiversity and climate change, and in particular are pleased to see the role that Green Infrastructure is playing in delivering the objectives.		Comments noted.
Mr Dave Hortin										
Environment Agency										

Pendle Core Strategy Further Options Report

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

No change proposed in response to this comment.

817583

Beck Developments Ltd

817585

Mr

John

Willcock

JWPC Ltd

85

No

No

It is not positively prepared.; It is not justified.; It is not effective.; It is not consistent with national policy.

No

3 Summary 3.1 Our clients and their professional team consider that the emerging Core Strategy (Further Options) Report is flawed through its dependency upon a single (as yet) unproven strategic housing development site which, at best, could only deliver 17% of the authority’s housing requirement. That comes at a time of considerable pressure not only to urgently & radically lift housing completions but also to provide a wider choice of better quality housing aimed at improving the social and economic base of the Borough. 3.2 We feel that there is inconsistency between the intentions of the key policies referred to above which would weaken the Plan’s effectiveness, especially in emphasising the drive to direct the majority of new growth to the Key settlements. 3.3 Finally, we consider that there is a lack of clarity as to whether the Further Options Report is seeking to be a hybrid policy document by incorporating a site-specific (with identified boundaries) proposed strategic housing site. Whilst it would be quite understandable for the Core Strategy text to identify the need to urgently select (through the Stage 2 site identification process) a number of strategic sites capable of rapid high-quality development, it is unusual for a single location to be so specifically identified. 3.4 This could be argued to effectively pull the rug from under other alternative locations which might, under close examination (and after a detailed dialogue with the landowner or prospective developer), offer equal or better development prospects especially if located adjacent to a Key Settlement. To allocate a specific site in this manner could also compromise the eventual site selection process from a public involvement aspect, arguably making the development plan preparation process itself unsound.

The strategic objectives and policies set out in the Core Strategy are not reliant on a single site, as further sites will be allocated in the Site Allocations & Development Policies DPD (see Chapter 2). One of the main purposes of the strategic sites for housing and employment is to help demonstrate that delivery can be achieved early in the plan period and to make a significant contribution towards that delivery. All sites are unproven until development commences and even then their success cannot be assured. However, a rigorous appraisal process has been undertaken. This has demonstrated that the sites at Trough Laithe (Housing) and Lomeshaye (Employment) are the only sites at this time in the M65 Corridor, which are both available and capable of fulfilling the functional requirements of a strategic site.

No change proposed in response to this comment.

817668

Mrs

P

Marshall

99

I wish to object to the above proposal for the following reasons:- 1) It is understood that it is proposed to create a roundabout onto the A 6068 to provide alternative access to the industrial Estate. This would definitely add substantial traffic flows onto an already busy and dangerous road which was constructed merely to serve as a by-pass to the various villages in the locality. I take the view, most strongly, that all traffic should only have access to and egress from the Estate via the M65 which was purpose built to take all forms of traffic. 2) The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. 3) The proposal would, in my view, have a detrimental effect on the appearance of the immediate locality which is generally of rural nature.

Comments noted.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

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Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Pendle Core Strategy Further Options Report

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>327713</div> <div><div></div><div></div><div></div></div> <div>Royal Mail Group plc</div> <div>815690</div> <div>MrAndrewTeage</div> <div>DTZ</div>	126	<div></div>	<div></div>			<div>Site Allocation and Development Policies Local Plan It is also requested that Pendle Borough Council keep DTZ appraised of the process of preparing the Site Allocation and Development Policies Local Plan, in particular the consultation periods related to the preparation of this Local Plan. This is of particular importance in the context of the Pendle Delivery Office that has no specific land use allocation and is located directly on the current town centre boundary. It is considered that this situation may make it vulnerable in the future to proposals for alternative land uses, particularly in respect of any proposed alterations to the Town Centre boundary.</div>	<div>Comments noted.</div> <div>No change proposed in response to this comment.</div>
<div>327935</div> <div><div></div><div></div><div></div></div> <div>Sainsbury's</div> <div>817889</div> <div>MrGeorgeWilyman</div> <div>Turley Associates</div>	153	<div></div>	<div></div>			<div>On behalf of our client Sainsbury's Supermarket's Ltd, we have reviewed the Core Strategy Further Options consultation and would like to take this opportunity to comment on the document. Our comments are set out below. Introduction Overall Sainsbury's consider the Core Strategy: Further Option Report is sound, if a number of changes are made to the document. The suggested changes are detailed in bullet points below (see relevant comments 154-158) according to the relevant policies on which Sainsbury's wish to make comment. Sainsbury's also support the inclusion and wording of other policies as referenced below (see relevant comments 154-158).</div>	<div>Comments noted.</div> <div>Policy specific issues are dealt with under the appropriate heading.</div>
<div>327467</div> <div><div>Mr</div><div>Iain</div><div>Lord</div></div> <div>Barrowford Parish Council</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>	166	<div></div>	<div></div>			<div>Barrowford Parish Council has discussed the latest revisions to the proposed Core Strategy and would like to make the following responses to the Consultation. The inclusion of these two sites from a planning and strategic point of view makes a great deal of sense due to their proximity to the M65 or other areas of similar usage. But the two sites will adversely impact on Barrowford either by loss of open spaces or additional stresses on the local infrastructure. Barrowford Parish Councils accepts that change is always inevitable but should be planned to meet the needs and aspirations of the people of Barrowford and Pendle as a whole. To local residents Barrowford still retains the village feel whilst in reality it is now the size of a small town. Barrowford has a high opinion of its own self-worth which over time has led to a vibrant diversity of both retail outlets and residential properties. Both the Parish Council and local residents are keen to keep that feeling and to build upon it. Barrowford in recent years has seen several new housing developments which the Parish Council has objected to not on the land being</div>	<div>Comments noted. These issues relating to Trough Laithe are addressed in the response to Comment 167 (Policy LIV2), whilst Appendix 3 considers the key issues raised in response to the proposed strategic employment site at Lomeshaye.</div>

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Pendle Core Strategy Further Options Report

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						developed but the quality of design, proposed materials and effect on existing streetscape. The council’s concerns have not been addressed by the current Local Plan with the result that in several areas the new development has totally dwarfed the existing buildings exacerbated by change of materials which have destroyed the character of the surrounding areas. Barrowford Parish Council see’s the Core Strategy as an opportunity to improve the future siting, design and quality of new housing and employment development within both Barrowford and Pendle over a long period.	<div>Any proposed changes to the Core Strategy are highlighted in the responses to the Policies LIV2 (Comment 167) and Policy WRK3 (Appendix 3).</div>
<div>618699</div> <div>MrRobertCrolla</div> <div>Indigo Planning</div> <div></div> <div></div> <div></div>	171					<div>1.1. These representations are submitted by Indigo Planning on behalf of Stirling Investment Properties LLP which owns land to the south of Long Ing Lane, Barnoldswick, in relation to the Pendle Local Plan Part 1: Core Strategy Further Options (CSFO) Report consultation. 1.2. Our client’s site is located off Long Ing Lane, Barnoldswick, approximately 300m south east of the town centre. The land within our client’s ownership extends to approximately 5ha. 1.3. The site is in a highly sustainable and accessible location, within an existing residential area, and is well related to a range of existing services including shops, schools and public service in Barnoldswick, and is well served by public transport. 1.4. Whilst it is currently unallocated in the adopted Pendle Local Plan, the northern portion of the site falls within the designated Barnoldswick as identified in the adopted Pendle Local Plan. 1.5. The northern part of the site which extends to 1ha has been identified as being suitable for residential development in the Pendle Strategic Housing Land Availability Assessment (SHLAA) (2013).</div>	<div>This comment provides an introduction to further responses made by the consultee. See comments 172-178..</div> <div>Policy specific issues are dealt with under the appropriate heading.</div>
<div>818047</div> <div></div> <div>Manthorpe Developments (UK) Ltd</div> <div>818046</div> <div>MrMichaelCourcier</div> <div>Barton Willmore</div>	200					<div>1 Introduction 1.1 Manthorpe Developments (UK) Ltd (‘Manthorpe’) is a developer active in East Lancashire, with interests in Pendle, including the land off Windermere Avenue Colne. 1.2 Manthorpe welcomes the decision of the Council to publish the Further Options Report with its acceptance of a much higher housing requirement than the previous Publication version. However, the Company still has significant reservations about the approach taken by the Core Strategy, and in particular that it does not accord with national policy in significant respects. 17 Next Steps 17.1 Manthorpe considers that the scale of changes necessary to the policies and proposals in the Further Options Report (including the evidence base) is such that the Council should publish a further options report. It should not proceed to the next stage of a Publication draft before the public has had opportunity to make representations on these further revisions.</div>	<div>The Pendle Core Strategy has undergone four formal public consultations. The strategy for growth is widely accepted as the most appropriate in meeting the Borough's future requirements for future growth and development. Whilst more up-to-date evidence may come forward prior to publication of the Core Strategy (Reg. 19), the methodology for translating this into policy is largely unchallenged. As such Pendle Council believes that it is acceptable to proceed to Publication (Reg. 19), without any need to re-publish a further Options Report (Reg. 18) for public comment.</div> <div>No change proposed in response to this comment.</div>

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Pendle Core Strategy Further Options Report

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

692633

225

Ms Jackie Copley

Lancashire Branch of CPRE

Summary 16. We trust that Pendle Council in so far as the National Planning Policy Framework allows will adopt a Core Strategy that enables urban locations to be revitalised and the rural places protected for the benefit of people today and in the future.

Comments noted.

No change proposed in response to this comment.

327623

235

Dr. John Plackett

Biodiversity within the Core Strategy Further Options: The following comments represent concerns that we have regarding information on pages 10-12, 25-26 and 39-46 in this Core Strategy and points we wish you to consider regarding biodiversity. Biodiversity within Pendle Borough Council’s Core Strategy is governed by: 5 Acts of Parliament (Primary Legislation) 4 Statutory Regulations + Water Framework Directive 1 Statutory Circular 2 Technical Standards In consideration of the above, 4 Government Guidance Publications RTP1 – Planning for Biodiversity The ALGE Biodiversity Planning Toolkit are available to aid interpretation of the statutes and to help incorporate biodiversity issues into the plan-making process. Our concerns about Biodiversity in the Core Strategy process may be as a result of the failure to represent Biodiversity in the critical processes and decisions relating to the core strategy. This led to 3 people recommending that a separate Task and Finish Group be established (documentary evidence available). One meeting in 2011 was given to construct a draft document with 4 biodiversity priorities (documentary evidence available). A decision was made not to accept this Task and Finish Group document.

The Core Strategy has been written in accordance with all relevant legislation, regulations and the requirements of the NPPF and where appropriate this is referenced in the document. The ALGE toolkit referred to provides pointers and suggestions which, whilst not actually used, have been satisfied by the Core Strategy. For example, there is context and policy in the Core Strategy, which relate to the 'Key Issues' bullet points in the ALGE toolkit. A special meeting of the LSP Biodiversity Sub-group in November 2011 considered an early draft of Policy ENV1. The responses received informed subsequent revisions to that policy. The proposal to establish a Task and Finish Group was presented to the Local Strategic Partnership, but not followed up by that body.

No change proposed in response to this comment.

Pendle Core Strategy Further Options Report

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
378959		247					Biodiversity within the Core Strategy Further Options: The following comments represent concerns that we have regarding information on pages 10-12, 25-26 and 39-46 in this Core Strategy and points we wish you to consider regarding biodiversity. Biodiversity within Pendle Borough Council's Core Strategy is governed by: 5 Acts of Parliament (Primary Legislation) 4 Statutory Regulations + Water Framework Directive 1 Statutory Circular 2 Technical Standards In consideration of the above, 4 Government Guidance Publications RTP1 – Planning for Biodiversity The ALGE Biodiversity Planning Toolkit are available to aid interpretation of the statutes and to help incorporate biodiversity issues into the plan-making process. Our concerns about Biodiversity in the Core Strategy process may be as a result of the failure to represent Biodiversity in the critical processes and decisions relating to the core strategy. This led to 3 people recommending that a separate Task and Finish Group be established (documentary evidence available). One meeting in 2011 was given to construct a draft document with 4 biodiversity priorities (documentary evidence available). A decision was made not to accept this Task and Finish Group document.	The Core Strategy has been written in accordance with all relevant legislation, regulations and the requirements of the NPPF and where appropriate this is referenced in the document. The ALGE toolkit referred to provides pointers and suggestions which, whilst not actually used, have been satisfied by the Core Strategy. For example, there is context and policy in the Core Strategy, which relate to the 'Key Issues' bullet points in the ALGE toolkit. A special meeting of the LSP Biodiversity Sub-group in November 2011 considered an early draft of Policy ENV1. The responses received informed subsequent revisions to that policy. The proposal to establish a Task and Finish Group was presented to the Local Strategic Partnership, but not followed up by that body.
Mrs Alison Plackett								No change proposed in response to this comment.
818152		261					Thank you for consulting North Yorkshire County Council on the above report. I can confirm that we have no further comments at this stage. Previous comments from North Yorkshire Highways regarding careful consideration of cross boundary travel and the requirement of Traffic Assessments for the Strategic Housing sites still remain.	Comments noted.
Ms Rachel Wigginton								No change proposed in response to this comment.
North Yorkshire County Council								

Pendle Core Strategy Further Options Report

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327580			262					<p>The Lidgett & Beyond Group broadly supports Pendle’s draft Core Strategy . In particular, it supports the provisions relating to protecting and enhancing our countryside and rural assets, the guidelines and restrictions on housing developments, and the focus on viable and sustainable development. This has been defined as: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." (as defined by The Bruntland Report (World Commission on Environment and Development, April 1987). We support all the Strategic Objectives listed in para 5.2 and, given our location, we support in particular SO9 and SO10 regarding protecting, enhancing and improving access to our green spaces, as well as having respect for our heritage and our landscape. Our area and our group Lidgett & Beyond (hereinafter "L&B"), in line with Pendle’s draft Core Strategy, would like to work with both Colne Town Council and Laneshawbridge Parish Council to draft a sustainable Neighbourhood Plan for our area which will complement the Borough’s Core Strategy, when approved. We would naturally also seek to provide community input to the Pendle Local Plan Part 2: Site Allocations and Development Policies and have already analysed Appendix 5 of the SHLAA and have found points of dispute within the Council’s analysis of the viability of some of the potential housing sites included within it. With the main Core Strategy, we seek to address Policy 12 which deals with Sites of Settlement Character. The L&B area has one of these at Favordale. We would like to see the boundaries of the Conservation Area redrawn to include this area. We see ourselves as part of the vision contained within the Sustainable Community Strategy (SCS) and, indeed, our raison d’être is bound up with maintaining a sense of local distinctiveness and community derived objectives. L&B has approaching 500 members, most from the Lidgett environs, making us the largest special interest group in Colne, a town of 18,000 inhabitants. Our response to the Core Strategy consultation seeks to highlight areas where (i) we agree strongly and wish to highlight the matter as key for L&B; (ii) we largely agree and want or expect the Council to strictly enforce the statement or policy set out; or (iii) we disagree and offer a constructive suggestion for a revision.</p>	<p>Issues relating to analysis and viability testing in the SHLAA are also addressed in response to Comment 208 (Policy LIV2). The officer response states: The SHLAA report clearly explains that assessing the viability of sites is a key part of the SHLAA process in term of demonstrating deliverability. It sets out the method for assessing both sites with and without planning permission. The methodology explains that the findings of the Development Viability Study have been used as an indicative guide to assessing viability and that although this is considered to be a reasonable approach, caution should be applied as individual site circumstances exist. Furthermore, although the proformas for a number of sites in the SHLAA indicate that they are not viable when compared to the model sites in the DVS, the proformas provide a clear caveat that (especially with smaller sites) there are site specific circumstances which mean that they are viable and therefore do not conform to the relevant benchmark site. In addition the NPPF is clear that unless there is site specific (not generic) evidence that a site with planning permission is not viable to develop then it should be included in the five year supply. The SHLAA has assessed sites with planning permission and discounted a number of them from the five year supply where there is specific evidence that the site will not come forward in the five year period. It is therefore considered that the SHLAA has provided a robust assessment of sites and those contain in the five year supply are deliverable.</p>
									<p>No change proposed in response to this comment,</p>
327580			277					<p>Conclusion We close our response letter by reiterating the sentiments of para 18.33 for both L&B members and visitors to our region which states: "access to nearby attractive public green space and footpaths is likely to lead to increased levels of walking for increased health; but it is just as important to be able to view a natural environment."</p>	<p>Access to green space is addressed by Policy ENV1, whilst its benefits for health are acknowledged in Policy SUP2.</p>

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Pendle Core Strategy Further Options Report

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							No change proposed in response to this comment.
<div>327423</div> <div>MrDavidSherratt</div> <div>United Utilities</div> <div></div> <div></div> <div></div>	279					<p>Thank you for your consultation seeking the views of United Utilities as part of the development plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within the North West. We aim to proactively identify future development needs and share our information. This helps: ensure a strong connection between development and infrastructure planning; deliver sound planning strategies; and inform our future infrastructure investment submissions for determination by our regulator. Water and wastewater services are vital for the future health and well-being of local communities and the protection of the environment. When progressing the development plan and future policies, LPAs should consider the availability of infrastructure. It is most appropriate to identify locations where infrastructure is available and if necessary, co-ordinate the delivery of infrastructure with the delivery of development. United Utilities wishes to submit the following comments to the Council for consideration as part of the consultation process for the above-mentioned document.</p>	<p>Comments noted.</p>
							Policy specific issues are dealt with under the appropriate heading.
<div>715388</div> <div>MsLouiseMorrissey</div> <div>Peel Holdings (Land & Property) Ltd</div> <div>714921</div> <div>MsAnnaNoble</div> <div>Turley Associates</div>	287					<p>1 Introduction 1.1 These representations to the Pendle Core Strategy Further Options Report are made on behalf of Peel Holdings (Land and Property) Ltd (“Peel”). Peel has significant land interests in Pendle, including key development sites at Trough Laithe Farm and Riverside Business Park in Barrowford, the delivery of which will be critical to the achievement of the Core Strategy’s vision and objectives. 1.2 The Core Strategy will provide a framework for the future growth and development of Pendle. It plays a critical role in ensuring that the Borough delivers sufficient housing of the right type and in the right location to meet long term needs; that new business investment and employment can be attracted to Pendle; that Pendle provides thriving and vibrant town and local centres which meet the needs of its residents and that the Borough’s key environmental assets are protected and enhanced. 1.3 To that end, Peel welcomes the further progression of the Core Strategy. Peel also supports the decision taken by the Council to gather new and up to date evidence relating to future housing and employment requirements following consultation on the proposed Publication Core Strategy in December 2012. This will help to ensure the Core Strategy is informed by and built upon a robust evidence base as is critical to achieving a sound plan. 1.4 Whilst generally supportive of much of the Further Options Report, Peel has a number of detailed comments to make regarding the overall spatial strategy for the Borough and a range of specific policies. Peel recommends that some limited changes are therefore needed to achieve a sound plan. The comments contained within this report relate to the following policies/sections of the Report and its evidence base: Spatial</p>	<p>Comments noted.</p>

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Pendle Core Strategy Further Options Report

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						Strategy Policy SDP2: Spatial Development Principles Policy SDP3: Housing Distribution Policy ENV2: Achieving Quality in Design and Conservation Policy LIV1: Housing Provision and Delivery Policy LIV2: Strategic Housing Site: Trough Laithe Farm Policy LIV4: Affordable Housing Policy LIV5: Designing better places to live Policy WRK2: Employment Land Supply Policy WRK6: Designing Better Places to Work Sustainability Appraisal 2 General comments 2.1 Peel is generally supportive of the Core Strategy Further Options Report. It welcomes the majority of changes made to the previous publication version of the Core Strategy, particularly with respect to the increased strategic housing requirement which the Core Strategy will plan to meet and the allocation of Trough Laithe Farm as a Strategic Site for housing. These changes are broadly consistent with those recommended by Peel in its representations to the Publication Core Strategy in December 2012. As set out in Peel’s previous representations, these changes are critical to the soundness of the plan. 2.2 In overall and general terms, Peel considers that the Core Strategy Further Options Report generally assesses previous concerns raised regarding its soundness. Notwithstanding this, Peel recommends that limited changes are needed in order for all policies to achieve soundness. These are considered in the following sections of this representations report.	
							Policy specific issues are dealt with under the appropriate heading.

379107	326					Thank you for your email dated 10 th January 2014. Please find attached a petition on behalf of the residents who live in the proximity of the proposed employment site on Barrowford Road, Colne. The petitioners are totally opposed to the land being utilised for industrial purposes. This application would cause total devastation to the area, be entirely out of character of the area, also to the detriment of the local environment and wildlife. Land designated as Greenbelt, sold as woodland and pasture, proposed as a Biological Heritage site in 2010, now proposed as a possible industrial site employing approximately 2,144. How can this be possible? Points of concern. Designated Greenbelt Land: The site is one of outstanding natural beauty which has been recognised over the years by residents and by Pendle Council who allocated its green belt status specifically because of its scenic value and to prevent urban sprawl. Volume of traffic from proposed Brown Route By-pass Highway safety Lorries, wagons, vans, cars, entering and leaving site. Traffic pollution. Possible hazardous substances/smells from manufacturing process on site. Detrimental to all wildlife on site, possibility of deer's being driven nearer to the By-pass. Could cause major accidents. Water retention on land. Drainage/Sewage disposal Protected trees on site Residents Property Depreciation Loss of privacy and overlooking. Noise and light pollution. Would also have an effect on Owls and Bats. Urban sprawl - if the Rail link to Skipton goes ahead plus the Employment site for 2, 144 and By-pass there is going to be very little open between Colne and Barrowford. Employment would mean more housing this would then open the door for Nelson and Colne College to apply to build houses on the playing field, hence another open piece of land being lost. Once this land is lost it will be lost forever. Please, we beg you to	The site at Heirs House Lane, Colne (also referred to as land at Barrowford Road, Colne) is not identified in the Core Strategy. This site (Ref. E235) was one of thirteen sites that were assessed at Stage 3 of the Employment Land Review (ELR) (Pendle Council, December 2013). These sites had previously been identified by, or suggested to, Pendle Council as potential sites for future employment development. The site was one of five sites taken forward for more detailed assessment in the document titled Strategic Employment Land - Site Allocation (Pendle Council, December 2013). This more detailed appraisal sought to identify the most sustainable site option within the M65 Corridor, which would then be allocated within the Core Strategy. Both the ELR and the Strategic Employment Land study concluded that land to the west of Lomeshaye near Nelson provided the most sustainable option for a strategic site allocation and it is this site that is identified in the Core Strategy (Policy WRK3).
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Pendle Core Strategy Further Options Report

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						think of what this area has to offer to visitors, who incidentally are being encouraged to spend time in our area. Many visitors to Boundary Mill make their way to the Heritage Centre/Barrowford Locks along Barrowford Road as do local residents enjoying a walk with either their children or pets. No one wants to see Industrial Units on the horizon. Why do land owners want to destroy what nature had bestowed upon us? Why is it the responsibility of residents to point out what would be catastrophic to the area? Do the residents see something that the powers to be can't? Or does money govern everything? We, the residents who have signed this petition, are very proud to live in this area and do everything in our power to make it attractive to visitors, walkers and families. As you will be aware there are still units available at Riverside Mill, Nelson. Lomeshaye Industrial Estate. Also plans to extend the Industrial Land at Lomeshaye. Thank you for taking the time to read this letter and hopefully the strong feelings of the residents to protect this land from development will be taken on board by the council.	
							No change proposed in response to this comment.

844180	329					1.0 Introduction Persimmon Homes Lancashire is a house builder currently operating within Lancashire and Cumbria. We are currently delivering a wide range of housing products from affordable housing units to luxury properties across 24 Local Planning Authorities. As we have historically delivered housing within your district and are always interested in new opportunities we have an interest in the Housing Policy of the future and its ability to influence the company's future development choices. Also see comments (330, 331,332) 5.0 Conclusion Persimmon Homes Lancashire recognises the tremendous effort by the Council's Planning Team on getting the Core Strategy to this position and look forward to its adoption to help support sustainable housing development. Persimmon Homes Lancashire would like to be part of any further consultation.	Comments noted.
Ms	Elinor	George					
Persimmon Homes Lancashire							
							No change proposed in response to this comment.

About the Core Strategy

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>379222</div> <div><div>Miss</div><div>Rachael</div><div>Bust</div></div> <div>The Coal Authority</div> <div></div> <div></div> <div></div> <div></div>			<div>14</div>	<div></div>	<div></div>	<div></div>	<div>Representation No.2 Site/Policy/Paragraph/Proposal - Paragraphs 2.12 and 2.13, Lancashire Minerals & Waste Development Framework Test of Soundness Positively Prepared Justified Effective Consistency to NPPF Legal & Procedural Requirements Inc. Duty to Cooperate Yes Yes Yes Yes Yes Support - The Coal Authority supports the text in these paragraphs which sets out a suitable and necessary cross reference to the Joint Lancashire Minerals and Waste Development Framework. In particular it illustrates how that DPD is relevant to the Core Strategy, for example in relation to mineral sterilisation and it goes on to demonstrate how the Core Strategy links and takes account of minerals issues.</div>	<div>Comments noted.</div> <div>No change proposed in response to this comment.</div>	
<div>712277</div> <div><div>Mr</div><div>Robert</div><div>Orgill</div></div> <div>Rolls Royce plc</div> <div>817556</div> <div><div>Ms</div><div>Kate</div><div>Skingley</div></div> <div>David Lock Associates</div> <div></div> <div></div> <div></div> <div></div> <div></div>			<div>69</div>	<div></div>	<div></div>	<div></div>	<div>Rolls-Royce recognise that there is a need for collaborative and positive working between the Council, Rolls-Royce and other major employers and land owners in order to achieve the vision and objectives set out within the Local Plan. Responsiveness, flexibility and being proactive are key in ensuring that Pendle is an attractive place for investment and will prosper. As the Local plan is intended to shape Pendle over the next 15 years it is crucial that the Council get it right, and respond positively to comments received from both key employers in the area and the local community who all have an interest in the future of Pendle.</div>	<div>Comments noted.</div> <div>No change proposed in response to this comment.</div>	
<div>817641</div> <div><div>Mrs</div><div>Rebecca</div><div>Harrison</div></div> <div></div> <div></div> <div></div> <div></div> <div></div>			<div>96</div>	<div>Yes</div>	<div>No</div>	<div>It is not effective.</div>	<div>Both myself and my husband are against the unnecessary extension to Lomeshaye. such extension will rip the heart out of surrounding villages and consequently people will be deterred from living in these areas. whilst we agree it is important to grow there are other means to facilitate this.there is already spare capacity on Lomeshaye and several ugly derelict buildings within the borough which could accommodate any growth expansion plans. inserting a road onto the bypass would make what is already a very dangerous road lethal, with extra fast moving traffic and not to mention the potential for vehicles to come racing through the villages And potentially past two primary schools, one of which is already experiencing congestion issues (higham).</div>	<div>Comments noted.</div> <div>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</div>	

About the Core Strategy

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
755915			143					<p>Plan Period It is noted that the plan period is anticipated to run until 2030. Whilst such a time frame appears appropriate for the Core Strategy, presuming it is adopted in autumn 2014, a significant element of the plan will be brought forward through the Site Allocations and Development Policies document. It is noted that consultation upon the ‘Preferred Options’ stage of this document is not anticipated until 2015 at the earliest, adoption is therefore unlikely until at least 2016. This means that a significant element of the plan will have a time horizon of less than 15 years from the date of adoption.</p>	<p>Paragraph 157 (bullet point 2) states that "Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon". The Core Strategy covers a 15 year period. It is anticipated that the Site Allocations & Development Policies DPD will be capable of adoption in 2016, just one year after the Core Strategy. This will provide a 14 year time frame for that part of the plan, which although less than the preferred 15-year period is not contrary to The Framework. In addition, it is anticipated that both the Core Strategy and the Site Allocations & Development Policies DPD will be reviewed and updated during this period.</p>
Mr	Matthew	Good							
Home Builders Federation Ltd									
								<p>Recommendation Given the preference within the National Planning Policy Framework (NPPF) for a minimum 15 time horizon (paragraph 157) it is recommended that the Council consider extending the plan period.</p>	<p>No change proposed in response to this comment.</p>

755915			144					<p>Duty to Co-operate The Core Strategy at paragraph 3.140 identifies that Pendle shares a housing market with the neighbouring authority of Burnley and that a joint Housing Needs Study and Strategic Housing Market Assessment (SHMA) has been undertaken. This is considered a positive step in fulfilling the duty to co-operate. It is, however, unclear how the cross boundary issues raised within the joint SHMA are effecting the preparation of the Pendle Core Strategy. Furthermore it is unclear how the duty has been discharged with regards to other neighbouring authorities and how the impacts of their housing requirement as well as other issues have influenced the preparation of the Core Strategy.</p>	<p>Plan making is an iterative process requiring both informal and formal engagement. Cross boundary issues have been addressed through the production of a joint evidence base where appropriate, formal meetings with neighbouring authorities to discuss specific issues and attendance at a range of forums. The key cross-boundary issues identified through this process have concerned housing, employment, biodiversity, transport and renewable energy. These are noted in paragraphs 3.139-3.151 of the Spatial Portrait. At the Publication Stage (October-December 2012) a Statement of Compliance with the Duty to Cooperate was published alongside the Core Strategy, which explains in detail how the strategic objectives and policies in the Core Strategy have been shaped through a mix of informal engagement (discussions and meetings with key stakeholders) and formal public consultation. Appendix 1 (Column 3) specifically addresses any cross-boundary issues that have been identified, whilst column 7 shows how these have been reflected in the policy. This document will be updated when we re-publish the Core Strategy. At each formal public consultation the Council's response to comments from earlier public consultations have been summarised in the Consultation Statements produced to accompany each formal public consultation. Duty to Cooperate meetings with neighbouring authorities in Lancashire and Yorkshire, have not raised any significant cross boundary issues with regard to housing. The borough's strong links with neighbouring Burnley have been acknowledged by the joint production of significant elements of the evidence base - Strategic Housing Market Assessment and Gypsy & Traveller Accommodation Assessment.</p>
Mr	Matthew	Good							
Home Builders Federation Ltd									
								<p>Recommendation It is recommended that the Council consider producing a background paper upon the duty to co-operate prior to the submission of the Core Strategy. This paper should identify the issues of cross boundary significance, the engagement which has taken place and the material</p>	<p>No change proposed in response to this comment.</p>

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About the Core Strategy

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

actions taken which have effected plan preparation.

618699			173					<p>General Principles 2.1. The National Planning Policy Framework (NPPF) sets out the Government’s requirements for the planning system. The NPPF is clear that development plan policies should encourage economic growth, furthering the Government’s wide ranging policies for economic growth. 2.2. Paragraph 10 of the NPPF is clear that plans need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. 2.3. Paragraph 14 states that a presumption of sustainable development is a golden thread which runs through both plan making and decision taking. For plan making this means that: “Local Planning Authorities should positively seek opportunities to meet the development needs of the area; and Local Plans should meet objectively assessed needs (Indigo emphasis) with sufficient flexibility to adapt to rapid change”. Core Planning Principles 2.4. Paragraph 17 the NPPF sets out the core planning principles which inform the overarching role of the planning systems which include: “Proactively drive and support sustainable economic development to deliver the homes... that the country needs. Every effort should be made objectively to identify and then meet the housing... needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.” “Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework.” “Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.” Housing Delivery 2.5. Paragraph 47 addresses the need to boost housing supply and encourages local planning authorities to: “Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying sites which are critical to the delivery of the housing strategy over the plan period” 2.6. In addition, it states that local planning authorities should: “Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.” “Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land” “Identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15” “For market and affordable housing, illustrate the expected rate of housing delivery through a</p>	<p>Comments noted.</p>
Mr	Robert	Crolla							
Indigo Planning									

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About the Core Strategy

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year supply of housing land to meet their own housing target” Plan Making 2.7. The NPPF provides practical guidance on plan making, with paragraph 153 highlighting that: “Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances” 2.8. Paragraph 156 requires local planning authorities to set out strategic priorities in the Local Plan, which should include strategic policies to deliver homes needed in the area. Paragraph 158 adds that: “Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence... Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals” 2.9. Paragraph 159 specifically considers housing requirements. Local planning authorities are required to have a clear understanding of housing needs in their area though developing a robust and full Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment which cover the plan period. 2.10. Paragraph 182 requires Local Plans to be sound, namely that they are: Positively prepared - based on a strategy to meet objectively assessed development and infrastructure requirements; Justified - implement the most appropriate strategy based on proportionate evidence; Effective - should be deliverable; and Consistent with National Policy. 2.11. Where a plan does not satisfy one or more of these tests of soundness, then it must be remedied through modification. This Report goes on to consider the implications of the above tests with regard to the soundness of the emerging Core Strategy.	
							Policy specific issues are dealt with under the appropriate heading.

618699	175					4.1. This section of the Report demonstrates that the Core Strategy has not been prepared in accordance with either the NPPF or the Planning & Compulsory Purchase Act (2004). 4.2. Subsection 5 of Section 19 of the Planning & Compulsory Purchase Act requires that: "The local planning authority must... a) Carry out an appraisal of the sustainability of the proposals in each document; b) Prepare a report of the findings of the appraisal." 4.3. More generally, Section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development" . Core Strategy Preparation & Sustainability Testing 4.4. The previous consultation on the Core Strategy was a ‘Preferred Options’ document in September 2011. This document was a Core Strategy in its purest form, i.e. it contained strategic policies and objectives, but did not allocate specific sites for development. 4.5. The current Core Strategy consultation ‘Further Options Report’ now identifies strategic allocations, including strategic housing sites in Barrowford and subsequent selective amendments to the Barrowford settlement boundary. 4.6. Whilst it is legitimate for a Core Strategy to contain strategic	In the preparation of the Pendle Core Strategy, the Council has sought to fully comply with government legislation, national planning policy and national planning guidance. The Core Strategy was subject to rigorous sustainability appraisal by leading environmental consultancy Amec Environment & Infrastructure UK Ltd. at the Preferred Options stage. An addendum to this document has been published alongside the Core Strategy for the subsequent public consultations at the Publication (October-December 2012) and Further Options (January-February 2014) stages. The addendum considering each of the strategic sites considered for inclusion within the Core Strategy will be published for information at the Publication stage.
Mr	Robert	Crolla					
Indigo Planning							

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About the Core Strategy

Person Details			Comment ID			Q1			Q2a			Q2b			Q3			Consultee comments			Officer Response and Recommendation		
																		allocations, these must be considered within the overall legal framework of Core Strategy (Local Plan) preparation, which as noted above must be subject to a Sustainability Appraisal. 4.7. The inclusion of specific allocations is a significant departure from the previous Core Strategy approach, which was subject to the Sustainability Appraisal. 4.8. However, the introduction of strategic sites in the current ‘Further Options’ Core Strategy consultation has not specifically been tested by a robust Sustainability Appraisal. 4.9. On this basis the current iteration of the Core Strategy is unsound as the proposed allocations have not been subject to a revised sustainability appraisal (as required by the Planning & Compulsory Purchase Act). 4.10. Furthermore, given the lack of sustainability testing, the proposed Core Strategy is not based on up to date or proportionate evidence, and is therefore unsound and not consistent with the policy requirements of the NPPF.					
																					No change proposed in response to this comment.		
817990			179															As a member I supporter of the Lidgett & Beyond Group, which campaigns to protect and enhance our local neighbourhood and environment, I wholly endorse the comments made in the formal Lidgett & Beyond response to the Core Strategy consultation.			Comments noted.		
MrMarkChung																					See Appendix 2 of the Core Strategy (Further Options Report) Consultation Statement which addresses the representations made by the Lidgett and Beyond Group.		

About the Core Strategy

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
								No change proposed in response to this comment.
715388		298			<p>4 Comments on Sustainability Appraisal 4.1 Peel is generally supportive of the Sustainability Appraisal and the methodology used in assessing individual policies. However, Peel considers that, in respect of the appraisal of the sustainability implications of Policy LIV2 of the Preferred Options Report, a number of positive impacts will arise which the Sustainability Appraisal does not identify. These are as follows: Sustainability Objective E1: to encourage business which is appropriately located to maximise the benefits on local, national and global markets Sustainability Objective E2: to secure economic inclusion and develop and maintain a healthy labour market 4.2 The development of Trough Laithe Farm will provide high quality, aspirational family housing, helping to attract and retain economically active residents within the Borough. It will also support the delivery of Riverside Business Park which will provide high quality business space within the M65 Corridor and which there is a general under supply of in Pendle. The development will make Pendle a more attractive location for business investment, helping to create jobs and secure economic growth. Policy LIV2 will therefore have a positive impact against the following criteria: Increase the number of growth businesses Reduce unemployment levels Improve the physical accessibility of jobs through the location of sites and transport links close to areas of high unemployment Provide better paid and higher quality jobs Sustainability Objective E3: to develop strategic transport, communication and economic infrastructure Sustainability Objective P2: to address the need to limit and adapt to climate change 4.3 The co-location of residential development at Trough Laithe Farm and business space development at Riverside Business Park will promote sustainable transport choices. Policy LIV2 will therefore have a positive impact against the following criteria: Reduce road traffic congestion and improve safety for road users Reduce or minimise greenhouse gas emissions Sustainability Objective P4: to reduce contamination, regenerate degraded environments, maintain soil resources and minimise development on greenfield sites 4.4 Trough Laithe Farm is classed as Grade 4: poor quality agricultural land. As such, its release for development will protect and prevent the need for the release of higher quality agricultural land. Policy LIV2 will therefore have a positive impact against the following criteria: Protect good quality soil resources.</p>			<p>The assessment of Objectives E1, E2, E3, P2 and P4, in respect of Policy LIV2 will be reviewed when updating the Sustainability Appraisal Report.</p>
Ms Louise Morrissey								
Peel Holdings (Land & Property) Ltd								
714921								
Ms Anna Noble								
Turley Associates								

When reviewing the Sustainability Appraisal (SA) Report, re-consider the appraisal of Objectives E1, E2, E3, P2 and P4 in respect of Policy LIV2. Any amendments to be reflected in the SA Report accompanying the Core Strategy (Publication Report).

Our Spatial Issues: Pendle Today

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>713082</div> <div>MrGWilkinson</div> <div>Dalesview Developments Ltd</div> <div>713089</div> <div>MrAndrewRollinson</div> <div>Rollinson Planning Consultancy Ltd</div>			<div>39</div>	<div>Yes</div>	<div>No</div>	<div></div>	<div>It is not effective.</div> <div>Yes</div>	<div>2.1 We are still of the view that the status of Earby needs to be clarified. Proposed policy SPD2 describes Earby as being a Local Service Centre and in many parts it is referred to as one of the West Craven Towns (of Barnoldswick and Earby). It continues, however, to also be referred to as a village (see para.3.125).</div>	<div>Earby Parish Council has become a Town Council since the Core Strategy was originally drafted. However, its function as a Local Service Centre remains unchanged.</div> <div>Remove the reference in paragraph 3.125 to Earby being a village.</div>
<div>714054</div> <div></div> <div>Trustees Green Emmott Trust</div> <div>817541</div> <div>MsJaneDickman</div> <div>Dickman Associates Ltd</div>			<div>44</div>	<div></div>	<div></div>	<div></div>	<div>It is not justified.</div> <div></div>	<div>Para 3.24 - long term vacancy rates are referred to but the information is based on a 2008 study which does not appear to have been updated. NPPF requires that background documents are up to date.</div> <div>The National Planning Policy Framework requires local planning authorities to base their plans on adequate, up-to-date and relevant evidence ... taking full account of market and economic signals (NPPF, paragraph 158). Paragraph 3.24: The data in the first sentence (from 2008) provides the context for the up-to-date figures quoted later in the paragraph (2013).</div> <div>No change proposed in response to this comment.</div>	
<div>712277</div> <div>MrRobertOrgill</div> <div>Rolls Royce plc</div> <div>817556</div> <div>MsKateSkingley</div> <div>David Lock Associates</div>			<div>56</div>	<div></div>	<div></div>	<div></div>	<div>On behalf of Rolls-Royce plc (Rolls-Royce), we are pleased to respond to the Local Plan for Pendle: Core Strategy Further Options Report consultation. Rolls-Royce welcomes this positive step in producing a plan to develop and shape Pendle into an attractive and vibrant place to both live and work. Rolls-Royce is recognised within the Plan as playing an important part in this, assisting with creating future prosperity and employment for the area. Rolls-Royce supports the vision of the Local Plan which recognises that in Pendle people and places matter. This is key for Rolls-Royce, in being able to attract and importantly, retain their highly skilled and motivated workforce. These comments are made in the context of the role and presence of Rolls-Royce in Barnoldswick as a major employer and investor. We hope that the Council will find these comments helpful in shaping the Local Plan as it moves to the next stage. We note that the Council has decided to take a step back in progressing with the Core Strategy in light of comments that were received on an earlier version of the Strategy. Whilst the updated evidence base has resulted in changes to just a selection of policies, Rolls-Royce make these comments in</div>	<div>Comments noted.</div>	

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Our Spatial Issues: Pendle Today

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								relation to the Core Strategy as a whole. Firstly Rolls-Royce support the Core Strategy focus for spatial interventions set out in the plan as below: To protect and enhance the built and natural environment, managing the causes and impacts of climate change. To deliver a range and mix of housing appropriate to the needs of the borough. To create a strong and dynamic economy. To address our infrastructure requirements, creating sustainable urban and rural communities. Rolls-Royce recognise the importance of having a strong and clear spatial focus for the plan to guide future growth and development and recognise the need to carefully balance a number of spatial priorities in order to create a well planned and sustainable Pendle over the lifetime of the plan.			
									No change proposed in response to this comment.		
378754			113					The Evidence Base of some of the data used seems to be very old, for example paragraphs 3.40, 3.41 and 3.127. This may impact upon the soundness of the document at examination. Paragraph 3.88 states 'more than eight in ten residents are satisfied with Pendle as a place to live', but deems this to be lower than the score for Lancashire (79%) and England (80%). This is higher and equivalent to Lancashire and England respectively.	The National Planning Policy Framework requires local planning authorities to base their plans on adequate, up-to-date and relevant evidence ... taking full account of market and economic signals (NPPF, paragraph 158). Paragraphs 3.40-3.41: The text states that "early death rates from cancer have increased SINCE 2002-2004", which is factually correct. However, paragraphs 3.39-3.41 are to be replaced with the text shown below: Paragraph 3.127: No up-to-date data is available below district level. Paragraph 3.88: Text from an earlier version of the Core Strategy has been retained, instead of being deleted. This has caused a discrepancy with the results from the latest survey.		
Mr	Marcus	Hudson							Amend the Core Strategy as shown below: Paragraphs 3.39-3.41 - replace with the following text: "The health of children and young people in Pendle is generally worse when compared to the nation as a whole. The proportion of children who are physically active is the eighth worst in England. Childhood obesity in reception classes and Year 6 are correspondingly high. Immunisation rates for children are significantly below county, regional and national comparators and successive surveys have shown that the rate of tooth decay in children has tended to be well above the national average." "Figures for life expectancy at birth for males (78) and females (82) are both below the national average [ONS, October 2013]. Within Pendle there are also wide disparities by location with men in the least deprived areas living on average 12.4 years longer than those in the most deprived areas. The comparative figure for females is 9.7 years." "Over the last 10 years, all-cause mortality rates have fallen. The early death rate from heart disease and stroke has fallen, but remains above the national average. There has been a 21% reduction in the mortality rate from cancer since 1993-95, which is once again higher than the comparable figure for England, but significantly below that for the North West." Paragraph 3.127 - Remove references to commuter inflows and		
Lancashire County Council											

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Our Spatial Issues: Pendle Today

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
								outflows. Paragraph 3.88: Amend paragraph 3.88 to read: "Significant progress is already being made with more than seven out of ten residents satisfied with Pendle as a place to live in 2011. This represents a 15% increase compared to when the same question was asked in 2007, but is still below comparable scores for Lancashire (79%) and England (80%). Satisfaction levels vary from as low as 46% in Brierfield and Reedley to 82% in Barrowford and the Western parishes."
327387		189	No	No		Yes	<p>Paragraph 3.75 refers to a variety of statutory and local designations and states that “ These sites form the basis for the creation of an Ecological Network that will protect, enhance and connect sites of biodiversity value necessary for flora and fauna to adapt to the effects of climate change.” However, in addition to the statutory and local designations, the ecological network needs to take account of ‘Habitats of Principal Importance in England’ and sites supporting statutorily-protected species as well as other ‘Species of Principal Importance in England’ (as referred to as in 3.69 as ‘ UK Priority Species’), in order to protect, enhance and connect sites of biodiversity value necessary for flora and fauna to adapt to the effects of climate change.</p> <p>The statement quoted above from 3.75 gives the impression that the ecological network has yet to be identified yet Lancashire County Council is able to provide maps of the ecological networks in any Borough of the county for no charge if the Borough has subscribed to the service level agreement or for a fee if not. The Wildlife Trust assumes that the ecological network will form part of the Core Strategy documentation in accordance with the Lawton Review. The Natural Environment White Paper and paragraphs 109, 117 and 165 of the National Planning Policy Framework. However, it would be helpful if this wasn’t an assumption and that the Core Strategy stated that this will be the case.</p> <p>This is consistent with paragraphs 114, 115, 117, 156, 157, 165 and 178-181 of the National Planning Policy Framework.</p>	<p>The ecological network will form an important component of the pending Green Infrastructure Strategy. The site categories listed in paragraph 3.75 are those which form the ‘basis’ of such a network in accordance with the Lawton Review. The elements within these networks do not have to be continuous, but can include so-called ‘stepping stones’. Other sites, which would include those which are key habitats, or contain key species, would be assessed and included as necessary to help create a robust network. LCC has prepared such a network at landscape level and an officer of Pendle Council, together with officers from neighbouring local planning authorities, sat on the steering group which guided its preparation. The Council's commitments under the Duty to Cooperate have thereby been acknowledged and fully complied with. Paragraphs 8.11 to 8.30, 8.33 and 8.34 to 8.47 address these issues and Policy ENV1 reflects them.</p> <p>No change proposed in response to this comment.</p>

Our Spatial Issues: Pendle Today

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327387			190	No	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.	Yes	Paragraphs 3.139 - 3.143 refer to cross boundary issues but do not mention cross boundary wildlife sites and/or ecological networks (see comments on paragraph 3.75), nor species that move or fly across such boundaries. There does not appear to be any evidence of cross border working and there are no actual cross boundary landscape scale policies or proposals in the Core Strategy.	Paragraph 8.34 refers to the need to allow species migration by appropriate connections and explains that such connections do not have to be continuous linear habitat. The LCC Ecological Network, to which Pendle Borough Council contributed, addresses this. Landscape character is addressed at paragraph 8.42 to 8.44 and reflected in Policy ENV1 through the Lancashire Landscape Assessment and AONB.
Mr	John	Lamb							
Wildlife Trust for Lancashire, Manchester and North Merseyside									

								Whilst the evidence may be presented at the Land Use Allocations stage, the Core Strategy should at least refer to cross boundary wildlife sites, ecological networks and species that move or fly across boundaries. The Core Strategy should also include a broad strategy that covers relevant cross cutting landscapes, e.g. the Forest of Bowland Area of Outstanding Natural Beauty (AONB), the South Pennines Moors Site of Special Scientific Interest (SSSI) and the National Character Areas.	
								This is consistent with paragraphs 114, 115, 117, 156, 157, 165 and 178-181 of the National Planning Policy Framework.	No change proposed in response to this comment.

692633			218					1. The Lancashire Branch of the Campaign to Protect Rural England is pleased to respond to the Core Strategy (Further Options) Consultation and wishes the Council well in its adoption of a Local Plan to steer development decisions in the future. Introduction 2. The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country. We promote positive solutions for the long-term future of the countryside to ensure change values its natural and built environment. 3. Pendle is a diverse place, with most of its people living in the four urban settlements of Nelson, Colne, Brierfield and Barrowford in the south of the borough or Barnoldswick and Earby to the north. However the majority of the area is rural in character with one-third of the borough of open countryside is protected by international, national or local environmental designations, so CPRE’s Lancashire Branch believes it is important for the Core Strategy to contain appropriate policies that best protect and enhance the countryside for the population of Pendle now and in the future. 4. CPRE Lancashire supported the inclusion of Pendle Hill, the picturesque millstone fell in isolated grandeur, in the Forest of Bowland Area of Outstanding Natural Beauty and we place high value on the landscapes afforded by the peaks of Weets and Boulsworth. The gently rolling landscapes offer some of the most interesting and attractive villages in Lancashire and forms an important part of Lancashire’s history and cultural identity with folklore include witchcraft, the Leeds and Liverpool Canal provides rich industrial heritage, and literary connections to the Bronte	There are two strands to this consultee comment. Firstly, ‘It is important for the Core Strategy to contain appropriate policies that best protect and enhance the countryside...’ Section 8 of the Core Strategy which culminates in Policy ENV1 achieves this. Secondly, ‘These heritage assets including the rural landscapes within which they are located ought to be safeguarded...’ Section 8 of the Core Strategy which culminates in Policy ENV1 together with that part of Section 11 addressing tourism, leisure and culture (paragraphs 11.118 to 11.131) and culminating in Policy WRK5 achieves this.
Ms	Jackie	Copley							
Lancashire Branch of CPRE									

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Our Spatial Issues: Pendle Today

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

sisters with the isolated hamlet of Wycoller. These heritage assets including the rural landscapes within which they are located ought to be safeguarded for continued benefit of residents and the value of the growing tourism sector of the area.

No change proposed in response to this comment.

327623

236

Dr. John Plckett

Forward Planning: Making Development Plans

Development Plans evaluate and resolve potential conflicts between development needs and protection of our natural heritage. Spatial planning systems should include Natural England’s spatial planning bullet points in regard to biodiversity (see their website). Fundamentally, information about places in Pendle, where habitats and species of Principal Importance occur, is missing. (These places are listed by Government as priorities for biodiversity conservation.) This information should have been available for the SEA and Sustainability Appraisal processes. The SEA reports noted the lack of information.

It is not clear to which bullet points the comment refers. Interrogation of Natural England's website revealed several sets of bullet points, together with much other advice. The information about places in Pendle where habitats and species of Principal Importance occur is included in the Biodiversity Audit and this is made clear at paragraph 8.14.

No change proposed in response to this comment.

327623

237

Dr. John Plckett

Pendle’s Sites of Local Natural Importance: (p.26 3.75)

These have not been tested against the SLNI criteria and therefore cannot be assumed to be rich in biodiversity. They may however make suitable sites for green infrastructure. The sites that should be used for restoration—see Biodiversity Framework---are the protected Habitats of Principal Importance, many of which support protected Species of Principal Importance. (These designations are given because they are of great conservation concern.) These habitats should form the basis of coherent Ecological Networks to halt the decline in biodiversity and to allow connection and species dispersal. Ecological Networks need to be at a landscape level but must aim to stop isolation and fragmentation of Habitats of Principal Importance, thereby helping to restore biodiversity. N.B. The Local Biodiversity Action Plan priorities were Woodland and Grassland Priority Habitats and these should still be a priority for protection and restoration.

The seven LNI sites have not been tested against the criteria, as they pre-date them. They are either designated as a BHS in their own right or are closely associated with a site with a recognised designation and therefore should not be excluded from the list. It is agreed that these sites are likely to be key components of the emerging green infrastructure strategy and ecological network. The site categories listed in paragraph 3.75 are those which form the ‘basis’ of such a network. Other sites, which would include those which are key habitats or with key species, would be assessed and included as necessary to create such a network. LCC has prepared such a network at landscape level and an officer of the council, along with others from neighbouring LPA's, was on the steering group which guided its preparation. Paragraph 8.34 refers to the need to allow species migration by appropriate connections and explains that such connections do not have to be continuous linear habitat. The LCC Ecological Network, to which Pendle Borough Council contributed, addresses this. Section 8 of the Core Strategy which culminates in Policy ENV1 addresses the above.

No change proposed in response to this comment.

Our Spatial Issues: Pendle Today

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
378959			248					Forward Planning: Making Development Plans Development Plans evaluate and resolve potential conflicts between development needs and protection of our natural heritage. Spatial planning systems should include Natural England’s spatial planning bullet points in regard to biodiversity (see their website). Fundamentally, information about places in Pendle, where habitats and species of Principal Importance occur, is missing. (These places are listed by Government as priorities for biodiversity conservation.) This information should have been available for the SEA and Sustainability Appraisal processes. The SEA reports noted the lack of information.	It is not clear to which bullet points the comment refers. Interrogation of Natural England's website revealed several sets of bullet points, together with much other advice. The information about places in Pendle where habitats and species of Principal Importance occur is included in the Biodiversity Audit and this is made clear at paragraph 8.14.
Mrs	Alison	Plackett							
No change proposed in response to this comment.									

378959			249					Pendle’s Sites of Local Natural Importance: (p.26 3.75) These have not been tested against the SLNI criteria and therefore cannot be assumed to be rich in biodiversity. They may however make suitable sites for green infrastructure. The sites that should be used for restoration—see Biodiversity Framework---are the protected Habitats of Principal Importance, many of which support protected Species of Principal Importance. (These designations are given because they are of great conservation concern.) These habitats should form the basis of coherent Ecological Networks to halt the decline in biodiversity and to allow connection and species dispersal. Ecological Networks need to be at a landscape level but must aim to stop isolation and fragmentation of Habitats of Principal Importance, thereby helping to restore biodiversity. N.B. The Local Biodiversity Action Plan priorities were Woodland and Grassland Priority Habitats and these should still be a priority for protection and restoration.	The seven LNI sites have not been tested against the criteria, as they pre-date them. They are either designated as a BHS in their own right or are closely associated with a site with a recognised designation and therefore should not be excluded from the list. It is agreed that these sites are likely to be key components of the emerging green infrastructure strategy and ecological network. The site categories listed in paragraph 3.75 are those which form the ‘basis’ of such a network. Other sites, which would include those which are key habitats or with key species, would be assessed and included as necessary to create such a network. LCC has prepared such a network at landscape level and an officer of the council, along with others from neighbouring LPA's, was on the steering group which guided its preparation. Paragraph 8.34 refers to the need to allow species migration by appropriate connections and explains that such connections do not have to be continuous linear habitat. The LCC Ecological Network, to which Pendle Borough Council contributed, addresses this. Section 8 of the Core Strategy which culminates in Policy ENV1 addresses the above.
Mrs	Alison	Plackett							
No change proposed in response to this comment.									

Our Spatial Issues: Pendle Today

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327580			265					Para 3.110 states that the SHMA carried out in 2013 by Nathaniel Lichfield and partners revealed that there is a shortage of affordable housing within Pendle. Yet, para 3.109 states that by late 2012 the house prices for terraced properties had fallen considerably since 2006 so that it is possible to purchase properties for under £50,000 in Nelson and Brierfield, an ideal price for a starter home. L&B highlights these statements on adjacent paragraphs conflict substantially with each other .	Low priced market housing is not necessarily affordable, or desirable. The SHMA notes that the very low house prices in some parts of the borough, and the lower monthly costs of servicing a mortgage, mean that a high proportion of households are unable to rent. However, this simple calculation does not take account of the need for households to save for a deposit, or that certain mortgage products may not be available. Low house prices often reflect the poor condition of the property and can lead to instances of unsustainable home ownership - i.e. people are theoretically able to afford the mortgage repayments, but cannot meet the cost of renovation, ongoing maintenance and running costs associated with ownership of a property. Poor quality housing is often situated in the borough's most deprived areas where residents on low incomes may still be unable to obtain a mortgage on such properties.
Mr.	Owen G.	Oliver							No change proposed in response to this comment.
Lidgett & Beyond Group									

Our Spatial Vision: Pendle Tomorrow

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>327432</div> <div>Mr. Steve Biddle</div> <div>Road Haulage Association</div> <div></div> <div></div> <div></div>	108					<div>Looking at issues related to business and employment, the strategy papers report that while 62% of Pendle is classified as open countryside, with Pendle Hill designated as an Area of Outstanding Natural Beauty, there is significant social deprivation in the borough, with relatively low household incomes. The papers also states that manufacturing and retail are an important part of the employment base, and that there is more scope for the development of tourism in the borough to take advantage of natural amenities, as well there being a need to do more to encourage the development of rural businesses. Given what has been reported it is worth stressing the contribution made by the haulage industry to life Pendle and agreeing with the Core Strategy section “Our Social Vision: Pendle Tomorrow” which says that improved connectivity in the borough could help revitalise some of Pendle’s depressed towns.</div>	<div>Note comment.</div> <div>No change proposed in response to this comment.</div>
<div>327387</div> <div>Mr John Lamb</div> <div>Wildlife Trust for Lancashire, Manchester and North Merseyside</div> <div></div> <div></div> <div></div>	180	No	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.	<div>Yes</div> <div>The last sentence in the second paragraph of Our Vision for Pendle on page 39 states that “ Urban green spaces enhance both the public realm and the setting of our historic buildings; they help the built environment adapt to climate change and make a positive contribution to ecological networks and local biodiversity ”, which is welcomed by the Trust, but there isn’t a similar statement that covers the rural environment.</div> <div>Amend the statement to apply to both urban and rural environments or include a similar statement that covers the rural environment.</div>	<div>The urban environment has a different set of issues than the rural environment. The urban environment is more developed, more densely populated and the residents need nearby green spaces and the associated health and recreational benefits they bring. The first sentence of the final paragraph on page 39 states ‘protecting and enhancing our high quality landscapes and habitats will see Rural Pendle...’ Such landscapes and habitats and their improvement will provide a range of borough-wide benefits including ecological networks and local biodiversity which is expanded in more detail in Chapter 8 and its associated policies.</div> <div>No change proposed in response to this comment.</div>	
<div>692633</div> <div>Ms Jackie Copley</div> <div>Lancashire Branch of CPRE</div> <div></div> <div></div> <div></div>	219					<div>Vision 5. We support the Council’s Core Strategy Vision that "In Pendle people and places matter. We want to unlock our potential, to create confident, creative, healthy, fair and thriving communities, whilst safeguarding our heritage and natural environment". The protection and enhancement of Pendle’s rural areas is central to delivering the vision and goals set out in Pendle’s Sustainable Community Strategy (SCS). 6. CPRE Lancashire is aware of economic development initiatives that can be developed in rural locations such as community woodlands to help tackle fuel poverty and other social enterprises that create jobs and other community benefits. There are significant health and education benefits from the countryside and we think our core aim of protecting and enhancing the countryside for the enjoyment of future generation accords well with the</div>	<div>Note support for the Vision. The Vision Statement on page 39, along with Chapter 8 and its associated policies will seek to protect and enhance the rural areas and allow sustainable development as defined in the NPPF.</div>

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Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Our Spatial Vision: Pendle Tomorrow

Person Details		Comment ID		Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
									No change proposed in response to this comment.	
327623		241						The Vision: In consideration of the designated sites, the habitats in Pendle and the land area that they cover, one sentence , which could apply to any borough, does not reflect the local representation of the Government’s priorities for gains in biodiversity, which are targeted to be achieved by 2020, in Pendle (not just Rural Pendle). Paragraph 2: Urban green space contributes to green infrastructures unless they are joining areas of high biodiversity value; then they become ecological networks.	Urban greenspace is an important element of our green infrastructure, but such places are not devoid of wildlife and can also be valuable components of an ecological network, for example, as stepping stones as described in the Lawton Report ‘Making Space for Nature’.	
Dr. John Plackett									No change proposed in response to this comment.	
378959		253						The Vision: In consideration of the designated sites, the habitats in Pendle and the land area that they cover, one sentence , which could apply to any borough, does not reflect the local representation of the Government’s priorities for gains in biodiversity, which are targeted to be achieved by 2020, in Pendle (not just Rural Pendle). Paragraph 2: Urban green space contributes to green infrastructures unless they are joining areas of high biodiversity value; then they become ecological networks.	Urban greenspace is an important element of our green infrastructure, but such places are not devoid of wildlife and can also be valuable components of an ecological network, for example, as stepping stones as described in the Lawton Report ‘Making Space for Nature’.	
Mrs Alison Plackett									No change proposed in response to this comment.	

Our Strategic Objectives: What We Need to Do

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>816907</div> <div>MrStuartMitchell</div> <div></div> <div></div> <div></div> <div></div>			32	No	No		<div>It is not justified.; It is not effective.; It is not consistent with national policy.</div> <div>No</div> <div>I do not believe that the policies in relation to the Green Belt and Open Countryside are sound and robust enough to protect and enhance these areas. This is evidenced by the introduction at the 11th hour of a proposal to substantially amend the Green Belt boundary to allow for an extension to Lomeshaye Industrial Estate. Over the last 5 or 6 years of work on this Core Strategy I cannot recall any mention of this major proposal. I was also given to understand by your Principal Planning Officer that the Core Strategy process could not be used to amend a Green Belt boundary. The evidence for the need for additional employment land is very weak, and I cannot see how this proposal can be viewed as sustainable. Furthermore to develop up the hillside towards the Fence bypass will be visually very intrusive and damaging to the environment of a much wider area. The Core Strategy recognises the strong linkages with neighbouring Burnley, which faces many of the same employment issues, and whilst there has been joint working on housing issues, there has been no joint review of available industrial sites and premises in the two Borough's. The Localism Act sets out a new duty to co-operate, and Government guidance says that account must be taken of the availability of employment land in neighbouring areas. Burnley Borough Council has recently completed a review of the availability of employment sites and premises , and my understanding is that there are significant amounts of employment land and premises available ,or shortly to become available in the Borough. It would be far more desirable to see these brownfield sites and prmises taken up (some of which have lain undeveloped for decades) before allowing a significany intrusion into the Green Belt in Pendle.</div> <div>The proposal to amend the Green Belt should be removed and the availability of employment land and premises in the two Boroughs should be jointly reviewed. Greater importance needs to be placed on the need to retain and enhance the Green Belt and Open Countryside.</div>	<div>Note comments.</div> <div>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</div>	
<div>814953</div> <div>MrsPamSlater</div> <div></div> <div></div> <div></div> <div></div>			94	Yes	Yes		<div>Strategic objectives should be strengthened to ensure developments provide a net gain for nature.</div> <div>Enhance objective 5 or create a new one stipulating that development must be sustainable & should meet point 9 of the NPPF, in particular provide a 'net gain' for nature. NPPF 9. Pursuing sustainable development involves</div>	<div>It is considered that the Strategic Objectives in the Core Strategy cover the points at paragraph 9 of the National Planning Policy Framework. In particular, Strategic Objective 10 seeks to ensure new development respects our natural and man-made heritage, by seeking to protect maintain and enhance those sites and habitats which are valued for the positive contribution they make to the character of our landscape, townscape or biodiversity. This objective therefore covers the NPPF point relating to moving from a net loss of biodiversity to achieving net gains for nature.</div> <div>No change proposed in response to this comment.</div>	

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Our Strategic Objectives: What We Need to Do

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to): ● making it easier for jobs to be created in cities, towns and villages; ● moving from a net loss of bio-diversity to achieving net gains for nature; 6 ● replacing poor design with better design; ● improving the conditions in which people live, work, travel and take leisure; and ● widening the choice of high quality homes	
						n/a	

327432	109					We note that in the Core Strategy “Strategic Objectives – What We Need to Do”, ensuring that Pendle’s infrastructure is capable of supporting both new and existing development is ranked second out of a list of eleven. The road haulage sector provides employment, and its collections and deliveries of essential goods support the wider business community. Good road transport links can encourage business inward investment and help residents to access employment opportunities across or outside the borough. Therefore we welcome the goal in the Core Strategy “Strategic Objectives” of ensuring that Pendle’s infrastructure is capable of supporting both new and existing development.	Support for Strategic Objective 2 is noted.
Mr.	Steve	Biddle					
Road Haulage Association							
							No change proposed in response to this comment.

755915	145					Strategic Objectives Strategic objective 5, ‘Deliver sufficient, quality housing that is both appropriate and affordable, contributing to the creation of a balanced housing market’, is not considered sufficiently positive or aspirational and is therefore contrary to the requirements of the NPPF.	It is accepted that following the introduction of The Framework the strategic objective, as currently worded, may not be considered to be sufficiently positive or aspirational.
Mr	Matthew	Good					
Home Builders Federation Ltd							
						Recommendation It is recommended that the wording be amended to; ‘Deliver quality housing to meet the full needs of current and future residents, contributing to the creation of a balanced housing market’	Remove the word ‘sufficient’ after ‘Deliver’ and add ‘for current and future residents’ after ‘affordable’ from Strategic Objective 5.

Our Strategic Objectives: What We Need to Do

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327370			161	Yes	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.	Yes	The wording of Objective 10 remains limited and on normal reading would be interpreted to refer only to areas/sites specifically designated rather than to their wider settings to which they are intrinsically connected. The NPPF is especially clear about the contribution of settings to heritage assets (e.g. paras 128/129) and also in respect of ecological networks and eco-systems services in Chapter 11.	The National Planning Policy Framework recognises the importance of the setting of heritage assets to their significance, noting that the significance of an asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting (NPPF paragraph 132). Additionally local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably (NPPF paragraph 137). The Framework also stresses the importance of ‘planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’ (NPPF paragraph 114). It is agreed that the setting of both heritage and natural assets is an important consideration in the protection and enhancement of our natural and man-made heritage.
Mr	Alan	Hubbard							
National Trust									

	<p>Amend to read as follows: " Ensure that new development respects our natural and man-made heritage, by seeking to protect, maintain and enhance those sites and habitats (including their wider settings) which are valued for the positive contribution they make to the character of our landscape, townscape or biodiversity ."</p>	<p>Amend Strategic Objective 10 to read: "Ensure that new development respects our natural and man-made heritage, by seeking to protect, maintain and enhance those sites and habitats (including their wider settings) which are valued for the positive contribution they make to the character of our landscape, townscape or biodiversity."</p>
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692633		220				Strategic Objectives 7. We are most pleased to see that the first strategic objective is to "Establish a hierarchy of settlements to assist regeneration by promoting the re-use of existing buildings and Brownfield sites and directing growth to the most sustainable locations." Sustainable communities, high quality design, reduction in climate change impacts, a balanced housing market, economic diversification/rural regeneration, choice of retail, tackling inequality, protecting and enhancing green spaces and built environment for biodiversity, safe and sustainable transport networks that reduce the need to travel are all laudable strategic objectives.	Note support for Strategic Objective 7.
Ms Jackie Copley	Lancashire Branch of CPRE						No change proposed in response to this comment.

Our Strategic Objectives: What We Need to Do

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327623			238					Strategic Objectives: SO4 Provision for biodiversity movements/migrations is not included. SO9 If Pendle is prioritising the protection, enhancement and improvement of ACCESS to our green (open) spaces.....THEN the objective of SO9 will be unlikely to provide net gains for biodiversity. N.B. Please see NPPF glossary for definitions of green space and open space. SO10 New development is unlikely to seek to protect, maintain and enhance sites and habitats which are valued for the contribution they make to biodiversity. These Strategic Objectives are ineffectual at delivering the biodiversity gains the government expects by 2020. The legislative framework is in place to achieve specific aims by 2020. Please see “England’s Biodiversity Framework”.	SO4 includes the wording 'mitigation and adaptation', and this along with the requirements in Chapter 8 cover issues relating to movements/migration. SO9 - Relates to the recreational use of open space. Such areas can still be valuable for biodiversity and make a valuable contribution to green infrastructure and ecological networks. Recreation and biodiversity are not mutually exclusive as shown by the NERC Act 2006, which describes a nature reserve as 'land managed not only for a conservation purpose but also for a recreational purpose'. SO10 - It is a requirement of the NPPF that development seeks to conserve and enhance biodiversity (paragraph 118) and Chapter 8 and Policy ENV1 of the Core Strategy addresses this.
Dr.	John	Plckett							No change proposed in response to this comment.
327623			240					The Sustainable Community Strategy: The SCS priority to “Care for our environment” lacks rigour in respect of the legislation, statutory regulations and obligations and the Government’s priorities for biodiversity conservation.	Our Pendle Our Future: Pendle's Sustainable Community Strategy (SCS) was published in 2007 and updated in 2010. It is a strategic document, which has played an important role in guiding the preparation of the Core Strategy. However, this document was produced by Pendle Partnership, the Local Strategic Partnership (LSP) for Pendle, and does not form part of this public consultation. Following the recent demise of Pendle Partnership, the future status of the SCS has yet to be determined.
Dr.	John	Plckett							No change proposed in response to this comment.
378959			250					Strategic Objectives: SO4 Provision for biodiversity movements/migrations is not included. SO9 If Pendle is prioritising the protection, enhancement and improvement of ACCESS to our green (open) spaces.....THEN the objective of SO9 will be unlikely to provide net gains for biodiversity. N.B. Please see NPPF glossary for definitions of green space and open space. SO10 New development is unlikely to seek to protect, maintain and enhance sites and habitats which are valued for the contribution they make to biodiversity. These Strategic Objectives are ineffectual at delivering the biodiversity gains the government expects by 2020. The legislative framework is in place to achieve specific aims by 2020. Please see “England’s Biodiversity Framework”.	SO4 includes the wording 'mitigation and adaptation', and this along with the requirements in Chapter 8 cover issues relating to movements/migration. SO9 - Relates to the recreational use of open space. Such areas can still be valuable for biodiversity and make a valuable contribution to green infrastructure and ecological networks. Recreation and biodiversity are not mutually exclusive as shown by the NERC Act 2006, which describes a nature reserve as 'land managed not only for a conservation purpose but also for a recreational purpose'. SO10 - It is a requirement of the NPPF that development seeks to conserve and enhance biodiversity (paragraph 118) and Chapter 8 and Policy ENV1 of the Core Strategy addresses this.
Mrs	Alison	Plckett							No change proposed in response to this comment.

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Our Strategic Objectives: What We Need to Do

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
378959			252					The Sustainable Community Strategy: The SCS priority to “Care for our environment” lacks rigour in respect of the legislation, statutory regulations and obligations and the Government’s priorities for biodiversity conservation.	Our Pendle Our Future: Pendle's Sustainable Community Strategy (SCS) was published in 2007 and updated in 2010. It is a strategic document, which has played an important role in guiding the preparation of the Core Strategy. However, this document was produced by Pendle Partnership, the Local Strategic Partnership (LSP) for Pendle, and does not form part of this public consultation. Following the recent demise of Pendle Partnership, the future status of the SCS has yet to be determined.
Mrs	Alison	Plackett							No change proposed in response to this comment.

The Key Diagram

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>714054</div> <div><div></div><div></div><div></div></div> <div>Trustees Green Emmott Trust</div> <div>817541</div> <div>MsJaneDickman</div> <div>Dickman Associates Ltd</div>	45					<div>Key Diagram - we are aware that the Core Strategy does not look at specific sites, save those identified as strategic sites. As far as we can tell from this key diagram which does not identify all site allocations specifically, we are nevertheless pleased to note that our clients sites are in one case seemingly within the settlement boundary and in the other within open countryside though that said it is an indent of such allocation directly into the centre of one of the identified rural villages so a highly sustainable, accessible and deliverable location.</div>	<div>The key diagram is for illustrative purposes only. It clearly states that it should not be used to identify individual sites. It also does not depict the exact settlement boundaries, but reflects the settlement (spatial) areas. The allocation of sites in rural settlements will be considered as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies. At this time the extent of the settlement boundaries will be shown on the Proposals Map and will be reviewed and amended where necessary to include sites to meet the development needs of the borough.</div> <div>No change proposed in response to this comment.</div>
<div>327387</div> <div><div>MrJohnLamb</div><div>Wildlife Trust for Lancashire, Manchester and North Merseyside</div><div><div></div><div></div><div></div></div><div></div></div>	181					<div>The Key Diagram between pages 43 and 44 identifies four Housing Regeneration Priority Areas, the north-easterly and the south-westerly areas both extend into Open Countryside, whereas the middle two do not. The Trust is concerned that landowners and/or developers will see this as a ‘green light’ to submit planning applications for developing any land that falls within the boundary of the Housing Regeneration Priority Areas, including any areas of Open Countryside.</div> <div>That the boundaries of the Housing Regeneration Priority Areas are amended so that they do not overlap with Open Countryside.</div> <div>The areas of Open Countryside within the Housing Regeneration Priority Areas include areas of land that support Habitats of Principal Importance in England and Species of Principal Importance in England.</div>	<div>The Key Diagram is for illustrative purposes only and provides a guide at to where development is intended to take place, but it should not be used to identify the specific location of sites. The Housing Regeneration Priority Areas are shown on the diagram as broad locations and do not represent the defined boundaries of these areas. The defined boundaries would be too detailed for the Key Diagram. Although two of the Housing Regeneration Priority Areas appear to cover areas of open countryside this is due to the placement of the symbol and as stated above does not provide a defined boundary for these areas. It does not change the application of policies in the Core Strategy in terms of development in the Open Countryside.</div> <div>No change proposed in response to this comment.</div>

The Key Diagram

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
328012			227					1) Key Diagram (page43) The area bounded by the dashed purple line (Transport Corridor) is much greater than any of the transport infrastructure and could be mistaken for a development or settlement boundary.	The Key Diagram provides an illustration of the spatial vision for the area. The transport corridor shown on the diagram is intended to represent the broad direction of movement in, out and through the borough. It does not represent the boundaries for development. For clarity it is proposed to include additional wording to the explanatory text which accompanies the Key Diagram to outline the purpose of the transport corridor. Furthermore, the graphics will be improved to depict a narrower corridor which follows the transport routes.
Mr	Andrew	Ashworth							
									Add the following explanatory text to the Key Diagram: "The Transport Corridor shows the principal direction of travel of people and goods in to, out of, and through the borough. It provides an indication of the direction of the routes that transport services should take."
327623			231					1) Key Diagram (page43) The area bounded by the dashed purple line (Transport Corridor) is much greater than any of the transport infrastructure and could be mistaken for a development or settlement boundary.	The Key Diagram provides an illustration of the spatial vision for the area. The transport corridor shown on the diagram is intended to represent the broad direction of movement in, out and through the borough. It does not represent the boundaries for development. For clarity it is proposed to include additional wording to the explanatory text which accompanies the Key Diagram to outline the purpose of the transport corridor. Furthermore, the graphics will be improved to depict a narrower corridor which follows the transport routes.
Dr.	John	Plackett							
									Add the following explanatory text to the Key Diagram: "The Transport Corridor shows the principal direction of travel of people and goods in to, out of, and through the borough. It provides an indication of the direction of the routes that transport services should take."

The Key Diagram

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327623			239					The Key diagram: (p43 Section 6) This must be clear and accurate. It does not express the spatial requirements for the environment. There is no diagrammatic representation for areas of restoration, biodiversity opportunities or ecological networks, which should be provided to halt biodiversity loss and to support net gains---a government priority for biodiversity.	The Key Diagram provides a broad representation of where development is planned to occur during the plan period. This is in line with the National Planning Policy Framework which states that the key diagram should indicate the broad locations for strategic development. In relation to areas of restoration, biodiversity opportunity and ecological networks - these elements are too detailed for the Key Diagram. They will be considered as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies and where appropriate, shown on the Proposals Map. The Key Diagram does however, identify the environmental designation of the South Pennines Moor (a Special Protection Area (SPA), Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI)), the landscape designation of the Forest of Bowland Area of Outstanding Natural Beauty (ANOB) and the extent of the Lancashire Green Belt in Pendle, as these three designations are considered to be of strategic importance.
Dr.	John	Plckett							
No change proposed in response to this comment.									

378959			243					1) Key Diagram (page43) The area bounded by the dashed purple line (Transport Corridor) is much greater than any of the transport infrastructure and could be mistaken for a development or settlement boundary.	The Key Diagram provides an illustration of the spatial vision for the area. The transport corridor shown on the diagram is intended to represent the broad direction of movement in, out and through the borough. It does not represent the boundaries for development. For clarity it is proposed to include additional wording to the explanatory text which accompanies the Key Diagram to outline the purpose of the transport corridor. Furthermore, the graphics will be improved to depict a narrower corridor which follows the transport routes.
Mrs	Alison	Plckett							
Add the following explanatory text to the Key Diagram: "The Transport Corridor shows the principal direction of travel of people and goods in to, out of, and through the borough. It provides an indication of the direction of the routes that transport services should take."									

The Key Diagram

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
378959			251					The Key diagram: (p43 Section 6) This must be clear and accurate. It does not express the spatial requirements for the environment. There is no diagrammatic representation for areas of restoration, biodiversity opportunities or ecological networks, which should be provided to halt biodiversity loss and to support net gains---a government priority for biodiversity.	The Key Diagram provides a broad representation of where development is planned to occur during the plan period. This is in line with the National Planning Policy Framework which states that the key diagram should indicate the broad locations for strategic development. In relation to areas of restoration, biodiversity opportunity and ecological networks - these elements are too detailed for the Key Diagram. They will be considered as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies and where appropriate, shown on the Proposals Map. The Key Diagram does however, identify the environmental designation of the South Pennines Moor (a Special Protection Area (SPA), Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI)), the landscape designation of the Forest of Bowland Area of Outstanding Natural Beauty (ANOB) and the extent of the Lancashire Green Belt in Pendle, as these three designations are considered to be of strategic importance.
Mrs	Alison	Plackett							No change proposed in response to this comment.

Our Spatial Strategy: Where and How We will Deliver

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
714054			46					Para 7.6 Spatial Strategy - Spatial Strategy sees only limited growth in Rural Villages. Restricting development in open countryside does not reflect NPPF on sustainable development which would enable infill and development in identified sustainable settlements. Rural Villages have been identified as such even if they are the lowest tier. By enabling sustainable development it will boost existing facilities and community. Also in the case of settlements in West Craven and on the Keighley Road by encouraging development it will tie in with strengthening connections to W & N Yorks. Also given the housing land undersupply and market conditions then consideration of sites that effectively are infill or rounding off in sustainable locations should not be discarded before being properly considered. Not consistent with NPPF	The intention of the vision is not to prevent development in the open countryside, but to restrict it to those developments which can demonstrate that they will make a positive contribution to sustainable development and growth.
Trustees Green Emmott Trust									
817541									
Ms	Jane	Dickman							
Dickman Associates Ltd									

Our Spatial Strategy: Where and How We will Deliver

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>This allocation will remain following the adoption of the Core Strategy. 3.4 Riverside Business Park presents a major opportunity to attract inward investment into Pendle, securing new employment and stimulating economic growth. It, along with the proposed Strategic Site for employment development at Lomeshaye, represents the largest employment development opportunity in the Borough. Barrowford also contains the only strategic housing allocation in the Core Strategy at Trough Laithe Farm. It is therefore evident that Barrowford will play a significant role in delivering economic growth in the M65 Corridor and in meeting the quantitative and qualitative need for new housing associated with this. This is not currently reflected in the reference to Barrowford within the Spatial Strategy. This apparent inconsistency between the spatial strategy and proposed allocations could bring the soundness of the Core Strategy into question. 3.5 To address this, Peel considers that the first sentence of the sixth paragraph of the Spatial Strategy (see page 45 of the report) should be amended to read: Barrowford will play a key role in the growth of the M65 Corridor, providing new employment for the Borough through the delivery of Riverside Business Park and providing new high quality family housing at Trough Laithe Farm. 3.6 Such a statement would better reflect the role of Barrowford through the Core Strategy, and particularly the amount and type of development it is planned to accommodate. Critically, referring to Barrowford in this way would not compromise the primacy of Nelson and Colne, and particularly their town centres, as the priority growth areas within the M65 Corridor.</p>	<p>New employment opportunities in the M65 Corridor are required to serve a wide catchment, so no distinction between individual settlements is made within Policy SDP4. The determining factors in the proposed location of the strategic site at Lomeshaye were the availability of land, accessibility and sustainability. The same is also true for new housing provision. The strategic site is intended to provide better quality housing early in the plan period to help support the proposed growth in employment, as well as providing housing for the increased population of the borough. It will also help to support regeneration initiatives in the M65 Corridor by providing dwellings in close proximity to Nelson and Colne, which will help to promote a better balance to the local housing market. As such Policy SDP3 provides some flexibility by not identifying allocations by individual settlement, although it requires any new provision, which is not meeting a strategic requirement, to be provided in line with the settlement hierarchy established in Policy SDP2.</p>
							<p>No change proposed in response to this comment.</p>

Policy SDP1: Presumption in Favour of Sustainable Development

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
714054			47					Policy SDP1 - We note the inclusion of this new SDP1 as reference to NPPF compliance was previously omitted. However the wording needs to be reconsidered. The reference to neighbourhood plans seems superfluous as they should comply with the CS so if a site meets the CS criteria any Neighbourhood Plan compliance should follow. Points 1 and 2 of SDP1 should apply to both policy and decision taking parts of the process in reading of para 7 of NPPF, as currently set out that is not clear from SDP1. We also note that footnote 9 to NPPF para 7 lists the type of areas that are protected and this does not include open countryside therefore in assessing sites for development in sustainable locations any settlement boundary amendments that would incorporate land that was open countryside but providing sustainable development should be within the presumption in favour of sustainable development. Not consistent with NPPF	In April 2012, the Planning Inspectorate published model wording to help local authorities ensure that their Local Plans are based upon, and reflect the presumption in favour of sustainable development, articulated in the Government's National Planning Policy Framework. This policy reflects the wording of that model policy. The statement that this is a new policy within the Pendle Core Strategy is incorrect, as it was included in the Publication Report as Policy SD1, which was made available for public consultation from October-December 2013.
<div></div> <div></div> <div>Trustees Green Emmott Trust</div>									
817541									
Ms	Jane	Dickman							
Dickman Associates Ltd									
No change proposed in response to this comment.									

817583			81	No	No	It is not positively prepared.; It is not justified.; It is not effective.; It is not consistent with national policy.	No	Policy SPD1 – Sustainable development 2.2 There is no issue with the emerging Core Strategy’s emphasis upon the need for sustainable development but we feel that greater clarity of what is meant by “sustainable” would better inform the strategic objectives of the Plan and its policies. By this, we mean that sustainability needs to be considered within the Pendle (or wider North East Lancashire) context. 2.3 We feel that the strategic objectives set out in paragraph 5.2 are all commendable targets, consistent with National Planning aims. However, to these we feel should be added the need to ensure that development will endure the inevitable peaks and troughs characteristic of life within a District containing a somewhat worn collection of former Lancashire mill towns with their outworn infrastructure and challenging economic base. Far too often, in our experience, the aims of the development plan have not always reflected achievable targets, and planning policies have been too rigid to offer real incentives for inward investment and new development when opportunities occurred. 2.4 In making this comment we are not saying that “project viability and deliverability” trump all other sustainability considerations but we are making the point that the Core Strategy should emphasise the importance which should be given to confidently securing new investment, as part of an overall balanced planning assessment. 2.5 My clients would therefore like to see SPD1 extended to reflect the above views in order to make the policy (and the overall strategy) more responsive to planning & development aims within the “Pendle context” and therefore more sound in its intentions.	The definition of sustainability is set out at the very beginning of the document in the Preface (paragraphs 1.1-1.6) and paragraph 1.4 states that the National Planning Policy Framework sets out what the government considers to be sustainable development. In April 2012, the Planning Inspectorate published model wording to help local authorities ensure that their Local Plans are based upon, and reflect the presumption in favour of sustainable development, articulated in the Government's National Planning Policy Framework. This policy reflects the wording of that model policy. The plan has been positively prepared and recognises the importance of growth, which involves securing new investment for housing and employment in particular.
<div></div> <div></div> <div>Beck Developments Ltd</div>									
817585									
Mr	John	Willcock							
JWPC Ltd									
No change proposed in response to this comment.									

Policy SDP2: The Role and Function of Our Towns and Villages

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
713082	38	Yes	No	It is not effective.		Yes	1.1 We are still of the view that the status of Earby needs to be clarified. Proposed policy SPD2 describes Earby as being a Local Service Centre and in many parts it is referred to as one of the West Craven Towns (of Barnoldswick and Earby). It continues, however, to also be referred to as a village (see para.3.125). 1.2 Earby is an important settlement which bears all the hallmarks of a small town. It is one of the main settlements in the north of the Borough and the Further Options Report acknowledges that it is served by regular bus services and that it retains a number of local services. In addition the opportunity to provide further employment opportunities within Earby is recognised. 1.3 As noted in our earlier representations Earby scores well across a wide range of measures used to assess a settlement's sustainability in the Sustainable Settlement Study. The town has considerable potential to help the Borough meet its housing requirement, provide for family housing and the creation of new housing for some higher earners (see para 10.2 regarding the need for a range of housing to be provided).	The status of Earby as a town will be clarified in the plan. Earby has been identified as a Local Service Centre in Policy SDP2 due to its characteristics and level of services. This is evidenced in the Sustainable Settlements Study. Earby is identified as one of the two settlements in the West Craven Towns spatial area and fulfils a secondary and supporting role to the larger centre of Barnoldswick. The Spatial Strategy sets out Earby's future role and in conjunction with Policy SDP2 allows for development that supports the projected employment and population growth.
713089								Clarify the status of Earby as a town in the Spatial Portrait and at any other point in the document where it occurs.

714054	48		No	<p>Para 7.20 - we agree that a balance needs to be struck between reusing PDL and promoting new development. The presumption being in favour of sustainable development having regard to economic, social and environmental roles. Policy SDP2 - in Reg 22 this was SDP1 and whilst some changes have been made including reference to a flexible approach to sustainable sites and we note footnote 99 to the policy will mean a review of settlement boundaries in the Local Plan Part 2 - Site Allocations which is encouraging and we would support and concur the view in line with the 2013 SHLAA that our clients 2 sites at Laneshawbridge which are both identified at suitable and sustainable to come forward in the 0-5 year timeframe should do so. We are still concerned that the policy focus is the sequential approach to sites is paramount not a presumption in favour of sustainable development. This theme/error of understanding runs through all the SDP policies and is a fundamental flaw in the CS as some SDP policies are cross referred in later topic specific policies. Unsound. It conflicts with paras 10 & 19 of NPPF. 'Planning should operate to encourage not act as an impediment to sustainable growth.' Also NPPF advocates that LPAs should take account of local uses and respond to the different opportunities for achieving sustainable development in different areas. NPPF does not propose a sequential approach to housing sites it wants to achieve sustainable development and encourage new homes and jobs.</p>	<p>The reuse of previously developed land is an important aspect of sustainable development. The NPPF (paragraph 17 point 8 and paragraph 111) is clear that planning policies (and decisions) should encourage the effective use of land by re-using land that has been previously developed provided it is not of high environmental value. The site selection approach outlined in Policy SDP2 aims to promote the reuse of such land. However, it is acknowledged that the current wording of the policy could be improved to make it more clearly consistent with the NPPF.</p>
<div>Trustees Green Emmott Trust</div> <div>817541</div> <div>Ms Jane Dickman</div> <div>Dickman Associates Ltd</div>					<p>Amend Policy SDP2 as follows: (Delete footnote 98 and part of 99 and insert the following wording into the policy after "Proposals for new development should be located within a settlement boundary as defined on the Proposals Map."): "These boundaries may be amended as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies where there is a need to identify</p>

Q1 = Do you consider the Core Strategy to be legally compliant?

Q2a = Do you consider the Core Strategy to be sound?

Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy SDP2: The Role and Function of Our Towns and Villages

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							additional sites to meet development needs." Replace the wording under the heading "Site Selection" with: "In order to encourage the effective use of land and other resources, the selection of sites for new development (including the allocation of sites in the Pendle Local Plan Part 2) should prioritise (in order) the use of the following types of land, provided they are not of high environmental value: Vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies."

817583	82	No	No	It is not positively prepared.; It is not justified.; It is not effective.; It is not consistent with national policy.	No	Policy SPD2 - Spatial development 2.6 Beck Developments concurs with the broad approach to settlement strategy and agrees with the list of settlement roles set out on page 60. The Company notes (para 7.22) that “Policy SDP2 sets out the locational priorities and development principles to help achieve sustainable growth in Pendle”. The Policy is also “intended to guide strategic decisions on the location of new development in the Core Strategy and will guide site allocations and policies in subsequent planning documents. It will also be used in the determination of individual planning applications” (para 7.23). 2,7 Para 7.24 explains that the Key Service Centres of Nelson (& Brierfield), Colne and Barnoldswick “provide the main facilities and services that are needed to support the local population and their surrounding rural hinterlands. The accessibility of these towns and the current level of services provide a good base for future development”. In comparison Local Service Centres (which include Barrowford and Earby) “provide a level of service which is appropriate to the size of the settlement and local population, i.e. they have a range of shops and facilities which provides for everyday needs, but do not necessarily have the more specialised services or variety of shops which are found in the Key Service Centres”. 2.7 Beck would agree with these classifications but finds inconsistency with the later Core Strategy Policies LIV1 & LIV2 which intend to earmark a new strategic housing site located at Trough Laithe, Barrowford “to provide certainty that a significant proportion of the housing requirement can be brought forward in the short term” (para 11.32). This, we believe, would be to the detriment of other possible strategic housing locations which might exist within, or adjacent to, the Key Service Centre urban boundaries, especially to address short term deficiencies. We find this inconsistency and also the lack of examination of any other strategic development options to be unsound in its presently drafted form. 2.8 It may well be that directing strategic growth to a second-tier settlement could be supported were no comparable & deliverable housing sites available at Nelson, Colne or Barnoldswick but that scenario appears not to have been robustly and openly examined as part of the Core Strategy preparation or within the Further Options Report text. Our client’s representations in relation to Policy LIV2 are set out below. 2.9 However, in terms of policy SPD2	The purpose of Policy SDP2 is to set out the roles and interrelationships of each settlement in the broad context of borough wide growth. The relationship between the strategic site allocation and the settlement hierarchy must be considered in the context of i) the purpose of allocating a strategic housing site and ii) the geographical location of the site. i) the allocation of the strategic site aims to deliver housing, which will serve the population of the M65 Corridor - not just the immediately adjacent settlement (in this case Barrowford). ii) the strategic housing site is located between Nelson and Barrowford with the centres of each settlement being of a similar distance away providing choice of access to different services. In terms of site selection, the SHLAA has thoroughly assessed a large range of potential housing sites in the borough. These have been identified through a desktop survey and a number of call for sites consultations. The SHLAA provides a robust mechanism for identifying the potential strategic site options in the borough. The information from the SHLAA shows that there was no comparable site to Trough Laithe in terms of size, deliverability and a willing landowner.
Beck Developments Ltd							
817585							
Mr	John	Willcock					
JWPC Ltd							

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy SDP2: The Role and Function of Our Towns and Villages

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

Beck considers that the inconsistency with policy LIV2 goes to the heart of the strategic intentions of the Plan especially when the proposal to prioritise strategic growth to a secondary, less sustainable settlement appears to be encouraged by the Council itself. That, in our view could weaken the Council's ability to make further planning decisions in line with its strategic settlement intentions - thus making the development plan ineffective as a robust planning tool.

Amend the first sentence of Policy SDP2 to read: "Proposals for development will be supported in the settlements listed below, provided that they are of a nature and scale that is proportionate to the role and function of that settlement or where they have been specifically identified in this plan to help meet the strategic growth needs of the borough."

814953	88	Yes	Yes		Yes	<p>Point 7.20. The re-use of Brownfield land helps to regenerate derelict sites and remediate land contaminated by previous uses. It can also help to protect the environment by minimising the use of Greenfield sites for development. The re-use of previously developed land provides a desirable and sustainable approach to accommodating future growth in the borough; as such sites are often located close to existing services and facilities. This can help to increase the likelihood of people choosing more sustainable modes of transport such as walking, cycling or public transport, thereby helping to reduce carbon emissions and the negative effects of climate change. However, this has to be set against the prevailing market conditions for the provision of new housing. A balance needs to be struck between reusing previously developed land and promoting new development. Totally agree that previously developed land should be developed ahead of other sites. However, I am very concerned that the policy is suggesting that developers could overcome that due to market conditions. This is leaving the door wide open for them to say a Brownfield/PDL site is not viable and they will instead build on a Greenfield Site.</p> <p>Need to strengthen to include strong sequential site selection criteria and make it very clear development on Greenfield Land is a last resort. Something along the lines of the existing Local Plan policy 17. Taking Colne as an example, both sides of the town have Greenfield Land under threat, with plenty of Brownfield/PDL land in the South Valley that will not be developed/regenerated unless the policy is strong enough to make developers build there first.</p>	<p>The NPPF encourages the effective use of land by reusing land that has been previously developed. However, it does not preclude the use of greenfield sites. The introduction of a strong sequential approach would not be consistent with national policy and the intentions of the NPPF. The Core Strategy has to balance the sustainable development of the borough - this requires ensuring the needs of the population are met, that development sites are viable to deliver and the environment is protected from unnecessary harm.</p> <p>No change proposed in response to this comment.</p>
<div>Mrs Pam Slater</div>							

Policy SDP2: The Role and Function of Our Towns and Villages

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
814953			89	Yes	Yes		Yes	<p>7.28 The core principles in the Framework (paragraph 17) indicate that planning should recognise the intrinsic character and beauty of the countryside and contribute to conserving and enhancing the natural environment. As a consequence development outside of a settlement boundary, as defined on the Proposals Map, will, in most cases, be restricted to help protect the open countryside and the landscapes within it. However, it is recognised that there will be situations where development in the open countryside may be necessary or appropriate. Policies in the Core Strategy and subsequent planning documents will set out the exceptions where development in the open countryside is considered to be acceptable. Further guidance is contained in Policy ENV1 Concerned that developers will see this as a green light to build outside the settlement boundary. With proposals to build off Knotts Lane, Colne, 13/120397p , developers were taking for granted that they could extend their plan outside of the existing settlement boundary when the current Local Plan does not support that. What liberties would they take if this were supported?</p>	<p>Policy SDP2 is clear that proposals should be located within a defined settlement boundary. However, the current local plan allows certain types of development in the open countryside - these are listed as criteria in Policy 1. Policy SDP2 of the Core Strategy supports this approach and explains that further details of such exceptions will be identified in the Pendle Local Plan Part 2. The Core Strategy forms the first part of the review of the local plan and involves setting the amount of development that will take place over the next 15 years. The evidence base supporting the plan shows that even if all the identified sites within the existing settlement boundaries were developed, there is still a need to bring forward some sites outside of these boundaries to meet the development needs of the borough. As such, Policy SDP2 has to put in place a mechanism for reviewing the settlement boundaries as part of the site allocation process in the preparation of the Pendle Local Plan Part 2.</p>
Mrs Pam Slater								<p>Policy should be very clear that development should not be allowed outside of an existing settlement boundary.</p>	<p>No change proposed in response to this comment.</p>
378754			114					<p>In Policy SPD2 Monitoring and Delivery, delivery agencies should include the Lancashire Enterprise Partnership.</p>	<p>The Lancashire Enterprise Partnership should be included in the list of delivery agencies in the Monitoring and Delivery table at the end of the policy.</p>
Mr Marcus Hudson									<p>Add the Lancashire Enterprise Partnership into the list of delivery agencies in the monitoring and delivery table in Policy SDP2.</p>
Lancashire County Council									

Policy SDP2: The Role and Function of Our Towns and Villages

[illegible]

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Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary Land uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies." Make reference to the National Planning Practice Guidance (NPPG) in the justification text relating to the measures which can be taken to improve the viability of Brownfield sites.
327935 <div><div></div><div></div><div></div></div> <div>Sainsbury's</div> <div>817889</div> <div>MrGeorgeWilyman</div> <div>Turley Associates</div>	154	<input type="checkbox"/>	Yes		<input type="checkbox"/>	Policy SDP2 (Spatial Development Principles) Sainsbury's support the aims of Policy SDP2 which maintains the Borough's settlement hierarchy and identifies Colne as a Key Service Centre, along with Nelson and Barnoldswick. Sainsbury's also support the Council's intention to direct new development to settlements in this hierarchy.	Support for the policy approach noted.
						None required. Sainsbury's consider this policy to be sound as currently drafted.	No change proposed in response to this comment.
327467 <div><div>Mr</div><div>Iain</div><div>Lord</div></div> <div>Barrowford Parish Council</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>	169	<input type="checkbox"/>			<input type="checkbox"/>	Hierarchy within Pendle The Core Strategy contains the proposed Local Hierarchy within Pendle which will be used to direct development and growth to the most appropriate locations. Barrowford is currently grouped on the second tier as a Local Service Centre but will be grouped in the M65 Corridor with Colne, Nelson and Brierfield who are included in the top tier as Key Service Centres. When the Core Strategy proposes that 70% of Housing and 78.5% of Employment land be found within the M65 corridor Barrowford should be accorded equal status within the hierarchy as the proposed inclusions will dramatically increase the size and population of Barrowford substantially and the elevation would help Barrowford develop and prosper to its full potential.	The hierarchy of settlements is determined by considering a number of factors including the current levels of service provision, the size of the population and opportunities for growth. Barrowford has been identified as a Local Service Centre partly because both its population and service provision are significantly lower than that of the towns of Nelson and Colne. In the context of the M65 Corridor spatial area Barrowford plays a supporting role to the larger centres with some opportunities for growth which will serve a wider than local area. The vision for Pendle does not include a change in status for Barrowford. It is not considered to be an appropriate response to the development needs of the borough to radically expand the extent of Barrowford to a level similar to Nelson or Colne. Although the strategic housing site is within the Barrowford area, the location of the site is such that it provides for some of Nelson's needs in the wider context of the M65 Corridor.
							No change proposed in response to this comment.

Policy SDP2: The Role and Function of Our Towns and Villages

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818047			201					<p>2 Policy SDP2: Spatial Development Principles 2.1 Manthorpe welcomes the identification of Nelson, Colne and Barnoldswick as Key Service Centres. 2.2 Nelson, Colne and Barnoldswick are the most sustainable settlements for new development in the Borough and contain the greatest concentration of population, employment, services and facilities. They also have the best access to good quality public transport. This is confirmed by the Further Options Report (7.24) which says:- “ Key Service Centres provide the main facilities and services that are needed to support the local population and their surrounding rural hinterlands. The accessibility of these towns and the current level of services provide a good base for future development ”. 2.3 The present version of Policy SDP2 does not provide a clear framework for the Allocations DPD or decision-making on planning applications. In particular, it does not clearly specify the roles of each type of settlement in the settlement hierarchy. 2.4 Manthorpe considers that the first part of Policy SDP2 should make clear that most development will be concentrated in the identified Key Service Centres as the most sustainable settlements with the best access to jobs, public transport and high order facilities without the need to use the private car. Such an approach would be consistent with the National Planning Framework (NPPF) which says (30): “ Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport .” 2.5 The requirement of Policy SDP2 that development should be located within settlement boundaries should be deleted as it is inappropriate to a strategic policy of this type. The definition of settlement boundaries (if any) is a matter for the Allocations DPD rather than the Core Strategy. Additionally, the 2013 Strategic Housing Land Availability Assessment (2013 SHLAA) clearly shows that the immediate housing needs of Pendle cannot be met within existing settlement boundaries, as currently defined by the Adopted Local Plan. In these circumstances, Policy SDP2 would be found to be out-of-date on adoption (NPPF paragraph 49), which is manifestly an undesirable outcome. 2.6 The second part of the Policy setting out the sequential approach to the location of new development should be deleted as it is not in accordance with national policy. The NPPF does not contain a sequential approach. This has been confirmed by the Secretary of State in recent planning decisions (for example APP/U4230/A/11/2157433, Burgess Farm, Salford).</p>	<p>The Spatial Strategy sets out the key changes that will take place in the borough over the next 15 years and provides the basis for Policy SDP2 in terms of identifying the priorities for growth. It is acknowledged that the hierarchy levels could be expanded to give clearer guidance as to their future roles in the development of the borough. Policy ENV4 (Promoting Sustainable Travel) refers back to SDP2 in terms of the need to locate uses in a sustainable way by following the settlement hierarchy. Policy SDP2 and its justification text will be revised to give clarity to settlement roles and the priorities for growth. The aim of Policy SDP2 is to provide guidance on the location of new development, both for plan-making and decision taking. The reference to settlement boundaries is appropriate to this policy, firstly as a policy hook for the Local Plan Part 2: Site Allocations and Development Policies, and secondly as a Development Management tool for directing new development to sustainable locations. The policy indicates that the settlement boundaries will be reviewed in the Local Plan Part 2 to ensure development needs can be met. The policy states that development 'should' be located within a settlement boundary - this wording provides flexibility allowing development outside of settlement boundaries in certain circumstances. The reuse of previously developed land is an important aspect of sustainable development. The NPPF (paragraph 17 point 8 and paragraph 111) is clear that planning policies (and decisions) should encourage the effective use of land by re-using land that has been previously developed provided it is not of high environmental value. The site selection approach outlined in Policy SDP2 aims to promote the reuse of such land. However, it is acknowledged that the current wording of the policy could be improved to make it more clearly consistent with the NPPF.</p>
Manthorpe Developments (UK) Ltd									
818046									
Mr	Michael	Courcier							
Barton Willmore									

Amend the justification text of Policy SDP2 as follows: 1) Move paragraph 7.24 from the Strategy to the Context section and combine it with paragraph 7.18. 2) Add the following wording to the beginning of paragraph 7.26: "The settlement hierarchy provides the basis for the growth strategy in Pendle." 3) Combine paragraph 7.26 with paragraph 7.27 and add the following wording to the end: "The role each settlement category will play in the future growth of the borough is explained below: 1. Key Service Centres - these will provide the focus for future growth in the borough and accommodate the majority of new development. 2. Local Service Centres – these will play a

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Policy SDP2: The Role and Function of Our Towns and Villages

Person Details		Comment ID		Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
									supporting role to the Key Service Centres and accommodate levels of new development to serve a localised catchment. 3. Rural Service Centres – these settlements will provide the focus for growth in Rural Pendle. 4. Rural Villages – these settlements will accommodate development primarily to meet local needs." Amend Policy SDP2 as follows: Replace the list of settlements with four tables, one for each settlement category and include the relevant settlements under each category, differentiating between the three spatial areas. (Delete footnote 98 and part of 99 and insert the following wording into the policy after "Proposals for new development should be located within a settlement boundary as defined on the Proposals Map."): "These boundaries may be amended as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies where there is a need to identify additional sites to meet development needs." Replace the wording under the heading "Site Selection" with: "In order to encourage the effective use of land and other resources, the selection of sites for new development (including the allocation of sites in the Pendle Local Plan Part 2) should prioritise (in order) the use of the following types of land, provided they are not of high environmental value: Vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies."	

328012			228					2) Para. 7.20 / 7.29 - Site Selection The emphasis on the recycling of previously developed land has been greatly reduced from the previous draft of the Core Strategy. This will be very detrimental to both the natural environment (greater pressure to develop green field sites) and to the urban environment (derelict builds and land will be less likely to be redeveloped, so the urban decay will continue) especially as the nett number of dwellings to be provided during the plan period has increased by almost 30% from the previous draft (was 3,375 now 4,350 - policy LIV1). Para. 7.20 Question the soundness of this paragraph: It correctly highlights the importance of recycling previously developed land, but then cautions: "However, this has to be set against the prevailing market conditions for the provision of new housing. A balance needs to be struck between reusing previously developed land and promoting new development." It does not explain what is meant by "market conditions" which may lead to doubt and ambiguity when implementing the policy. It's always going to be cheaper to build on greenfield sites so urban decay sites will not be re-developed. Some defined policy needs to be drafted to encourage the development of previously developed land especially now the HMR projects have been largely abandoned. "Balance" implies two extremes or opposites, but new development CAN be promoted on previously developed land with the right polices in place. Para. 7.29		Paragraphs 7.20 and 7.29 reflect the NPPF which encourages the effective use of land by reusing land that has been previously developed. However, the NPPF does not preclude the use of greenfield sites and does not set targets for the reuse of previously developed land. Furthermore, the NPPF also requires that the full, objectively assessed housing needs of the borough are met. The evidence shows that for Pendle to meet its full needs some development on greenfield sites will be required. To add clarity to the plan the context section of Policy SDP2 will be amended to include a reference to the relevant part of the NPPF in relation to the use of previously developed land. The reference to 'prevailing market conditions' is made to reflect the fact that many brownfield sites are not currently viable due to the current economic circumstances, and in order to ensure new housing is delivered in a timely manner to meet the objectively assessed needs, there may have to be some greenfield release ahead of brownfield development. However, if market conditions improve, it is likely that brownfield sites will become viable again and more weight can be given to prioritising brownfield development. The National Planning Practice Guidance suggests that measures can be used to help improve the viability of brownfield sites. A reference will be made to potential	
Mr	Andrew	Ashworth									

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								<p>Question the soundness of this paragraph. It correctly sets out a sequential approach to development. But then appears to immediately contradict it by adding a disclaimer that actually there is no need to follow the sequential approach after all ("it is recognised that the release of some of these Greenfield sites may be necessary in advance of development on previously developed land.") This will give the green light to the big developers and their lawyers to be constantly hounding the council on every technicality of "sustainability" to have their green field sites developed in advance of nearby brown field sites. Greenfield sites will always be more "economically viable" than previously developed land. This will make the previously developed sites even less financially viable to redevelop than now, and will undermine the Strategy's principal policy of recycling a greater proportion previously developed land, making the Strategy's Target (page 51 - "Increase the amount of development... on previously developed land") very difficult to achieve.</p> <p>Remedy: Ideally, to delete the following text: “However, in order not to unduly restrict development, ensure that the levels of growth proposed in the Core Strategy can be achieved, and take account of current market conditions, it is recognised that the release of some of these Greenfield sites may be necessary in advance of development on previously developed land. This flexible approach will only be supported where such sites are shown to be economically viable and in a sustainable location. It is important to achieve a balance between the sustainable development of sites whilst not compromising development that may bring employment and housing opportunities to the borough.” But if it is thought necessary to maintain a “flexible approach”, instead modify the text as follows:- “This flexible approach will only be supported where there is a shortage of previous developed land in that Parish and such green field sites are shown to be economically viable and in a sustainable location.”</p>	<p>actions which can be taken to help improve brownfield site viability and therefore deliverability. The introduction of a stronger sequential approach would not be consistent with national policy and the intentions of the NPPF therefore the flexible approach of Policy SDP2 must be retained. The Core Strategy has to balance the sustainable development of the borough - this requires ensuring the needs of the population are met, that development sites are viable to deliver and the environment is protected from unnecessary harm.</p>
									<p>Make reference in the context section of Policy SDP2 to paragraphs 17 and 111 of the NPPF explaining that the reuse of previously developed land is encouraged. Make reference in the context section of Policy SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.</p>
328012	Mr	Andrew Ashworth	229					<p>3) Page 51 – Monitoring and Delivery – Targets. The second target from the previous draft Core Strategy, which has been dropped, should be reinstated and be even more positive and set a goal of “more than” or a “minimum of” “65% of new housing development should be built on previously developed land.” Surely, if circumstances permitted it, there should be no upper limit on the percentage of previously developed land which is recycled - in neighbouring Burnley, 87% of new dwellings were built on previously developed land between 2007 and 2010; this figure was 51% in Pendle for the same period. (http://www.lancashire.gov.uk/corporate/web/?siteid=6118&pageid=36804&e=e) 4) Absence of any mechanism for defining the settlement boundary. e.g. How close to existing developments? Which land uses should generally be included? etc.</p>	<p>The percentage figure quoted (from LCC data) for dwellings in Pendle developed on previously developed land is inconsistent with the records reported in Pendle's Authority's Monitoring Report (AMR). The figures in this report show that between 2007 and 2010 82% of the dwellings completed in Pendle were on previously developed land. The NPPF (paragraph 111) indicates that local planning authorities may continue to consider setting a locally appropriate target for the reuse of brownfield land, however, as with any target there must be evidence to justify the figure. The delivery rates on brownfield land in Pendle have been consistently high and show that land is being recycled. However, the number of available brownfield sites has declined in recent years. The SHLAA provides evidence of the amount of land potentially available for housing development and this can be categorised by land type. It shows that there is previously developed land which could accommodate approximately 2,400 dwellings. The step change in the proposed levels of growth for the borough means that the amount of available brownfield land will account for a smaller</p>

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Policy SDP2: The Role and Function of Our Towns and Villages

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							proportion of the development land required to meet the future needs of the borough. The evidence in the SHLAA shows the available brownfield sites represent only 40% of the total housing requirement. In addition, given the current viability issues with bringing previously developed land forward, it is unlikely a high target would be achievable. The broad target in Policy SDP2 to increase the amount of development on previously developed land still encourages the reuse of previously developed land and allows the Council to monitor progress and consider introducing a percentage target at a later stage. In terms of the method for defining settlement boundaries, this will be set out in the Pendle Local Plan Part 2: Site Allocations and Development Policies, as this is the stage when the existing settlement boundaries will be reviewed. The reference to settlement boundaries in the Core Strategy provides a policy 'hook' for the review process to be carried out in the Local Plan Part 2.
							No change proposed in response to this comment.

327623	232					2) Para. 7.20 / 7.29 - Site Selection The emphasis on the recycling of previously developed land has been greatly reduced from the previous draft of the Core Strategy. This will be very detrimental to both the natural environment (greater pressure to develop green field sites) and to the urban environment (derelict builds and land will be less likely to be redeveloped, so the urban decay will continue) especially as the nett number of dwellings to be provided during the plan period has increased by almost 30% from the previous draft (was 3,375 now 4,350 - policy LIV1). Para. 7.20 Question the soundness of this paragraph: It correctly highlights the importance of recycling previously developed land, but then cautions: "However, this has to be set against the prevailing market conditions for the provision of new housing. A balance needs to be struck between reusing previously developed land and promoting new development." It does not explain what is meant by "market conditions" which may lead to doubt and ambiguity when implementing the policy. It's always going to be cheaper to build on greenfield sites so urban decay sites will not be re-developed. Some defined policy needs to be drafted to encourage the development of previously developed land especially now the HMR projects have been largely abandoned. "Balance" implies two extremes or opposites, but new development CAN be promoted on previously developed land with the right polices in place. Para. 7.29 Question the soundness of this paragraph. It correctly sets out a sequential approach to development. But then appears to immediately contradict it by adding a disclaimer that actually there is no need to follow the sequential approach after all ("it is recognised that the release of some of these Greenfield sites may be necessary in advance of development on previously developed land.") This will give the green light to the big developers and their lawyers to be constantly hounding the council on every technicality of "sustainability" to have their green field sites developed in advance of nearby brown field sites. Greenfield sites will always be more "economically viable"	Paragraphs 7.20 and 7.29 reflect the NPPF which encourages the effective use of land by reusing land that has been previously developed. However, the NPPF does not preclude the use of greenfield sites and does not set targets for the reuse of previously developed land. Furthermore, the NPPF also requires that the full, objectively assessed housing needs of the borough are met. The evidence shows that for Pendle to meet its full needs some development on greenfield sites will be required. To add clarity to the plan the context section of Policy SDP2 will be amended to include a reference to the relevant part of the NPPF in relation to the use of previously developed land. The reference to 'prevailing market conditions' is made to reflect the fact that many brownfield sites are not currently viable due to the current economic circumstances, and in order to ensure new housing is delivered in a timely manner to meet the objectively assessed needs, there may have to be some greenfield release ahead of brownfield development. However, if market conditions improve, it is likely that brownfield sites will become viable again and more weight can be given to prioritising brownfield development. The National Planning Practice Guidance suggests that measures can be used to help improve the viability of brownfield sites. A reference will be made to potential actions which can be taken to help improve brownfield site viability and therefore deliverability. The introduction of a stronger sequential approach would not be consistent with national policy and the intentions of the NPPF therefore the flexible approach of Policy SDP2 must be retained. The Core Strategy has to balance the sustainable development of the borough - this requires ensuring the needs of the population are met, that development sites are viable to deliver and the environment is protected from unnecessary harm.
Dr.	John	Plackett					

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Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

than previously developed land. This will make the previously developed sites even less financially viable to redevelop than now, and will undermine the Strategy's principal policy of recycling a greater proportion previously developed land, making the Strategy's Target (page 51 - "Increase the amount of development... on previously developed land") very difficult to achieve.

Remedy: Ideally, to delete the following text: “However, in order not to unduly restrict development, ensure that the levels of growth proposed in the Core Strategy can be achieved, and take account of current market conditions, it is recognised that the release of some of these Greenfield sites may be necessary in advance of development on previously developed land. This flexible approach will only be supported where such sites are shown to be economically viable and in a sustainable location. It is important to achieve a balance between the sustainable development of sites whilst not compromising development that may bring employment and housing opportunities to the borough.” But if it is thought necessary to maintain a “flexible approach”, instead modify the text as follows:- “This flexible approach will only be supported where there is a shortage of previous developed land in that Parish and such green field sites are shown to be economically viable and in a sustainable location.”

Make reference in the context section of Policy SDP2 to paragraphs 17 and 111 of the NPPF explaining that the reuse of previously developed land is encouraged. Make reference in the context section of Policy SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.

327623

233

Dr.

John

Plckett

3) Page 51 – Monitoring and Delivery – Targets. The second target from the previous draft Core Strategy, which has been dropped, should be reinstated and be even more positive and set a goal of “more than” or a “minimum of” “65% of new housing development should be built on previously developed land.” Surely, if circumstances permitted it, there should be no upper limit on the percentage of previously developed land which is recycled - in neighbouring Burnley, 87% of new dwellings were built on previously developed land between 2007 and 2010; this figure was 51% in Pendle for the same period. (<http://www.lancashire.gov.uk/corporate/web/?siteid=6118&pageid=36804&e=e>) 4) Absence of any mechanism for defining the settlement boundary. e.g. How close to existing developments? Which land uses should generally be included? etc.

The percentage figure quoted (from LCC data) for dwellings in Pendle developed on previously developed land is inconsistent with the records reported in Pendle's Authority's Monitoring Report (AMR). The figures in this report show that between 2007 and 2010 82% of the dwellings completed in Pendle were on previously developed land. The NPPF (paragraph 111) indicates that local planning authorities may continue to consider setting a locally appropriate target for the reuse of brownfield land, however, as with any target there must be evidence to justify the figure. The delivery rates on brownfield land in Pendle have been consistently high and show that land is being recycled. However, the number of available brownfield sites has declined in recent years. The SHLAA provides evidence of the amount of land potentially available for housing development and this can be categorised by land type. It shows that there is previously developed land which could accommodate approximately 2,400 dwellings. The step change in the proposed levels of growth for the borough means that the amount of available brownfield land will account for a smaller proportion of the development land required to meet the future needs of the borough. The evidence in the SHLAA shows the available brownfield sites represent only 40% of the total housing requirement. In addition, given the current viability issues with bringing previously developed land forward, it is unlikely a high target would be achievable. The broad target in Policy SDP2 to increase the amount of development on previously developed land still encourages the reuse of previously developed land and allows the Council to monitor progress and consider introducing a percentage target at a later stage.

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378959		244					2) Para. 7.20 / 7.29 - Site Selection The emphasis on the recycling of previously developed land has been greatly reduced from the previous draft of the Core Strategy. This will be very detrimental to both the natural environment (greater pressure to develop green field sites) and to the urban environment (derelict builds and land will be less likely to be redeveloped, so the urban decay will continue) especially as the nett number of dwellings to be provided during the plan period has increased by almost 30% from the previous draft (was 3,375 now 4,350 - policy LIV1). Para. 7.20 Question the soundness of this paragraph: It correctly highlights the importance of recycling previously developed land, but then cautions: "However, this has to be set against the prevailing market conditions for the provision of new housing. A balance needs to be struck between reusing previously developed land and promoting new development." It does not explain what is meant by "market conditions" which may lead to doubt and ambiguity when implementing the policy. It's always going to be cheaper to build on greenfield sites so urban decay sites will not be re-developed. Some defined policy needs to be drafted to encourage the development of previously developed land especially now the HMR projects have been largely abandoned. "Balance" implies two extremes or opposites, but new development CAN be promoted on previously developed land with the right polices in place. Para. 7.29 Question the soundness of this paragraph. It correctly sets out a sequential approach to development. But then appears to immediately contradict it by adding a disclaimer that actually there is no need to follow the sequential approach after all ("it is recognised that the release of some of these Greenfield sites may be necessary in advance of development on previously developed land.") This will give the green light to the big developers and their lawyers to be constantly hounding the council on every technicality of "sustainability" to have their green field sites developed in advance of nearby brown field sites. Greenfield sites will always be more "economically viable" than previously developed land. This will make the previously developed sites even less financially viable to redevelop than now, and will undermine the Strategy's principal policy of recycling a greater proportion previously developed land, making the Strategy's Target (page 51 - "Increase the amount of development... on previously developed land") very difficult to achieve.	Paragraphs 7.20 and 7.29 reflect the NPPF which encourages the effective use of land by reusing land that has been previously developed. However, the NPPF does not preclude the use of greenfield sites and does not set targets for the reuse of previously developed land. Furthermore, the NPPF also requires that the full, objectively assessed housing needs of the borough are met. The evidence shows that for Pendle to meet its full needs some development on greenfield sites will be required. To add clarity to the plan the context section of Policy SDP2 will be amended to include a reference to the relevant part of the NPPF in relation to the use of previously developed land. The reference to 'prevailing market conditions' is made to reflect the fact that many brownfield sites are not currently viable due to the current economic circumstances, and in order to ensure new housing is delivered in a timely manner to meet the objectively assessed needs, there may have to be some greenfield release ahead of brownfield development. However, if market conditions improve, it is likely that brownfield sites will become viable again and more weight can be given to prioritising brownfield development. The National Planning Practice Guidance suggests that measures can be used to help improve the viability of brownfield sites. A reference will be made to potential actions which can be taken to help improve brownfield site viability and therefore deliverability. The introduction of a stronger sequential approach would not be consistent with national policy and the intentions of the NPPF therefore the flexible approach of Policy SDP2 must be retained. The Core Strategy has to balance the sustainable development of the borough - this requires ensuring the needs of the population are met, that development sites are viable to deliver and the environment is protected from unnecessary harm.
Mrs Alison Plackett							Remedy: Ideally, to delete the following text: “However, in order not to unduly restrict development, ensure that the levels of growth proposed in the Core Strategy can be achieved, and take account of current market	Make reference in the context section of Policy SDP2 to paragraphs 17 and 111 of the NPPF explaining that the reuse of previously developed land is encouraged. Make reference in the context section of Policy

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						conditions, it is recognised that the release of some of these Greenfield sites may be necessary in advance of development on previously developed land. This flexible approach will only be supported where such sites are shown to be economically viable and in a sustainable location. It is important to achieve a balance between the sustainable development of sites whilst not compromising development that may bring employment and housing opportunities to the borough.” But if it is thought necessary to maintain a “flexible approach”, instead modify the text as follows:- “This flexible approach will only be supported where there is a shortage of previous developed land in that Parish and such green field sites are shown to be economically viable and in a sustainable location.”	SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.

378959			245						
Mrs	Alison	Plckett							

3) Page 51 – Monitoring and Delivery – Targets. The second target from the previous draft Core Strategy, which has been dropped, should be reinstated and be even more positive and set a goal of “more than” or a “minimum of” “65% of new housing development should be built on previously developed land.” Surely, if circumstances permitted it, there should be no upper limit on the percentage of previously developed land which is recycled - in neighbouring Burnley, 87% of new dwellings were built on previously developed land between 2007 and 2010; this figure was 51% in Pendle for the same period. (<http://www.lancashire.gov.uk/corporate/web/?siteid=6118&pageid=36804&e=e>) 4) Absence of any mechanism for defining the settlement boundary. e.g. How close to existing developments? Which land uses should generally be included? etc.

The percentage figure quoted (from LCC data) for dwellings in Pendle developed on previously developed land is inconsistent with the records reported in Pendle's Authority's Monitoring Report (AMR). The figures in this report show that between 2007 and 2010 82% of the dwellings completed in Pendle were on previously developed land. The NPPF (paragraph 111) indicates that local planning authorities may continue to consider setting a locally appropriate target for the reuse of brownfield land, however, as with any target there must be evidence to justify the figure. The delivery rates on brownfield land in Pendle have been consistently high and show that land is being recycled. However, the number of available brownfield sites has declined in recent years. The SHLAA provides evidence of the amount of land potentially available for housing development and this can be categorised by land type. It shows that there is previously developed land which could accommodate approximately 2,400 dwellings. The step change in the proposed levels of growth for the borough means that the amount of available brownfield land will account for a smaller proportion of the development land required to meet the future needs of the borough. The evidence in the SHLAA shows the available brownfield sites represent only 40% of the total housing requirement. In addition, given the current viability issues with bringing previously developed land forward, it is unlikely a high target would be achievable. The broad target in Policy SDP2 to increase the amount of development on previously developed land still encourages the reuse of previously developed land and allows the Council to monitor progress and consider introducing a percentage target at a later stage. In terms of the method for defining settlement boundaries, this will be set out in the Pendle Local Plan Part 2: Site Allocations and Development Policies, as this is the stage when the existing settlement boundaries will be reviewed. The reference to settlement boundaries in the Core Strategy provides a policy 'hook' for the review process to be carried out in the Local Plan Part 2.

No change proposed in response to this comment.

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy SDP2: The Role and Function of Our Towns and Villages

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>327580</div> <div><div>Mr.</div><div>Owen G.</div><div>Oliver</div></div> <div>Lidgett & Beyond Group</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>	267					<p>Policy SDP2 Spatial Development Principles states that the scale of development that will be supported should be proportionate to the role and function of the settlement. It lists the Key Service Centres as Nelson (including Brierfield), Colne and Barnoldswick. Yet Policy SDP3 is inconsistent with that list in suggesting a housing distribution split between M65 Corridor/West Craven Towns/Rural Pendle of 70% / 18% / 12% referring to the recent SHMA advice.</p>	<p>The intention of Policy SDP3 is to show that the housing requirement should be distributed into the three spatial areas and that the settlement hierarchy applies to the distribution within each area. The distribution of housing is shown by spatial area to provide flexibility to the future allocation of sites and not to fix specific limits to each settlement. It is acknowledged that the wording of policy SDP3 could be clarified to explain that the housing requirement is distributed foremost by spatial area and then within each area the settlement hierarchy will apply. However, it should be noted that other representations to the consultation have seen an amendment to Policy SDP2 in relation to the allocation of the Strategic Housing Site. Consideration will also be given to amending Policy SDP2 to show more clearly the relationship between the settlement hierarchy and the spatial areas.</p> <p>Reword Policy SDP3 to read: " In order to achieve sustainable housing growth over the plan period, the location of new housing, including the allocation of sites in the Pendle Local Plan Part 2: Site Allocations and Development Policies, should be guided by the percentages in Table SDP3a. Within each spatial area, the provision of housing should follow the settlement hierarchy set out in Policy SDP2. The housing requirement figures are set out in Policy LIV1 and should be read in conjunction with this policy." Amend Policy SDP2 to clarify the relationship between the settlement hierarchy and the three spatial areas.</p>
<div>327580</div> <div><div>Mr.</div><div>Owen G.</div><div>Oliver</div></div> <div>Lidgett & Beyond Group</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>	269					<p>Paras 7.10 – 7.29 outline the roles that each of these spatial areas should fulfil and offers guidance on factors to consider when looking at future growth and development. L&B wishes to highlight that the Eastern side of Colne, despite being part of the Key Service Centre of Colne, shares many of the limitations of service provision, the infrastructure capacity and environmental constraints of the Rural Service Centre of Trawden and the Rural Village of Laneshawbridge. L&B wishes the Council to reclassify Favordale, Lidgett and Bents accordingly so that they can enjoy both the protection and investment/enhancement of Rural Pendle .</p>	<p>Favordale, Lidgett and Bents is an integral and contiguous part of the urban area of Colne. There is no natural separation between this area and the rest of Colne and therefore cannot be considered as a separate 'settlement' area in the hierarchy.</p> <p>No change proposed in response to this comment.</p>

Policy SDP2: The Role and Function of Our Towns and Villages

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327580			270					In considering the re-use of Brownfield land (para 7.20), the Core Strategy notes that this can help to: regenerate derelict sites and remediate land contaminated by previous uses; protect the environment by minimising the use of Greenfield sites for development provide a desirable and sustainable approach to accommodating future growth in the borough; as such sites are often located close to existing services and facilities; increase the likelihood of people choosing more sustainable modes of transport such as walking, cycling or public transport, thereby helping to reduce carbon emissions and the negative effects of climate change. L&B notes that the draft Core Strategy then caveats all of the above by stating that it has to be set against the prevailing market conditions for the provision of new housing. L&B expects the Council to proactively encourage development of Brownfield land .	The NPPF encourages the effective use of land by reusing land that has been previously developed. However, it does not preclude the use of greenfield sites. The NPPF also requires that the full, objectively assessed housing needs are met. If Pendle is to meet its full needs some greenfield development will be required. The reference to 'prevailing market conditions' is made to reflect the fact that many brownfield sites are not currently viable due to the current economic circumstances, and in order to ensure new housing is delivered in a timely manner to meet development needs, there may have to be some greenfield release. However, if market conditions improve, it is likely that brownfield sites will become viable again. The National Planning Practice Guidance suggests that measures can be used to help improve the viability of brownfield sites. A reference will be made to potential actions which can be taken to help improve brownfield site viability and therefore deliverability. The introduction of a strong sequential approach would not be consistent with national policy and the intentions of the NPPF. The Core Strategy has to balance the sustainable development of the borough - this requires ensuring the needs of the population are met, that development sites are viable to deliver and the environment is protected from unnecessary harm.
Mr.	Owen G.	Oliver							
Lidgett & Beyond Group									

Make reference in the context section of Policy SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.

327580			271					L&B welcomes the statements in para 7.28 regarding planning recognising "the intrinsic character and beauty of the countryside and contribute to conserving and enhancing the natural environment. As a consequence, development outside of a settlement boundary, as defined on the Proposals Map, will, in most cases, be restricted to help protect the open countryside and the landscapes within it." L&B notes the caveat yet again "that there will be situations where development in the open countryside may be necessary or appropriate." Specifically, L&B hopes that when "Policies in the Core Strategy and subsequent planning documents will set out the exceptions where development in the open countryside is considered to be acceptable" that these are clear and unambiguous. L&B wholly supports Policy SDP2 which states: "Proposals to develop outside of a defined settlement boundary (i.e. within the open countryside) will only be permitted for those exceptions identified in The Framework, or policies in a document that is part of the development plan for Pendle." Site Selection In order to ensure the best use of land and other resources, the location of new development will also be considered in accordance with the following sequential approach (in order of priority): Re-use of vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses. The allocation of land for development in the Pendle Local Plan Part 2: Site Allocations and Development Policies will follow the sequential	The exceptions for developing outside of the Settlement Boundaries will be set out in the Local Plan Part 2: Site Allocations and Development Policies and are likely to follow a similar approach to the current Local Plan Policy 1. However, it should be noted that as part of the Local Plan Part 2, the settlement boundaries will be reviewed and may be changed to include sites to meet the development needs outlined in the Core Strategy.
Mr.	Owen G.	Oliver							
Lidgett & Beyond Group									

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Policy SDP2: The Role and Function of Our Towns and Villages

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						approach and prefer land of lesser environmental value."	
							No change proposed in response to this comment.

715388	289					Settlement roles 3.7 Peel’s representations to the Publication Core Strategy questioned the settlement hierarchy set out in Policy SDP 1 insofar as this was based on the current role of settlements without regard to their potential/future role and their potential for sustainable growth. This resulted in a strategy which sought to maintain the existing status-quo irrespective of whether this represented the most sustainable approach to meeting the identified development and regeneration needs of the Borough. 3.8 It is accepted that Nelson, Colne and Barnoldswick are the largest towns in the Borough and provide sustainable development opportunities and economic growth potential. This particularly applies to their town centres and their residential and commercial hinterlands. It is correct that the Core Strategy promotes growth in these locations and provides a policy framework that will achieve this. Establishing a clear settlement hierarchy as set out in Policy SDP 2 is one way of achieving this. 3.9 Policy SDP 2 provides a development control tool which ensures that speculative development (i.e. on non-allocated sites) for which planning permission is sought is of a scale and type appropriate to the role and status of the host settlement. However, the policy has a further role in informing lower level policies, including site allocations, both within the Core Strategy and any subsequent Site Allocations Development Plan Document. 3.10 It is noted that whilst Policy SDP 2 refers to Key Service Centres and Rural Service Centres, it is clear from the wording of the policy that its’ application is not limited to retail and town centre uses; the hierarchy set out dictates the level of priority given to the identified settlements for all forms of development, including housing and employment uses. 3.11 In view of this, and as with the overall spatial strategy, it is critical that the settlement hierarchy is consistent with the distribution of proposed allocated sites in order to achieve a sound plan. It is noted that Barrowford is defined as a Local Service Centre within the settlement hierarchy. Given its location within the M65 Corridor and the amount and type of development Barrowford will accommodate through the development of the strategic housing site at Trough Laithe Farm and the delivery of Riverside Business Park, Peel would question whether this accurately reflects Barrowford’s role over the plan period and the role it will be performing by the end of the plan period. 3.12 In this regard, it is noted that Barrowford is positioned alongside Earby, a West Craven Town which does not contain any proposed Strategic Allocations, in the settlement hierarchy. It is clear that Barrowford and Earby will perform very different roles over the plan period. 3.13 At this stage, Peel would wish to highlight the importance of ensuring that the spatial strategy and settlement hierarchy supports the proposed strategic allocations in the Core Strategy in order to achieve a sound plan. Going forward, the Council will therefore need to satisfy itself that the settlement hierarchy and distribution of allocations are consistent and that this position is fully justified. Site selection 3.14 Whilst seeking to maximise the use of previously developed
Ms Louise Morrissey						
Peel Holdings (Land & Property) Ltd						
714921						
Ms Anna Noble						
Turley Associates						

Barrowford's position in the settlement hierarchy reflects the level of service provision and its population size. The allocation of the Strategic Housing Site at Trough Laithe serves a wider purpose than meeting the housing needs of Barrowford. Its geographical location and access to Nelson (town centre) mean that it is technically as well linked to Nelson as Barrowford and will provide housing for the wider M65 Corridor area. The Sustainable Settlements Study shows that Barrowford and Earby share many of the same characteristics in terms of the provision of services and facilities. The population of Barrowford is slightly higher than Earby but of a similar magnitude. In recommending the settlement hierarchy the Sustainable Settlements Study considered the opportunities for growth in each settlement through a review of the available development sites. Barrowford and Earby have been defined as Local Service Centres in the Settlement Hierarchy as this reflects their status as supporting settlements to the three Key Service Centres. The Key Service Centres are clearly distinguishable from the Local Service Centres in terms of service and infrastructure provision and population size. The most appropriate way to achieve sustainable growth in Pendle is to maintain this hierarchy. However, for the avoidance of doubt in relation to the allocation of strategic sites and the position of settlements in the hierarchy the wording of Policy SDP2 will be amended to reflect that new development proposals will be supported where they are of a nature and scale proportionate to the role and function of the settlement in which they are located or where they have been specifically identified in the Core Strategy to help meet the strategic growth needs of the borough. In response to this and other comments made to the Further Options consultation it is recommended that the wording of the 'Site Selection' part of the policy be amended to increase the flexibility of the policy and ensure consistency with the NPPF. It is not considered necessary to make specific reference to the strategic housing site in Policy SDP2 with regards to the application of the site selection part of the policy. The proposed amendments to the beginning of the policy are sufficient to acknowledge that development proposals on the strategic site allocations are considered separately to other development proposals.

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Policy SDP2: The Role and Function of Our Towns and Villages

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						land would not be at odds with NPPF as a matter of principle, the Core Strategy should not seek to impose a rigid sequential approach to the release of sites. This could frustrate the delivery of housing over the plan period and particularly during the first five early years of the plan given the stated role of the Strategic Allocation at Trough Laithe Farm (a green field site) in ensuring early delivery of housing. For this reason, the plan should make it clear that any sequential approach does not apply to Trough Laithe Farm.	Amend the wording of the first sentence of Policy SDP2 to read: "Proposals for development will be supported in the settlements listed below, provided that they are of a nature and scale that is proportionate to the role and function of that settlement or where they have been specifically identified in this plan to help meet the strategic growth needs of the borough. " Replace the wording under the heading "Site Selection" with: "In order to encourage the effective use of land and other resources, the selection of sites for new development (including the allocation of sites in the Pendle Local Plan Part 2) should prioritise (in order) the use of the following types of land, provided they are not of high environmental value: Vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies."

Policy SDP3: Housing Distribution

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>618788</div> <div><div>Mr</div><div>Richard</div><div>Clark</div></div> <div>Arrowsmith Associates</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>			10				<div>We write on behalf of Mr Greenwood of Bromley Park Farm, Blacko in response to the current consultation that is taking place into the core strategy further options report and the strategic housing land availability assessment 2013. Mr Greenwood is the owner of the site identified by the Council in the SHLAA as SO93, located on Gisburn Road, Blacko. Our client supports the objectives of the core strategy in proposing the allocation of an appropriate amount of housing in the ‘rural villages’ which include Blacko. We assume that inclusion on the ‘rural villages’ list will result in housing allocations being made in the future at Blacko.</div>	<div>The Core Strategy sets out the amount and distribution of new housing in the borough. This includes the provision of some new housing in rural villages to meet the needs of the local population. The Pendle Local Plan Part 2: Site Allocations and Development Policies will look to allocate appropriate sites in each settlement to meet such needs, in accordance with the distribution policies in the Core Strategy. The Pendle Local Plan Part 2 will use the evidence base, including the Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites for allocation.</div> <div>No change proposed in response to this comment.</div>	
<div>816745</div> <div><div>Miss</div><div>Victoria</div><div>Thorp</div></div> <div>Barley Parish Council</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>			26				<div>Policy SDP 3 (p53) This Policy states that the allocation of housing sites in Rural Pendle should be 12%; this is a 2% increase from the figure recommended in the Burnley & Pendle SHMA. This appears to have been an exhaustive study and there appears to be no rationale for deviating from its recommendation in this instance. Market attractiveness and financial viability cannot be a justification for this increase as it is clearly counter-productive: the more the rural villages are built on, the less attractive they become. Any increase in housing sites around Barley is also at odds with Policy ENV 1 which aims to 'protect and enhance the natural beauty of the AONB'. Barley Parish Council has previously submitted objections to the figure of 10% housing distribution in Rural Pendle and an increase to 12% is unacceptable.</div>	<div>The variation of the housing distribution in Policy SDP3 from that reported in the Burnley & Pendle SHMA reflects the distribution of housing land, as recorded in the current Strategic Housing Land Availability Assessment (SHLAA). The increase is not at odds with Policy ENV1 as suggested. The proposed distribution, as noted above, has been informed by the SHLAA which highlights limited opportunities for new housing development in Barley and the AONB.</div> <div>No change proposed in response to this comment.</div>	
<div>713082</div> <div><div>Mr</div><div>G</div><div>Wilkinson</div></div> <div>Dalesview Developments Ltd</div> <div>713089</div> <div><div>Mr</div><div>Andrew</div><div>Rollinson</div></div> <div>Rollinson Planning Consultancy Ltd</div>			40	Yes	No		<div>It is not effective.</div>	<div>3.1 It is refreshing that the Further Options Report acknowledges that some tensions may arise in the delivery of Borough's strategic objectives. As before however, we believe that greater justification needs to be provided for the proportioning of the overall housing across the settlements. 3.2 We continue to have concerns about the application of percentage totals by Spatial Area and are still of the view that these figures should be expressed as a range and that use of the phrase Site Allocations and Development Policies should adhere (our emphasis) to this distribution is unhelpful. It does not provide necessary flexibility. The National Planning Policy Framework (NPPF) attaches significant weight to the need to boost significantly the supply of housing and seeks choice and competition in the market for land. 3.3 Strict adherence to the percentage set out within proposed Policy SDP3 will not aid the provision of choice and competition in the land market and may prevent the delivery of suitable housing sites in sustainable locations and in areas which are attractive to the market. 3.4 Without flexibility we have serious reservations that the Borough's housing requirements will not be met and fear that some</div>	<div>Policy SDP3 was changed following the Publication consultation to distribute housing by Spatial Area rather than individual settlement. This was to provide flexibility to the location of new housing giving more opportunity for a range of sites to come forward in viable and sustainable locations. The proposed distribution presents a sustainable approach to the growth of the borough. The policy is clear that these percentages are to guide the location of new housing development and it is not considered necessary to provide these figures as a range. However, it is acknowledged that the policy could be clarified in relation to the flexibility of allocating sites in the Pendle Local Plan Part 2: Site Allocations and Development Policies.</div>

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Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy SDP3: Housing Distribution

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

sustainable settlements will fail to fulfil their roles and realise their potential.

Reword the policy to clarify the flexibility of the housing distribution: "In order to achieve sustainable housing growth over the plan period, the location of new housing, including the allocation of sites in the Pendle Local Plan Part 2: Site Allocations and Development Policies, should be guided by the percentages in Table SDP3a. Within each spatial area, the provision of housing should follow the settlement hierarchy set out in Policy SDP2. The housing requirement figures are set out in Policy LIV1 and should be read in conjunction with this policy."

714054

Trustees Green Emmott Trust

817541

Ms Jane Dickman

Dickman Associates Ltd

49

No

Policy SDP3 - still refers to SDP1 (as per Reg 22 version) and the settlement hierarchy this should now say SDP2 (current version). It is unclear if the percentages used in SDP3 take account of the under delivery of housing since 2008. We are still concerned that the policy focus is the sequential approach to sites is paramount not a presumption in favour of sustainable development so our concerns are as stated under SDP2 in this regard. Unsound.

Reference to Policy SDP1 will be changed to Policy SDP2. The housing distribution percentages have been determined by looking at a number of factors including past delivery rates and the location of potential sites for future housing development. The under delivery of housing has been accounted for in the housing requirement figures (see Policy LIV1). The policy is clear that the percentages should be used as a guide to help direct housing to the most sustainable locations. The requirement to follow the settlement hierarchy is intended to help further direct the location of new housing within each spatial area. One of the purposes of the settlement hierarchy is to identify the most sustainable settlements and therefore help to show where new development can be sustainably located. This approach does not conflict with the presumption in favour of sustainable development. However, it is acknowledged that the policy wording could be clarified in terms of how the locational approach of the settlement hierarchy is applied within the spatial areas used in the housing distribution.

Change the reference to Policy SDP1 to Policy SDP2. Reword the policy to read: "In order to achieve sustainable housing growth over the plan period, the location of new housing, including the allocation of sites in the Pendle Local Plan Part 2: Site Allocations and Development Policies, should be guided by the percentages in Table SDP3a. Within each spatial area, the provision of housing should follow the settlement hierarchy set out in Policy SDP2. The housing requirement figures are set out in Policy LIV1 and should be read in conjunction with this policy."

Policy SDP3: Housing Distribution

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327994			141					HOUSING DISTRIBUTION 7.31 The Burnley and Pendle SHMA looks at a number of the quantitative factors outlined above and presents a recommended spatial distribution for new housing development for the three spatial areas. Specifically for each area it looks at the current population and household distribution, past housing delivery rates, current housing land supply and the current affordable housing need. It suggests on a quantitative basis that 70% of new housing should be located in the M65 Corridor, 20% in the West Craven Towns and 10% in Rural Pendle. Policy SDP 3 7.34 The market attractiveness and financial viability of sites varies across the borough and this may have an impact on where new housing can be delivered. The Development Viability Study broadly indicates that the delivery of new housing is likely to be most viable in the West Craven Towns and Rural Pendle . However, there may be environmental issues that challenge the delivery of sites in these locations. Striking the right balance between these factors will ensure that new housing is distributed to the most sustainable locations.	<p>This comment reiterates specific points of the policy, emphasising that the viability of sites may effect where housing can be delivered. This comment is made in relation to the request for a site in Salterforth to be allocated for development. Policy SDP3 allows for a proportion of new housing to be developed in the rural villages to meet local needs. It will be for the Pendle Local Plan Part 2: Site Allocations and Development Policies to consider the potential sites for future allocation.</p>
Mr	Robert	Whiteoak							
No change proposed in response to this comment.									

755915			147					Policy SDP 3: Housing Distribution Whilst this policy identifies a percentage distribution between the three spatial areas the Core Strategy lacks any clarity upon how much development each of the named settlements identified in policy SDP2 is expected to accommodate. The concerns raised against policy SDP2 are therefore equally appropriate to this policy. It is noted that in policy SDP4, relating to employment provision, the Council has sought to indicate the relative percentages of development to be attributed to settlements. It is unclear why the same cannot be applied to the housing distribution. Policy SDP3 does, however, indicate that the majority (70%) of the proposed housing development will be accommodated within the M65 corridor spatial area. The HBF is concerned that such a reliance upon this spatial area may render the plan undeliverable. Paragraph 6.9 of the DVS identifies that; ‘It is clear that most non-residential development across Pendle and residential development in the parts of the M65 Corridor (excluding the north of this area) is not viable in the current market’. Given that the plan needs to begin delivering housing from the date of its adoption, and needs to address the built up backlog, the impact on viability of current market conditions must be a factor in the Council’s planning of the area.	Policy SDP3 was changed following the Publication consultation to distribute housing by Spatial Area rather than individual settlement. This was to provide flexibility to the location of new housing, giving more opportunity for a range of sites to come forward in viable and sustainable locations. The proposed distribution presents a sustainable approach to the growth of the borough. Indeed, it is proposed to amend Policy SDP4 to provide the employment distribution on a spatial area basis only, thereby giving additional flexibility to the location of new employment land, albeit still within the context of the sustainable growth of settlements within each spatial area. The Core Strategy has to balance the distribution of development in a sustainable way. The evidence base shows that the housing need is within the M65 Corridor. Furthermore the M65 Corridor represents the most sustainable location for growth given the level of services, facilities and accessibility. The Spatial Strategy is clear that this area presents the best option for future growth. It is acknowledged that there are some viability issues for sites within the inner urban areas, but there are sites within the M65 Corridor which are viable and can be delivered in the short term. Furthermore, there are sites that will become viable in the future and present the most sustainable option for delivery. It is not sustainable to distribute a much greater proportion of housing to the West Craven Towns or Rural Areas. However, it should be noted that the policy is clear that the percentage distribution should be used as a guide and this provides flexibility for a change in the distribution should the deliverability of development within the M65 Corridor become a significant problem. The policies in the plan have been assessed to determine any potential impacts on the viability of sites in each spatial area. In response to this work the policies in the plan have been developed to ensure that sites
Mr	Matthew	Good							
Home Builders Federation Ltd									

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Policy SDP3: Housing Distribution

Person Details		Comment ID	Q1	Q2a	Q2b		Q3	Consultee comments		Officer Response and Recommendation
									Recommendation It is recommended that sites outside of the M65 corridor, which represent viable locations within the current market, are given greater consideration and potentially provide a greater share of the housing requirement. Any sites within the M65 corridor should not be subject to any additional burdens upon development. This will provide greater opportunities for the plan to deliver against its requirements.	within areas of poor economic viability are not subject to requirements which would threaten their deliverability.
										No change proposed in response to this comment.

818047	202				3 Policy SDP3: Housing Distribution 3.1 This Policy adds little to the overall strategy. The table should be transferred to one of the policies in the housing section such as LIV1. For the M65 Corridor, it should distinguish between the Key Service Centres and other centres in line with Policy SDP2. 3.2 The proportion of housing development being allocated to the M65 Corridor should be increased. The 70% guide figure simply reflects the proportion of Pendle’s population in this area. It does not address the policy objective that development should be directed towards the most sustainable settlements in the Borough which are the Key Service Centres in the M65 Corridor.	The policy is clear that the percentages should be used as a guide to help direct housing to the most sustainable locations. The percentages are provided by Spatial Area rather than individual settlement to give a more flexible approach to the location of new housing. Therefore, allowing a range of sites to come forward in viable and sustainable locations. Policy SPD3 makes reference to Policy SDP2 and the settlement hierarchy, thereby directing development to the most sustainable locations within the spatial areas, albeit with some flexibility to ensure delivery of the plan. The housing distribution percentages have been determined by looking at a number of factors including past delivery rates, the location of potential sites for future housing development and the current affordable housing need. The figures are not solely based on the current population distribution. The policy aims to distribute new housing in a balanced way, reflecting the sustainability credentials of the M65 Corridor but also acknowledging the need for some housing provision in the West Craven Towns and Rural Areas.
<div>Manthorpe Developments (UK) Ltd</div> <div>818046</div> <div>MrMichaelCourcier</div> <div>Barton Willmore</div>						No change proposed in response to this comment.

327580	268				The SHMA states that housing delivery will be challenging in certain sub-market areas, in which case a re-distribution of the figures may be required. Table 10.11 in the SHMA lists the market demand for the Pendle housing market sub-areas, and Table 10.8 past housing delivery rates. Both are in direct contrast to the distribution suggested in SDP3. L&B recommends that SDP3 distribution be reviewed, and a further search for sites be undertaken outside the M65 corridor .	The Core Strategy has to balance the distribution of development in a sustainable way. The evidence base shows that the housing need is within the M65 Corridor. Furthermore the M65 Corridor represents the most sustainable location for growth given the level of services, facilities and accessibility. The Spatial Strategy is clear that this area presents the best option for future growth. It is acknowledged that there are some viability issues for sites within the inner urban areas, but there are sites within the M65 Corridor which are viable and can deliver in the short term. It is not sustainable to distribute a much greater proportion of housing to the West Craven Towns or Rural Areas. However, it should be noted that the policy is clear that the percentage distribution should be used as a guide and this provides flexibility for a change in the distribution should the deliverability of development within the M65 Corridor become a significant problem.
<div>Mr.Owen G.Oliver</div> <div>Lidgett & Beyond Group</div> <div></div> <div></div> <div></div>						No change proposed in response to this comment.

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy SDP3: Housing Distribution

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>715388</div> <div><div>Ms</div><div>Louise</div><div>Morrissey</div></div> <div>Peel Holdings (Land & Property) Ltd</div> <div>714921</div> <div><div>Ms</div><div>Anna</div><div>Noble</div></div> <div>Turley Associates</div>		290					<div>Policy SDP 3: Housing Distribution 3.15 Peel supports the proposal to identify the distribution of housing across the Borough based on spatial area only rather than by spatial area and settlement as set out in Policy SDP 2 of the Publication Core Strategy. This change provides for greater flexibility in the distribution of housing across the settlements. This provides certainty that the Core Strategy is able to deliver sufficient housing over the plan period whilst retaining an adequate level of control over its spatial distribution across the Borough. 3.16 Notwithstanding the above, whilst fully supporting the priority given to the M65 Corridor Spatial Area for housing growth, Peel would question whether the proposal for West Craven Towns and Rural Pendle to provide 30% (1,305 units) of the total housing requirement over the plan period is deliverable. 3.17 It is noted that the 2013 Pendle Strategic Housing Land Availability Assessment identifies developable sites in the West Craven Towns and Rural Pendle which are capable of delivering 913 units (21% of the strategic requirement over the plan period). 3.18 As such, based on the available evidence, it is not clear whether the proposed spatial distribution of housing is achievable. In order to rectify this and ensure a more deliverable distribution of housing growth, a more appropriate distribution of the strategic housing requirement for the Borough may be as follows: M65 Corridor – 75% West Craven Towns – 15% Rural Pendle – 10%</div>	<div>The Strategic Housing Land Availability Assessment (SHLAA) shows that there is land available in the West Craven Towns to provide 1,126 dwellings and in the Rural Areas to provide 987 dwellings. It is considered that there are sufficient sites within these two spatial areas to deliver the housing requirement based on the current distribution as set out in Policy SDP3. The policy is clear that the percentages should be used as a guide to help direct housing to the most sustainable locations. This provides flexibility for a change in the distribution to meet additional needs and demands.</div>
								<div>No change proposed in response to this comment.</div>
<div>844180</div> <div><div>Ms</div><div>Elinor</div><div>George</div></div> <div>Persimmon Homes Lancashire</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>		330					<div>2.0 Policy SDP3: Housing Distribution (pg 52 and 53) The policy named above recommends the distribution of development be heavily weighted toward the M65 corridor at 70% of the overall housing target. Persimmon Homes accepts that this is the most sustainable location for development given its good transport links and urban nature. However, there are concerns regarding the deliverability of sites within this location, this is corroborated by paragraph 6.9 of the Council’s Development Viability Study: ‘It is clear that most non-residential developments across Pendle and residential development in parts of the M65 corridor (excluding the north of this area) is not viable in the current market’ Further detail should be provided to explain how 70% of all residential development can be made deliverable within the M65 corridor. Without this justification there would be concerns regarding the soundness of the Core Strategy and the authority’s ability to deliver the required housing numbers. This concern is strengthened by recent delivery rates within Pendle and its surrounding authorities.</div>	<div>The distribution of housing is concentrated in the M65 Corridor for a number of reasons including: i) the borough’s population is concentrated in this area; ii) the SHMA indicates that the majority of housing need is in this area; iii) the services, facilities and infrastructure to support population and development growth is already established in this area; iv) this area has a large proportion of land which is available for development. Based on these factors it is considered that the most sustainable approach is to locate the majority of new housing growth in this area. With regard to the delivery of this amount of housing in the M65 Corridor - the Development Viability Study indicates that sites in the northern fringe of the M65 Corridor, around Colne and Barrowford are potentially viable. The SHLAA has identified a number of sites in these areas with significant capacity which could be developed in the short, medium and long term. In addition there are a number of sites in the urban areas of the M65 Corridor which may come forward later in the plan period when viability improves. This range of sites provides a number of options for the delivery of the housing requirement over the plan period. There is sufficient capacity on these sites to provide the 70% requirement set out in Policy SDP3.</div>
								<div>No change proposed in response to this comment.</div>

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy SDP3: Housing Distribution

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
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Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy SDP4: Employment Distribution

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
713082			41	Yes	No	It is not effective.	Yes	3.5 For the same reasons set out above, we have concerns about Policy SDP4 and the allocation of percentages of employment land to individual settlements (e.g. 55% of the new employment land is to be provided in Earby) will not provide necessary flexibility.	It is agreed that employment land allocations by settlement do not provide sufficient flexibility and may serve to artificially restrict future delivery. This is particularly true within the M65 Corridor spatial area, where there is little separation between the four adjacent settlements and provision in a suitable location can be reasonably expected to adequately serve the wider catchment.
713089									To help improve flexibility and make the wording of the policy more compatible with its ‘sister policy’ SDP3; two changes are proposed. (1) Reword the first two paragraphs of the policy to be consistent with Policy SDP3. (2) Amend the table within the policy by removing the second and third columns.

Policy SDP5: Retail Distribution

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327935			155					Policy SDP5 (Retail Distribution) Sainsbury's supports the aims of Policy SDP5 which seeks to locate major retail development within the three Town Centres of Nelson, Colne and Barnoldwick. However, the policy should clarify that there remains identified capacity for additional convenience retail floorspace in the north of the Borough. Allowance for the provision of such floorspace should be made within Policy SDP4 (5?), with specific site(s) to be considered for allocation within the future Site Allocations DPD.	Policy SDP5 sets out the retail hierarchy and explains that the provision of new retail development should be in scale with the position the settlement holds in the hierarchy. In terms of the quantum of retail development required, this is dealt with in Policy WRK4 (Retailing and Town Centres) and explains that the retail capacity study provides the evidence for future retail needs. Policy WRK4 states that there is limited additional capacity identified for convenience retail up to 2023.
Sainsbury's									
817889									
Mr	George	Wilyman							
Turley Associates									
								Expand the policy o made specific reference to identified capacity for additional convenience retail floorspace in the north of the Borough.	No change proposed in response to this comment.

Policy SDP6: Future Infrastructure Requirements

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>327713</div> <div><div></div><div></div><div></div></div> <div>Royal Mail Group plc</div> <div>815690</div> <div>MrAndrewTeage</div> <div>DTZ</div>			123				Background Royal Mail, formerly Consignia plc, is the successor to the former statutory corporation, The Post Office. Royal Mail is a publically listed company. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal functions through the Royal Mail letterpost delivery and collections services, handling letters, postal packets and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide, which is a parcels carrier. Post Office Limited (a "sister" company to Royal Mail) operates the national network of post offices and sub post offices. The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 and Royal Mail now operates in a highly competitive market place. As such, it is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has, and continues to change and Royal Mail’s real estate needs to respond accordingly. Royal Mail Properties Our clients are keen to be involved in the development plan preparation process and to review land use and development proposals where they might affect their property and land interests or where they may have an impact upon service delivery. Royal Mail has a statutory duty to provide efficient mail sorting and delivery for Pendle Borough Council’s administrative area. Royal Mail’s collection and delivery service for this area is provided from the following properties: Pendle Delivery Office, Stanworth Road, Nelson, BB9 7DS Barnoldswick Delivery Office, Unit 2 Ravenscroft Way, Barnoldswick, BB18 6ZZ	Comments noted.	
									No change proposed in response to this comment.

<div>327713</div> <div><div></div><div></div><div></div></div> <div>Royal Mail Group plc</div> <div>815690</div> <div>MrAndrewTeage</div> <div>DTZ</div>			125				Policy SDP6 Future Infrastructure Requirements It is noted that the intentions of Policy SDP6 are to ensure that appropriate and necessary infrastructure is provided to support development proposals and that future developments contribute to resolving any pressures they may generate. In this context, and as a statutory provider, Royal Mail may seek the allocation of a site for a new Delivery Office or developer contribution towards its provision through Section 106 of the Town & Country Planning Act and/or Community Infrastructure Levy (CIL) as a valid recipient of infrastructure funds should the requirements of housing growth make this necessary. The circumstances that would bring such a scenario into consideration is where the scale of this proposed growth (with reference to the LIV policies) would place a significant burden on existing Delivery Offices in handling additional deliveries as a result of significant increases in new homes. Royal Mail would therefore welcome engagement with Pendle Borough Council around their growth aspirations and objectives and any subsequent medium to long term infrastructure requirements. It is noted that such dialogue is welcomed by the Council and has been undertaken with key utility and service providers within the Borough as part of the plan making process.	Comments noted.
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Policy SDP6: Future Infrastructure Requirements

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>327620</div> <div><div></div><div></div><div></div></div> <div>Sport England North West</div> <div><div></div><div></div><div></div></div> <div></div>	136	Yes	No		Yes	<p>It is noted that the reasoned justification refers to Social and Green infrastructure which includes indoor and outdoor sports facilities for community sport and recreation. However, there is no up to date needs assessment in place to identify what the current needs are and what the impact of new housing in the area will be on the need for new or improved sports infrastructure. Paragraph 73 of NPPF requires an up to date assessment of need to identify needs and opportunities for facilities that include sports. The Open Space Audit referred to dates back to 2008 and the baseline information is out of date. No assessment of demand and supply was provided it was purely an audit of what is currently available. No assessment of the impact of new housing was taken into consideration in determining what the future needs and opportunities are for open space including sports facilities. The council are about to begin a Playing Pitch Strategy (PPS) which will include a site specific action plan that will help address any deficiencies and in pitch provision. Sport England has been asked to assist with the preparation of the PPS. Sport England considers this policy to be contrary to paragraph 73 of NPPF</p> <p>The Council should provide a robust Needs Assessment in accordance with paragraph 73 of NPPF. This should include all open space typologies. Please be aware there is a separate methodology for indoor and outdoor sports facilities because of the different role and function of sport to any other open space typology. For pitch provision this is a step by step guide adopted October 2013, and for sports facilities this is the emerging Assessing Needs and Opportunities Guidance. Both guidance will be linked from the NPPF section of the DCLG website to Sport England’s website in the near future. In the interim the guidance can be found at: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p>	<p>No change to the Core Strategy is required, but it is recommended that a reference to the potential need for a new delivery office is included in the accompanying Pendle Infrastructure Strategy. Should sound evidence for such a requirement become available, an allocation will be made within Local Plan (Part 2): Site Allocations and Development Policies document.</p> <p>Pendle Council has commenced work to update the Open Space Audit (Pendle Council, 2008). This will form part of a wider Green Infrastructure (GI) Strategy, which will also include an assessment of the needs assessment for sports and leisure provision, including the Joint Playing Pitch Strategy highlighted within the representation. The GI Strategy will assess existing and projected demand to highlight where there may be a surplus, a qualitative or a quantitative deficiency in supply. The new GI Strategy will be adopted before the Preferred Options Report for Pendle Local Plan (Part 2): Site Allocations and Development Policies is made available for public consultation in 2015. Any new information will be included within Appendix A of the Core Strategy prior to Publication, or identified as a suggested amendment in the Schedule of Proposed Changes submitted to the Inspector following Submission. It is considered that by the time the Core Strategy is adopted, sufficient progress will have been made on the GI Strategy to inform relevant policies within the Core Strategy.</p> <p>No change proposed in response to this comment.</p>

Policy SDP6: Future Infrastructure Requirements

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
755915			148					<p>Policy SDP 6: Future Infrastructure Requirements The policy indicates that the Council will work with partners to deliver the infrastructure required within the borough. However, without the foresight of a strategic policy which clearly sets out where and how much development is likely to take place, this is likely to be an impossible task. This lack of a strategic policy identifying the location and quantum of development is probably the reasoning behind the policy delegating the identification of the Council's approach to obtaining such funding or provision from developers, including the priority of competing requirements to part 2 of the Local Plan (Site Allocations and Development Policies document). In conformity with our comments on policies SDP2 and SDP3 such an approach will not provide a framework for the proper planning of the area and will leave considerable uncertainty for developers and residents alike until the adoption of the second local plan document at some unspecified point in the future.</p> <p>Recommendation The core strategy provide a strategic context for the location of development setting out where and how much development is likely to take place. This would enable the Council to identify any infrastructure implications and consider how this can be delivered within current market conditions.</p>	<p>The comments state that the Core Strategy does not have a strategic policy setting out where and how much development is likely to take place. These matters are addressed under a number of policies as highlighted below: Location: SDP2 (Principles), SDP3 (Housing), SDP4 (Employment), SDP5 (Retail), LIV2 and WRK3 (Strategic Sites) Quantum: LIV1 (Housing) WRK 2 (Employment)</p> <p>No change proposed in response to this comment.</p>
327387			182	No	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.	Yes	<p>Paragraph 7.57 states that “ New development needs new infrastructure and facilities. Where viable, planning should help to orchestrate the delivery of the social, physical and green infrastructure necessary to support the delivery of sustainable development and communities.” However, it isn’t clear that the green infrastructure requirements need to conserve and enhance the ecological network in order to meet the environmental role of sustainable development as defined in paragraph 7 of the National Planning Policy Framework.</p> <p>Clarify that the green infrastructure requirements need to conserve and enhance the ecological network within or outside of the curtilage of new development.</p> <p>This is consistent with the definition of sustainable development in paragraph 7 of the National Planning Policy Framework and the policies outlined in paragraphs 109, 117 and 118 of the Framework.</p>	<p>The comment is not relevant at this point in the document and is properly addressed in Policy ENV1 (paragraph 8.34).</p> <p>No change proposed in response to this comment.</p>

Policy SDP6: Future Infrastructure Requirements

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818047			203					4 Policy SDP6: Future Infrastructure Requirements 4.1 In the absence of an adopted CIL scheme, the Policy should make clear that contributions for off-site infrastructure and services will only be required where they meet all the tests set out in paragraph 204 of the NPPF. These tests are that obligations must be:- necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. 4.2 The implication of Policy SDP6 (and especially paragraph 7.66) is that contributions may be sought where these NPPF tests are not fully satisfied by a particular development.	Agree that wording could be taken to imply that S106 contributions may be sought in circumstances where the NPPF makes it clear they should no longer apply.
Manthorpe Developments (UK) Ltd									
818046									
Mr	Michael	Courcier							
Barton Willmore									
									Include a footnote linked to paragraph 7.66 stating that: " S106 contributions towards the provision of off-site infrastructure and services will only be required where they meet the tests set-out in paragraph 204 of the National Planning Policy Framework."

327580			272					Reiterating the need to site new employment opportunities close to where they are most needed, and in locations that are highly accessible to the local population to reduce the need for people to travel (para 7.38) and the infrastructure having sufficient capacity in place before development can proceed (para 7.45), L&B wishes to highlight the way in which the Council can use the Community Infrastructure Levy (CIL), as per para 7.62. 7.62. The CIL is based around the premise that new development will usually have an impact on infrastructure and as such should make a contribution towards providing it. Current legislation sets out that S106 contributions can only be used to secure necessary requirements to mitigate the effects of the development and make it acceptable in planning terms, whilst CIL contributions are to be sought for more general infrastructure requirements across the borough. The Planning Act 2008 provides a definition of the infrastructure which can be funded by CIL, including transport, flood defences, schools, hospitals and other health and social care facilities, parks and green spaces, cultural and sports facilities, district heating schemes and police stations and other community safety facilities. Affordable housing will continue to be funded by planning obligations (S106) as the Government considered this to be the best way of delivering affordable housing, allowing for contributions to be tailored to particular circumstances and crucially to enable affordable housing to be delivered on site. 7.66. To secure funding for infrastructure improvements arising from any development, developers will be required to contribute towards the cost of provision through a S106 agreement or CIL tariff. L&B notes that Pendle Council has stated that implementing CIL cannot be used in Pendle, because, as para 7.68 states, "the current economic circumstances will not support the introduction of CIL in Pendle. Therefore, the "Council will seek S106 contributions to mitigate unacceptable impacts of development". L&B requires that where the Council is dealing with a Greenfield site, either inside or most especially outside the settlement boundary, where profit	The Council cannot simply introduce a requirement for developers to make CIL contributions, but must follow a detailed process as prescribed in the regulations. CIL is typically applied to different types of development (e.g. housing, retail etc.). Although the amounts to be charged can be varied by geographical area, provided that supporting evidence is available to demonstrate different levels of profitability/viability, it cannot address site specific characteristics such as Greenfield and Brownfield land.
Mr. Owen G. Oliver									
Lidgett & Beyond Group									

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Policy SDP6: Future Infrastructure Requirements

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						margins and market attractiveness are likely to be high, then CIL should be introduced in those circumstances .	No change proposed in response to this comment.

327423	280					United Utilities supports Policy SDP 6 Future Infrastructure Requirements which sets out the partnership approach to ensuring infrastructure with capacity can be delivered to support the growth of the borough.	Support for the policy noted.
Mr	David	Sherratt					
United Utilities							
							No change proposed in response to this comment.

Our Foundations for a Sustainable Future: Improving the Environment We Live In

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
816745			25					Policy ENV 1 (p70) Within the 'Landscapes' section, the policy should reiterate the statement made in 8.24 'the AONB...is a nationally important landscape and is afforded one of the highest levels of protection for its scenic beauty' to avoid any doubt regarding PBC's intention to protect this landscape.	The statement at paragraph 8.24 is the context for and informs the policy ENV1 and therefore does not need to be reiterated.
Miss	Victoria	Thorp							No change proposed in response to this comment.
Barley Parish Council									

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327773	6					<p>Thank you for informing us of the Pendle Core Strategy (Further Options Report) consultation. We would like to welcome the document, particularly section 8.48 and policy ENV1. Whilst these concentrate on the built environment, it is pleasing to see that buried heritage assets are mentioned and that landscapes have their own section. The only significant alteration we would suggest is to include a sentence at the end of the historic environment and built heritage section of policy ENV1 that discusses mitigation of adverse impacts on built heritage, as per NPPF 141 and the statements on mitigation included under other sections of the policy</p>	<p>The National Planning Policy Framework recognises the importance of mitigation of any adverse impacts on heritage assets by means of investigation and recording. Local Planning Authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (NPPF paragraph 141).</p>
Mr Peter Iles						<p>The following wording, adapted from that used for the natural environment and the NPPF is suggested as a model: Where a development, including the extraction of minerals, is deemed necessary, but would have a negative impact on the borough's historic environment or built heritage (including archaeological heritage), the developer will be required to undertake mitigation measures and to make the results of that work publicly available through the Historic Environment Record.</p>	<p>Add an additional sentence at the end of the Historic environment and built heritage section of Policy ENV1 to read: "Where harm to or loss of significance of a heritage asset is permitted (in line with the criteria in The Framework paragraphs 132-135), the developer will be required to undertake appropriate investigation and recording and make the results of that work publicly available through the Historic Environment Record."</p>

[illegible]

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
816751			27	Yes	Yes		Yes	<p>We particularly welcome the strong protection given to ancient woodland in Policy ENV1. Ideally we would like to see this extended to ancient or veteran trees as they are referred to in the same paragraph of the NPPF as ancient woodland.. We also welcome in ENV1 and in paras 816 to 8.18 of the supporting text the references to the importance of creating new woodland as part of new development and the role of woodland creation in reconnecting habitats and enabling adaptation to climate change.</p>	<p>The NPPF makes it clear that ancient semi-natural woodland (ASNW) and veteran trees should be protected paragraph 118). Policy ENV1 refers to protection of ASNW, but does not include aged or veteran trees outside ASNW as per NPPF. Policy ENV1 clearly states that TPO's will be made where necessary which can/will include veteran trees as appropriate. Whilst planning policy can encourage the planting of street trees to help with urban cooling it is not the appropriate mechanism for raising the awareness of, or ensuring the good management of, ancient trees.</p>
<div>MrNickSandford</div> <div>The Woodland Trust</div> <div></div> <div></div> <div></div>							<p>addition of the words"and ancient or veteran trees" after "ancient woodland" in line 1 of policy ENV1.</p> <p>Old individual trees are an important part of our cultural and landscape heritage : ancient, veteran and notable trees resonate with the history of the landscape and form markers in the lives of individual people and communities. Ancient trees also have a special conservation value, supporting many species of epiphytes, invertebrates and fungi, whilst also providing a habitat for other animals including owls, woodpeckers, other hole nesting birds and bats. In addition, trees make a significant contribution to the urban environment both in visual terms and in helping to abate air pollution and create oxygen. It is important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees</p>	<p>Add the following text to the end of the first sentence of Policy ENV1: " ..., aged and veteran trees"</p>	
807418			70					<p>Page 70 -71, Policy ENV 1 - Protecting and Enhancing our Natural and Historic Environments: the policy states that there will be more focus on enhancement of the natural environment, and natural networks and corridors. We would suggest including mention of suitable buffers to protect the riparian corridor from development and enhance green infrastructure.</p>	<p>Agree in part. But if buffer zones are to be identified, they would be to protect functional components of the borough's ecological network, rather than just the riparian corridor. This would then help to inform planning decisions.</p>
<div>MrDaveHortin</div> <div>Environment Agency</div> <div></div> <div></div> <div></div>									

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details			Comment ID			Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation			
											Add the following text to the end of paragraph 4 in the policy: "This may also require the identification of buffer zones to protect the integrity of the borough's ecological network."			
814953			86			Yes	Yes		Yes	<p>8.29. PBC acknowledges that there is poor open space provision along the M65 corridor, and the intention to focus further housing development in that area can only be detrimental to existing informal open space provision. PBC is pro-active and works with local residents, Town Councils and Councillors to designate areas as Local Green Space within the Local Plan Review. This could be a win win situation. Valued green space is retained, benefiting residents and wildlife. In certain areas, this could prevent towns from being merged together. Also fit in with point 8.13 and Lawton recommendations. NPPF paragraph 76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. 77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: ●● where the green space is in reasonably close proximity to the community it serves; ●● where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and ●● where the green area concerned is local in character and is not an extensive tract of land.</p>	<p>NPPF paragraph 76 requires the potential to designate Local Green Space with certain exceptions. It would be possible to identify such sites through Site Allocations process. The Core Strategy does not refer to Local Green Space but could be amended to do so in chapter 8 and ENV1</p>			
<div>MrsPamSlater</div>									<p>That PBC includes designation of Local Green Space sites within the Core Strategy , as per NPPF paragraph 76. Such sites could then be taken forward at the site allocation stage.</p>			<p>Amend chapter 8 and ENV1 to include reference to Local Green Space and its potential for designation.</p>		

814953			87			Yes	Yes		Yes	<p>In the current Local Plan 2001 to 2016, section 4C - Natural Heritage - County and District Designates Sites - details the protection that this policy gives to such sites, and identifies the sites and their status in table 2a. The policy also identifies how new sites may be approved.</p>	<p>Such designations are all detailed in the Pendle Biodiversity Audit which informs the strategy and is referred specifically at paragraph 8.14. Policy ENV1 states that "the biodiversity and geological assets of the borough will be protected and enhance, with specific protection given to those sites which have been designated for nature conservation purposes..." This includes the sites currently covered under Policy 4C of the Replacement Pendle Local Plan. Policy ENV1 also explains that the Council will work with its partners where appropriate to designate new sites. The Pendle Local Plan Part 2: Site Allocations and Development Policies will identify the specific sites designated for nature conservation purposes and display these on the Proposals Map.</p>			
<div>MrsPamSlater</div>														

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Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						That this level of detail is carried forward to the Revised Local Plan.	No change proposed in response to this comment.
378754 Mr Marcus Hudson Lancashire County Council	115					Policy ENV1 cites The Statutory Register of Listed Buildings – this has been replaced by the National Heritage List for England, which includes Listed Buildings, Scheduled Monument and Registered Parks and Gardens.	It is recognised that the Statutory Register of Listed Buildings has been superseded by the National Heritage List for England, which is the official database of all nationally designated heritage assets, including listed buildings and scheduled monuments. Amend wording of the final paragraphs of the Historic environment and built heritage section of Policy ENV1 to read: " New development proposals should have regard to the National Heritage List for England, the Historic Environment Record and where appropriate the Lancashire Historic Landscape Assessment and Lancashire Extensive Urban Survey, to assess the impact of the development and to show how the proposal fits within the landscape and townscape character. Policy ENV2 provides further guidance on the connections between design and heritage. Proposals that are likely to affect a heritage asset and/or its setting (including archaeological assets) should be accompanied by a heritage statement and/or an archaeological assessment."
327620 Sport England North West	135	Yes	No		Yes	Open space and green infrastructure The footnote(111) within the policy refers to the Open Space Audit being reviewed periodically. However, an audit is only an analysis of existing provision it does not provide an assessment of current and future needs and opportunities. It should also be noted that there is a separate methodology for playing pitches because of the unique role and function and this was not used to inform the Open Space Audit. The demand and supply of pitches is dependent on the number, size and type of teams which in turn dictates the number size and type of pitches. Sport England is a statutory consultee for any development that affects playing fields and will require council's to have an up to date and robust Playing Pitch Strategy (PPS) in place in order to help determine planning applications that affect existing or create new playing fields. A PPS has not been undertaken but the Council has recently approached Sport England to undertake a full PPS. This will not be done in time to help inform the Core Strategy but should have been adopted by the time the Site Allocations DPD begins preparation. The wording " In exceptional cases, the loss of open space may be acceptable to facilitate a particular development proposal(111). Where this is agreed to be acceptable, compensation will be required in the	Discussions have already been held with Sport England, the relevant pitch sport National Governing Bodies and neighbouring LPAs to collaboratively bring a Playing Pitch Strategy forward. NPPF paragraph 74 sets out the circumstances when sport/recreational land can be developed and the requirements for mitigation.

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Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

					<p>form of alternative site provision or a financial contribution in order to continue to serve the local population ." This wording is considered to be contrary to both paragraph 74 of NPPF and Sport England policy. Any loss of open space to facilitate development must either be clearly demonstrated to be surplus to requirement in accordance with an up to date and robust needs assessment, which the Council does not have, or a replacement provided that is of an equivalent or better quantity and quality in the locality. A financial contribution to provide a replacement must be clearly linked to an equivalent replacement scheme which must be implemented prior to development commencing on the existing site. Sport England do not condone the loss of open space to facilitate development unless the replacement provides significantly better opportunities to the local community. Sport England considers this policy to be contrary to paragraph 74 of NPPF</p>	
					<p>Revised wording for the second paragraph of the Open Space and Green Infrastructure section of policy ENV 1: In exceptional cases, the loss of open space may be acceptable to facilitate a particular development proposal(111). Where this is agreed to be acceptable, a replacement site will be required that provides facilities of an equivalent or better quantity and quality within the locality to meet the needs of the local community. A financial contribution may be acceptable where a specific replacement site has been identified and the contribution provides the full cost of implementing the works required. The Council should provide a robust Needs Assessment in accordance with paragraph 73 of NPPF. This should include all open space typologies. Please be aware there is a separate methodology for indoor and outdoor sports facilities because of the different role and function of sport to any other open space typology. For pitch provision this is a step by step guide adopted October 2013, and for sports facilities this is the emerging Assessing Needs and Opportunities Guidance. Both guidance will be linked from the NPPF section of the DCLG website to Sport England’s website in the near future. In the interim the guidance can be found at: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p>	<p>Amend ENV1 second paragraph on page 71 to read: "In circumstances where a development proposal would result in the loss of open space or sports and recreational buildings and land, the applicant must comply with the criteria and requirements of paragraph 74 of The Framework. A financial contribution may be acceptable where a specific replacement site has been identified and the contribution provides the full cost of implementing the works required. "</p>

327370	162	Yes	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.	Yes	National Trust wishes to support the latest changes to the section of Policy ENV1 relating to the Historic Environment; specifically the changes to make particular references to ‘settings’ are welcomed and now suitably address the concerns previously raised by the Trust.	Previous concerns have been addressed by changes to Policy ENV1.
Mr	Alan	Hubbard					
National Trust							

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
							No further changes are considered necessary.	No change proposed in response to this comment.	
327387		188	No	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.	Yes	Paragraph 76 of the National Planning Policy Framework states that “ Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Space should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period .” However, the Local Plan doesn’t make any reference to Local Green Space hence is not consistent with this requirement of the National Planning Policy Framework.	NPPF paragraph 76 requires the potential to designate Local Green Space with certain exceptions. It would be possible to identify such sites through the Site Allocations process. The Core Strategy does not refer to Local Green Space but could be amended to do so in chapter 8 and ENV1.	
Mr	John	Lamb							
Wildlife Trust for Lancashire, Manchester and North Merseyside									
								Amend chapter 8 and ENV1 to include reference to Local Green Space and its potential for designation.	
818047		204					5 Policy ENV1: Natural and Historic Environments 5.1 The Policy should more closely follow the approach taken by NPPF. In particular: The section dealing with Green Belts is not consistent with national policy. The test for inappropriate development in the Green Belt is “very special circumstances” (NPPF paragraph 87). If very special circumstances can be demonstrated (for example because of the need for the development), there should be no further requirement to maintain the openness of the Green Belt. The test of “exceptional circumstances” is different and applies only to proposed amendments by development plans to Green Belt boundaries. The definition of open space in Footnote 110 should follow that in Annex 2 to the NPPF. This requires the land (or water) to offer “ important opportunities for sport and recreation ” before it can be designated as open space. If this definition is applied, some types of ‘open spaces’ identified by Footnote 110 would have to be excluded. Sites of visual amenity but offering no important opportunities for sport and recreation cannot be identified as open spaces. Footnote 111 should be amended. If the circumstances arise which justify the loss of open space under the first bullet point of NPPF paragraph 74, no need would arise for alternative site provision or a financial contribution.	It is acknowledged that the current policy wording does not reflect the National Planning Policy Framework (NPPF). Both the justification and the policy text will be amended to make clear the circumstances in which green belt boundaries can be amended and development in the green belt can take place. With regards to the types of open space set out in the policy, these are consistent with the approach taken in the National Planning Practice Guidance which states that "open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development". However, the footnote will be amended to explain that open space is not defined as the stated typologies, but that the policy applies to these typologies of open space. It is acknowledged that there is some inconsistency between Policy ENV1 and the NPPF with	
Manthorpe Developments (UK) Ltd									
818046									
Mr	Michael	Courcier							
Barton Willmore									

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Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							regards to the requirements when open space is to be lost. The policy text will be amended to bring it in line with the NPPF.
							Amend the justification text at paragraphs 8.26 and 8.44 and the tenth paragraph of the policy text relating to the circumstances where green belt boundary amendments are acceptable and where development in the green belt is acceptable. The policy text should read: "The general extent of the Lancashire Green Belt in Pendle will be maintained. A review of the Green Belt boundaries in Pendle will be carried out as part of the preparation of the Local Plan Part 2 to establish whether exceptional circumstances exist, which would allow alterations to the boundaries to be made. Inappropriate development in the Green Belt will not be permitted. Only in very special circumstances, where any harm is clearly outweighed by other considerations, should development be allowed in the Green Belt. The Framework sets out those exceptions where development is not considered to be inappropriate." Amend footnote 110 relating to the types of open space to which the policy applies so it reads as follows: "This policy applies to the following types of open space as set out in the Open Space Audit or its replacement: Parks, Woodland, Natural Greenspaces, Green Corridors, Outdoor Sports, Amenity Greenspaces, Play Areas, Equipped Areas for Play, Allotments, Cemeteries, Civic Spaces. Policy SUP2 Health and Well-Being covers aspects relating to built sports and recreation facilities." Amend the twelfth paragraph of the policy text relating to the loss of open space so that it reads as follows: "In circumstances where a development proposal would result in the loss of open space or sports and recreational buildings and land, the applicant must comply with the criteria and requirements of paragraph 74 of The Framework. A financial contribution may be acceptable where a specific replacement site has been identified and the contribution provides the full cost of implementing the works required. "

692633	221					Green Belt 8. Nationally, CPRE has had a long-standing interest and involvement in the designation, maintenance and use of the Green Belt across the country as a whole. CPRE Lancashire is pleased to hear that there are no plans to review the general extent of the Green Belt in Pendle (Policy 3). However we are naturally concerned to find the Council considers there is exceptional need to release of Green Belt land to allow for the allocation of a Strategic Employment Site (Policy WRK3) involving a large expansion to the Lomeshaye Industrial Estate by Junction 12 of the M65. Given the duty to cooperate with the Local Enterprise Partnership concerning their investment priorities of the nearby Enterprise Zones such as Shalmesbury for advanced engineering, and also the strategic employment site policies of neighbouring authorities we see potential dis-benefits from an over-supply of land for employment uses. 9. We do acknowledge the need for the Council to tackle issues of deprivation and encourage new forms of economic development to	The specific issues relating to the allocation of a Strategic Employment Site at Lomeshaye on land currently defined as Green Belt are covered in a separate paper: Policy WRK3 Key Issues and Officer Responses. With regards to the potential oversupply of employment land across the wider Lancashire area, the Pennine Lancashire Investment Plan has been prepared to identify specific opportunities for new employment development in each local authority area across the sub-region. This work has been carried out as part of a bid to the Lancashire Enterprise Partnership. This shows that a joint-working approach has been adopted to consider the economic development of the Pennine Lancashire area. Furthermore, the Employment Land Review shows that there are needs for employment which should be met locally. With regards to the enterprise zones, the rules governing these areas restrict the relocation of local businesses to these areas. Therefore
Ms	Jackie	Copley					
Lancashire Branch of CPRE							

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Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						ensure for a prosperous future for Pendle. But, CPRE Lancashire wants to be confident that there really is no alternative to the loss of land currently in the countryside due to adverse impacts on the economic, social and environmental impacts. We would prefer to see the Council focus on the reuse of Brownfield land in urban areas in the first instance in advance of greenfield release. We understand the need to keep rural communities alive and working so accept that new employment may need to be created in rural locations, but we believe that this ought to be as a last resort, as once it is gone, the countryside is gone for good.	local employment sites are required.
							No change proposed in response to this comment.

692633	223					Peat 12. CPRE Lancashire informed the policies contained in the Joint Lancashire Minerals and Waste Development Framework [MWDF]. We ensured that a map identifying peat areas was contained in it due to the Governments National Planning Policy Framework prohibiting the working of peat due to the significant harm caused to global warming from the release of carbon dioxide. 13. As the South Pennines contains one of the largest unenclosed moorland areas in the country and as the peat moorland and Atlantic blanket bogs along the fringes of Boulsworth Hill is internationally recognised for its upland bird and plant communities and consequently much is designated as a Special Protection Area (SPA), Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) we believe there is room for improvement in the wording of the policy for peat. We advocate the inclusion of the map contained in the Lancashire County Council’s Waste and Minerals Plan.	Paragraph 8.18 refers to the importance of the conservation and restoration of peat bogs and soils due to their role in carbon sequestration. The importance of the South Pennines is recognised in paragraph 8.14 and the protection and enhancement of such habitat/landscape is detailed throughout chapter 8.
Ms Jackie Copley Lancashire Branch of CPRE							No change proposed in response to this comment.

327623	242					Biodiversity issues in Section 8: Paragraphs 8.1 – 8.6: This section should set out your KEY ISSUES and OBJECTIVES for improving the environment we live in. Your objectives should include conservation and restoration---Local BAP and Biodiversity Framework Priority areas. Development and enhancement of Ecological Networks. Urban Green space projects, incorporating these into green infrastructure through Local Area Agreements and Neighbourhood Renewal. Creating suitable Biological Opportunity Areas including use of Local Green Space designation for sites, which meet the criteria, to provide areas for both Eco-networks and Green Infrastructure. Promote and maintain Sites of Geological Importance Further paragraphs and comments: 8.7 It is important to convey that biodiversity is the variety of life on earth and includes all species of plants and animals and the natural systems that support them. 8.11 NPPF paragraph 109---“The planning system should contribute to and enhance the natural and local environment by” All 5 bullet points from para.109 should be included. 8.12 These locations should already have been identified in the forward planning procedures and expressed in the	1) Paragraphs 8.1 to 8.6 are the introduction to the chapter and do not include the specifics which are in the subsequent paragraphs and policies of chapter 8. 2) The definition and importance of biodiversity is cited in the context section and paragraph 8.11 onward. 3) There is no need to transcribe paragraphs from the NPPF as that is national policy. 4) The Vision as an overview refers to protecting and enhancing habitats. It would not be meaningful to include all the sites and/or areas listed in paragraph 8.12 in the Key Diagram due to their number and the scale of the diagram; they are in the Biodiversity Audit. The Pendle Local Plan Part 2: Site Allocations and Development Policies will identify the specific sites designated for nature conservation purposes and display these on the Proposals Map. 5) In Lawton, the proposed overarching aim is underpinned by the three objectives as set out in paragraph 8.13 and policy ENV1 cites coherent ecological networks which will be informed by Lawton. 6) All the detail relating to all the sites typologies listed at paragraphs 8.14 and 8.15 are fully detailed in
Dr. John Plackett							

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>Vision and Key Diagram. 8.13 All key actions of the Lawton Review must be included. 8.14 (The Pendle Biodiversity Audit has not informed the forward planning processes and contains some inaccuracies. It has not performed its purpose as envisaged.) It would be preferable to say how many of each site designation exist, but note that species of importance are likely to be found in designated habitats. 8.15 The 7 Broad Habitats should be broken down into individual Habitats of Principal Importance showing the number of each type found in Pendle. Reference to the Local BAP priorities(woodland, grassland) should be included. 8.16 ALL the BAP priority habitats are of GREAT concern--- these are a government priority for actions. 8.17 As a result of climatic changes the provision of ecological networks and green infrastructure are required to provide resilience to current and future pressures. 8.20 This paragraph should indicate key issues and objectives to protect these designated sites. A section entitled Ecological Networks should have been included before Green Infrastructure setting out the development and enhancement of these networks as they are now a government priority for biodiversity. 8.27 (In the heading at the start of this section, “Open Space” should be omitted as it is not really relevant to Green Infrastructure.) N.B. The NPPF glossary re open space. Open space has a small part to play in green infrastructure. This paragraph should be amended and put at the end of this section. 8.28 This paragraph should head this section. 8.29 This paragraph should refer to green space as an element of green infrastructure provision. Open space plays a small part. 8.37 The incorporation of specific features into the design of the site or buildings should be considered to protect existing features and to enhance the local environment. Any habitat creation scheme should aim to increase species numbers, but its maintenance and viability will need to be monitored. 8.39 Existing LGS’s should be protected and enhanced for their inherent value (para. 109 NPPF). Ecological Networks: Strategies for their development and enhancement and how these will be implemented are absent. 8.45 The protection and ENHANCEMENT of existing green space should be the priority. Opportunities should be sought to connect green space to form green infrastructure networks. How will the green infrastructure strategy be implemented (para 114, NPPF)? Are any schemes or programmes envisaged to promote net gains in biodiversity (para 117, NPPF)? Policy ENV1: para 1 Biodiversity partners are not normally involved in T.P.O.s . Consider separate bullet points to give clarity. para 2 The impact of development on the natural environment should be avoided. Para 118 in NPPF and RTP1 5 point approach. para 3 (last sentence) The LBAP requires that both woodland and grassland Priority Habitats are a priority for protection and restoration. para 4 The Council should be aiming to develop and enhance coherent ecological networks across the borough. para 11 Green Infrastructure should be in the Bio/Geodiversity section. N.B. The definitions of open space and green space in NPPF glossary. The council should plan positively for the creation of Green Infrastructure (para 114, NPPF). Consideration needs to be given to more LNRs, Biodiversity Opportunity Areas and Local Green Space designations. Targets and indicators need to be matched against green space. Targets are insufficient and need to provide for the protection and restoration of Habitats of Principal Importance, the development and enhancement of</p>	<p>the Biodiversity Audit. 7) 8.16 relates to woodland and its creation, enhancement, protection and also as an important habitat. Paragraph 8.19 and ENV1 provide for the protection and enhancement of biodiversity and ecological networks. 8) Paragraphs 8.17 and 8.18 address issues of climate change and 8.19 then stresses the importance of protection and enhancement of biodiversity. The strategy at paragraph 8.33 onwards and ENV1 outlines the importance, protection and enhancement of biodiversity, geodiversity and other typologies. 9) Paragraph 8.20 defines geodiversity and paragraph 8.33 onwards and ENV1 outlines the importance, protection and enhancement of biodiversity, geodiversity and other typologies. 10) Ecological networks are inclusively addressed throughout chapter 8 and ENV1 and do not need to be separated out. 11) 8.27 Open space is absolutely relevant to green infrastructure. The NPPF definition of GI refers to multi-functional green space (TCPA definition makes it clear that this includes still and running water) which will include a range of typologies. This paragraph sets the scene that open space be protected, will be components of GI and contribute to ecological networks. 12) 8.28 follows on well after 8.27 setting the context for both open space, green infrastructure and their inter-relationships. 13) 8.29 Green space is open space which, along with other typologies such as gardens, street trees etc as referred all comprise GI as defined at 8.45. 14) 8.37 outlines a positive approach to protecting and enhancing biodiversity reiterated in ENV1. Site monitoring is not under the remit or scope of the Core Strategy. 15) 8.39 positively states that geological sites will be protected and enhanced. Such sites, where appropriate, will be incorporated into ecological networks in the context of their habitat value as per 8.34 and ENV1. 16) 8.45 relates to protection of open space but 8.47 refers to enhancement of existing. It is agreed, it would be appropriate to include enhancement in 8.45 and ENV1. 17) The emerging green infrastructure strategy will address issues of implementation. 18) It is not within the remit of the Core Strategy to detail schemes or programmes to promote net gains in biodiversity. Chapter 8 and ENV1 provide positively for protection and enhancement of biodiversity. 19) ENV1 paragraph 1, it is agreed that the wording is ambiguous as partners do not assist with making of TPO and should be clarified. 20) NPPF paragraph 118 refers to significant harm. Reference in paragraph 2 of ENV1 to keep impact to a minimum is in keeping with that. 21) The penultimate sentence of paragraph 3 states that support will be given to the creation and/or restoration of habitats which can include all LBAP typologies as appropriate. 22) Paragraph 4 clearly states that the council will work ... to establish coherent ecological networks across the borough. 23) Paragraph 11 relates to open space and GI which can contain biodiversity but is not subservient to it. It should stay as its own heading. 24) Green space is not defined in NPPF glossary but GI is and it can include environmental/biodiversity benefits. 25) The emerging GI Strategy will bring together all typologies of land under the definition including</p>

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Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>Ecological Networks, the creation of Green Infrastructure and address the need to create Biodiversity Opportunity Areas and Local Green Space. Key linkage—England’s Biodiversity Framework should be added.</p>	<p>ecological networks and will work in collaboration with the Core Strategy. A reference to the designation of Local Green Spaces will be added to Policy ENV1. 26) It is noted that the UK BAP has now been superseded by the UK Post-2010 Biodiversity Framework and should be substituted in the key linkages.</p> <p>Amend 8.45 and ENV1 to include enhancement more specifically. Amend ENV1 paragraph 1 to make it clear that partners do not assist with making TPO. Amend Policy ENV1 to explain that the Council will work with local communities to designate Local Green Spaces. Amend Key linkages on page 72 to substitute UK Biodiversity Action Plan with UK Post-2010 Biodiversity Framework.</p>

378959			254						Biodiversity issues in Section 8: Paragraphs 8.1 – 8.6: This section should set out your KEY ISSUES and OBJECTIVES for improving the environment we live in. Your objectives should include conservation and restoration---Local BAP and Biodiversity Framework Priority areas. Development and enhancement of Ecological Networks. Urban Green space projects, incorporating these into green infrastructure through Local Area Agreements and Neighbourhood Renewal. Creating suitable Biological Opportunity Areas including use of Local Green Space designation for sites, which meet the criteria, to provide areas for both Eco-networks and Green Infrastructure. Promote and maintain Sites of Geological Importance Further paragraphs and comments: 8.7 It is important to convey that biodiversity is the variety of life on earth and includes all species of plants and animals and the natural systems that support them. 8.11 NPPF paragraph 109---“The planning system should contribute to and enhance the natural and local environment by” All 5 bullet points from para.109 should be included. 8.12 These locations should already have been identified in the forward planning procedures and expressed in the Vision and Key Diagram. 8.13 All key actions of the Lawton Review must be included. 8.14 (The Pendle Biodiversity Audit has not informed the forward planning processes and contains some inaccuracies. It has not performed its purpose as envisaged.) It would be preferable to say how many of each site designation exist, but note that species of importance are likely to be found in designated habitats. 8.15 The 7 Broad Habitats should be broken down into individual Habitats of Principal Importance showing the number of each type found in Pendle. Reference to the Local BAP priorities(woodland, grassland) should be included. 8.16 ALL the BAP priority habitats are of GREAT concern---these are a government priority for actions. 8.17 As a result of climatic changes the provision of ecological networks and green infrastructure are required to provide resilience to current and future pressures. 8.20 This paragraph should indicate key issues and objectives to protect these designated sites. A section entitled Ecological Networks should have been included before Green Infrastructure setting out the development and enhancement of these networks as they are now a government priority for biodiversity. 8.27 (In the heading at the start of this section, “Open Space” should be omitted as it is not really relevant to Green Infrastructure.) N.B. The	
Mrs			Alison		Plackett				1) Paragraphs 8.1 to 8.6 are the introduction to the chapter and do not include the specifics which are in the subsequent paragraphs and policies of chapter 8. 2) The definition and importance of biodiversity is cited in the context section and paragraph 8.11 onward. 3) There is no need to transcribe paragraphs from the NPPF as that is national policy. 4) The Vision as an overview refers to protecting and enhancing habitats. It would not be meaningful to include all the sites and/or areas listed in paragraph 8.12 in the Key Diagram due to their number and the scale of the diagram; they are in the Biodiversity Audit. The Pendle Local Plan Part 2: Site Allocations and Development Policies will identify the specific sites designated for nature conservation purposes and display these on the Proposals Map. 5) In Lawton, the proposed overarching aim is underpinned by the three objectives as set out in paragraph 8.13 and policy ENV1 cites coherent ecological networks which will be informed by Lawton. 6) All the detail relating to all the sites typologies listed at paragraphs 8.14 and 8.15 are fully detailed in the Biodiversity Audit. 7) 8.16 relates to woodland and its creation, enhancement, protection and also as an important habitat. Paragraph 8.19 and ENV1 provide for the protection and enhancement of biodiversity and ecological networks. 8) Paragraphs 8.17 and 8.18 address issues of climate change and 8.19 then stresses the importance of protection and enhancement of biodiversity. The strategy at paragraph 8.33 onwards and ENV1 outlines the importance, protection and enhancement of biodiversity, geodiversity and other typologies. 9) Paragraph 8.20 defines geodiversity and paragraph 8.33 onwards and ENV1 outlines the importance, protection and enhancement of biodiversity, geodiversity and other typologies. 10) Ecological networks are inclusively addressed throughout chapter 8 and ENV1 and do not need to be separated out. 11) 8.27 Open space is absolutely relevant to green infrastructure. The NPPF definition of GI refers to multi-functional green space (TCPA definition makes it clear that this includes still and running water) which will include a range of typologies. This paragraph sets the scene that open space be protected, will be components of GI and contribute to ecological	

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Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>NPPF glossary re open space. Open space has a small part to play in green infrastructure. This paragraph should be amended and put at the end of this section. 8.28 This paragraph should head this section. 8.29 This paragraph should refer to green space as an element of green infrastructure provision. Open space plays a small part. 8.37 The incorporation of specific features into the design of the site or buildings should be considered to protect existing features and to enhance the local environment. Any habitat creation scheme should aim to increase species numbers, but its maintenance and viability will need to be monitored. 8.39 Existing LGS’s should be protected and enhanced for their inherent value (para. 109 NPPF). Ecological Networks: Strategies for their development and enhancement and how these will be implemented are absent. 8.45 The protection and ENHANCEMENT of existing green space should be the priority. Opportunities should be sought to connect green space to form green infrastructure networks. How will the green infrastructure strategy be implemented (para 114, NPPF)? Are any schemes or programmes envisaged to promote net gains in biodiversity (para 117, NPPF)? Policy ENV1: para 1 Biodiversity partners are not normally involved in T.P.O.s . Consider separate bullet points to give clarity. para 2 The impact of development on the natural environment should be avoided. Para 118 in NPPF and RTPI 5 point approach. para 3 (last sentence) The LBAP requires that both woodland and grassland Priority Habitats are a priority for protection and restoration. para 4 The Council should be aiming to develop and enhance coherent ecological networks across the borough. para 11 Green Infrastructure should be in the Bio/Geodiversity section. N.B. The definitions of open space and green space in NPPF glossary. The council should plan positively for the creation of Green Infrastructure (para 114, NPPF). Consideration needs to be given to more LNRs, Biodiversity Opportunity Areas and Local Green Space designations. Targets and indicators need to be matched against green space. Targets are insufficient and need to provide for the protection and restoration of Habitats of Principal Importance, the development and enhancement of Ecological Networks, the creation of Green Infrastructure and address the need to create Biodiversity Opportunity Areas and Local Green Space. Key linkage—England’s Biodiversity Framework should be added.</p>	<p>networks. 12) 8.28 follows on well after 8.27 setting the context for both open space, green infrastructure and their inter-relationships. 13) 8.29 Green space is open space which, along with other typologies such as gardens, street trees etc as referred all comprise GI as defined at 8.45. 14) 8.37 outlines a positive approach to protecting and enhancing biodiversity reiterated in ENV1. Site monitoring is not under the remit or scope of the Core Strategy. 15) 8.39 positively states that geological sites will be protected and enhanced. Such sites, where appropriate, will be incorporated into ecological networks in the context of their habitat value as per 8.34 and ENV1. 16) 8.45 relates to protection of open space but 8.47 refers to enhancement of existing. It is agreed, it would be appropriate to include enhancement in 8.45 and ENV1. 17) The emerging green infrastructure strategy will address issues of implementation. 18) It is not within the remit of the Core Strategy to detail schemes or programmes to promote net gains in biodiversity. Chapter 8 and ENV1 provide positively for protection and enhancement of biodiversity. 19) ENV1 paragraph 1, it is agreed that the wording is ambiguous as partners do not assist with making of TPO and should be clarified. 20) NPPF paragraph 118 refers to significant harm. Reference in paragraph 2 of ENV1 to keep impact to a minimum is in keeping with that. 21) The penultimate sentence of paragraph 3 states that support will be given to the creation and/or restoration of habitats which can include all LBAP typologies as appropriate. 22) Paragraph 4 clearly states that the council will work ... to establish coherent ecological networks across the borough. 23) Paragraph 11 relates to open space and GI which can contain biodiversity but is not subservient to it. It should stay as its own heading. 24) Green space is not defined in NPPF glossary but GI is and it can include environmental/biodiversity benefits. 25) The emerging GI Strategy will bring together all typologies of land under the definition including ecological networks and will work in collaboration with the Core Strategy. A reference to the designation of Local Green Spaces will be added to Policy ENV1. 26) It is noted that the UK BAP has now been superseded by the UK Post-2010 Biodiversity Framework and should be substituted in the key linkages.</p> <p>Amend 8.45 and ENV1 to include enhancement more specifically. Amend ENV1 paragraph 1 to make it clear that partners do not assist with making TPO. Amend Policy ENV1 to explain that the Council will work with local communities to designate Local Green Spaces. Amend Key linkages on page 72 to substitute UK Biodiversity Action Plan with UK Post-2010 Biodiversity Framework.</p>

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327580			273					<p>Para 8.9 states that "The area’s built heritage and natural landscapes play an important cultural role and are a catalyst for regeneration. The protection and enhancement of these assets will provide a positive legacy for future generations." L&B believes that not following this point is inherently unsustainable . Looking at our historic environment and built heritage, as per para 8.50, L&B insists that the Council does not "seek to", but actually implements the schemes, programmes and strategies outlined : Require applicants to submit a statement which outlines how their proposal affects heritage assets. Prepare and review, on a regular basis, Conservation Area Character Appraisals and Management Plans. Maintain a record of heritage assets which are considered to be at risk and devising strategies to protect these. Use of Article 4 directions in conservation areas to further control against inappropriate development in these areas. Designate new conservation areas where this is merited. L&B strongly supports Policy ENV1, extracts of which are given below: Open space and green infrastructure Existing open spaces will be protected from development. The Council will encourage and support the improvements to the route ways between open spaces along with the creation of new sites as part of a wider programme of green infrastructure provision. In exceptional cases, the loss of open space may be acceptable to facilitate a particular development proposal. Where this is agreed to be acceptable, compensation will be required in the form of alternative site provision or a financial contribution in order to continue to serve the local population. Historic environment and built heritage The historic environment and heritage assets of the borough, including their settings, will be conserved and where appropriate enhanced. This may be through the declaration of conservation areas or other heritage designations. In designated conservation areas proposals should have regard to the relevant character appraisal or management strategy. Proposals that are likely to affect a heritage asset and/or its setting (including archaeological assets) should submit a heritage statement and/or an archaeological assessment. All new development will be encouraged to maximise the use of recycled and secondary materials where practicable before considering the use of primary materials in accordance with Policy ENV6. Landscapes Development proposals should have regard to the Lancashire Landscape Assessment and specifically the different landscape character types that are present in the borough. Proposals should show how they respond to the particular landscape character type they are located within.</p>	<p>Paragraph 8.48 sets out the Council's strategy for protecting and enhancing the historic environment and built heritage. The first sentence of the paragraph indicates a positive commitment to the schemes, programmes and strategies listed. The strategies listed include actions to be undertaken not only by the Council but which also require the input of partner organisations, such as English Heritage, the Heritage Lottery Fund and other national or local heritage or community organisations, and which therefore cannot be subject to the same level of positive commitment. The wording ‘seek to’ is therefore appropriate. Actions which are within the full control of the Council, such as requiring applicants to submit a heritage statement, and the use of Article 4 Directions, will continue to be implemented.</p>
Mr. Owen G. Oliver									No change proposed in response to this comment.
Lidgett & Beyond Group									

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818431			322	Yes	No	It is not justified.	Yes	This policy is negatively impacted by Policy LIV2. Should Policy LIV2 be implemented this would have a direct environmental impact on a significant area of open countryside.	The Core Strategy has to take a balanced approach to protecting the natural environment and meeting the development needs of the borough. The alteration of the settlement boundary at Trough Laithe encompasses the strategic site into the urban area. Policy LIV2 already requires the development to include a high quality landscape scheme incorporating the site's natural features. This aims to mitigate the impact of the development of the site. In response to other comments made against Policy LIV2, additional wording is proposed to be included in Policy ENV1 relating to the impact of development on the natural environment and Policy LIV2 will refer to these policies.
Mr	Simon	Stead						The removal of Policy LIV2.	
								Part of the reason that people visit our area in Pendle is to enjoy the open spaces. To create this strategic housing site is to reduce significantly an area of open space. There is no evidence that supports the need to create new housing on this scale.	See changes proposed to Policies ENV1 and LIV2 in response to comment 183 made against Policy LIV2.

Policy ENV2: Achieving Quality in Design and Conservation

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327520	5					<p>Thank you for the opportunity to comment as part of this consultation. In relation to the Pendle Core Strategy, I would ask that you consider incorporating something similar to the following extract into your policy document with regard to Crime and Community Safety. This extract is taken from the Central Lancashire Core Strategy and I feel that it is imperative to deliver a consistent level of service to the communities across Lancashire, with regard to reducing the risk of crime in our communities. Crime and Community Safety 11.19 Crime and the fear of crime, is a major factor in determining people's quality of life. Crime levels are generally below average in Chorley and South Ribble, but the more deprived areas of Preston have crime levels within the worst 10% in England and Wales. The police and local authorities are working to reassure local communities with the advent of neighbourhood policing, and Police and Communities Together meetings. Partnership working between agencies includes Community Safety Partnerships which feed into the respective Local Strategic Partnerships. 11.20 Planning can help address crime through the design and layout of developments and individual buildings. "Secured by Design" is a national police initiative to promote awareness. It produces design guides and also has an accreditation scheme for residential and other types of development. Lancashire Constabulary employs a specialist Architectural Liaison Officer to advise developers and local authorities. Secured by Design principles concern the use of natural surveillance within developments, good lighting and the integration of security measures. Issues of road safety - particularly the reduction of accidents involving pedestrians and cyclists - is a matter relevant to the Sustainable Travel Chapter (Chapter 7). 11.21 Crime is often linked to other issues. For example, youth crime and anti-social behaviour may be reduced if there are adequate, affordable leisure and community activities in an area. In town centres, avoiding an over-concentration of pubs and bars in an area may help to disperse revellers so it is important that planning and licensing decisions complement each other. Introducing a greater mix of leisure uses into town centres may help to attract a wider age range of people. Policy 26: Crime and Community Safety Plan for reduced levels of crime and improved community safety by: (a) Working with the police, community safety partnerships and other agencies to co-ordinate analysis and action. (b) Encouraging the inclusion of Secured by Design principles in new developments. (c) Providing adequate leisure and community facilities or activities, particularly in high crime areas, and especially for young people. (d) Aiming to achieve a complementary mix of uses in the City and key service centres with appropriate controls over entertainment uses, taking account of the local authorities' Statement of Licensing policies.</p>	<p>Policy ENV2 already covers issues of crime and safety. It requires that development should be safe and secure for occupants and passers by, reducing crime or the fear of crime. The Council will encourage buildings to obtain Secured by Design or similar standards. The justification text also provides the context and strategy for addressing crime and safety issues in new development in Pendle. Furthermore, Policy SUP4 looks at the design of the public realm which seeks to design out the opportunity for crime and anti-social behaviour and encourage natural surveillance. It is considered that the policies in the Core Strategy are sufficient to adequately address the issues of crime and community safety at a strategic level. More detailed guidance will be incorporated into the policies in the Local Plan Part 2.</p>
Lancashire Constabulary						<p>If you were able to include a section similar to the extract above, we would be better positioned to provide the same level of service within Lancashire</p>	<p>No change proposed in response to this comment.</p>

Policy ENV2: Achieving Quality in Design and Conservation

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
712277			64					Rolls-Royce, as an organisation are ever striving to improve the efficiency and energy usage of their buildings, and will continue to ensure that the new development proposals achieve the highest standards that are achievable and viable. Whilst Rolls-Royce support the synergy between their own Environmental objectives and those of the Council, Rolls-Royce suggest that a degree of flexibility is demonstrated in Policy ENV 2 and Policy WRK 6 to recognise the economic and viability implications of energy efficiently initiatives. This will ensure that in line with the NPPF, policy requirements to not overly burden development proposals and prevent them from coming forward (para 174).	Policy ENV2 already provides flexibility in its approach to securing low and zero carbon developments. The introduction of the carbon compliance and allowable solutions approach gives developers the flexibility and choice of how they meet the national standards. This approach is identified and supported by the zero carbon hub and it follows the National Planning Policy Framework in terms of being consistent with the Government's zero carbon buildings policy.
Mr	Robert	Orgill							
Rolls Royce plc									
817556									
Ms	Kate	Skingley							
David Lock Associates									
No change proposed in response to this comment.									

814953			91	Yes	Yes	Yes	8.52 The Framework sets out the approach local planning authorities should take towards design. It states that 'good design is indivisible from good planning' and sees design as a key element in achieving sustainable development and making better places for people. Poor design is not acceptable. Plans should seek high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Strengthen to identify what criteria applications should meet.	Paragraph 8.52 states the requirements of the National Planning Policy Framework in respect of design, and therefore sets out the overall policy context. The Strategy section and Policy ENV2 go on to discuss the guiding principles for design which are expanded upon in further design policies (LIV5, WRK6 and SUP4) which outline the specific measures that will be expected in particular types of development, and through other Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). It is these policies and guidance which set out the more detailed design criteria which applications should meet. Paragraph 10.149 explains the Building For Life standards and paragraph 10.162 states that 'The standards set out in Building for Life should be followed and applied wherever possible in all parts of Pendle to address sustainability and community needs'.	
Mrs	Pam	Slater							
Identify that plans must meet Building for Life 12 industry standard (BfL).									

327935			158				Sainsbury's have a proactive approach to sustainability which is clearly demonstrated through their 20/20 Corporate Sustainability Strategy. This strategy clearly set out how Sainsbury's will improve the sustainability performance of their assets and business activities through a range of measures. One of these measures is a commitment to low carbon design by following the increasingly stringent building regulations which now set challenging carbon reduction targets. Building regulations are met principally through a strong focus on minimising the energy consumption of the building combined with a fabric first approach to efficiency. In addition to this Sainsbury's also undertake a store specific low and zero carbon energy study to determine whether the deployment of LZC technologies are viable. Sainsbury's are therefore supportive of the overall aim of the policy which is to encourage the development of low carbon, energy efficient buildings. Sainsbury's do have concerns however regarding the requirement for new development to incorporate on-site decentralised het and/or power. As a	The general support for the policy is noted. With regards to the requirement for the use of on-site decentralised heat and/or power, the policy already acknowledges that this may not always be viable and in such circumstances consideration should be given to using on-site renewable technologies. This follows the approach of the zero carbon hub. The policy also acknowledges that the provision of such technologies may not be viable and gives the developer the option of allowable solutions. This is a reasonable and flexible approach for developers to follow to move towards achieving low and zero carbon buildings. The policy text will be amended to explain that the Council will provide a suggested list of suitable allowable solution projects and will update this list in the Local Planning Authority's Monitoring Report (AMR).	
Sainsbury's									
817889									
Mr	George	Wilyman							
Turley Associates									

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy ENV2: Achieving Quality in Design and Conservation

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>result of the strong focus on fabric and building efficiency (which includes the use of heat reclamation), the heat demand of their stores is low which regularly excludes the feasibility of CHP.</p> <p>Sainsbury's object to the requirement for decentralised energy and requests that this be deleted from the policy and replaced with a requirement for a compliance with Building Regulations only which will provide greater flexibility in securing the strategic objectives of the policy. With regards to the Allowable Solutions element to Policy ENV2, Sainsbury's request that the council develop a list of local allowable solutions projects in order to determine the feasibility of funding such projects.</p>	<p>Amend the second paragraph under the heading 'Allowable Solutions' in Policy ENV2 to include the following wording: "The Council will provide a list of suggested allowable solution projects which applicants could use and will update this list in the AMR."</p>
<div>818047</div> <div><div></div><div></div><div></div></div> <div>Manthorpe Developments (UK) Ltd</div> <div>818046</div> <div><div>Mr</div><div>Michael</div><div>Courcier</div></div> <div>Barton Willmore</div>	205					<p>6 Policy ENV2: Quality in Design and Conservation 6.1 The general objectives of Policy ENV2 to achieve good design are supported. However the policy is overly detailed and in some respects in conflict with national policy. It also deals with matters covered by other policies such as Green Belt and heritage assets, providing alternative and sometimes contradictory policy tests. 6.2 The policy needs to be shortened so that it is appropriate to a Core Strategy; unnecessary repetition or duplication with other policies should be removed; and it should be made consistent with national policy. Detail should be left to a development management policy or supplementary planning document. 6.3 The Policy will add significantly to the costs of some developments, particularly in its requirements for materials, water saving and recycling, fabric energy efficiency, and on-site low-carbon heat and power. The impacts of these onerous requirements have not been properly assessed or shown to be viable by the Development Viability Study (December 2013). As such, their proposed imposition is contrary to the NPPF (174).</p>	<p>Policy ENV2 sets out the broad design requirements for new development. These requirements are not overly prescriptive and provide a level of detail appropriate for the Core Strategy. The inclusion of issues relating to built heritage assets are relevant to the approach taken to design and conservation in the borough. Some issues, such as Green Belt, are covered in other policies but these relate to different aspects of development and they are not considered to be duplicating information. Appendix 1 of the Development Viability Study (DVS) explains that there are costs associated with the requirement of higher design standards as included in Policy ENV2. However, it explains that these are incorporated in to the costs used in the financial appraisals. In terms of the consideration of costs associated with the requirement for low and zero carbon buildings, the DVS explains that consideration has been given to these through the application of the Code for Sustainable Homes and BREEAM (at the publication stage). In additional the policy clearly acknowledges that the provision of low and zero carbon development may not be feasible or viable, therefore providing a flexible approach to delivery.</p> <p>No change proposed in response to this comment.</p>
<div>327580</div> <div><div>Mr.</div><div>Owen G.</div><div>Oliver</div></div> <div>Lidgett & Beyond Group</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>	274					<p>L&B requests that the Council to follow these policy statements very closely and that, for example, "exceptional" really is exceptional and "will be encouraged" is strictly enforced, especially where Conservation or Rural areas are involved. In addition, in the event of a loss of open space , L&B expects the Council to seek a "significant" financial contribution to recompense the local population . These sentiments of L&B are in fact highlighted in paras 8.67-8.69 which state that any development should respond positively to their local context, respect the townscape character and heritage of their setting, and use local sustainable materials. In line with this, L&B supports the provisions of Policy ENV2: All new developments should viably seek to deliver the highest possible standards of design, in form and sustainability, and be designed to meet future demands whilst enhancing and conserving our heritage assets. Good design should be informed by, and reflect, the history</p>	<p>This comment provides support for the approach to Policy ENV2. Issues relating to the loss of open space are covered in Policy ENV1.</p>

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Policy ENV2: Achieving Quality in Design and Conservation

Person Details		Comment ID	Q1	Q2a	Q2b		Q3	Consultee comments		Officer Response and Recommendation
								and development of a place. The historic and natural environments contribute substantially to Pendle’s "sense of place" and bring enjoyment to many people. Therefore: Proposals should contribute to a sense of place by respecting the built heritage and local context, including the townscape and distinct settlement characteristics of the locality. Proposals should ensure the significance of heritage assets and their settings is not harmed or lost. Proposals should protect or enhance the natural environment. Where applicable, they should maintain the openness of the Green Belt...		No change proposed in response to this comment.

715388	291							Policy ENV2: Achieving Quality in Design and Conservation 3.19 Peel is committed to the creation of high quality places and buildings that provide significant benefits to the local economy and community. 3.20 Peel supports the objectives of Policy ENV 2 which is seeking to promote quality during the design and construction process and ensure that climate change mitigation and adaptation principles are incorporated into the design process. 3.21 With regards to climate change mitigation and carbon emissions, Policy ENV 2 promotes the Building Regulations as the local standard for carbon reductions in new housing. Peel supports this approach which is in line with the Government’s emerging policy as set out in the Housing Standards Review consultation document, August 2013. 3.22 Peel is concerned however with one aspect of Policy ENV 2 which is the request for new development to prioritise the use of decentralised on-site combined heat and power. Typically, such systems are only viable for mixed use, high density urban developments and are not suitable for residential only schemes. The evidence base document developed to support the Core Strategy: Renewable and Low Carbon and Energy Study, Maslen Environmental, 2010 (p60) states that; ‘Decentralised heating and cooling networks can be a very effective in city areas, due to the dense character of the built environment and the complex mix of uses, which produces a high and relatively even density of heat demand.’ For CHP to be viable it is important to have a high and consistent heat load for most of the year. 3.23 In addition, given that Policy ENV 2 is enforcing Building Regulations as the local standard for carbon reductions, it is the developer’s decision as to the most appropriate design solution to meet these regulations which may involve (depending on target reduction) a combination of energy efficiency measures, on-site carbon compliance and allowable solutions.		The general support for the policy aims are noted. The policy is sufficiently flexible to acknowledge that the connection to/or creation of a decentralised energy network is not always viable or that the size and scale of the proposal would not lend itself to the provision of such infrastructure. The policy therefore allows for the provision of on-site Renewable and Low Carbon energy generation equipment where it is feasible and viable. However, in light of this comment the policy wording will be amended to clarify the flexibility.
Ms Louise Morrissey Peel Holdings (Land & Property) Ltd										
714921								3.24 With regards to these concerns, Peel requests that the policy be amended as follows; On-site low-carbon heat and power The council will encourage new mixed use, high density development to incorporate onsite low carbon/ zero carbon heat and power where they are commercially and technically feasible.		Amend the policy wording under the heading 'On-site low-carbon heat and power' to read: " New development should incorporate on-site low or zero carbon heat and power technologies in the following order of preference: a. The installation of, or connection to, an on-site decentralised energy network. The council will encourage new development to connect to an existing decentralised energy network where one exists on-site and capacity is sufficient or can be viably increased. Where no on-site network exists the preference will be for
Ms Anna Noble Turley Associates										

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Policy ENV2: Achieving Quality in Design and Conservation

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							their creation, where technically feasible and commercially viable. The development of decentralised energy networks, which utilise renewable or low carbon technologies will be encouraged. b. The on-site installation of renewable technologies Where the scale or density of the proposed development is not sufficient to support the creation of a decentralised energy network, or connection to one does not make the development carbon compliant, it will be necessary - where technically feasible and commercially viable - to install RLC energy generation equipment on-site. This element of the proposal will also be assessed against Policy ENV3."

Policy ENV3: Renewable and Low Carbon Energy Generation

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327580			275					L&B has been involved in several renewable energy applications in and neighbouring our area and we support para 8.94 "In the Green Belt renewable energy developments, which threaten to have a negative impact on the openness of the area, will not be appropriate." We note and wish to highlight the comments in Footnote 116 that "In reality, offshore wind can play a significant contribution to renewable electricity generation on a national and regional scale and as such, if formal district targets were ever set by Government, Pendle may not be required to achieve the full 15.4MW by 2020 for the North West and the UK as a whole to meet the EU targets." Bearing this in mind, L&B supports Policy ENV3: The Council will support proposals for all RLC technologies where the proposal is of an appropriate scale for its setting, and where the development will not: Have an unacceptable level of impact on the landscape and visual character of an area, either on its own or cumulatively, or Result in an unacceptable impact on the value of any ecological or heritage assets, or to residential amenity.	Support for the policy approach in terms of its requirement to consider scale and setting in relation to applications for renewable energy development.
Mr. Owen G. Oliver									
Lidgett & Beyond Group									
									No change proposed in response to this comment.

Policy ENV4: Promoting Sustainable Travel

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
379105			2					Hi all at Pendle gov,seriously opposed to any wholesale developments in and around my area. Might be able to see possibly more leisure facility based ideas or even some kind of reserve around Barrowford locks but defo not large, concrete, high speed road/bypass to make amends for stupid idea to allow retail and Golden arches on North Valley. This from a man from North Manchester most challenged estates. Pendle is such a gem of a place it possibly requires some freshening up but almost certainly not wholesale redevelopment.	Lancashire County Council (LCC) is the Highways Authority for Pendle and is responsible for preparing plans and policies relating to the highways and transport network. As such LCC has prepared a Local Transport Plan for Lancashire and is currently preparing four separate Highways and Transport Masterplans for different areas of the county, including one for East Lancashire. The proposal for a bypass around Colne is outlined in the East Lancashire Highways and Transport Masterplan and is shown to be required to alleviate congestion along the North Valley Corridor which suffers from some of the worst in Lancashire at peak times. Policy ENV4 of the Pendle Core Strategy supports the objectives of the Masterplan as it provides evidence for the Lancashire Enterprise Partnership (LEP) Growth Plan bid and will help to secure the sustainable development of the borough. The public consultation on the Masterplan presented a number of different route options for the proposed bypass and the suitability of these routes will be considered along with comments received to the consultation. The Masterplan also identified a number of other interventions which could be used to help ease traffic congestion and improve traffic flows through Colne. To ensure that the Core Strategy is consistent with the Masterplan reference will be made to these potential interventions.
Mr	Paul	Horner							Include the following additional wording in the context section of the policy: "Along with the proposal for the bypass the Masterplan also identifies some potential short-term measures which could help to manage the flow of traffic through the North Valley Corridor."

812210			7					Many thanks for your e-mail in regard to the Pendle Core Strategy. We have reviewed your proposals and supporting documents and note your proposals do not affect the current or (future) operation of the mainline network in Great Britain, heritage railways or the London Underground network. It might be helpful if I explain that the office has a number of key functions and duties in our role as the independent regulator of Britain's Railways. If your plans relate to the development of the current railway network including the operation of passenger and freight services, stations, stabling and freight sites (including the granting of track and station access rights and safety approvals) within your administrative area, we would be happy to discuss these with you once they become more developed so we can explain any regulatory and statutory issues that may arise. We can also suggest the other stakeholders that might have a view in the development of your plans such as the Network Rail and the Department for Transport.	This comment indicates that the Core Strategy does not have an impact on the mainline railway network.
	Humeira	Yaqub							No change proposed in response to this comment.

Policy ENV4: Promoting Sustainable Travel

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>327500</div> <div>Mrs.<div>Lindsay</div>Alder</div> <div>Highways Agency</div> <div></div> <div><div></div></div> <div></div>			19	Yes	Yes		Yes		This comment supports Policy ENV4. It acknowledges that the policy recognises the need to deliver a safe, sustainable transport network and that transport assessments and travel plans are carried out when major developments are likely to have an impact on the transport network.
								Thank you for consulting the Highways Agency on the Borough of Pendle Core Strategy (Further Options Report). The extent of the Highways Agency's management of the M65 extends from Junction 1 to Junction 10, 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 any development within the Borough of Pendle would be Junctions 14, 13 and 12. We welcome the Borough's objective to deliver a safe, sustainable transport network that improves connectivity and reduce the need to travel by car. The M65 suffers from peak congestion at certain junctions and we have assessed that parts of the M65 corridor will operate at or approach capacity in future years. Given this, it is important that, consistent with the DfT Circular 02/2013, Transport Assessments and Travel Plans are undertaken where any development is likely to have significant transport implications on the SRN, which is recognised in the document. Any capacity issues must be addressed through appropriate infrastructure improvements and and/or mitigation measures, which should be agreed in liaison with the Agency. The document recognises that traffic congestion can exacerbate environmental and health problems, such as air quality, which is welcomed. There is an emerging pressure between the drive for economic growth/additional trips and the need to improve air quality for those living adjacent to such routes. Likewise, the reduction in traffic noise is also a high priority and the same pressures exist, which again is recognised.	No change proposed in response to this comment.

Policy ENV4: Promoting Sustainable Travel

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
817517			34					<p>I have just spoken to Catherine from the Planning Dept at PBC with regard to my concerns on your opposing policies for the areas part of your Core Strategy and she suggested I contact you directly:- PBC are pro a bypass Colne-Foulridge to reduce congestion and pollution at the end of the M65 and along North Valley Rd PBC are still allowing commercial planning applications to be considered along the very same route creating a draw to the area. Unfortunately this policy doesn't make any sense whatsoever and these concerns were voiced by the Councillors at the LCC Cabinet meeting in Preston on 6/2/14. In fact it was suggested by CC Azhar Ali that until LCC's Transport Planning Dept (Hazel Straw) has conducted the requisite traffic survey that a moratorium should be imposed upon on all development along this route. Hazel estimates that it will take between 15-18 months to conduct a survey and report on the findings. I note that PBC expressed their disappointment that the matter of the bypass had fallen into the bottom of LCC's agenda but with such opposing policies it is hardly surprising and I respectfully suggest that the 'Core Strategy' for the area needs revision pending the outcome of LCC investigations.</p>	<p>Lancashire County Council (LCC) is the Highways Authority for Pendle and is responsible for preparing plans and policies relating to the highways and transport network. As such LCC has prepared a Local Transport Plan for Lancashire and is currently preparing four separate Highways and Transport Masterplans for different areas of the county, including one for East Lancashire. The proposal for a bypass around Colne is outlined in the East Lancashire Highways and Transport Masterplan and is shown to be required to alleviate congestion along the North Valley Corridor which suffers from some of the worst in Lancashire at peak times. Policy ENV4 of the Pendle Core Strategy supports the objectives of the Masterplan as it provides evidence for the Lancashire Enterprise Partnership (LEP) Growth Plan bid and will help to secure the sustainable development of the borough. The public consultation on the Masterplan presented a number of different route options for the proposed bypass and the suitability of these routes will be considered along with comments received to the consultation. The Masterplan also identified a number of other interventions which could be used to help ease traffic congestion and improve traffic flows through Colne. To ensure that the Core Strategy is consistent with the Masterplan reference will be made to these potential interventions. With specific regards to applications for development along North Valley Road, the Council has a duty to consider and determine planning applications that are submitted. All major developments are required to carry out a traffic impact assessment and Lancashire County Council provides expert advice on highways issues, which is used in the determination of the application. The NPPF is clear that if an assessment shows that the residual cumulative impacts of a development on the transport network are severe then the application should be recommended for refusal. The public have the opportunity to comment on planning applications in order to raise issues of concern. Further information relating to specific planning applications can be found on the Council's website.</p>
Ms Jane Pilkington									<p>Include the following additional wording in the context section of the policy: "Along with the proposal for the bypass the Masterplan also identifies some potential short-term measures which could help to manage the flow of traffic through the North Valley Corridor."</p>

Policy ENV4: Promoting Sustainable Travel

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>712277</div>			<div>62</div>					<p>Travel and Transport Rolls-Royce are pleased to see that the plan recognises the spatial implications of the termination of the M65 motorway to the west of Colne, and the effect that this has for future spatial planning and the distribution of homes and employment in Pendle. The plan also recognises that there are no 'A' classified roads into Barnoldswick, which has a significant impact on the accessibility of the area and the potential for its future Growth. Rolls-Royce therefore support initiatives which look to improving connections to Barnoldswick and improvements to the local and strategic road network; and support the vision which states that 'A better connected West Craven will have stronger links with the M65 Corridor and beyond, helping to support existing businesses and facilitate the diversification of the local economy. Improved transport and communications will ensure that Barnoldswick continues to be a focus for advanced manufacturing centred on the aerospace industry' Rolls-Royce recognise and largely support the Councils aspiration to move towards sustainable means of travel in line with the NPPF, however it must be recognised that this will only be achievable where there is an effective, efficient and appropriate public transport provision or sustainable alternative. As such, Rolls-Royce support a pragmatic approach to reviewing development proposals on a case by case basis, on the presumption that accessibility and travel demand will be suitably managed. Part of this must be the recognition that whilst there is an aspiration to move towards more sustainable forms of transport, and this is largely supported by Rolls-Royce, there needs to be a degree of realism attributed to this, in how it can realistically be achieved in the lifetime of the plan, particularly in recognising the limitations of the road networks in and around Pendle. The plan needs to recognise that moves to sustainable travel are not always compatible with shift patterns and the demands of business in the 21st century. On this point, Policy ENV 4 indicates that new development should comply with the existing maximum car and cycle standards until they are replaced in the Part 2: Site Allocations and Development policies. Rolls-Royce would stress that this policy is now 13 years old and as such would ask that until it is replaced, applications be considered on their individual and unique needs in this respect. Rolls-Royce ask that they be consulted on the Local Plan Part 2 once it has been prepared.</p>	<p>Policy ENV4 aims to ensure new development is accessible by a range of sustainable transport methods. The policy indicates there may be a need to provide new or improved public transport systems to increase accessibility levels. The NPPF (paragraph 29) indicates that different measures will be required depending on whether the area is urban or rural. The strategy section of the policy considers issues of flexible working patterns, but it is acknowledged that it does not specifically cover issues of shift working in terms of accepting that some developments cannot be accessible all the time due to the availability of public transport services. The strategy section of the policy will be amended to make reference to such issues. With regards to parking standards, the NPPF (paragraph 39) allows Local Planning Authorities to set local parking standards and in doing so take account of the accessibility of the development; the type, mix and use of development; the availability of and opportunity for public transport; local car ownership levels; and an overall need to reduce the use of high-emission vehicles. The current parking standards in the Replacement Pendle Local Plan require an assessment of accessibility to be carried out to determine the level of parking to be provided. In this respect the standards are consistent with the NPPF and are considered to be appropriate to apply until they are reviewed as part of the Local Plan Part 2: Site Allocations and Development Policies.</p>
<div>Mr Robert Orgill</div> <div>Rolls Royce plc</div> <div>817556</div> <div>Ms Kate Skingley</div> <div>David Lock Associates</div>								<p>Include the following wording into the strategy section of the policy at paragraph 8.134: "It should be acknowledged that certain types of employment require people to work shift patterns which cannot always be accommodated, in terms of the availability of public transport provision."</p>	

Policy ENV4: Promoting Sustainable Travel

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327432		107					<p>I note that in the Core Strategy papers, in the “Our Spatial Issues: Pendle Today – Connections” section (paragraphs 3.83-3.86), you say that the A682, the A56 and the A6068 have had the “heavy burden of transporting goods and people to Yorkshire” since a railway link closed decades ago. It is also said that an A56 by-pass is yet to be built despite years of campaigning and the inclusion of such a proposal in the preliminary East Lancashire Highways & Transport Masterplan 2013. I would like to ask what steps are being taken to press for an A56 by-pass at present, since such a new road would be of benefit to both road hauliers and Pendle residents.</p>	<p>The proposals for a strategic road link around Colne are supported through Policy ENV4. Lancashire County Council (LCC) is the highways authority for Pendle and is currently preparing a Highways and Transport Masterplan for East Lancashire. This Masterplan identifies the opportunity for a bypass around Colne, from the end of M65 motorway to the north of Foulridge on the A56. The plan includes a number of suggested routes for the new road and the implications for each. A public consultation on the plan was completed in November 2013 and the responses are currently being considered. Additional work is being carried out relating to the justification for the proposed bypass. The case for the new road will need to be sufficiently robust for it to be included in the final Masterplan. The implementation of the bypass scheme will be dependent on the allocation of appropriate funding. The draft timescales for the work show that it could be delivered by 2023.</p>
Mr.	Steve	Biddle						No change proposed in response to this comment.
Road Haulage Association								

327432	111				Turning to issues of particular concern to the haulage industry, we would like account to be taken of the needs of the sector for adequate parking and loading facilities en route for trucks, as well as at commercial parks and in town centres. It is also essential that drivers should have easy access on long journeys to refreshments and bathroom facilities. If such facilities are not available, then drivers may stop at inappropriate locations that cause inconvenience to local residents and other road users. I should emphasise that the tachograph laws require drivers to take regular rest breaks and so provision of comprehensive facilities will be of benefit to the haulage industry and local residents alike. The lack of secure facilities en route also means that drivers and their loads are at greater risk of crime, as high value loads have to be parked at the roadside. Finally, the importance of traffic management and in particular the positioning of road signs is also worth highlighting. Good signage helps drivers to find correct places to park and load, but also to avoid the risk of trucks, for example, hitting low bridges because signs are in the wrong place or because the bridge sign gives insufficient notice for the driver to divert before approaching the bridge.	The strategic road network does not run through Pendle and although haulage vehicles travel on the main roads, the demand for parking and roadside facilities has not been of a level to warrant additional provision. Services and facilities are available on the M65 at Blackburn and should additional provision be required in Pendle consideration would be given to such a proposal, especially if the proposed bypass comes to fruition. Road signage is an issue for Lancashire County Council as the highways authority for Pendle. It is not an issue which can be covered in the Core Strategy.
Mr.	Steve	Biddle				
Road Haulage Association						
No change proposed in response to this comment.						

Policy ENV4: Promoting Sustainable Travel

[illegible]

Policy ENV4: Promoting Sustainable Travel

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
692633			224					Transport 14. CPRE Lancashire responded to the recent consultation on the East Lancashire Highway and Transport Masterplan and trust that the policies and investment priorities will help to overcome some of the transport issues identified in the Core Strategy. It is of course preferable to see investment in public transport prioritised to tackle rising car ownership and associated problems of poor air quality and congestion that result. 15. The routes currently being favoured by Lancashire County Council carve through land designated as Green Belt. We have concerns about the bypass to open up land in the Green Belt and Open Countryside for development and remain concerned about the adverse impact on the countryside.	Lancashire County Council (LCC) is the highways authority for Pendle and has the responsibility for identifying and justifying the need for the bypass around Colne. Both the East Lancashire Highways and Transport Masterplan and the Core Strategy aim to support initiatives that reduce the need to travel and provide more sustainable modes of transport. However, given the growing needs of the borough and the proposed levels of development identified in the Core Strategy, such measures may not be sufficient to prevent unacceptable levels of congestion and other transport issues occurring. The Transport Masterplan recognises that the existing levels of congestion along the North Valley Corridor are amongst the worst in Lancashire at peak times. Although further traffic management systems may provide a short term option to reduce this congestion, given the levels of proposed growth over the plan period it is likely that an alternative approach will be required. The proposal for a bypass from the M65 motorway to the A56 north of Foulridge would help to significantly reduce congestion along the North Valley Corridor. This would help to tackle the air quality issues that currently exist at this location. The allocation of land for new development will be considered as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies. The proposed route of the road will pass through land designated as Green Belt, however, the NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances. Alternative options for development would need to be sufficiently discounted before Green Belt sites could be considered and a robust case would need to be made for the release of Green Belt land. It is acknowledged that the provision of the bypass could put pressure on adjacent sites to be released for development however, the current evidence base (e.g. ELR and SHLAA) indicates that with the exceptions of proposed strategic employment site at Lomeshaye, the development needs of the borough during the plan period can be accommodated on land not designated as Green Belt. The release of Green Belt site may be required in the future but this will be considered in future reviews of the plan.
Ms	Jackie	Copley							
Lancashire Branch of CPRE									
									No change proposed in response to this comment.

Policy ENV4: Promoting Sustainable Travel

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327580			276					With regard to transport, L&B notes that the A6068 North Valley corridor and through the town are severely congested. Policy ENV 4 notes the benefits of locating new housing, employment and service developments near to each other to give people the opportunity to live and work within a sustainable distance, with Policy ENV 5 noting the improvements in air quality this would bring. L&B believes that the co-location of housing, employment and services must be paramount with all sustainable planning .	Support for Policy ENV4 in relation to its approach to the co-location of housing, employment and services in order to reduce the need to travel and ensure the sustainable development of the borough.
Mr.	Owen G.	Oliver							
Lidgett & Beyond Group									
								No change proposed in response to this comment.	

Policy ENV5&6: Pollution, Unstable Land and Waste Management

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
379222	13					Representation No.1 Site/Policy/Paragraph/Proposal - Policy ENV5, Pollution and Unstable Land Test of Soundness Positively Prepared Justified Effective Consistency to NPPF Legal & Procedural Requirements Inc. Duty to Cooperate Yes Yes Yes Yes Yes Support - The Coal Authority welcomes and supports this policy which addresses the concerns previously expressed by The Coal Authority. The policy addresses mining legacy which is a locally distinctive issue and sets out an appropriate and suitable planning policy framework for assessing land instability. As such the policy is considered to conform with the National Planning Policy advice in the NPPF, paragraphs 109, 120, 121 and 166.	Note the Coal Authority's support for this policy.
							No change proposed in response to this comment.

807418	71					Page 96, Policy ENV 6 – Waste Management: there is a target to reduce the amount of new development in flood zones. We feel that a target of improving the amount of river meeting the standards set by the Water Framework Directive would be more appropriate.	Agreed. The current status of waterbodies in Pendle is shown in the table below, which was supplied by the Environment Agency. The target is for all waterbodies to be at ‘Good’ status by 2027. EA ID Name of Waterbody Catchment Status Overall Priority GB112071065140 Sabden Brook Ribble Good Low GB112071065160 Trawden Brook Ribble Good Low GB112071065220 Wanless Water Ribble Good Low GB112071065230 Pendle Water Ribble Good Low GB31230422 Ogden Reservoir Ribble Good Low GB31230431 Ogden Reservoir Ribble Good Low GB31230459 Churn Clough Reservoir Ribble Good Low GB31230533 Coldwell Reservoirs Ribble Good Low GB112071065150 Colne Water Ribble Moderate HIGH GB112071065170 Pendle Water Ribble Moderate Low GB112071065180 Wycoller Beck Ribble Moderate HIGH GB112071065190 Colne Water (Laneshaw) Ribble Moderate Low GB112071065200 Colne Water Ribble Moderate Low GB112071065210 Colne Water (Laneshaw) Ribble Moderate Low GB31230390 Black Moss Reservoirs Ribble Moderate Low GB112071065540 Stock Beck Ribble Poor HIGH Langber Beck Aire TBC TBC Earby Beck Aire TBC TBC
							No changes are required to the wording of Policy ENV5, which at bullet point 2 refers to the need to "secure improvements to water quality" and makes reference to Policy ENV7, where this matter is properly dealt with. However, one change is proposed: Targets: Replace the target to "reduce the amount of new development in flood zones" with the two from Policy ENV7: i) Improve water quality in waterways throughout Pendle. ii) Reduce the number of planning permissions granted contrary to the advice of the Environment Agency on the grounds of flood risk and water quality.

Policy ENV5&6: Pollution, Unstable Land and Waste Management

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818047	207					<p>8 Policy ENV5: Pollution and Unstable Land 8.1 The proposed Policy requires all new development “ to improve ” air quality, both during and after construction. This is an unduly onerous requirement and not in accordance with national policy.</p> <p>9 Policy ENV6: Waste Management 9.1 The proposed Policy says that in all new developments, the Council will require the use of sustainable waste management processes that seek to reduce the generation of waste and prepare waste for re-use, recycling or other forms of recovery, by requiring disposal as a last resort. It is unclear what this is likely to mean for residential development. However, if it adds significantly to development costs, Manthorpe would object on the basis that it has not been viability tested in line with the NPPF (174).</p>	<p>Air Quality - It is agreed that the inclusion of the wording "improve air quality" within the policy is too onerous a requirement. Waste Management - Waste reduction is a national objective and a direct response to the EU Waste Framework Directive. Recent revisions to the Directive have been implemented through the Waste (England and Wales) Regulations 2011. These changes place a greater emphasis on the waste hierarchy to ensure that waste is dealt with in the priority order of: prevention, preparing for re-use, recycling, other recovery (for example, energy recovery), disposal. Following the waste hierarchy is good practice which businesses should adopt as a matter of course and is partly implemented through Duty of Care requirements. The types of waste materials generated by new development are so variable that it is not possible to accurately test viability in such a 'broad brush' manner. To reflect the fact that viability may be an issue, and provide flexibility, the final bullet point in the policy concludes with the caveat that where materials cannot be reused, recycled or recovered disposal will be permitted.</p>
<p>Manthorpe Developments (UK) Ltd</p> <p>818046</p> <p>Mr Michael Courcier</p> <p>Barton Willmore</p>						<p>Air Quality - Amend the start of the first bullet point to read: "minimise pollutant emissions and ..." Waste Management - No changes to the Core Strategy are considered necessary to address the main thrust of this objection (viability testing). However, it is felt that the policy could be improved further by making the following changes: (1) Including a detailed reference to the EU Waste Framework Directive and the waste hierarchy within the reasoned justification. (2) Amend the sentence introducing the final two bullet points in the policy to read "All new developments will be encouraged to follow the waste hierarchy. In particular the Council will:"</p>	

Policy ENV7: Water Management

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
816751			28	Yes	No	It is not effective.		Yes	<p>Paragraphs 8.18 and 8.35 specifically address the role and benefits of trees and woodland and its creation in mitigating climate change. Policy ENV1 refers specifically to the planting of new native woodland and restoration of ancient semi-natural woodland. ENV1 also supports the incorporation of beneficial biodiversity features and ENV7 requires new development to include sustainable drainage systems which in both cases can incorporate native woodland planting as appropriate.</p>	
Mr	Nick	Sandford								
The Woodland Trust										
<p>We would like to see more emphasis in the policy on sustainable management of water catchments. In particular we would like to see the role of woodland creation in appropriate locations recognised as an effective means of improving water quality and alleviating flooding. The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf) - http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx . Trees and woodland are very well placed to contribute to the emerging agenda of water risk management in the light of a changing climate. For example: - Creation of tree and woodland buffers to improve water quality · Buffers adjacent to surface waters, pollution sources or pollution pathways can improve water quality by reducing sediment, nitrate, phosphate and pesticide concentrations. Trees on river banks can help reduce water temperature, thus helping to maintain oxygen levels. Native woodland creation to improve water quality Native woodland creation on arable, improved pasture and urban areas can improve water quality by reducing sediment, nitrate, phosphate and pesticide concentrations. Native woodland creation as part of sustainable urban drainage systems (SUDs) can reduce surface run-off and retain pollutants on brownfield sites. Restoration of Planted Ancient Woodland Sites (PAWS) in upland headwaters to increase water quality and quantity Restoration of PAWS (ancient woodland sites planted with non-native conifers) to broadleaf woodland or other semi-natural habitats can reduce nitrate concentrations by up to 90 per cent and increase local water quantity by 20-50 per cent in very dry regions. Restoration can also reduce local streamwater acidification in acid-sensitive areas. Creation/Restoration of floodplain woodland to alleviate, and slow the rate of, flooding The creation or restoration of native broadleaf woodland can lead to a reduction of major and local flood events. Modelling suggests that major flood events can be delayed and attenuated where woodland creation is targeted to bottlenecks in 100-year flood envelopes. At the local scale woodland creation also needs to be appropriately targeted. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6 %. The creation of short rotation coppice woodland can lead to a reduction in major and local flood events.</p>										
<p>Include a reference to woodland creation in the sections of the policy on surface water run off and water quality.</p>									<p>Amend paragraph 8.189 to include native woodland creation as one of the possible approaches to SuDS which will then inform policy ENV7.</p>	

Policy ENV7: Water Management

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
712277			65					On this point, Rolls-Royce are concerned that Policy ENV 7 relating to Water Management may be overly prescriptive in relation to the management of Surface Water runoff. Whilst it is recognised that this is an issue that needs careful management, it is suggested that the Council review the requirements of this policy to ensure that it is not overly burdensome to development and is the most effective way to manage this.	Recent flooding across the country have highlighted that the impact of surface water runoff is of increasing concern. This policy has been carefully prepared in conjunction with both United Utilities and the Environment Agency and its requirements are not considered to be overly burdensome on development.
Mr	Robert	Orgill							
Rolls Royce plc									
817556									
Ms	Kate	Skingley							
David Lock Associates									
No change proposed in response to this comment.									

807418			72					Page 98 – Water Management: the definitions of flooding that are used require clarification. The table attached sets out the types of flooding and the organisations responsible for them. In this section we would recommend making reference to Lancashire County Council (LCC) as the Lead Local Flood Authority. LCC are due to have adopted the Lancashire Local Flood Risk Management Strategy by April this year and this document should be referenced. Mention should also be made of LCC’s future role as the Sustainable Drainage System (SUDS) Advisory Body (SAB). Footnote 120: Low risk areas (Flood Zone 1) are classed as having a less than 0.1% chance of flooding. Medium risk areas have a probability between 0.1% and 1.0%. Page 99, paragraph 8.165 and page101, paragraph 8.185: our Flood Maps were updated in December 2013 and provide the following information: (Table explaining the different flood map types). Page 102 to 103, Policy ENV 7 – Water Management: under Surface Water Management reference to the SUDS hierarchy would be useful.	It is acknowledged that the management of flooding in the UK has become increasingly complex over recent years and that further clarification would be useful within the reasoned justification to the policy. It is also acknowledged that Lancashire County Council's role as the Lead Local Flood Authority and SuDS Advisory Body (SAB) should be referenced, as should the emerging Local Flood Risk Management Strategy and the SuDS Hierarchy. To be comprehensive and improve clarity it is agreed that the information in Footnote 120 should be re-presented and the information in paragraphs 8.165 and 8.185 updated. However, referencing the latest update of a particular product is not appropriate in a strategic document, which is intended to last for at least 15 years.
Mr	Dave	Hortin							
Environment Agency									
OFFICER RECOMMENDATION 1: Replace the introduction with the following text: "Water is a sensitive and often scarce resource that needs to be carefully managed. It is vital for all liv-ing plants and ani-mals. For human beings it is not only essen-tial to life, but also of importance to indus-try and agri-cul-ture; as a means of trans-port and for recre-ation. In the UK, flood risk is of particular concern, the primary issues being: 1. Climate change, resulting in increased severity and intensity of rainfall, and 2. New development, which may itself be at risk of flooding, and may increase the risk of flooding downstream. The potential impacts of climate change over the next 30-80 years have been assessed by the United Kingdom Climate Impacts Programme (UKCIP, 2002). In the context of flood risk the key outcomes of Climate Change are: the UK climate will become warmer; winters will become wetter and summers may become drier everywhere; heavy winter rain and snow will become more frequent; relative sea level will continue to rise around most of the UK shoreline;									

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy ENV7: Water Management

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							<p>and extreme sea levels will be experienced more frequently. Climate change is therefore likely to significantly increase the risk of flooding over time. The most common causes of flooding in Pendle are listed below: Fluvial Flooding This occurs in the floodplains of rivers [Footnote: The term is used here to refer to both Main Rivers and Ordinary Watercourses] when the capacity a watercourse is exceeded as a result of rainfall, snow or ice melts within the upstream catchment, or blockages cause river defences to be overtopped. Groundwater Flooding Low lying areas sitting over aquifers may periodically flood as ground water levels rise. This type of flooding is often seasonal, slow in its onset and can be forecast with reasonable accuracy. Surface Water Flooding Surface water (pluvial) flooding often occurs outside of recognised floodplains. It is caused by rainwater run-off from urban and rural land with low levels of absorbency. High density urban development has increased the proportion of non-permeable surfaces, a problem that is often exacerbated by an overloaded and out-dated drainage infrastructure. These circumstances, combined with intense localised rainfall that is difficult to forecast, can give rise to severe localised flooding where the onset can be very rapid. Highways Flooding Water which runs off roads can influence the occurrence of local flooding and potentially impact on the quality of receiving surface waters or groundwater. Flooding from Sewers Flooding from sewers most often occurs where combined storm and foul sewers receive large amounts of surface water run-off over a short period of time and capacity is temporarily exceeded. This type of flooding is hard to predict, has significant sanitary consequences for those affected, and can occur very rapidly. Flooding from Other Man Made Infrastructure The failure of canals, reservoirs, other manmade structures, certain industrial activities, water mains or pumping stations may all give rise to the flooding of areas downstream. New development will be directed towards those areas with the lowest probability of flooding and required to minimise surface water runoff, in order to avoid the potential for increasing flood risk and introducing contaminants into the water supply. OFFICER RECOMMENDATION 2: That Footnote 120 is replaced by a table within the reasoned justification under the sub-heading 'Development and Flood Risk'. OFFICER RECOMMENDATION 3: Insert the following text after paragraph 8.166: "In recognition of their role as the Lead Local Flood Authority (LLFA), Lancashire County Council adopted the Lancashire Local Flood Risk Management Strategy in April 2014. The County Council will also assume the role of the Sustainable Drainage System (SuDS) Advisory Body (SAB) from April 2015." OFFICER RECOMMENDATION 4: That the following changes be made to the reasoned justification: Paragraph 8.165 - Amend the text to read: "EA produces a wide-range of products addressing flood risk. For land use planning the Flood Map indicates those areas considered to be at risk of flooding from rivers and the sea in England and Wales, and highlights those areas that benefit from flood defences. Other EA</p>

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Policy ENV7: Water Management

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							products show areas where a more detailed study of surface water flooding may be appropriate within a SFRA or Surface Water Management Plan (SWMP) and assist local authorities and reservoir operators in the production of emergency plans for reservoir flooding." Paragraph 8.185 - Delete the final sentence of this paragraph, as the information is out-of-date and would be better addressed under the section headed 'Context'. OFFICER RECOMMENDATION 5: Under the heading 'Surface water run-off ' in the reasoned justification, add the following text after paragraph 8.175: "The Framework notes that "development should give "priority to the use of sustainable drainage systems" (Paragraph 103) and that "developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through ... the appropriate application of sustainable drainage systems" (Table 1, Technical Guidance). Sustainable Drainage Systems (SuDS) mimic natural drainage and reduce burden on the sewer system. Their use also offers benefits for biodiversity, water quality, and amenity. The SuDS Hierarchy (see table below) sets out the preferred method for selecting which SuDS should be used in particular circumstances. INSERT SuDS HIERARCHY TABLE Where possible surface water should be dealt with at source and not conveyed to a large attenuation structure. SuDS such as rainwater harvesting systems, waterbutts and permeable surfaces can be used to immediately deal with surface water runoff as it lands on a building, car park or road, helping to reduce flood risk and improve the quality of surface water runoff. Rainwater harvesting and waterbutts also encourage rainwater recycling, which reduces the use of potable water supplies. Elsewhere the use of soft SuDS such as ponds and swales are preferred, as they mimic natural drainage and provide a number of other benefits. They can be used to attenuate surface water flows, reduce the flow rate of surface water runoff, improve the quality of surface water runoff by removing hydrocarbons and pathogens and also promote and enhance biodiversity within a developed environment. In small developments where there is insufficient space for pond and swales, the preference is for the use of infiltration systems as these recharge natural ground water supplies, reduce the impact of excess flows to watercourses and surface water sewers and help to remove contaminants found in surface water. However, care should be taken when these are used in or near aquifer protection zones, or close to buildings or structural foundations. It is recommended that the Environment Agency is consulted prior to constructing infiltration systems and soakaways. Where space is at a premium, or simply not available, there is also merit in using storage tanks, oversized pipes and culverts This can be complemented by discharging to natural drainage system such as a reed bed or small pond to provide a final stage of treatment to the surface water runoff."

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy ENV7: Water Management

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
814953			92	Yes	Yes		Yes	8.175 Urban environments can be highly susceptible to surface water run-off, which can lead to flooding. New development is required to limit water discharge levels into local sewers and drains to help improve capacity in the network. New development, particularly on Greenfield sites, should seek to replicate existing drainage where possible, with sites that drain into ditches or watercourses continuing to do so and not enter the public sewerage system post development. It is the responsibility of Lancashire County Council to take reasonable steps to prevent water from running off the adopted highway onto private property. When does it become acceptable for run-off from development on Greenfield to not run into public sewerage system?	It is not always possible, particularly on small development sites, to replicate existing drainage patterns. In such circumstances the use of the SuDS Hierarchy is recommended (see response to Comment ID 072). Whilst an assessment of the potential flood risk to the proposed development site is required in all instances, the submission of a formal Flood Risk Assessment is not always required. The Council publishes a list of application requirements, which includes the national and local list of information required for any planning application involving development. This is the appropriate mechanism for determining the information necessary to accompany a particular planning application.
Mrs	Pam	Slater						Remove 'where possible'. If this can't be achieved, then should building be allowed? Should it be specified for a Flood Risk Assessment FRA to be submitted with an application?	No change proposed in response to this comment.

327423		281				United Utilities supports Policy ENV 7 Water Management which focuses on the key principles to managing development in flood risk area, surface water and water quality. In some circumstances, it may be necessary to coordinate the delivery of new development with the delivery of future infrastructure. United Utilities' requests developers / landowners engage with us at an early stage to understand the impact of development on existing infrastructure with details of their drainage strategy for development sites. United Utilities requests developers produce drainage strategies of each phase of development in agreement with the LPA, United Utilities and the Environment Agency. It is prudent that developers and landowners keep United Utilities informed of realistic and achievable delivery timescales for development and approach infrastructure in a coordinated manner. It will be necessary to ensure drainage infrastructure is delivered in a holistic and co-ordinated manner as part of an overall strategy between phases of development and between developers. The delivery of development as part of an overall strategy and the early receipt of details allows the impact of development on infrastructure to be determined with improved accuracy. Please also note, the following water supply investment programmes outlined in Paragraph 8.180 are now complete: - £32.5m scheme to improve Pendle's water quality; and - £19m scheme to replace a water treatment works in Barley which serves over 40,000 people in Nelson, Colne and Barrowford is now complete.	Note comments.
Mr	David	Sherratt					
United Utilities							
							To reflect the fact that the investments mentioned are now complete, replace paragraph 8.180 with the following text: "United Utilities has invested £19 million to create a state-of-the-art water treatment facility at Ridgaling Farm north of Barrowford. This replaced the old facility at Barley, and provides over 40,000 people in Nelson, Colne and Barrowford with some of the cleanest drinking water in Europe. In addition, a further £11 million was spent between 2005 and 2010 to prevent sewer flooding and help deliver cleaner streams and rivers across the borough."

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Q2a = Do you consider the Core Strategy to be sound?

Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy ENV7: Water Management

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

327423	284				United Utilities requests that the LPA robustly considers the availability of alternatives to the public sewer for sites which are proposed to be developed. This should be a consideration of policy and the subsequent application process. Applicants should be required by policy to thoroughly investigate the surface water hierarchy on sites identified for development in the plan period (and beyond). It is most appropriate to establish key site specific drainage principles as part of policy where it is possible to identify the most sustainable form of approach to surface water drainage. Any surface water discharge should be attenuated to the most appropriate level having regard to existing site conditions including an allowance for climate change and this should be reflected in policy. It is important that we continue to work with landowners and developers in limiting the extent of surface water entering the public sewerage system as a result of new development to ensure we are able to most appropriately manage the impact of growth on drainage infrastructure. United Utilities therefore requests that all new development must discharge surface water to one of the following, listed in order of priority: 1. continue and / or mimic the site’s current natural discharge process; 2. direct discharge to a watercourse or to an on-site suitable form of Sustainable Urban Drainage System (SUDS); 3. direct and controlled discharge to a surface water sewer or controlled discharge into a combined sewerage network. It should be a clear requirement of allocated and windfall sites that all new development should manage surface water in the most sustainable, effective and appropriate way. We request that developers / applicants clearly demonstrate with evidence, how they have applied the drainage hierarchy set out in Building Regulations 2010 H3 Rainwater Drainage (as outlined above) as part of the consideration of development sites.	Note comment.
Mr	David	Sherratt				
United Utilities						
After further discussion with United Utilities, it was agreed that no change to the policy was required to address this comment.						

Living: Creating a Vibrant Housing Market

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
379043			1					<p>Hello, in response for feedback/comments on the Local Plan. It's a shame this was not put in place before developers began a feeding frenzy to grab the best bits of land i.e. green fields that have great amenity value for local people. With that in mind, I'd like to be assured that the officers and councillors will do all they can to stop development on land at Lidgett/Skipton Old Road. This land is used by 100s of walkers and is one of the areas that make Colne special. If we want to attract business and visitors to the town it is absolutely vital that we protect these areas that have great visual appeal as well as tremendous amenity value. Skipton Old Road is, increasingly, a gateway into Colne. At the moment it gives a wonderful first impression. If we allow that land to be crowded with "anywhere houses" the impact will be devastating, plus, the traffic would be a major issue. I suggest that we look to the under used South Valley for potential building plots. If the council and ;landowners join forces to assess the flood risks/contamination and what needs to be done to tackle the issues, then the land and the crumbling old mills would be viable. It could become a real jewel in what is considered one of the more deprived areas. The council could insist on a village-style environment with private and social housing. You could look to Derwentthorpe in York for inspiration. What about having a joint venture with the landowners and a developer? - Barnfield possibly but with the addition of a forward thinking architect. They could learn how to build for the 21st century rather than creating more anywhere houses. We could have eco-friendly homes, live work properties, community facilities and green spaces. In other words something to be proud of that would impress visitors and those thinking of basing their business here.</p>	<p>The land at Lidgett/Skipton Old Road is not proposed as an allocation in the Core Strategy. Sites in that area of Colne have been identified in the Strategic Housing Land Availability Assessment (SHLAA) as having the potential to be developed for housing. However, their identification in the SHLAA does not mean planning permission will necessarily be granted or that they will be allocated in the Local Plan Part 2: Site Allocations and Development Policies. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan’s economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. The Strategic Housing Land Availability Assessment indicates that there is not a sufficient number of sites within the existing settlement boundaries to meet the housing requirement. The SHLAA includes the sites within the South Valley area of Colne and the previous work carried out relating to the regeneration of this area will be incorporated into the Local Plan Part 2. However, even with the redevelopment of areas like the South Valley there will still be a need for some land outside of the settlement boundaries to be allocated for future housing development.</p>
									<p>No change proposed in response to this comment.</p>
618699			172					<p>Summary of Representations 1.6. The representations are submitted specifically in respect of the housing policies of the emerging Core Strategy, which we consider are unsound and not consistent with National Policy for the following reasons: The housing numbers proposed in the Core Strategy are not based on robust evidence as they are set at a lower level than recommended in the Strategic Housing Market Assessment (SHMA); The Council cannot demonstrate a five year supply of deliverable housing sites; The strategic housing sites being proposed in the CSFO have not been robustly and vigorously assessed to establish whether they are ‘strategic’ and thus whether they can be considered as part of the Core Strategy; and There is no certainty that the scale of residential development proposed at the strategic site at Trough Laithe can be delivered within the timescales set out in the Core Strategy and SHLAA.</p>	<p>The housing requirement figure of 290 dwellings per annum, as detailed in the Core Strategy, was within the range (280-320dpa) set out in the Strategic Housing Market Assessment (SHMA) and is therefore consistent with the evidence base. However, with the release 2012-based Sub-national Population Projections (SNPP) a Housing Needs Study (HNS) Update report was prepared to consider the impact of these new projections on the housing requirement. A new objectively assessed needs (OAN) range of between 250 and 320 dwellings per annum has been identified, which takes account of the lower levels of population growth. It is considered that in order to ensure that the housing requirement reflects the plan’s economic growth aspirations the annual housing figure should be set at 298 dwellings. The plan will also be revised to include a staggered delivery</p>

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Living: Creating a Vibrant Housing Market

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

approach to give the market time to respond to an increased housing figure and to acknowledge the slower housing market recovery rates in Pendle. The Strategic Housing Land Availability Assessment (SHLAA) indicates that there is sufficient land available to meet the overall housing requirement and a five year supply against the staggered delivery targets. The five year supply calculation in the SHLAA is to be revised in line with the National Planning Practice Guidance. The strategic site has been identified through an assessment of the sites in the SHLAA and through representations made to previous versions of the Core Strategy. This work indicated that only the site at Trough Laithe was strategic in terms of its location serving the wider area of the M65 Corridor, its magnitude/size, and its ability to deliver. In terms of the scale and timescales for delivery of the strategic site, the landowner has provided evidence to show that the site can be delivered at the proposed rate.

In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text. The five year housing land supply calculation in the Strategic Housing Land Availability Assessment will be revised to reflect the National Planning Practice Guidance.

618699

174

Mr

Robert

Crolla

Indigo Planning

Background 3.1. The emerging Local Plan is underpinned by a number of documents which were prepared in support of the Core Strategy Further Options (CSFO) Report. In particular, the housing policies in the CSFO are based upon the findings of the following: Burnley & Pendle Strategic Housing Market Assessment (SHMA) (2013); and Pendle Strategic Housing Land Availability Assessment (SHLAA) (2013). 3.2. Separate representations have been made to these documents, which highlight that the Council cannot demonstrate a five year supply of deliverable housing on the following grounds: i. Using the high growth scenario suggested in the SHMA, the Council can only demonstrate a 4.8 year supply of deliverable housing sites; ii. The SHLAA includes a number of sites where either the proposed trajectory of delivery or delivery as a whole is questionable, thus reducing the number of sites which are deliverable within the five year time frame required by the NPPF; and iii. The strategic SHLAA sites promoted in the latest iteration of the Core Strategy have not been soundly assessed to define whether they are ‘strategic’ and thus whether they can be considered as part of the Core Strategy. 3.3. As such the housing policies within the CSFO are not based on robust evidence and are unsound. 3.4. The most robust way to remedy the lack of deliverable housing land is to reconsider the portfolio of sites within the SHLAA (including the timescales and trajectory of their delivery) and

The Strategic Housing Land Availability Assessment (SHLAA) indicates that there are sufficient, deliverable sites available to make up a five year supply of housing land against the staggered delivery targets set out in Policy LIV1. The delivery rates of sites in the SHLAA are based on average current delivery rates or specific information from the landowner/developer. These delivery rates are considered to be realistic. The strategic site has been identified through an assessment of the sites in the SHLAA and through representations made to previous versions of the Core Strategy. This work indicated that only the site at Trough Laithe was strategic in terms of its location serving the wider area of the M65 Corridor, its magnitude/size, and its ability to deliver. The SHLAA will be used in the preparation of the Local Plan Part 2 to help determine which sites should be allocated for new development. This approach will ensure sufficient sites are allocated to meet the housing requirement.

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Living: Creating a Vibrant Housing Market

Person Details			Comment ID			Q1			Q2a			Q2b			Q3			Consultee comments			Officer Response and Recommendation								
																		consider the inclusion of additional sites such as land at Long Ing Lane which will help to meet the existing and future acute housing need in Pendle. 3.5. Until such sites have been considered the Council cannot demonstrate a sufficient deliverable supply.						No change proposed in response to this comment.					

618699

MrRobertCrolla

Indigo Planning

178

6.1. These representations are submitted to the ‘Further Options’ document of the Pendle Local Plan Part 1: Core Strategy and should be read alongside our representations to the Pendle & Burnley SHMA and Pendle SHLAA. 6.2. As currently prepared and drafted, the emerging Core Strategy is unsound and as such there are a number of matters which require further review: i. Policy LIV1 should be amended to adopt the higher housing targets recommended in the Council’s SHMA; ii. Further evidence should be provided by the Council which demonstrates why the proposed site at Trough Laithe Farm (Policy LIV2) is of strategic importance; iii. Additional site investigation works should be undertaken which confirm whether the site at Trough Laithe Farm can be delivered within the timescales proposed or delivered at all; and iv. If the Council consider the site to be strategic, it should be subject to an a more detailed Sustainability Appraisal. 6.3. Alternatively the Council should revise the Local Plan approach and prepare a single Local Plan which incorporates both development management and site specific policies and allocations. Allocations should include land at Long Ing Lane, Barnoldswick. 6.4. The Council should revisit the evidence base, policy wording and Core Strategy targets before proceeding to advanced stages of document examination (including submission to the Secretary of State).

In order to ensure that the housing requirement reflects the plan’s economic aspirations, the overall provision will be increased to 5,662 dwellings (equivalent to 298 dwellings per annum). Additional evidence will be provided to outline the need for a strategic housing site and the process for selecting the site at Trough Laithe. There is already evidence available relating to the delivery of the strategic housing site. This will be incorporated to the Strategic Housing Site Paper. Policy LIV2 of the Core Strategy Further Options report introduces the Strategic Site Option and has been through the sustainability appraisal process. Abandoning the Core Strategy in favour of preparing a single Local Plan would further delay the Council getting an up-to-date plan in place. The preparation of the Local Plan Part 2: Site Allocations and Development Policies will follow the adoption of the Core Strategy and is the most expedient way for the Council to get a completed development plan in place.

No change proposed in response to this comment.

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Appendix 1 Page 111

Policy LIV1: Housing Provision and Delivery

Person Details				Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
713082				42	Yes	No			4.1 In order to achieve Priority Goal 3 of the Sustainable Community Strategy the further Options Report recognises the need to ensure the provision of a range of housing. As part of this we welcome the recognition that there is a need to ensure we have a range of housing provided in different locations to encourage higher earners to live in Pendle. We encourage attempts to redress the current imbalance. 4.2 Following our earlier representations, qualified support is offered to the increased housing requirement of 4350 dwellings to be delivered over the plan period, a rise of almost 1000 additional dwellings over the requirement set out in the earlier iteration of the Core Strategy. Nonetheless, we still question whether the revised target will provide the step change in housing delivery required by the NPPF. 4.3 Work on the Site Allocations and Development Policies will continue to require some enlightened thinking in order to ensure that settlements with clear sustainability credentials, such as Earby, are prevented from realising their potential through strict adherence to the percentage figures set out in proposed Policy SD3. It seems apparent that there will be a need for the allocation of new housing land over and above those currently identified in the Strategic Housing Land Availability Assessment (SHLAA) if Earby is to realise its potential as a sustainable settlement, which is attractive to the housing market and which is readily capable of providing the desired accommodation for higher earners.	In response to this and other comments made to the Further Options consultation it is deemed necessary to better align the housing provision figure with the employment land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met. This should therefore provide the step change required by the NPPF to significantly boost the supply of housing. As a consequence this will invariably mean that additional land will need to be allocated in the Pendle Local Plan Part 2: Site Allocations and Development Policies, including within the Local Service Centres. The Officer Response to comment 40 under Policy SDP3 deals with the issue relating to housing distribution.
Mr	G	Wilkinson	Dalesview Developments Ltd							
713089										
Mr	Andrew	Rollinson	Rollinson Planning Consultancy Ltd							

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Policy LIV1: Housing Provision and Delivery

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						residential development will be to contribute to delivery of affordable housing’ – this does not comply with NPPF . Pendle have had a consistent under delivery of housing per se which means both market and affordable. Yes market housing may help to enable delivery of affordable but affordable should not be given higher priority than market housing as the problem is a general under delivery one not affordable specific. Para 10.35 – whilst the council need to understand the viability of a site they must also recognise that housebuilders will not provide sensitive business information. So whilst providing a viability appraisal may be necessary, requiring details of build and acquisition costs is unlikely to be readily provided. This also assumes that all applications for development will be made by developers whereas some could be landowner led. So it is not flexible. Unsound Para 10.37 – support the idea of bring land forward to provide viable sites in the 0-5 year period to meet the requisite demand. Para 10.42 – support the release of greenfield sites as inadequate viable brownfield sites. Policy LIV1 - It is unclear which approach to calculating Housing Land Supply (HLS) has been used – residual or Sedgefield. Recent appeal decisions support the Sedgefield approach meaning any under delivery has to be addressed in the 0-5 year timeframe not spread across the remaining plan period. The approach to sites should follow NPPF presumption in favour of sustainable development and not the sequential approach in SDP2. As noted in our response to para 10.32 above allocating a strategic site does not equate to early delivery. Indeed quite the converse and in other LA areas strategic sites have been included to assume the long term not short term housing delivery because of the time it takes to bring them forward. We do note and support ‘ Proposals on other, non-allocated, sites will be supported where they are sustainable and make a positive contribution to the five-year supply of housing land.’ Not justified, unsound.	provide a rolling supply of housing over the medium term. Paragraph 10.32 will be amended to clarify the role of the strategic site in terms of delivery. 3) Paragraph 10.34 refers to the impact of policy requirements on the viability of new housing developments. It explains that in terms of the priority for contributions, where the viability of a site may be an issue, the Council would prefer the developer to provide affordable housing rather than, for example, open space. It is not trying to promote the provision of affordable housing over market housing. 4) The Council already operates a policy which requires the submission of a financial viability statement. This is used to negotiate with the applicant regarding the amount of affordable housing that can be provided and to provide assurances to the Council that the development is deliverable. These viability statements are confidential between the applicant and the Council and include land values and build costs. The requirement for such a statement should be seen as a tool which can help the applicant bring forward a viable scheme. However, in response to this and other comments to the Further Options consultation the policy will be amended to clarify the circumstances when a financial viability assessment will be required. 5) Support for bringing land forward where it contributes to the five year supply is noted. 6) Support for the release of greenfield sites is noted. 7) The method used to calculate the five year housing land supply is the Sedgefield method and this is clearly explained in the Strategic Housing Land Availability Assessment (SHLAA). The justification text of Policy LIV1 will be revised to include a reference to this method. 8) Issues relating to the locational approach / distribution of new housing are dealt with in the Officer Response to comment 49 under Policy SDP3. 9) Issues relating to the delivery of the strategic site are dealt with under point 2) above. 10) Support for 'proposals on other, non-allocated sites...' is noted.
							1) Insert the following wording into the context section of the justification text: "In accordance with the Duty to Co-operate, a SHMA has been prepared together with Burnley Borough Council to acknowledge that the two boroughs form a joint Housing Market Area (HMA). The SHMA examines the inter-relationships between the HMA and adjacent areas, and clearly indicates that the surrounding districts operate as separate, discrete housing markets." 7) Amend the justification text to explain that the five year supply calculation uses the Sedgefield method and deals with any under supply in the ensuing five year period.

Policy LIV1: Housing Provision and Delivery

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
712277			60					Housing In relation to housing, the plan indicates that provision will be made for the delivery of a minimum 4,350 dwellings over the plan period (between 2015 and 2030), equating to an annual provision rate of 290 dwellings. Ensuring that Rolls-Royce's workforce is able to access high quality and affordable housing in accessible locations is key. Rolls-Royce therefore, supports the opportunities presented within the plan for housing mix and provision. Creating quality environments and quality housing is key to ensuring a strong and competitive economy. This is recognised at paragraph 3.148 of the Plan which states that 'Planning must also address how future housing requirements can be met in the most sustainable manner in supporting economic growth and recovery, and assisting housing market regeneration initiatives'.	This comment provides support for the approach the policy takes to the provision of new housing.
Mr	Robert	Orgill							
Rolls Royce plc									
817556									
Ms	Kate	Skingley							
David Lock Associates									
No change proposed in response to this comment.									

817583			80	No	No	It is not positively prepared.; It is not justified.; It is not effective.; It is not consistent with national policy.	No	1 Introduction 1.1 These representations are made by JWPC Ltd on behalf of Beck Developments Ltd which is an established housing developer currently engaged in housing construction within the Borough. Beck is also keen to continue housebuilding activities within Pendle and has identified a number of such opportunities on viable sites located immediately outwith the Colne settlement boundary but in locations which are readily sustainable and which can confidently be swiftly delivered in a manner which would assist the Borough’s five-year housing requirement. Several of these sites identified by the Council are designated in the Pendle Replacement Local Plan (2011-2016) as land safeguarded for possible future development under Policy 3A. 1.2 Beck therefore has an active interest in the development plan review and, whilst being encouraged by the Council's acknowledgement of the need to update its housing policy and - in so doing - allocate new sites capable of confidently delivering a range of quality dwellings, the Company does have concerns that some of the intended policies contained within the Further Options Report have not been fully justified and may well slow down, rather than speed up, housing delivery within the Borough. 1.3 In making representations, Beck Developments is conscious of the guidelines set out within NPPF which focus upon the tests of sustainability and deliverability. The company is also aware of the policy imperative set out within the Framework which places the responsibility upon statutory planning authorities to provide at least five years forward housing land supply which is truly deliverable and which addresses any market requirements identified in local housing studies. 1.4 For that reason my client has taken careful note of the present housing position explained within the Further Options Report, as well as the supporting studies dealing with housing need and perceived housing land availability - ie the Updated Pendle Strategic Housing Land Availability Assessment (SHLAA) and the Burnley and Pendle Joint Strategic Housing Market Assessment (SHMA). 1.5 In particular, my client notes the substantial shortfalls in required housing delivery which have occurred in Pendle, year on year, since 2008/9 (using the old RSS lower target of 190 new units per annum as a base). The inevitable substantial reduction in new	In response to this and other comments made to the Further Options consultation it is deemed necessary to better align the housing provision figure with the employment land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met. With regards to backlog against previous plan targets, the NPPG and recent judgements indicate that in assessing future housing need, authorities should not add any ‘backlog’, where past housing development under delivered RSS targets. The HNS Update report takes account of this advice and provides a set of scenarios which identify the housing need for Pendle in the future. In addition, the NPPG requires that the demographic projections are used as a starting point and should be adjusted to take account of various market signals. One of these signals considers the rate of housing development and suggests that where the historic rate of development shows that actual supply falls below planned supply, then future supply should be increased to reduce the risk of future under-delivery. Within the OAN the relevant demographic scenarios have been adjusted to reflect this situation and therefore take account of past under-delivery. In terms of under-delivery post 2011, this should be dealt with in the five year supply calculation and through the monitoring procedures put in place going forward. Policy LIV1 will be amended to make clear that the housing requirement in the Core Strategy covers the period from 2011 to 2030. The justification text will be amended to clarify this position and also to explain that the Sedgefield method is used in the five year land supply calculation, which aims to deal with any under delivery in the ensuing five year period. With regards to the use of brownfield land, the NPPF is clear
Beck Developments Ltd									
817585									
Mr	John	Willcock							
JWPC Ltd									

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Policy LIV1: Housing Provision and Delivery

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>completions caused by the economic recession over the last five years has been compounded by the existing Local Plan’s emphasis upon inner urban brownfield sites, the development of which have been heavily compromised by lack of funding and by negative viability in recent times. 1.6 Net completion totals have been further eroded to take account of unfit house demolitions which resulted in negative net completions in 2008/9 and 2009/10 and only one third of the RSS requirements for the following three years. Given the continuing disappointing housebuilding performance within the Borough, we believe the Core Strategy’s starting point is an accumulated deficit of almost 1000 units which needs to be taken into account when setting the new five year housing land requirement by adding in estimated forward requirements required to address the historic deficit and provide for the identified needs of the local population. Added to this, as the CS Further Options report points out, is the need to underpin policies aimed at improving the Borough’s economic base by attracting inward investment, ideally of a high calibre, for which an improved and attractive housing offer is an essential component.. 1.7 For this to be successful there needs to be an urgent and radical shift in housing strategy by encouraging high quality, more viable development with less reliance upon currently questionable (but admittedly highly sustainable - in traditional locational terms) brownfield inner urban locations. Beck Developments fully acknowledges government aims to direct new development toward previously developed sites within established settlement boundaries and also understands that this priority will need to be reflected in emerging planning policy for Pendle. But Beck, as an experienced housing developer, also understands the importance of project viability, especially in a compromised housing market, and concurs with the emerging Council view that, if housing numbers and housing quality is to be uplifted, there needs to be a move away from a focussed dependency on inner urban sites. 1.8 Additionally, Beck acknowledges that the Council will need to take a positive enabling role (through its development plan) in promoting a wider choice of attractive housebuilding locations to developers. This, we believe is a current policy imperative required to restore developer confidence but also to deliver much needed housing to satisfy identified local needs. We say “policy imperative” because any delay in supporting new developable/sustainable sites further compounds the housing shortfall, to the detriment of both the social and economic well-being of the Borough.</p>	<p>that planning policies should encourage the effective use of land by re-using land that has been previously developed. Policy SDP2 includes details of the site selection process and use of land. It has been recommended that this policy is amended to reflect comments made to the Further Options consultation and to better align with the NPPF. The Core Strategy acknowledges that there will be a need to release sites to meet the development needs of the borough and is committed to preparing the Pendle Local Plan Part 2: Site Allocations and Development Policies expediently following the adoption Core Strategy.</p>
							<p>In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text. Amend the justification text to explain that the five year supply calculation uses the Sedgefield method and deals with any under supply in the ensuing five year period.</p>

Policy LIV1: Housing Provision and Delivery

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
817583			83	No	No	It is not positively prepared.; It is not justified.; It is not effective.; It is not consistent with national policy.	No	Policy LIV1 – Housing Provision and Delivery 2.10 The policy explains that “To ensure early delivery of the housing requirement a strategic site has been allocated in the Core Strategy (policy LIV2). The Pendle Local Plan Part 2 Site Allocations and Development Policies will be used to allocate specific sites to meet the remainder of the housing requirement. The distribution and location of the housing requirement is set out in policy SDP3. Proposals on other, non-allocated, sites will be supported where they are sustainable and make a positive contribution to the five year supply of housing land. Applicants should demonstrate the deliverability of their proposal by providing a statement with details of the availability, suitability and achievability of the scheme. For major schemes this statement should also include a financial viability assessment. Proposals should use land in a sustainable way by following the site selection approach outlined in policy SPD2”. 2.11 Paragraphs 11.53 & 11.54 explain that “ In order to increase delivery of housing, reduce the undersupply and meet the housing requirements of the Borough in a timely manner, the evidence points to the need to identify and allocate a strategic housing site. Indeed the SHLAA shows that the portfolio of sites (including the proposed strategic site) is only just sufficient to deliver a five year supply of housing land against the proposed housing requirement figure identified in the SHMA and is set out in policy LIV1. The strategic site needs to be of sufficient magnitude to make a real difference to the housing land supply position and on the ground delivery. In particular it must be able to deliver new housing at a rate which will make a significant impact in meeting the annual requirement”. 2.12 Paragraph 11.55 explains the strategic site selection methodology in a very simplified manner stating that, through the SHLAA review process, a number of additional sites that were not previously considered have been assessed to determine their suitability, availability and achievability. It further explains “The findings of SHLAA show that there is only one site of a size which could be put forward as a potential strategic site allocations. This is the site at Trough Laithe Farm, Barrowford”. 2.13 Paragraphs 11.56 and 11.57 further explain that “ This site was previously protected to meet future long-term requirements under policy 3A of the replacement Pendle local plan 2001 – 2016. This site is approximately 12ha and can provide an estimated 481 dwellings and will play a major role in bringing forward a significant proportion of the overall amount of housing that is needed in the Borough. The landowner has produced evidence to show that this site could be delivered at an estimated rate of 50 dwellings per annum. This equates to 17% of the borough’s annual housing requirement.”	This comment set out key points from Policies LIV1 and LIV2. It suggests that the use of the SHLAA as a mechanism for choosing the strategic site is simplistic. In terms of site selection, the SHLAA has thoroughly assessed a large range of potential housing sites in the borough. These have been identified through a desktop survey and a number of call for sites consultations. The SHLAA provides a robust mechanism for identifying the potential strategic site options in the borough. The information from the SHLAA shows that there was no comparable site to Trough Laithe in terms of size, deliverability and a willing landowner.
Beck Developments Ltd									
817585									
Mr	John	Willcock							
JWPC Ltd									
No change proposed in response to this comment.									

Policy LIV1: Housing Provision and Delivery

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
814953			90	Yes	Yes		Yes	10.27 One of the 12 planning principles set in The Framework (paragraph 17), is to encourage the effective use of land by re-using land that has been previously developed (Brownfield land), provided that it is not of high environmental value. The delivery of new housing will play a key role in re-using previously developed land. However, The Framework is clear that the full housing requirement should be met and therefore if there are insufficient Brownfield sites to meet the requirement or where such sites are not viable (deliverable), Greenfield sites will need to be used. In the current local plan, policy 17, there is a clearly defined sequential site search criteria for the allocation of land for development.	The NPPF states that planning policies should encourage the effective use of land by re-using land that has been previously developed (brownfield), provided that it is not of high environmental value. However, the NPPF does not preclude the use of greenfield sites and is clear that the housing requirement must be delivered. Policy SDP2 sets out the approach to site selection and encourages the reuse of previously developed land. The inclusion of a strong sequential approach would not be consistent with the aims of the NPPF.
Mrs	Pam	Slater						In order to focus development on Brownfield Sites, strong sequential criteria needs to be defined within the revised Local Plan. Greenfield sites should only be considered for development as an absolute last resort.	No change proposed in response to this comment.

755915		149				
Mr	Matthew	Good				
Home Builders Federation Ltd						
Policy LIV 1: Housing Provision and Delivery The plan identifies a housing requirement of 4,350 net new dwellings between 2015 and 2030, this equates to a net annual requirement of 290 dwellings per annum. In determining the housing requirement it is noted that the Council has had regard to the national household projections, the Council’s own economic aspirations and the Strategic Housing Market Assessment (SHMA). This is in accordance with the draft guidance contained within the National Planning Practice Guidance (NPPG) as well as the PAS good practice guidance upon identifying an objectively assessed housing requirement (‘Ten key principles for owning your housing number - finding your objectively assessed needs’). The 2013 ‘Housing Needs Study and SHMA’ undertaken by NLP on behalf of both Pendle and Burnley provides a good analysis of various scenarios and the effect they have upon the housing requirement. It is noted that the NLP report identifies that the housing requirement should be set within the range of 280 to 320 dwellings per annum (dpa) (paragraph 5.9). Whilst the Council’s proposed housing requirement of 290dpa does sit within the suggested range it is noted that this is at the lower end of the proposed range and no justification for the choice of this figure has been provided. It is also noted that a significant proportion of the tested scenarios are in excess of 300dpa, including the ‘policy on’ job growth requirement of 311dpa. Given this represents the Council’s economic ambitions and the need, identified within the NPPG and PAS documents, to align economic and housing strategies it is unclear why the Council would choose a figure lower than its own economic aspirations suggest. It should also be noted that the Council’s proposed requirement is less than the annual requirement identified by the 2011 based interim household projections. The NPPF is very clear that Local Plans need to plan to meet their objectively assessed need for housing (paragraphs 14, 17, 47, 159 and 182). Paragraph 47 of the NPPF further clarifies in terms of housing plans should meet the full, objectively assessed needs for market and affordable (our emphasis) housing in the housing market area. The NPPF (paragraph 159)						
In response to this and other comments made to the Further Options consultation it is deemed necessary to ensure that the housing requirement meets the population projections and is better aligned with the employment land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met. With regard to the requirement for applicants to submit a financial viability assessment, the Council already requires such a statement through its Interim Housing Policy. This is used to negotiate with the applicant regarding the amount of affordable housing that can be provided and to provide assurances to the Council that the development is deliverable. These viability statements are confidential between the applicant and the Council and include land values and build costs. The requirement for such a statement should be seen as a tool which can help the applicant bring forward a viable scheme. In particular, the statement is used by Policy LIV4 to negotiate the levels of affordable housing that can be provided. In response to this and other comments to the Further Options consultation the policy will be amended to clarify the circumstances when a financial viability assessment will be required. Specifically this will make the intentions of the requirement clearer in relation the Policy LIV4 Affordable Housing.						

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Q2a = Do you consider the Core Strategy to be sound?

Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy LIV1: Housing Provision and Delivery

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

states that the SHMA should be used to determine ‘the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period’. Paragraph 11.8 of the ‘Housing Needs Study and SHMA’ document identifies a net annual need for 672 affordable dwellings over next five years (including addressing current backlog). Paragraph 11.9 further notes that even when this requirement is considered against net household projections this still equates to 236 per annum (over 80% of the proposed housing requirement). The viability of sites across Pendle dictates that the percentages of affordable housing supplied from market sites is unlikely to achieve significant volumes. To assist in the delivery of affordable housing the Council should therefore consider increasing its housing requirement, particularly in the more viable locations. The policy places a requirement upon applicants to justify the viability of a site including financial appraisals for sites of 10 dwellings or more. This is an unjustified requirement by the Council and simply places a further bureaucratic burden upon the development industry and Council officers which is likely to slow the development process. The Council should only justifiably ask for such information where a developer is seeking to vary Council policy based upon viability grounds.

Recommendation The chosen housing requirement will not meet the full objectively assessed needs of the area. It is recommended that the Council identify a minimum housing requirement which accords with its own economic ambitions (311dpa) as an absolute minimum. This will not only ensure that the Council’s economic aspirations can be met in full but will also increase the supply of affordable homes within Pendle. The requirement for financial appraisals on all residential developments of 10 units or greater should be deleted.

In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text. Amend the policy as follows to clarify the circumstances where a financial viability assessment will be required: "To demonstrate the deliverability of their proposal applicants should provide a statement outlining details of the availability, suitability and achievability of the scheme. In line with Policy LIV4, this statement should also include a financial viability assessment, which will be used to help determine the amount of affordable housing to be provided."

618699

176

Mr

Robert

Crolla

Indigo Planning

Policy LIV 1 – Housing Provision and Delivery 5.1. Whilst the evidence base which underpins this policy is robust, the housing policies within the Core Strategy itself are unsound as they do not follow the recommendations within the evidence base, namely the suggested high growth housing scenario in the SHMA. 5.2. Policy LV1 sets out a housing requirement in Pendle of 4,200 (net) dwellings between 2015 and 2030, equating to 280 dwellings per annum. The policy allows for further allocation of sites where evidence of further need or demand is identified. 5.3. This approach is unsound as it does not accord with the Pendle & Burnley SHMA which recommends a target of 320 dwellings per annum (i.e. 4,800 net over the plan period). 5.4. The NPPF requires local authorities to ensure that local documents are based on adequate, up-to-date and relevant evidence. The Council’s policy approach should therefore follow

The Strategic Housing Market Assessment (SHMA) recommends that the housing requirement figure for Pendle should be set within a range of between 280 and 320 dwellings per annum. The SHMA states that setting the figure within this range would provide a realistic level of housing to deliver some economic growth, whilst recognising the demographic and viability challenges that remain. The Pendle Core Strategy Further Options Report set the housing requirement figure at 290 dwelling per annum based on a number of factors including the ability to deliver new housing at a realistic rate. However, in response to this and other comments made to the Further Options consultation it is deemed necessary to ensure that the housing requirement meets the population projections and is better aligned with the employment

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Policy LIV1: Housing Provision and Delivery

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							the recommendations of the SHMA, and as such the Council should revise the proposed housing targets to meet the SHMA recommendations.	land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met.
								In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text.

818033	198	Yes	No	It is not justified.	Yes	1. PWA Planning are retained on behalf of the owners of land north of Wheatley Lane Road, Barrowford to make representations to the Pendle Core Strategy : Further Options Report. The following responses follow the format set out in the pro-forma representation document. 2. The minimum housing requirements are at the lower end of the range advised in the NLP SHMA report which evidences the Core Strategy. It is considered that the annual requirement should be increased to a minimum of 320 dwellings per annum, representing a total requirement over the plan period of 4,800 dwellings; this represents the upper figure in the range given in the SHMA. Only by maintaining requirements at the upper end of the range will the authority achieve the NPPF requirement to boost significantly the supply of housing. Use of a lower figure will not achieve the housing provision required to support economic and general growth throughout the plan period.	In response to this and other comments made to the Further Options consultation it is deemed necessary to ensure that the housing requirement meets the population projections and is better aligned with the employment land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met.
<div>Owners of land north of Wheatley Lane Road</div>							
818030						3. The housing requirement across the plan period should be increased to 4,800 dwellings, with a minimum annual housing provision of 320 dwellings. 4. Policy LIV1 should be amended to state :- “A minimum of 4,800 (net) dwellings will be provided in Pendle between 2015 and 2030, equating to 320 dwellings per annum.”	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text.
<div>Mr Paul Walton</div>							
PWA Planning						We would wish to present further evidence (where appropriate orally) to the Inspector appointed to examine the Core Strategy in due course.	

Policy LIV1: Housing Provision and Delivery

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>818033</div> <div><div></div><div></div><div></div></div> <div>Owners of land north of Wheatley Lane Road</div> <div>818030</div> <div>MrPaulWalton</div> <div>PWA Planning</div>	199	Yes	No	It is not justified.	Yes	<div>1. PWA Planning are retained on behalf of the owners of land north of Wheatley Lane Road, Barrowford to make representations to the Pendle Core Strategy : Further Options Report. 2. It is not considered appropriate to identify a strategic housing site within the Core Strategy. Taken in isolation the allocation of the Trough Laithe site does not perform as a strategic site, rather it simply functions as a large potential housing site which might help to make up some of the housing needs to ensure that the plan’s housing strategy can come close to meeting the needs. Without the development (and where necessary the identification) of other large areas of greenfield land in the Site Allocations document, it is clear that the Core Strategy cannot deliver the housing required. Either the Core Strategy should be abandoned in favour of a full Local Plan with specific housing land allocations to at least meet the first 10 years housing needs, or the Trough Laithe site should be removed and considered as part of the Pendle Local Plan Part 2: Site Allocations and Development Policies. Without further land allocation or the issue of planning permissions, it is clear that in isolation the strategic housing site cannot meet the assessed needs and is therefore of little strategic importance. It is therefore unsound to pre-empt the site allocations to include a specific site allocation in the Core Strategy which does not perform as a strategic site (representing only around 10% of the housing needs in the plan period).</div> <div>3. Policy LIV2 should be removed from the Core Strategy with consequential amendments made to the remainder of the document. The Council should then rely upon the next stage of the plan process, i.e. the Site Allocations document, to ensure adequate land is allocated, together with other consented schemes, to meet the housing needs identified in LIV1. To do otherwise may result in a failure to identify more sustainable options for meeting housing needs across the Borough.</div> <div>We would wish to present further evidence (where appropriate orally) to the Inspector appointed to examine the Core Strategy in due course.</div>	<div>The site at Trough Laithe is of strategic importance to the delivery of the Core Strategy. The provision of nearly 10% of the overall housing requirement on one site is significant and provides a level of certainty in terms of the delivery of housing in the short and medium term. The location of the site between Barrowford and Nelson gives it a strategic location in the M65 Corridor which can provide housing for the wider area. Abandoning the Core Strategy in favour of a single Local Plan will further delay the Council putting a plan in place. The allocation of the strategic site does not pre-empt the site allocation process but provides a mechanism to help show delivery of the Core Strategy. This does not restrict other sites being allocated in the Local Plan Part 2. The Strategic Housing Land Availability Assessment (SHLAA) indicates that there are sufficient, deliverable sites available to make up a five year supply of housing land against the staggered delivery targets set out in Policy LIV1.</div> <div>No change proposed in response to this comment.</div>
<div>818047</div> <div><div></div><div></div><div></div></div> <div>Manthorpe Developments (UK) Ltd</div> <div>818046</div> <div>MrMichaelCourcier</div> <div>Barton Willmore</div>	208					<div>10 Policy LIV1: Housing Provision and Delivery 10.1 Manthorpe welcomes the fact that the Further Options Report proposes a significant increase in housing provision over the previous draft. However, it considers that the Council has not sufficiently justified its proposed provision, and the requirement should be increased further. 10.2 Manthorpe also considers that Policy LIV1 does not provide a firm strategy to meet the required level of provision. In particular, it will not ensure that there would be a five year supply of deliverable land on adoption of the Core Strategy. This is a key requirement of national policy. If it is not complied with, the Core Strategy would be found unsound at examination. The Housing Requirement 10.3 The Council has proposed a provision of 290 dwellings per annum (dpa) for the period 2015 and 2030. The Council has given no coherent explanation why it has chosen the figure of 290 dwellings per annum, especially as it is towards the lower end of the range suggested by the Strategic Housing Market Assessment (SHMA) of 280 to 320 dpa and is below the figure suggested by the CLG 2011 Household Projections. 10.4 Manthorpe also notes that the SHMA suggests two other</div>	<div>Issues relating to the housing requirement: In response to this and other comments made to the Further Options consultation it is deemed necessary to ensure that the housing requirement meets the population projections and is better aligned with the employment land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met. With regards to those scenarios in the SHMA which return an annual housing requirement above 320, these have been discounted as they are scenarios that are unlikely or cannot realistically materialise. This is explained in the SHMA under the section relating to the appropriateness of the scenarios. It should also be noted that the</div>

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Policy LIV1: Housing Provision and Delivery

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>scenarios which produce significantly higher housing requirements than 320 dwellings per annum. The Company considers that these scenarios have been prematurely discarded without adequate consideration by the SHMA. 10.5 Manthorpe considers that at the very least the housing requirement should be set at 320 dwellings per annum. This figure would be consistent with the CLG 2011 household projections, expected job growth and migration trends. Any lower figure (such as 290 dpa) would not meet “ the full objectively assessed housing needs ” of the Borough as required by paragraphs 14, 17, 47 and 159 of the NPPF. 10.6 Manthorpe notes that all the SHMA estimates of future housing needs are based upon the period 2011 to 2030. Despite this, the start date for Policy LIV1 is 2015 (presumably 1 April), and not 2011. This is an obvious inconsistency which should be rectified. If the start date of 1 April 2015 is retained, it would mean that the under-provision between 2011 and 2015 against the identified housing need would not be made up. This would not accord with national policy. Policy LIV1 should be amended so that the start date is 2011. Housing Delivery 10.7 Manthorpe considers that there is a major issue of whether the Core Strategy will deliver a five year requirement on adoption. This is a very important requirement of the NPPF and is a fundamental test of soundness. Paragraph 47 says that “ to boost significantly the supply of housing ”, local planning authorities should:- “ identify and update annually a supply of specific and deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. ” 10.8 The 2013 Pendle SHLAA seeks to show how the Council will satisfy this requirement of the NPPF. However, we have major concerns about the results of the SHLAA because:- 1. Its assessment of the deliverability of sites fails to take adequate account of achievability, and in particular viability, which is a key test of a site being deliverable. Many of the sites identified in the deliverable supply by the SHLAA are not viable according to the Council’s own Viability Study. As this is the only comprehensive information on viability, such sites cannot be considered deliverable within the meaning of the Framework. Other sites fail the tests of deliverability as they have a history of expired permissions or are not available for land ownership reasons. If these sites are excluded, there would not be a five year supply, even on the present policy requirement of 290 dwellings dpa. 2. A major part of the SHLAA’s identified deliverable supply is on the “ Additional Sites ” which are currently not in accordance with planning policy. Some of these sites are in relatively unsustainable rural locations, and others are the subject of protective designations such as Adopted Local Plan Policies 3A and 12. If the Council is not prepared to grant planning permission for these sites in advance of the Allocations DPD (which is unlikely to be adopted before the end of 2016 at the earliest), there would be a major shortfall against the five year requirement. The identification of the proposed strategic site at Trough Laithe Farm would</p>	<p>policy already presents a flexible approach to the housing requirement by allowing for additional development should new evidence emerge to suggest the need in the borough has changed. Issues relating to housing delivery: Policy LIV1 acknowledges the importance of identifying and maintaining a five year supply of housing land. One of the main purposes of preparing a Strategic Housing Land Availability Assessment (SHLAA) is to help demonstrate that there are sufficient deliverable sites to meet the five year housing land requirement. It is considered that the SHLAA is a suitable mechanism for demonstrating the deliverability of sites until such a time that the Local Plan Part 2: Site Allocations and Development Policies is prepared. The SHLAA report clearly explains that assessing the viability of sites is a key part of the SHLAA process in terms of demonstrating deliverability. It sets out the method for assessing both sites with and without planning permission. The methodology explains that the findings of the Development Viability Study have been used as an indicative guide to assessing viability and that although this is considered to be a reasonable approach, caution should be applied as individual site circumstances exist. Furthermore, although the proformas for a number of sites in the SHLAA indicate that they are not viable when compared to the model sites in the DVS, the proformas provide a clear caveat that (especially with smaller sites) there are site specific circumstances which mean that they are viable and therefore do not conform to the relevant benchmark site. In addition the NPPF is clear that unless there is site specific (not generic) evidence that a site with planning permission is not viable to develop then it should be included in the five year supply. The SHLAA has assessed sites with planning permission and discounted a number of them from the five year supply where there is specific evidence that the site will not come forward in the five year period. It is therefore considered that the SHLAA has provided a robust assessment of sites and those contain in the five year supply are deliverable. The Council has reviewed the SHLAA on the basis of the need to increase the supply of housing land given the changes in the level of housing need. The National Planning Practice Guidance is clear that consideration should be given to sites with policy constraints for the sake of comprehensiveness and that these constraints should be tested again rather than just accepted. The purpose of reviewing the Local Plan is to bring the policies up-to-date and this will involve a review of the policy designations which are currently restricting development. The Council has identified sites in the SHLAA which are considered to be deliverable in response to the requirements of The Framework.</p>

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Policy LIV1: Housing Provision and Delivery

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

do little by itself to rectify this situation. 10.9 In conclusion, Manthorpe considers that the Council will not be able to show a five year supply of deliverable housing sites on adoption of the Core Strategy. If this is the case, the Core Strategy would be found to be out-of-date at adoption which is clearly an unacceptable outcome and is a fundamental reason for unsoundness. Strategic Sites and Broad Locations 10.10 To ensure that there is a five year supply of deliverable sites on adoption of the Core Strategy Manthorpe considers that the Core Strategy should identify more strategic sites that can come forward immediately after the plan is adopted. These sites should be identified in accordance with the spatial strategy identified in Policy SDP2. Particular priority should be given to the identification of sites in and around the Key Service Centres of Nelson, Colne and Barnoldswick as these are the most sustainable locations for new development in the Borough. 10.11 The land to the north east of Colne between the existing urban edge and the Green Belt boundary should be identified as a strategic site for immediate development. It can be delivered immediately as it is in the control of a house builder; its development now would be viable; it could contribute a significant number of dwellings over the next 5 years; and there are no environmental or other constraints that would prevent development. Its location adjoining Colne would help achieve the settlement strategy set out in Policy SDP2.

In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text.

692633

222

Ms

Jackie

Copley

Lancashire Branch of CPRE

Housing 10. Policy LIV1 sets out a minimum of 4,350 dwellings that should be delivered over the plan period (between 2015 and 2030), equating to an annual provision rate of 290 dwellings. CPRE Lancashire notes that this figure is much higher than the North West Regional Spatial Strategy to 2021 which identified a figure of 190 per annum (total 3,420), but this is now revoked by Government in order to stop ‘top-down’ over ambitious housing figures being imposed on local authorities. Given the spatial portrait states there was a recent slow growth trend, even accepting the demographic structure with younger age cohorts and impacts of migration, CPRE Lancashire views this housing figure as too high. But, we do not which to incur any delay in the Council adopting a Local Plan as this policy void renders Pendle vulnerable to speculative housing developments in the countryside. 11. CPRE Lancashire believes the level of new housing should ensure that the needs and demands for housing are met (i.e. it will meet the objectively assessed needs for housing in the borough), address the likely population and household growth and cater for the predicted level of economic growth to ensure the Local Plan can be found sound at Examination to aid its adoption at the earliest possible

The housing requirement figure set out in the Pendle Core Strategy Further Options report is derived from the Strategic Housing Market Assessment (SHMA). The NPPF is clear that the housing requirement should be determined through the preparation of a SHMA. In response to comments made to the Further Options consultation and taking account of recent inspectors’ decisions, the housing requirement figure will need to be increased to ensure alignment with the economic aspirations of the borough and to ensure it meets the population and household projections. Clearly this will require the further identification of sites for new development and is likely to mean the development of some greenfield sites outside the current settlement boundaries. However, it should be noted that the level of housing growth has been determined in line with government guidance and is therefore consistent with national policy.

Policy LIV1: Housing Provision and Delivery

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							time.	
								No change proposed in response to this comment.
328012		230					5) Policy LIV1 – Housing Provision and Delivery 5-a) “A minimum of 4,375 (net) dwellings will be provided in Pendle between 2015 and 2030.” This is the conclusion of a very complicated analysis of the statistics (Strategic Housing Market Assessment) and possibly is too prescriptive given the so many assumptions, estimates, uncertainties and unknowns in the populous since the 2011 census and the year 2028. It would clearly be good practice to review and update this policy every few years, in line with population trends, and other local socio-economic and environmental issues.	The NPPF is clear that the housing requirement should be determined through the preparation of a Strategic Housing Market Assessment (SHMA). It also makes clear that Local Planning Authorities are required to significantly boost the supply of housing and ensure that the objectively assessed needs of the borough are met. The Burnley and Pendle SHMA has been prepared following DCLG guidance and uses the most up-to-date statistics available at the time of preparing the report. It sets out a robust assessment of housing need in the borough to determine the most appropriate range for the housing requirement figure. The SHMA has recently been supplemented by a Housing Needs Study Update report to take in to account the release of the 2012-based Sub-national Population Projections and the impact that these may have on the housing requirement figure. In terms of a review mechanism for the housing requirement, the plan will be subject to an examination by an independent planning inspector to determine whether the plan is sound. If it is found sound and adopted by the council the plan would not normally be reviewed until towards the end of the plan period. However, the planning system requires plans to be monitored and if there were a significant change to the evidence base then an early review could be carried out. The policy will be amended to reflect this. With regards to the impact of proposals on projects in Housing Regeneration Priority areas it is accepted that the policy should consider those proposals adjacent to such areas. As such the policy will be amended accordingly.
Mr Andrew Ashworth							Remedy: Substitute with: Based on current (2014) estimates, a minimum of 4,350 (net) dwellings should be provided in Pendle between 2015 and 2030. This target will be reviewed every 5 years. 5-b) The fact that within one year of the previous draft Core Strategy the figure of 3,375 net dwellings has been revised upwards by 30% to 4,350 illustrates my point in 5-a) that these statistics need to be treated with much caution and not be prescriptive. 5-c) “Within a Housing Regeneration Priority Area, proposals must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken.” Strongly support this statement, but it should also apply to sites outside of a Housing Regeneration Priority Area which may also impact on any regeneration. So reword along the lines of: “Proposals must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in a nearby Housing Regeneration Priority Area, and should ideally show how they will complement the regeneration work being undertaken.”	Include the following additional text in Policy LIV1: “Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered.” Reword the first sentence of the final paragraph of Policy LIV1 to read: "Proposals within or adjacent to a Housing Regeneration Priority Area must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken."

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy LIV1: Housing Provision and Delivery

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327623			234					5) Policy LIV1 – Housing Provision and Delivery 5-a) “A minimum of 4,375 (net) dwellings will be provided in Pendle between 2015 and 2030.” This is the conclusion of a very complicated analysis of the statistics (Strategic Housing Market Assessment) and possibly is too prescriptive given the so many assumptions, estimates, uncertainties and unknowns in the populous since the 2011 census and the year 2028. It would clearly be good practice to review and update this policy every few years, in line with population trends, and other local socio-economic and environmental issues.	The NPPF is clear that the housing requirement should be determined through the preparation of a Strategic Housing Market Assessment (SHMA). It also makes clear that Local Planning Authorities are required to significantly boost the supply of housing and ensure that the objectively assessed needs of the borough are met. The Burnley and Pendle SHMA has been prepared following DCLG guidance and uses the most up-to-date statistics available at the time of preparing the report. It sets out a robust assessment of housing need in the borough to determine the most appropriate range for the housing requirement figure. The SHMA has recently been supplemented by a Housing Needs Study Update report to take in to account the release of the 2012-based Sub-national Population Projections and the impact that these may have on the housing requirement figure. In terms of a review mechanism for the housing requirement, the plan will be subject to an examination by an independent planning inspector to determine whether the plan is sound. If it is found sound and adopted by the council the plan would not normally be reviewed until towards the end of the plan period. However, the planning system requires plans to be monitored and if there were a significant change to the evidence base then an early review could be carried out. The policy will be amended to reflect this. With regards to the impact of proposals on projects in Housing Regeneration Priority areas it is accepted that the policy should consider those proposals adjacent to such areas. As such the policy will be amended accordingly.
Dr.	John	Plckett						Remedy: Substitute with: Based on current (2014) estimates, a minimum of 4,350 (net) dwellings should be provided in Pendle between 2015 and 2030. This target will be reviewed every 5 years. 5-b) The fact that within one year of the previous draft Core Strategy the figure of 3,375 net dwellings has been revised upwards by 30% to 4,350 illustrates my point in 5-a) that these statistics need to be treated with much caution and not be prescriptive. 5-c) “Within a Housing Regeneration Priority Area, proposals must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken.” Strongly support this statement, but it should also apply to sites outside of a Housing Regeneration Priority Area which may also impact on any regeneration. So reword along the lines of: “Proposals must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in a nearby Housing Regeneration Priority Area, and should ideally show how they will complement the regeneration work being undertaken.”	Include the following additional text in Policy LIV1: “Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered.” Reword the first sentence of the final paragraph of Policy LIV1 to read: "Proposals within or adjacent to a Housing Regeneration Priority Area must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken."

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Policy LIV1: Housing Provision and Delivery

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
378959			246					<p>5) Policy LIV1 – Housing Provision and Delivery 5-a) “A minimum of 4,375 (net) dwellings will be provided in Pendle between 2015 and 2030.” This is the conclusion of a very complicated analysis of the statistics (Strategic Housing Market Assessment) and possibly is too prescriptive given the so many assumptions, estimates, uncertainties and unknowns in the populous since the 2011 census and the year 2028. It would clearly be good practice to review and update this policy every few years, in line with population trends, and other local socio-economic and environmental issues.</p>	<p>The NPPF is clear that the housing requirement should be determined through the preparation of a Strategic Housing Market Assessment (SHMA). It also makes clear that Local Planning Authorities are required to significantly boost the supply of housing and ensure that the objectively assessed needs of the borough are met. The Burnley and Pendle SHMA has been prepared following DCLG guidance and uses the most up-to-date statistics available at the time of preparing the report. It sets out a robust assessment of housing need in the borough to determine the most appropriate range for the housing requirement figure. The SHMA has recently been supplemented by a Housing Needs Study Update report to take in to account the release of the 2012-based Sub-national Population Projections and the impact that these may have on the housing requirement figure. In terms of a review mechanism for the housing requirement, the plan will be subject to an examination by an independent planning inspector to determine whether the plan is sound. If it is found sound and adopted by the council the plan would not normally be reviewed until towards the end of the plan period. However, the planning system requires plans to be monitored and if there were a significant change to the evidence base then an early review could be carried out. The policy will be amended to reflect this. With regards to the impact of proposals on projects in Housing Regeneration Priority areas it is accepted that the policy should consider those proposals adjacent to such areas. As such the policy will be amended accordingly.</p>
Mrs	Alison	Plckett						<p>Remedy: Substitute with: Based on current (2014) estimates, a minimum of 4,350 (net) dwellings should be provided in Pendle between 2015 and 2030. This target will be reviewed every 5 years. 5-b) The fact that within one year of the previous draft Core Strategy the figure of 3,375 net dwellings has been revised upwards by 30% to 4,350 illustrates my point in 5-a) that these statistics need to be treated with much caution and not be prescriptive. 5-c) “Within a Housing Regeneration Priority Area, proposals must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken.” Strongly support this statement, but it should also apply to sites outside of a Housing Regeneration Priority Area which may also impact on any regeneration. So reword along the lines of: “Proposals must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in a nearby Housing Regeneration Priority Area, and should ideally show how they will complement the regeneration work being undertaken.”</p>	<p>Include the following additional text in Policy LIV1: “Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered.” Reword the first sentence of the final paragraph of Policy LIV1 to read: "Proposals within or adjacent to a Housing Regeneration Priority Area must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken."</p>

Policy LIV1: Housing Provision and Delivery

Person Details			Comment ID	Q1	Q2a	Q2b		Q3	Consultee comments	Officer Response and Recommendation
<div>327580</div>			263						<div>Population levels and housing targets The net migration out of Pendle continues to be higher than the numbers of people moving into the borough. The Office for National Statistics predicts that the population of Pendle will grow by 7,700 (para 3.19), whilst the SHMA estimates a growth of 8,461 by 2030. This equates to an ambitious target of 5,764 new households, even though the Communities and Local Government Household Projections indicate an increase of only 531 households by 2021 and 4,220 by 2033 (para 3.20). L&B suggests that Pendle has set itself too high a target, and has increased the risk of failure, for housing development and we suggest that "break clauses" for revisiting projections and targets are included, so that strategic plans do not make the area a "hostage to development quotas".</div>	<div>The Strategic Housing Market Assessment (SHMA) has used more up-to-date figures than those quoted in the Spatial Portrait. This inconsistency in the plan will be addressed. The NPPF requires plans to be based on up-to-date evidence and that Local Planning Authorities should use the evidence base (e.g. the SHMA) to set the housing requirement for the borough. The requirement should meet the household and population projections but also take account of the economic growth aspirations for the borough. The SHMA has robustly tested a number of scenarios in order to determine the most appropriate range for the housing requirement figure. In terms of a review mechanism for the housing requirement, the plan will be subject to an examination by an independent planning inspector to determine whether the plan is sound. If it is found sound and adopted by the council the plan would not normally be reviewed until towards the end of the plan period. However, the planning system requires plans to be monitored and if there were a significant change to the evidence base then an early review could be carried out. The policy will be amended to reflect this.</div> <div>Amend the spatial portrait so it is consistent with the evidence in the SHMA. Include the following additional text in Policy LIV1: “Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered.”</div>
<div>715388</div>			292						<div>Policy LIV1: Housing Provision and Delivery Strategic housing requirement 3.25 Peel supports the proposed increased in the strategic housing requirement. This has been informed by an up to date Strategic Housing Market Assessment (SHMA) and represents a more realistic growth projection than that set out in the publication version of the Core Strategy. 3.26 Notwithstanding this, Peel notes that the proposed annual requirement of 290 dwellings net of clearance is at the lower end of the range recommended by the SHMA. Most notably, the analysis of trend-based demographic scenarios suggest that the need for housing is likely to sit at the upper end of the 280 – 320 range identified whilst the economic-led scenarios, in the form of the ‘past-trends’ and ‘policy-on’ scenarios also point towards the upper end of the range, showing a requirement of 314 dwellings per annum and 311 dwellings per annum respectively. Conversely, the bottom end of the range would only be supported by the Experian job growth scenario, which is clearly not consistent with the Borough’s aspirations for employment and economic growth. 3.27 In view of this, Peel considers that the annual requirement of 290 dwellings should be the absolute minimum level of housing growth that the Borough should be planning for. The policy should make this explicit. Moreover, it will be important for the Council to ensure that it fully justifies the intention to adopt a strategic housing requirement at the lower end of the range set out in the SHMA, particularly in the context NPPF and its clear</div> <div>In response to this and other comments made to the Further Options consultation it is deemed necessary to ensure that the housing requirement meets the population projections and is better aligned with the employment land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met. It is acknowledged that the strategic site plays a wider role than simply early delivery. The suggested wording will be incorporated into Policy LIV2 as this policy relates specifically to the strategic site. However, in addition it is recommended that Policy LIV1 also be amended to acknowledge the wider role of the strategic site in terms of delivery of the housing requirement. With regard to the requirement for applicants to submit a financial viability assessment, the Council already requires such a statement through its Interim Housing Policy. This is used to negotiate with the applicant regarding the amount of affordable housing that can be provided and to provide assurances to the Council that the development is deliverable. These</div>	
<div>Ms Louise Morrissey Peel Holdings (Land & Property) Ltd</div> <div>714921</div> <div>Ms Anna Noble Turley Associates</div>										

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Policy LIV1: Housing Provision and Delivery

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>messages around the need for plans to be aspirational and deliver growth, Reference to Trough Laithe Farm 3.28 The reference to the delivery of housing at the proposed Strategic Site at Trough Laithe Farm and its importance to the achievement of Policy LIV1 is welcomed. However, Peel considers that the role of this Strategic Site extends beyond ensuring delivery of housing early in the plan period. Whilst Trough Laithe Farm will deliver housing in the first five years of the plan, its allocation will also achieve a number of wider objectives of the plan. These include delivering high quality family housing, which is short supply in the Borough, helping to attract and retain economically active households in the Borough to support its economic growth and helping to rebalance the housing profile of Pendle, and particularly the M65 Corridor, which is heavily skewed towards smaller terraced dwellings. 3.29 It is therefore recommended that the first sentence of the third paragraph of Policy LIV 1 should read as follows: ‘To ensure early delivery of the housing requirement and to secure the provision of much needed high quality and aspirational family housing within the M65 Corridor to support the Borough’s regeneration and economic growth, a Strategic Site has been allocated in the Core Strategy (See Policy LIV2).’ 3.30 Delivery of housing at Trough Laithe Farm is expected to commence early and continue through the plan period. Demonstrating deliverability 3.31 Peel maintains its objection to the requirement that applications for residential development be accompanied by a deliverability statement, including a financial viability assessment for schemes of 10 dwellings or more. 3.32 Peel previously set out its objection to this proposal in its representations to the Publication Core Strategy. As set out in these representations, there is no justification for requiring the provision of such information and the inclusion of this component of the policy is a clear misinterpretation of NPPF which places the onus on Local Planning Authorities to demonstrate the viability and deliverability of the Local Plan; something which Pendle has already done through the Pendle Development Viability Study. 3.33 Planning applications for development should be assessed based solely on their planning merits and not whether they are financially deliverable. Moreover, including such a requirement could actively discourage developers from submitting applications for residential development as most applicants will be reluctant to disclose sensitive financial information about their proposed schemes. This requirement could therefore have an impact on the propensity of developers to progress schemes in Pendle, undermining the delivery of the whole Core Strategy. 3.34 This provision therefore makes the policy unsound and should not be included.</p>	<p>viability statements are confidential between the applicant and the Council and include land values and build costs. The requirement for such a statement should be seen as a tool which can help the applicant bring forward a viable scheme. In particular, the statement is used by Policy LIV4 to negotiate the levels of affordable housing that can be provided. In response to this and other comments to the Further Options consultation the policy will be amended to clarify the circumstances when a financial viability assessment will be required. Specifically this will make the intentions of the requirement clearer in relation the Policy LIV4 Affordable Housing.</p>
							<p>In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text. To acknowledge the wider role the strategic site plays in the delivery of the housing requirement insert the following wording between "To</p>

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Policy LIV1: Housing Provision and Delivery

Person Details		Comment ID	Q1	Q2a	Q2b		Q3	Consultee comments		Officer Response and Recommendation
										ensure" and "early delivery": "significant and" To clarify the circumstances for requiring a financial viability assessment, amend the wording of the policy to read: "To demonstrate the deliverability of their proposal applicants should provide a statement outlining details of the availability, suitability and achievability of the scheme. In line with Policy LIV4, this statement should also include a financial viability assessment, which will be used to help determine the amount of affordable housing to be provided."

844180		331						3.0 Policy LIV1: Housing Provision and Delivery (113) This policy recommends 290 dwellings per annum; this is an increase to the historic Regional Spatial Strategy requirement. Persimmon Homes agrees with increasing housing numbers and feels that this is in line with the economic development aspirations. However, there is further scope to increase this figure as many of the scenarios put forward within Nathaniel Lichfield’s SHMA indicated a need above 300 dwellings per annum. Persimmon Homes suggests that Pendle take a figure from higher in the proposed range to address the expansive current need associated with the consistent under supply of housing through the economic downturn. The SHLAA states that the council currently have 2,200 dwellings considered to be ‘potentially deliverable’. Further information as to how these are deliverable in line with the NPPFs definition needs to be provided. The need for this information to be robust is critical for Pendle due to the viability issues and historic delivery rates in the area and identified within the supporting documents such as the SHLAA.		In response to this and other comments made to the Further Options consultation it is deemed necessary to better align the housing provision figure with the employment land requirement. In addition, the timescales for the provision of new housing will also be amended to bring them in line with the housing needs evidence base as set out in the SHMA and Housing Needs Study (HNS) Update report. The annual dwelling requirement will be increased to 298dpa over the 19 year plan period from 2011 to 2030. This figure reflects the plan’s economic aspirations and will ensure that the Objectively Assessed Needs (OAN) for housing are met. With regard to the need to provide further information relating to the deliverability of sites in the SHLAA, in line with the NPPF, – the SHLAA clearly explains how the viability and deliverability of each site has been assessed. Appendix 5 of the SHLAA provides information for each site in a proforma. This information includes details relating to each site’s viability, and a commentary relating to the status of the site. The NPPF is clear that where a site has planning permission it should be considered to be deliverable until the permission expires or there is clear evidence that schemes will not be implemented within five years. Those sites in the SHLAA with planning permission have been assessed to identify any problems with delivery. Where such issues exist, a decision has been taken as to whether they can contribute to the five year supply. For sites without planning permission that are included in the five year supply, contact has been made with the owners/developers of these sites to establish their intentions and gather evidence to show that such sites can be deliverable within the five year period. Appendix 7 of the SHLAA provides details of the questionnaire survey that was sent to landowners. The findings from this survey work helped to inform the programming of sites in the SHLAA/five year supply.
Ms Elinor George	Persimmon Homes Lancashire									In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan’s economic aspirations, the first sentence of Policy LIV1 should be revised as follows: “Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum.” Appropriate amendments will also be made to the justification text.

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
674992	8					<p>Thank you for consulting the Ministry of Defence (MOD) in relation to the above consultation. The MODs principle concern with respect to development in the Borough of Pendle is ensuring that structures, particularly tall buildings do not cause an obstruction to meteorological radar transmitter/receiver facilities located in the area. As you may be aware the meteorological technical installations are protected with statutory safeguarding zones which identify height consultation zones in the area relative to topography and distance from site. The MOD height safeguarding zone for the Clee Hill meteorological radar extends over the Borough of Pendle. I would like to register the following comments the proposed sites for housing and employment at Trough Laithe Farm, Barrowford and Lomeshaye near Nelson all fall within the 45.7m height consultation zone surrounding Clee Hill Met radar. Therefore, please consult DIO Safeguarding at planning if any proposed development exceeds this height criterion.</p>	<p>The request to inform the MOD of development over a height of 45.7m is considered to be too detailed for this policy. This should be part of the Development Management consultation procedure and is best dealt with by adding a constraint layer to the GIS mapping system, which can be used to consult the MOD of any relevant development proposals.</p>
							<p>No proposed change to the Core Strategy in response to this request. Liaise with the Development Management team and the MOD to set up an additional constraints layer.</p>

813533	17				On the first of these proposals I object to the proposal because following the last District Plan the site remained protected and the reasons for this remain the same today and why not bring forward other available sites in South Valley at Colne. Moreover why bring forward the proposal in the core strategy rather than deal with it in the allocation plan. Notwithstanding the Highway Authorities historical reluctance to be involved this amounts to an abnegation of their responsibilities since the motorway junction at 13 is already totally congested as are parts of the Fence By Pass, Gisburn Road into Barrowford and Church Street. In a case recently in Ribble Valley the Secretary of State has accepted the highway objection even though the highway authority did not object and the development was rejected on appeal notwithstanding the new sustainable development argument. These considerations apply with equal strength to the Peel Site. With this size of development questions of the adequacy of the main drainage system arises as does the question of flooding because the water is no longer absorbed into land naturally, but runs off from built surfaces.	<p>The site at Trough Laithe was allocated in the Replacement Pendle Local Plan 2001-2016 as a Protected Area under Policy 3A. The Inspector at the Local Plan Inquiry indicated that the purpose of designating sites under this policy was to help maintain the permanence of the Green Belt. The Inspector stated that Policy 3A sites should be reconsidered as part of the review of the Local Plan and if the pressure for development after 2016 indicated that they would not be required, consideration should be given to including them within the Green Belt. The Core Strategy is the first part of the review of the Local Plan and sets out the needs for development up to 2030. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan's economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the development needs of the borough in the future. The Strategic Housing Land Availability Assessment identifies sites with the potential</p>
Mr.	Brian	Whittle				

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							<p>to be developed for housing and indicates that there is not a sufficient number of sites within the existing settlement boundaries to meet the housing requirement. This includes areas such as the South Valley in Colne. As such, consideration has been given to the sites designated under Policy 3A in the current Local Plan. The Core Strategy allocates the site at Trough Laithe as a strategic housing site to help show that the plan is deliverable. The site accounts for nearly 10% of the borough's housing requirement over the plan period and its allocation in the Core Strategy will allow for both early and medium term provision. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of both the proposed Strategic Housing Site at Trough Laithe and the proposed Strategic Employment Site at Lomeshaye. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. With regards to infrastructure provision, the Council has engaged with the utilities providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raise any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. In relation to flooding and surface water run-off; building regulations, planning policy and the requirements of the Environment Agency and United Utilities are clear that measures should be put in place to ensure that surface water run-off is managed at source and should continue to mimic the natural discharge process. Policy ENV7 includes detailed guidance of the requirements new developments will need to comply with in relation to water management and these will apply to the strategic housing site. In conclusion the evidence base supports the inclusion of the proposed strategic housing site in the Core Strategy in order to help meet the development needs of the borough and provide a level of certainty in terms of short and medium term delivery.</p> <p>No change proposed in response to this comment.</p>

Policy LIV2: Strategic Housing Site

Policy LIV2: Strategic Housing Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
817521			36	Yes	No	It is not effective.	Yes	Not efficient, effective or economic therefore not providing value for money – the owners, Peel Holdings have already established a Business Park at the bottom of this land – no demand for Units, not all are sold or rented. Land has been neglected for years by the owners – this has been part of their land bank for years.	<p>The National Planning Policy Framework (NPPF) requires Local Planning Authorities to identify their objectively assessed needs for housing in their Local Plan through the preparation of a Strategic Housing Market Assessment (SHMA). The Burnley and Pendle SHMA has been prepared in accordance with government guidance and provides a robust and credible source of information which has been used to set the housing requirement in the Core Strategy. The NPPF also requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites which could be used for housing development in the future. The SHLAA shows that even if all the available sites within the existing settlement boundaries are used (including brownfield sites in Nelson) there will still be a need for some development on greenfield sites currently located outside of the settlement boundary. The Inspector at the last Local Plan Inquiry allocated a number of sites under Policy 3A, which aimed to protect these sites from development up until 2016 or a review of the plan, at which time the Council would need to reconsider whether these sites were needed for development. The evidence shows that the level of new housing that is needed, up to 2030 will require the release of these sites. With regards to traffic problems and the impact on the highways: improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. With regards to infrastructure provision, the Council has engaged with the utilities providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. None of the providers have raised any specific objection to the proposed allocation. In terms of harm to the environment and maintaining green space, clearly the development of any greenfield site will have an impact on the natural environment and result in the loss of open land. The NPPF sets out the presumption in favour of sustainable development which essentially looks to balance environmental impact with social and economic needs. The site is in a sustainable location and will help to meet the housing needs of the borough. Mitigation measures will be employed to reduce any negative impact on the environment and Policy LIV2 requires that the development of the site is designed in a way that incorporates the natural features of the site and provides a high quality landscaping scheme. It also requires that</p>
Mr	Gavin	Murray							

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Policy LIV2: Strategic Housing Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

open space is provided as part of the development. In conclusion, the evidence base shows that the development needs of the borough are such that there is a need to allocate a strategic housing site. The policies in the Core Strategy will ensure that measures are put in place to mitigate any negative effects on the environment and to provide the necessary infrastructure and improvements to the highways network.

No change proposed in response to this comment.

Apart from:- New Local Plan – Housing Development @Land at Trough Laithe Farm - Not efficient, effective or economic therefore not providing value for money – the owners, Peel Holdings have already established a Business Park at the bottom of this land – no demand for Units, not all are sold or rented. Land has been neglected for years by the owners – (this has been part of their land bank for years and part of their ‘cut-throat’ aggressive corporate culture. Will it be proposed that Barnfield Construction will be the builders, that would be a surprise – NOT!) The following points are also relevant:- Proposed development will impact negatively on the environment like the eyesore of the ridiculous Barrowford Business Park which is a white elephant – there’s hardly any firms there! Plenty of brownfield sites to develop and re-develop in Nelson Yet more of Barrowford’s green fields to be lost, negative impact on the environment Will make existing traffic problems even worse Will raise serious infrastructure problems Given the planning record of Pendle Council in effectively managing the decline of Nelson in the past 25 years this would be yet another wrong decision which the people do not want! It’s not a NIMBY question, it’s a question of maintaining the green spaces we have The evidence that these houses are needed does not stand rigorous scrutiny! However, after the fiasco of voting on the planning committee to approve the development of Barrowford Business park I have little or no confidence in the planning department to listen and action the concerns expressed by myself and others –a cynic might argue that it was already a ‘done deal’ but i couldn’t possibly comment on that!

714054

Trustees Green Emmott Trust

817541

Ms Jane Dickman

Dickman Associates Ltd

51

Para10.46 – this suggests 40% affordable is required. Para 10.56 then informs us that the strategic site will only support 20% affordable, yet it is the largest housing site in the borough and greenfield. We question the consistency and credibility of the viability therefore.

Paragraph 10.47 explains that the borough wide affordable housing need is 40% and this is set out in Policy LIV4. This figure is taken from the Burnley and Pendle Strategic Housing Market Assessment which acknowledges that the deliverability of the target needs to be viability tested. Policy LIV4 uses evidence from the SHMA and Development Viability Study (DVS) to set flexible affordable housing targets for different areas of the borough based on the general viability of sites in those areas. These targets are then used as the basis for negotiations with applicants to consider the site specific viability issues and determine the most appropriate level of affordable housing for the site. The Strategic Housing Site is located in the M65 Corridor spatial area. Policy LIV4 currently sets the affordable housing target at zero

Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							for this area. The owner of the strategic site has undertaken some specific work associated with the deliverability of the site, including a consideration of the amount of affordable housing which could be provided. Policy LIV2 uses the findings of this work to set an affordable housing target of 20% for the Strategic Housing Site. This is considerably higher than the general targets for the M65 Corridor and will help to ensure the delivery of some affordable housing in this area. The two policies are therefore not inconsistent with each other. Both policies use the most appropriate available evidence to set affordable housing targets that are relevant to the purposes of each policy.
							No change proposed in response to this comment.
712277 Mr Robert Orgill Rolls Royce plc 817556 Ms Kate Skingley David Lock Associates	61					The NPPF is clear at Paragraph 17 that 'planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. As such the inclusion of a strategic housing site to contribute to meeting housing need in a sustainable location is welcomed by Rolls-Royce.	This comment indicates support for the allocation of a strategic housing site. No change proposed in response to this comment.
807418 Mr Dave Hortin Environment Agency	73					Trough Laithe and Lomeshaye Strategic Sites Both sites contain areas within Flood Zones (FZ) 2 and 3. For these sites to be allocated within the Core Strategy they will need to be evidenced by a Level 2 Strategic Flood Risk Assessment (SFRA) as we have discussed previously. The Report and accompanying Sustainability Appraisal (SA) Addendum make no explicit reference to a SFRA as having been undertaken, although Policy ENV 7 does refer to the sequential and exception tests, without the SFRA we would object to the allocation of these sites. The SA in respect of these sites does not take into account the presence of FZ 2 and 3. For the appraisal of both sites under the Sustainable Development Objective, "P6. Reduce the risk of flooding and conserve water resources", the commentary states that, "The policy makes no explicit reference to water management" and no effects are recorded. The purpose of SA is to appraise the likely significant effects of the implementation of the proposed policies. For both Strategic Sites the likely effect of development in FZ 2 and 3 is that it would significantly increase the risk of flooding to property but this is not considered. It is our opinion that the SA should be amended to reflect this or it will risk being found unsound.	The original comment made by the Environment Agency (EA) has been superseded. The proposed Strategic Housing Site does not fall within either Flood Zone 2 or 3 and therefore the EA comment is not relevant to Policy LIV2.

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<p>Policy ENV 7, and to some degree Policy ENV 2, would provide mitigation for the allocation of these sites. Additionally, further mitigation could be provided by including criteria in Policy LIV 2 and Policy WRK 3 that would ensure unsuitable development, as defined in the Technical Guidance to the National Planning Policy Framework, does not take place in FZ 2 or 3.</p>							<p>No change proposed in response to this comment.</p>

Following a telephone conversation with Neil Watson and provision of a revised plan on 5 March 2014, we would like to confirm that we do not in principle have any objections to the Trough Laithe strategic housing site. The map provided clearly identifies that the site is outside Flood Zones 2 and 3 which removes our concerns in relation to potential for fluvial flooding and means that there is no longer a requirement for a Strategic Flood Risk Assessment. We look forward to receiving further information to clarify the position with the Lomeshaye strategic employment site.

817580	79	<input type="checkbox"/>	No	It is not justified.	<input checked="" type="checkbox"/>	Yes	<p>Since there are no detailed plans, it is difficult to accurately assess the effects of any proposed planning. Obviously, there has to be some idea of where future development could be sited to cover five years of growth. During this 5 year period, I am sure there will be annual reviews of progress and on overall reassessment in 2018/19 of the housing situation. My immediate reaction to the development site at Trough Laithe is that it is far too large. Not only will the character of this particular area be changed, but if it is implemented in full, it will have consequences far beyond this locality. The balance between Nelson and Barrowford will be changed. In fact a new village will be created larger than Wheatley Lane, Fence or Higham. The supplies of electricity, gas and water will have to be increased and drainage/waste water systems enhanced. New roads and traffic systems will have to be modified. If we accept that plans for 480 homes come to fruition, then another primary school will be required in this area. There would certainly have to be changes to the traffic system at Junction 13 of the M65 and the road through Barrowford. Any shift in population from Nelson to this area would certainly reduce the number of potential shoppers in Nelson and increase parking problems in Barrowford. I would like you to consider limiting the size of this development area from a 481 house site to a 200 house site as envisaged in 2018/19. Since Peel Holdings have already constructed access roads into the lower south eastern slopes, development could be planned near the Riverside Business Park. If Warren Drive is to be considered as a means of access, then the north eastern section, nearest to the village could be used. Planning permission may be more readily granted, and previous policies changed, if this site were reduced, and future development restricted to the two areas mentioned above.</p>	<p>Specific details regarding issues of layout, materials etc. are not usually considered at the allocation stage. Any planning application for the site will need to conform to the policies in the Core Strategy which set out the requirements for new housing developments such as density, scale, layout, and landscaping. In terms of the size and scale of the site, the proposed allocation is intended to provide a magnitude of housing which helps to meet a significant proportion of the housing requirement. A range of other sites will be required to be allocated in the Local Plan Part 2 to meet the remainder of the housing requirement. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off the road into the Business Park. Further details of this will be made available at the application stage. With regards to infrastructure provision, the Council has engaged with the utilities providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a</p>
<div>Mr<div>Wilfred</div><div>Byrne</div></div> <div></div> <div></div> <div><div></div><div></div><div></div></div> <div></div>								

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							<p>requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision.</p>
						A much reduced area to proposed development a Trough Laithe - limited to 200 houses.	No change proposed in response to this comment.

817583				84	No	No	<p>It is not positively prepared.; It is not justified.; It is not effective.; It is not consistent with national policy.</p>	No	<p>Policy LIV2 – Strategic Housing Site 2.14 We find the decision to identify this single housing development site as a strategic intention to be a most unsafe position for the Council to take. Not only does the selection conflict with the settlement intentions of policy SPD2 but the very text of policy LIV1 confirms that “proposals should follow the site selection approach outlined in policy SPD2”. Such inconsistency is unsound in our view. 2.15 More importantly, however, there seems to be a lack of clarity as to whether the Core Strategy is partly doubling up as a site allocations (Local Plan Part 2) process, even if only as far as the assessment of available strategic sites. If that is the case then there should be a comparable and thorough assessment of each of the alternative sites (accompanied by similar landowner/developer dialogue to that which appears to have taken place for the Trough Laithe site) which the Council says it has examined (para 11.5). It is highly unsatisfactory to simply dismiss those sites in a single sentence and without any material evidence whatsoever of their relative attributes. 2.16 This boils down to a question of fairness and thoroughness, especially when the Council is faced with such a significant shortfall in its housing position, together with a fundamental need to raise the profile of its housing offer. Surely, if the Council acknowledges that it must urgently (if not immediately) address its housing shortfall by promoting new (“strategic”) development sites (and extending the settlement boundaries) then it has nothing to lose by casting the net wider and proactively involving other landowners in its site search. Such an examination cannot possibly be adequately undertaken in the very skeletal form of the SHLAA consultation. 2.17 There is no evidence within the Further Options Report of whether this has been done and if so how other strategic sites would fare, other than the extremely superficial scoring undertaken through the SHLAA. 2.18 Additionally, the Council makes clear its aim to urgently identify housing land “which will make a significant impact in meeting the annual requirement” (para 11.54). However the Trough Laithe site would only deliver an estimated 50 dwellings per annum (para 11.57), set against the presently calculated annual housing requirement of roughly 7 times that figure. At that level there is significant doubt as to whether the site would play a strategic role in bringing forward a significant proportion (our emphasis) of the overall amount of housing that is needed in the Borough, especially as a contribution to the key initial five year housing programme.</p>	<p>The issues relating to the perceived inconsistency between Policies LIV1, LIV2 and SDP2, and the assertion that the strategic housing site is located in a secondary settlement are dealt with in the response to comment 82 which was made against Policy SDP2. The Core Strategy is not doubling up as a site allocations document. The identification of two strategic sites, one for housing and one for employment, is in response to the increase in development requirements shown by the evidence base, and the need to show that the plan is deliverable. The site at Trough Laithe has been identified through a review of sites in the Strategic Housing Land Availability Assessment (SHLAA) and through representations made to previous versions of the Core Strategy. It is important to explain the purpose and parameters of the strategic site allocation in the context of the Core Strategy. Such sites must be of a sufficient magnitude to deliver a significant proportion of the housing requirement both in the short and medium term to help demonstrate that the housing requirement can be achieved. They must also be available and deliverable now, and have a willing landowner/developer. Following the review of the sites in the SHLAA, it was evident that only Trough Laithe fulfilled this role. Other sites, such as those designated under Policy 3A in the Replacement Pendle Local Plan, are not of a sufficient magnitude to offer the same level of provision as Trough Laithe. The allocation of the strategic site will not preclude other sites coming forward for development in the short term. Indeed it is acknowledged that a range of sites will be required and the SHLAA identifies those which are deliverable within the next five years. Furthermore once the Core Strategy is adopted the Local Plan Part 2 will look to allocate land to meet the remainder of the housing requirement.</p>
Beck Developments Ltd										
817585										
Mr	John		Willcock							
JWPC Ltd										

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Policy LIV2: Strategic Housing Site

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								<p>Rather, such a significant impact could only be achieved through the rapid release of a range of deliverable (strategic) sites ideally related to the more sustainable Key Settlements which provide most jobs and offer most support facilities. 2.19 Whilst we accept that Trough Laithe would make a useful contribution to the authority’s numerical housing needs, that contribution will only be a small proportion of the overall housing requirement and is only likely to deliver its first completed units in late 2015/16 (when the current delivery deficit will have further increased). It is also located within a secondary settlement with only limited access to essential services - thereby questioning its sustainability if one respects the present intentions of settlement policy SPD1. 2.20 Our conclusion (and that of our client) is that the Core Strategy’s intention to identify a single strategic housing site close to a secondary settlement (and without a clear and defensible examination of possible alternative strategic sites) is unsound. If the Core Strategy’s intention is to stray into development site identification where is the evidence that Trough Laithe will deliver what the Council say, presented in a manner which would allow members of the public or other landowners an opportunity to examine and comment on the proposal? 2.21 Similarly, where is the evidence that other available sites (especially other Local Plan Policy 3A sites) cannot similarly speedily deliver new dwellings which would make a more effective impact upon housing needs than simply relying upon a single, currently unproven, strategic housing location? We strongly question the robustness of any analysis. 2.22 For these reasons we consider the wording and intentions of proposed Policies LIV1 and LIV2 to be unsound in their presently drafted form.</p>	
									No change proposed in response to this comment.

814953			93	Yes	Yes	Yes	10.54 The strategic site needs to be of a sufficient magnitude to make a real difference to the housing land supply position and on the ground delivery. In particular it must be able to deliver new housing at a rate which will make a significant impact in meeting the annual requirement. How is PBC going to ensure that delivery of new housing rate will meet the annual requirement once permission is granted? In the Core Strategy proposal, the strategic housing site at Barrowford identifies a 17% contribution to the annual housing requirement. So would need either 5/6 other large sites to be on-going at the same time or a significant number of smaller sites being developed to meet just 1 year's requirement. Is PBC in danger of being forced to grant planning permission to meet housing targets, and have too many permissions that are not being delivered, so in a perpetual cycle of granting permission?	There will always need to be a range of sites across borough that are available and under construction in order to meet the annual housing requirement. The National Planning Policy Framework (NPPF) requires Local Planning Authorities to maintain a five year supply of housing land to ensure the delivery of the annual requirement. The Strategic Housing Land Availability Assessment is the mechanism for identifying sites. The Local Plan Part 2: Site Allocations and Development Policies will allocate sites for new housing development. As part of this process the Council will need to ensure as far as possible that the sites which are allocated are deliverable and that the owners/developers will progress development once permission is granted. The Council has little control over the market and therefore the delivery of new housing is heavily dependent on both the development industry and the overall current economic conditions. The assessment of the developer’s financial viability statement by the Council at the application stage aims to provide some assurance that a site is viable and likely to be developed out. However, the rate of development is linked to the movements in the housing market and current demand. With larger schemes it is likely that a phased approach to development
Mrs	Pam	Slater						

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						Apply the principle from 10.120 (of retesting viability of schedules if development not commenced within 2 years) to all major housing applications so a developer can not just 'land bank' a site once permission granted and equally must provide a realistic development scheme, with defined phases. This could help the council meet it's housing targets and help to reduce existings residents pain with large scale developments continuing for many years at a developers pace. If a development rate is only 15 per annum in some schemes, then the threshold for such a rule to apply may need to be set quite low. 10.120 To ensure that the maximum amount of affordable housing is provided, without impeding the delivery of new (general market) housing, the Council will require the viability of schemes to be retested where development has not commenced within two years of the permission being granted. Should the economic conditions have changed the level of affordable housing will be renegotiated. This provides a flexible approach to housing delivery, which reflects the prevailing economic conditions. Whilst in some circumstances it may result in a reduction in the amount of affordable housing that can be provided, in other situations it may increase the amount. Overall, it will ensure that the delivery of new housing is not unduly restricted by the requirement to provide affordable housing.	will be employed by the developer in order to finance the scheme. The requirement in Policy LIV4 to retest the viability of housing developments to help deliver affordable housing will apply to most housing developments and does not need to be repeated in Policy LIV2.
							No change proposed in response to this comment.

327735	120					The above report is currently out for consultation. We have been instructed by our clients, Maro Developments, to object to Policy LIV 2, Strategic Housing Site: Trough Laithe. Reason for Objection. The Strategic Housing site is within an area designated in the Replacement Pendle Local Plan under Policy 3A – Protected Areas. The narrative to the Policy states that no development will be permitted within these areas during the plan period up to 2016. Policy LIV 1 of the Further Options report requires the delivery of 290 dwellings per annum from and including 2015. There is therefore a contradiction between Policy 3A and Policy LIV 2. The Further Options report contains no proper justification or explanation for the selection of the Trough Laithe site as the Strategic Housing site when other sites identified in the SHLAA could meet or contribute to the immediate need for housing. The proposed Strategic Housing site is outside of the settlement boundary and does not relate well to the service centre of Nelson of the local service centre of Barrowford when compared with possible alternative sites. In addition there is no evaluation of traffic issues which may constrain development. Other sites identified in the SHLAA, both within and outside of the Settlement Boundary, are capable of contributing to the immediate need for housing. These include sites in the South Valley, Colne, (sites 60, 77 and S004) which in total can provide for over 200 houses beginning in 2015. Site S004 is owned by my clients. It is shown in years 11 – 15 of the SHLAA and not currently viable but my clients are ready	Policy 3A of the Replacement Pendle Local Plan indicates that the future of these areas is to be reassessed through subsequent reviews of the plan and that they represent areas of choice for possible development to meet long term requirements. The Core Strategy is the first part of the review of the Local Plan and sets out the needs for development up to 2030. It is therefore appropriate to reassess the need for the sites covered by Policy 3A at this time. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan's economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in
Mr Chris O'Brien							
Maro Developments Limited							
817831							
Mr Andrew Walker							
JWPC Ltd							

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						and able to begin a phased development within the early plan period. Other sites in Barrowford, S199 and S240, are shown as available in the first five years of the plan. They would provide for around 110 dwellings and are well related to Barrowford centre and are much more sustainable sites that the proposed Strategic Housing site. The above comments serve to show that the selection of Trough Laithe as the Strategic Housing site is not the only site which could be put forward as suggested by paragraph 10.55 of the Further Options report. It is also suggested in the report that the site could deliver 50 houses per annum and that this is sufficiently significant to justify the Strategic designation. My clients question that assertion and believe that the correct approach is to bring forward the Local Plan Part 2 document, the Site Allocations Plan. This plan has been in preparation for some time and the necessary evidence base (the SHLAA) is available to allow its publication. Only by publishing the Local Plan Part 2 can proper consideration be given to the proposed Strategic Housing site.	the future. The requirement to provide 290 dwellings from 2015 in Policy LIV1 does not present a contradiction between Policy 3A and Policy LIV2. The allocation of the site under Policy LIV2 will supersede its allocation under Policy 3A. The site is situated in a sustainable location between Barrowford and Nelson and is easily accessible to both these centres. The evidence in the SHLAA shows that there are no other comparable alternative sites of the same magnitude which are in a better location. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off the road into the Business Park. Further details of this will be made available at the application stage. It is not contended that there are other sites which can help to contribute to the immediate housing need and the review of the SHLAA in 2013 aimed to identify additional sites for this purpose. The SHLAA will be used in the preparation of the Local Plan Part 2: Site Allocations and Development Policies to identify the most appropriate sites to allocate to meet the housing requirement set out in the Core Strategy. The allocation of the strategic site does not preclude these sites from coming forward. However, the purpose of allocating the strategic site in the Core Strategy is to demonstrate that the plan is deliverable and that a significant proportion of the housing requirement will come forward over the short and medium term. Other sites in the SHLAA are not of a sufficient magnitude to provide this level of development. The annual delivery rate of 50 dwellings on the strategic site reflects the current economic circumstances and will provide a significant proportion of the annual requirement. The Core Strategy sets out the quantum of development that will be required therefore this must be finalised through the examination process before further consultation on the site allocations plan can be carried out. The Local Plan Part 2 will be progressed expediently following the adoption of the Core Strategy.
							No change proposed in response to this comment.

Policy LIV2: Strategic Housing Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
817848			140					<p>I wish to comment on the proposal to build houses on land at Trough Laithe Farm. I have lived on Lupton Drive in Barrowford since 1974 and know Wheatley Lane Road well. I attended the Public Consultation at Nelson Town Hall on 11th February and found Mr Halton to be most helpful and informative. However I did not find the Representation Form which I was given at all useful as it required knowledge about semi legal issues on which that I am unable to comment. For example Question 3 -I do not know about the "Duty to Co-operate ". I would like to make the following points: I am concerned that it is proposed that green fields are taken to build houses when there are many sites that could be redeveloped such as the Coloroll site in Nelson The proposal to build 481 new dwellings just off Wheatley Lane Road will have an impact on traffic. Wheatley Lane Road and Church Street are already well used particularly when there is congestion on Gisburn Road. Church Street is narrow and with parked cars on both sides is difficult to negotiate. The number of households created by building such a large number of houses will have an impact on local resources such as schools and GPs. Any development needs to be mixed - not just expensive large detached houses. Care homes for the elderly have been closed by Lancashire County Council but there has been no new provision of sheltered housing in Barrowford. Private developers want to maximise their profits but I feel that consideration needs to be given to a range of housing to meet the needs of different age groups. I hope that my comments can still be taken into consideration.</p>	<p>In terms of the use of greenfield land for housing, the NPPF requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites (both brownfield and greenfield) which could be used for housing development in the future. The SHLAA shows that even if all the available sites within the existing settlement boundaries are used (including brownfield sites in Nelson) there will still be a need for some development on greenfield sites currently located outside of the settlement boundary. There is also a need to ensure sites are viable to develop. The current economic conditions mean that many brownfield sites are not viable and are therefore not being developed. The strategic site is greenfield and viable and can provide a significant amount of housing over the next five years. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The siting of the access point off Riverside Way is to limit the impact the development of the site could have on Church Street and the junction with Gisburn Road. With regards to infrastructure and service provision, the Council has engaged with the utilities and service providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site. In terms of the type of housing to be developed on the site, Policy LIV3 relating to housing needs and Policy LIV5 relating to the types, sizes and</p>
Ms	Susan	Sunderland							

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Policy LIV2: Strategic Housing Site

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									density of development will apply to the strategic site. This should ensure a range and mix of dwellings is provided, including some affordable housing, some of which could be sheltered accommodation to meet the needs of the population. In addition, Policy LIV2 requires that the site is developed using a high quality landscape scheme to incorporate the site's natural features. Policy LIV5 requires the provision of open space. This should help to provide breaks between the housing so as not to over dominate the area.		
									No change proposed in response to this comment.		
817872	Mr and Mrs	Peter and Elisabeth Johnson	142					We would like to place on record our unequivocal objection to the potential housing development on the above site, as outlined and contained within the Council's Strategic Housing Land Availability Assessment. The number of proposed houses would cause issues as follows Traffic volumes within the area causing danger, nuisance and pollution. The road into Barrowford is already a bottleneck, and could not sustain the increased traffic volumes. Barrowford itself is becoming gridlocked. No suitable local infrastructure for the size of the site - schools, shops. No transport services. The site is of natural beauty, and will create environmental issues for the wildlife inhabiting therein. The pathways for walkers would disappear. Flooding is a potential. We do not accept or understand why the countryside would have to be destroyed to fulfil your strategy. Equally, we do not understand the need for such an increased level of housing in Barrowford.	With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The siting of the access point off Riverside Way is to limit the impact the development of the site could have on Church Street and the junction with Gisburn Road. With regards to infrastructure and service provision, the Council has engaged with the utilities and service providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site. With regards to the environmental impact, the majority of the site has not been identified as an area of ecological interest. Policy LIV2 requires the site to be developed using a high quality landscaping scheme		

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Policy LIV2: Strategic Housing Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

which incorporates the natural features of the site. It also requires open space to be provided. These measures are intended to help mitigate against any negative impacts. In terms of the potential for flooding, the site is not located in an identified flood risk zone. Policy ENV7 requires that new developments should incorporate measures which mimic the natural surface water run-off rates to reduce any potential to increase flood risk. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan’s economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. The Strategic Housing Land Availability Assessment identifies sites with the potential to be developed for housing and indicates that there is not a sufficient number of sites within the existing settlement boundaries to meet the housing requirement. The Core Strategy allocates the site at Trough Laithe as a strategic housing site to help show that the plan is deliverable. The site accounts for nearly 10% of the borough's housing requirement over the plan period and its allocation in the Core Strategy will allow for both early and medium term provision.

No change proposed in response to this comment.

327935

Sainsbury's

817889

Mr

George

Wilyman

Turley Associates

156

Sainsbury's supports the inclusion of Policy LIV2 in the Core Strategy and the designation of Trough Laithe Farm as a strategic site for housing. However, it is recommended that with the accumulation of further housing development, there will be an additional need for further retail development in the local vicinity. Supplementary retail development will be required in order to meet the needs of the future residents and ensure the development is sustainable.

Expand the policy to make specific reference to the need for a retail provision attached to future housing development at Trough Laithe Farm.

This comment provides general support for the identification of the Strategic Housing Site. In relation to the provision of supplementary retail provision for the site, it should be noted that the site is in a sustainable location with relatively easy access to both Nelson town centre and Barrowford local shopping centre. Policy WRK4 already allows for the provision of small-scale retail uses that enable people to meet their daily needs within walking distance of their homes and places of work. This could include the provision of a corner shop or similar type of retail development. It is therefore not considered necessary to expand Policy LIV2 to make specific reference to retail provision on the site.

No change proposed in response to this comment.

Policy LIV2: Strategic Housing Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

327467

Mr

Iain

Lord

Barrowford Parish Council

167

Land at Trough Laithe Farm: 1. That the Parish Council agrees in principle to the use of Trough Laithe as housing land but feels that the proposed housing density of around 28 dwellings per hectare is more suited to an urban core setting than an elevated edge of town development. The site due to the rising nature of land is the predominant view for large swathes of Nelson and is situated above much of Carr Hall which has been a much sought after residential area where for the last century people aspired to live. The site would be used to meet these aspirations by providing high quality housing of mixed sizes up to very large properties at a much lower density with generous open spaces consistent with the size of the dwelling. The development should include landscaped areas to both mitigate the loss of visual amenity and also to reduce run off of surface water onto the flood plain at the bottom of the hill. The Parish Council feels that the proposed 481 dwelling will not meet the aspirations of the village and would be opposed to any such development. 2. The Parish Council accepts that developers are loathed to build affordable housing within a prestigious development and in mitigation of the need for affordable housing would support the levy of significant section monies for the provision of social housing elsewhere within Barrowford. 3. The Council is mindful of the possibility of any future developer wishing to access the site from Wheatley Lane Road and due to the straight wide aspect of the road adjacent to the site the Highways Authorities may be minded to allow access. This stretch of road does not highlight the inadequacies of the road infrastructure at either end and again the Parish Council would be totally opposed to any application that include the creation of an access. . 4. The Parish Council feels that due to the extent of the proposed site implications to local infrastructure including roads, schools and drainage should be investigated and where deficiencies are found section monies should be levied from developer to reduce these deficiencies.

The strategic site is likely to be developed in sections and the density of each section will vary. Policy LIV5 will apply to any planning application to develop the site and this policy requires that the density of new housing should be appropriate to its location taking account of townscape and landscape character and accessibility. Policy LIV2 requires the provision of the relevant infrastructure to serve the development including open space. Policy LIV5 also sets out the requirements for the provision of open space, including gardens, and the types and sizes of dwellings that may be required in the borough to meet needs and aspirations. Policy LIV2 will be amended to make reference to Policy LIV5. Policy LIV2 requires that a high quality landscape scheme is developed incorporating the natural features of the site. In terms of the potential for flooding, the site is not located in an identified flood risk zone. Policy ENV7 requires that new developments should incorporate measures which mimic the natural surface water run-off rates to reduce any potential to increase flood risk. The total number of dwellings proposed for the site is estimated at 500. However, this is an indicative figure and is subject to change with the submission of a planning application. The site is allocated on the basis of meeting the wider housing needs of the M65 Corridor rather than solely Barrowford. Policy LIV2 includes a requirement to provide 20% affordable housing on-site. This is an important part of creating mixed and sustainable communities. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off the road into the Business Park. Further details of this will be made available at the application stage. If access off Wheatley Lane Road is required it would only be used to access the top area of the site for a small part of the development. With regards to infrastructure provision, the Council has engaged with the utilities providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also

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Policy LIV2: Strategic Housing Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
									engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. Policy LIV2 is clear that development of the site will only be supported where the relevant infrastructure can be provided.
									Amend Policy LIV2 to make reference to the types, sizes and density of the new housing to be provided, and link this to Policy LIV5.
817934			170	<input type="checkbox"/>	No		No	(Please note: a number of photographs were submitted with this representation and these can be seen on the next page) The ‘Strategic Housing Land Availability Assessment’ is heavily flawed with no scientific evidence to back up findings. Pendle Council has reacted to the requirement of Central Government by undertaking the assessment to find ‘suitable’ land to ensure a five year delivery programme, this land bank is to be reviewed year on year to ensure constant supply of land. However, this is very much lead by spreadsheet analysis in terms of numbers of houses, average house price receipts in particular areas and readiness to deliver by land owners and developers. The report is immature in its direction and Pendle Council has allowed findings to be influenced by developers. There is particular issue with the identified ‘Policy LIV2: Strategic Housing Site – Trough Laithe Farm’. The problems associated with this site best illustrates the issues prevalent in most of the sites identified in your strategic document. Paragraph 2.30 discusses current build rates suggesting that current rates reflect a decreasing average per annum from 14 to 7 units per year. Pendle Council has taken advice from land owners in terms of deliverability. In the case of the Strategic Housing Site, the developer has suggested a delivery rate of 50 houses per year from 2015 to a maximum of 481 houses based on 12.96ha of land. This is a significant parcel of land which should be considered extremely carefully for inclusion within the plan. There is a definite and tangible risk that Pendle Council would be guilty of giving away the family jewels should this site be allowed to be developed? The significant issue is the lack of scientific approach from Pendle Council to identify suitable land for Housing. More so there is evidence within the strategy of naïve panic to secure land in response to Central Government. Proof of need... ...Going forwards I would urge Pendle Council to review actual demand for housing and based housing typology. For example, numbers depicted in spreadsheets are based on the vernacular to the area and not on what is actually required. The findings that only 7 houses are constructed per year suggests there is a distinct lack of demand for the type of houses on offer i.e. detached ‘executive’ properties. Mix this assumption of detached executive houses with a large site of 12.96 ha and the council will have a failed development on their hands with little or no take up for the new homes as people in that type of market prefer smaller more exclusive developments. First of all, we must understand the typology of	The National Planning Policy Framework requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The preparation of the Strategic Housing Land Availability Assessment (SHLAA) provides the information used to demonstrate the supply of housing land. The SHLAA has been prepared in accordance with government guidance. It assesses the availability, suitability and achievability of each site using a range of criteria. It also looks at the potential constraints of developing the sites. The SHLAA looks at current build rates to estimate the potential delivery of sites. However, where developers/landowners provide information relating to delivery this is used as it represents a more realistic figure. The need for new housing is set out in the Strategic Housing Market Assessment (SHMA). The NPPF requires local planning authorities to prepare a SHMA to ensure their local plan meets the full, objectively assessed needs for market and affordable housing. The SHMA has been prepared in accordance with government guidance and provides a robust and credible approach to establishing the housing need for Pendle. The types of houses to be provided on the strategic site have not yet been determined. Any planning application for the site will need to have regard to Policy LIV5 which identifies the types and sizes of housing which are required in the borough and are based on the findings of the SHMA. The mix of house types will respond to the needs and demands of the borough. With regards to infrastructure provision, the Council has engaged with the utilities providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school
Mr	Paul	Henderson							

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Policy LIV2: Strategic Housing Site

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						<p>housing unit? Is this number made up of; Social housing, retirement housing, assisted living, apartments, detached ‘executive’ houses, bungalows, semi-detached, terraced housing etc? Most of all with house building on the perceived scale of Trough Laithe Farm there will be a need for significant investment in social infrastructure; where is the new £6m to £10m primary school, where is the nursery as promised by the business park development to the lower part of the site, where is the new doctors surgery, where is the new dentist. Is the developer willing to fund this type of social infrastructure? The development of this site would significantly increase the current settlement boundary to Barrowford which is currently to the edge of Wheatley Springs and encroach into valuable green field space. The value of which is demonstrated by the impact of the site on surrounding areas. Most notably, Trough Laithe Farm provides vistas to keys areas within Pendle including Nelson and Colne. This is something which should be taken seriously. The following pictures (these are shown on the next page of this report) are views from Barkerhouse Road in Nelson, Reedyford Road in Barrowford, The Shooters Arms and importantly, Albert Road in Colne. The Strategic Housing site at Trough Laithe Farm plays a very important role in providing the primary vista which connects Colne with the country side beyond. This is very much evident when walking, or traveling in a vehicle from Colne Town hall via Albert Road to the Crown Hotel Public House. To develop this prime Green field site would in effect close the open feel and connection of a busy Town Centre main street to its surrounding green countryside. The development of this site would be sacrilege and begin to destroy the open feel and reputation which Colne has as the ‘Bonnie Town on the Hill’. This view should become a Protected View for this aspect alone! With over development and lack of understanding of the right type of housing unit, Pendle Council is at risk of rushing a decision which would see key valuable sites being lost to profit hungry developers with the opportunity cost being the loss of benefits brought by the shear impact of such a site in terms of public amenity to surrounding areas. We do not want this development to become another Boundary Mill which is probably viewable from the International Space Station! As is well documented, Colne, Nelson and Barrowford suffer from significant traffic congestion issues. This is being reviewed via a different strategy in the form of bypassing the worst hit areas. Given the type of high yield housing that the strategic housing site at Trough Laithe Farm would provide, it would be safe to assume upwards of three cars (plus) per household (not including visitors). This equates to 480 x 3 = 1440 extra cars to an already congested area. Add that number to the overall housing strategy should other developments be successful and that would equate to approximately 9600 cars (Para 4.42, Table 4.12 – Housing supply 2015-30. Assuming 2 cars per unit x 4800). Clearly this further adds to the requirement for road infrastructure upgrades. With respect to the Strategic Housing Site at Trough Laithe Farm, 1440 extra cars would cause melt down to the local road network, specifically if taking into consideration; the junction to Carr Hall Road and Wheatley Lane Road, Church Street and to Gisburn Road running through the village. Should Pendle Council be forced into the retention of Trough Laithe Farm within their ultimate strategy then the suggestion is</p>	<p>places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site. In terms of the landscape impact the landowner/developer of the site has carried out work to assess the potential impacts on the landscape. Development on new sites will always change the character of an area. The policies in the Core Strategy aim to meet development needs but also limit the impact on the environment and mitigate to lessen any negative impacts. Policy LIV2 recognises that the development of Trough Laithe will need to be sensitive to its location and surroundings. It requires that the development of the site must include a high quality landscaping scheme incorporating the natural features of the site. This requirement aims to mitigate the landscape impact. In addition, the land to the west of the site has not been identified for development. This site is within the Carr Hall and Wheatley Lane Conservation Area and will maintain some of the openness of this area. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off the road into the Business Park. Further details of this will be made available at the application stage. The site is likely to be developed in phases, possibly by more than one developer, and will require a number of planning applications. These applications will need to comply with relevant policy requirements at the time. This may include traffic and environmental assessments. The Core Strategy is based on evidence which has been prepared in accordance with government guidance and represents the best approach to achieve the sustainable development of the borough over the next 15 years.</p>

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						rather than considering the whole of the parcel of land in one single move; The land should be ‘parcelled’ and handed to developers in a phased manner i.e. split into thirds, fifths etc with a new planning application for each segment based on proof of demand, typologies, links with social infrastructure including schools and providing a full socioeconomic impact assessment, traffic impact assessments and preferably an Environment Impact Assessment at each phase.	
						The strategy must be fundamentally revised taking the steer from scientifically proven demand for housing and determining the type of housing required. This must then be married to the most appropriate land prior to any developer consideration.	No change proposed in response to this comment.
						Labour flyer. We would not have known about it otherwise. This is disappointing to be informed in this manner.	

618699	177					Policy LIV 2 – Strategic Housing Site: Trough Laithe 5.5. To remedy the previous undersupply of housing and a lack of housing provision in the Core Strategy Preferred Options Report, Policy LIV2 allocates land outside the settlement boundary of Barrowford for the development of circa 450 homes, as a ‘strategic allocation’. 5.6. Notwithstanding our view (at Section 4) that the process by which the site has been introduced is flawed, the policy itself is unsound as it is not underpinned by a robust evidence base. 5.7. There is no evidence provided which demonstrates that the proposed allocation is ‘strategic’ and therefore whether it can be legally included within the Core Strategy. 5.8. The Planning & Compulsory Purchase Act and NPPF advise that a Core Strategy should inter alia include the strategic policies and objectives, which can include strategic policies. It is however not appropriate for a Core Strategy to include only selective allocations. 5.9. In the context of strategic sites the Planning Advisory Service consider that ‘strategic’, planning involves: ‘Larger than local issues that cannot be dealt with by one local planning authority working alone... For example the provision for new housing across a major conurbation or wider housing market area’. 5.10. The proposed housing site represents only 9% of proposed housing supply over the plan period (and 12% of the Council’s five year supply), and the allocation does not present issues which cannot be dealt with locally. On this basis Policy LIV 2 is unsound. 5.11. To remedy the above matter, the Council should either: Halt preparation of the Core Strategy and Site Allocations DPD and prepare a single Local Plan which includes all policies and necessary sites (both strategic and non-strategic); or Omit the strategic allocation from the plan. 5.12. Moreover, as summarised in Section 3 of these representations and detailed in our separate representations to the Pendle SHLAA there is no evidence to demonstrate that this site will come forward in the timescales proposed. 5.13. There is therefore uncertainty on the delivery of this site, which is reflected in Policy LIV 2 itself which states that: “The development of a strategic housing site at Barrowford will be supported subject to the following criteria being met: The site is adequately connected to the road and motorway network and is accessible by public transport, walking and cycling; The relevant infrastructure
Mr	Robert	Crolla				
Indigo Planning						

The strategic site has been identified as an option in the Core Strategy Further Options Report to meet the increased housing needs both in the short and medium term. This is supported by the housing needs evidence in the Strategic Housing Market Assessment (SHMA) and the site identification process in the Strategic Housing Land Availability Assessment (SHLAA). A separate paper outlining the purpose and identification of the strategic site has been prepared. The identification of a strategic site is necessary to help to demonstrate that the quantum of housing proposed in the Core Strategy can be delivered. It provides a level of certainty to the success of the strategy and in particular helps to show the strategic objectives and vision can be achieved. Strategic sites can be allocated in core strategies to meet local strategic needs. The site at Trough Laithe helps to meet the borough's overall housing need and is situated in a location which serves Nelson, Barrowford and the wider M65 Corridor area. It is also located close to the strategic employment site providing an integrated approach to the growth of the M65 Corridor. This links in to the wider Pennine Lancashire growth plan along the M65 Corridor. The allocation of the strategic site in the Core Strategy does not restrict other sites from being developed and many of these other sites will be allocated in the Local Plan Part 2. In relation to the timescales for delivery of the strategic site, the landowner has carried out work to show with some certainty that the level of housing proposed can be delivered. The Council has already engaged with the infrastructure and utilities providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of

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Policy LIV2: Strategic Housing Site

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								(e.g. utilities, open space etc.) can be provided...” (Indigo Planning emphasis). 5.14. The second bullet point of the policy is particularly relevant. It indicates that no work has been undertaken which confirms whether the relevant infrastructure can be provided, or if it can what the timescales for doing so are. 5.15. If the Council do consider the site to be strategic then evidence should be made available which details the current site constraints, how they can be overcome, and the timescales for doing so. 5.16. The NPPF requires plans to be deliverable over the plan period in order to be effective. Plans should enable the delivery of sustainable development in accordance with the policies in the NPPF in order to be consistent with national policy. 5.17. Assessed against the requirements of the NPPF, Policy LIV 2 is inconsistent with national policy as it is not supported by robust evidence which demonstrates it is deliverable. Without this information, the policy is unsound.	the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site. The requirement in Policy LIV2 for the developer to provide the relevant infrastructure is to ensure that at the application stage the most up-to-date information is provided relating to the infrastructure needs at the time. Evidence is available to show that Policy LIV2 is deliverable, that there is a need for a strategic site and that the chosen site presents the most appropriate option.
									No change proposed in response to this comment.

327387	183							On page 117, LIV2 states that “ The development of a strategic housing site at Barrowford will be supported subject to the following criteria being met, which includes: ● a high quality landscaping scheme is developed incorporating the natural features of the site.” However, this is not consistent with other policies in the Core Strategy such as points 7 and 8 of Policy WRK2, which includes the following: 7. Does not have an adverse impact on the natural environment, in particular designated sites of international, national or local importance. 8. Makes a positive contribution to the protection, enhancement, conservation or interpretation of our natural environment and built heritage.	It is acknowledged that the points outlined in Policy WRK2 should be considered by new development proposals. However, to provide a consistent approach across the plan it is considered more appropriate to move these points into Policy ENV1 and then make reference to this policy in Policy LIV2.
Mr	John	Lamb	Wildlife Trust for Lancashire, Manchester and North Merseyside						
								Amend LIV2 so that it is consistent with Policy WRK2.	Amend Policy ENV1 to include the natural environment criteria outlined in Policy WRK2. Include an additional bullet point in Policy LIV2 to make reference to the criteria outlined in Policy ENV1 relating to the impact on the natural environment.
								This is consistent with the definition of sustainable development in paragraph 7 of the National Planning Policy Framework and the policies outlined in paragraphs 109, 117 and 118 of the Framework.	

Policy LIV2: Strategic Housing Site

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818007			193	No	No	It is not justified.; It is not effective.; It is not consistent with national policy.	No	Policy LIV 2 - Strategic Housing Site – Trough Laithe The proposed strategic housing site allocation is considered to be premature for the following reasons; 1) The significant extension of the settlement boundary will lead to unsustainable development which is not consistent with the aims and objectives of the Government’s National Planning Policy Framework. 2) There are alternative sites which are previously developed and do not require a significant the extension of the settlement boundary (as demonstrated in the 0-5 year availability assessments), that when considered cumulatively are more appropriate for the provision of residential development. Sites outside the settlement boundary should be ‘held in reserve’ where appropriate and protected for future development needs only when it is required and justified. The Core Strategy is considered unsound if this is taken forward early in its entirety at the expense of other sites within settlement boundaries. The NPPF does not encourage non sustainable, non-compliant sites to come forward prematurely. 3) Sites sitting within settlement boundaries, Brownfield first then Greenfield should be prioritised before considering allocating such a large area of land for residential development in one location. 4) There is inadequate infrastructure, for example education, highways provision, to support development within an unsustainable location. An allocation on this scale is contrary to the Government’s objectives for sustainable development proposals. 5) The allocation of such a significant site for residential development outside of the existing settlement boundary is considered to be premature. A strategic allocation in this location will reduce market appetite to build on previously developed land in other settlements within the ‘sustainable’ M65 corridor (Colne, Nelson, Brierfield) thereby significantly reducing the potential for regeneration. The Council will not achieve its objective of creating a ‘balanced housing market’. 6) An inadequate evidence base has been put forward to support the proposed strategic allocation of land. The site is designated as a Protected Area with the potential for the site to meet future development needs. The site should continue to be safeguarded until a requirement is demonstrated to extend the settlement boundary of Barrowford. There can be no confidence, given the lack of an evidence base relating specifically to the proposed strategic housing land allocation, that this is the correct decision at this stage. 7) It is not considered commercially viable to deliver 50 dwellings per annum from 2014 – the basic assumptions are therefore fundamentally flawed. This is not Effective. 8) The extension of the settlement boundary in this location will harm landscape character from short, medium and long distance views due to the extent of the allocation and mass of resultant development.	The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development and requires local planning authorities to meet the development needs of their area, specifically the objectively assessed needs for housing. In terms of the use of greenfield land for housing, the NPPF requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites (both brownfield and greenfield) which could be used for housing development in the future. The SHLAA shows that even if all the available sites within the existing settlement boundaries are used (including all brownfield sites) there will still be a need for some development on greenfield sites currently located outside of the settlement boundaries. There is also a need to ensure sites are viable to develop. The current economic conditions mean that many brownfield sites are not viable and are therefore not being developed. The strategic site is greenfield and viable and can provided a significant amount of housing over the next five years. The Core Strategy includes a policy on the selection of sites for development and this incorporates the approach in the NPPF to encourage the reuse of land that has been previously developed. However, the NPPF does not preclude greenfield development and given the current circumstances in relation to the economic viability of sites and the need to deliver an increased housing requirement the strategic site provides a viable option to meet these needs. With regards to infrastructure provision, the Council has engaged with the utilities providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raise any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site. Feedback from the infrastructure providers indicates that services can be provided to meet the expected levels of development proposed in the Core Strategy. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic
Mr	Mark	Roberts							

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							<p>Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off the road into the Business Park. Further details of this will be made available at the application stage. In relation to the regeneration of other areas of the borough many of the sites in these areas are not viable to develop at the present time. The strategic site will ensure delivery of the strategy is not put at risk by relying on the development of inner urban sites. These sites will be brought forward later in the plan period once viability levels have improved. The site at Trough Laithe was allocated in the Replacement Pendle Local Plan 2001-2016 as a Protected Area under Policy 3A. The Inspector at the Local Plan Inquiry indicated that the purpose of designating sites under this policy was to help maintain the permanence of the Green Belt. The Inspector stated that Policy 3A sites should be reconsidered as part of the review of the Local Plan and if the pressure for development after 2016 indicated that they would not be required, consideration should be given to including them within the Green Belt. The Core Strategy is the first part of the review of the Local Plan and sets out the needs for development up to 2030. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan's economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. In relation to the timescales and quantum of delivery of the strategic site, the landowner has carried out work to show with some certainty that the level of housing proposed can be delivered. In terms of the landscape impact the landowner/developer of the site has carried out work to assess the potential impacts on the landscape. Development on new sites will always change the character of an area. The policies in the Core Strategy aim to meet development needs but also limit the impact on the environment and mitigate to lessen any negative impacts. Policy LIV2 recognises that the development of Trough Laithe will need to be sensitive to its location and surroundings. It requires that the development of the site must include a high quality landscaping</p>

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>The proposed strategic housing allocation at Trough Laithe Farm (LIV2) should be erased. The land should continue to be safeguarded as a 'Protected Area' for residential development, with phases of land brought forward under the safeguarding allocation for residential development both short (however it is not possible to commence building residential units on the site prior to 2016 as proposed), medium and longer term. It is noted that the land to the West of the proposed Trough Laithe Farm Strategic Allocation remains a Protected Area.</div> <div>The level of consultation with the community impacted by the proposed allocation of the land at Trough Laithe Farm has been extremely poor and unacceptable. Community Consultation and participation is a fundamental requirement of the Governments aims and objectives for the new plan making system. The lack of consultation and discussion with the community in relation to the Trough Laithe Farm allocation (such a fundamental alteration from the original consultation) renders the Core Strategy proposals unsound. Direct consultation is required on all future stages within the process with full input at relevant stages by the local community.</div>							<div>scheme incorporating the natural features of the site. This requirement aims to mitigate the landscape impact. In addition, the land to the west of the site has not been identified for development. This site is within the Carr Hall and Wheatley Lane Conservation Area and will maintain some of the openness of this area.</div> <div>No change proposed in response to this comment.</div>
818047	209					<div>11 Policy LIV2: Trough Laithe Strategic Housing Site 11.1 Manthorpe considers that the Council has not properly justified the identification of the Trough Laithe Site as the only strategic housing allocation of the Core Strategy. There should have been a published strategic assessment of the alternatives, including an appraisal of sites in and around the Key Service Centres of Nelson, Colne and Barnoldswick. 11.2 The identification of the only strategic site allocation at Trough Laithe Farm is not in accordance with the spatial strategy set out in Policy SDP2. Barrowford is only a second-tier settlement in the settlement hierarchy established by that policy. 11.3 The Policy LIV2 explanation (paragraph 10.55) says that:- " Through the SHLAA review process a number of additional sites, that were not previously considered, have been assessed to determine their sustainability, availability and achievability. The findings of the SHLAA show that there is only one site of a size which could be put forward as a potential strategic allocation..... This is the site at Trough Laithe Farm ". 11.4 However, there is no minimum size set by national policy for strategic site allocations in core strategies. Sites of greatly differing sizes have been identified by core strategies as strategic allocations or broad locations and found to be acceptable by Inspectors. A recent example is the Knowsley Core Strategy. Manthorpe therefore does not accept that Trough Laithe is the only site of sufficient size to justify being identified as a strategic allocation. 11.5 For these reasons, Manthorpe considers the proposal is not properly justified and alternatives or additional sites should have been fully considered</div>	<div>A separate paper outlining the purpose and identification of the strategic site has been prepared. The purpose of Policy SDP2 is to set out the roles and interrelationships of each settlement in the broad context of borough wide growth. The relationship between the strategic site allocation and the settlement hierarchy must be considered in the context of i) the purpose of allocating a strategic housing site and ii) the geographical location of the site. i) The allocation of the strategic site aims to deliver housing, which will serve the population of the M65 Corridor - not just the immediately adjacent settlement (in this case Barrowford). ii) The strategic housing site is located between Nelson and Barrowford with the centres of each settlement being of a similar distance away providing choice of access to different services. Although there is no minimum site size threshold set for strategic sites, by their very nature they should usually provide a quantum of development which will help to deliver a significant proportion of the borough's development needs and provide reassurance that the strategic objectives and vision of the plan can be achieved. The review of sites in the Strategic Housing Land Availability Assessment (SHLAA) showed that although other potentially large sites may be available they are not of the same magnitude or sufficiently progressed to be considered as strategic sites. The Local Plan Part 2 will be prepared following the adoption of the Core Strategy and provides the mechanism for allocating further sites for housing</div>

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Policy LIV2: Strategic Housing Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

development.

No change proposed in response to this comment.

379101

278

Mr.

Richard D.

Halstead

I wish to make the following comments relevant to the above in respect of Section LIV2, Trough Laithe Farm Strategic Housing Site. 1. The erection of 480 dwellings in that area cannot be in keeping with the stated proportions of 30% affordable houses, nor can it be in keeping with the adjacent property development on the Carr Hall and Wheatley Lane sides of the area. Taking an adjacent equivalent area on the Ridgeway and Dixon St area through towards Nora St, There are only 300 properties and these are roughly 70% terraced (affordable housing?). The plan is clearly impossible, even under the rules. 2. It is grossly unfair to single out Barrowford for what looks like the whole of the Rural Development in Pendle. 3. The infrastructure of the area will not support such a large development. Access via Church St is already highly congested and any link through to the Business Estate, where grossly inadequate parking already exists for the only partially occupied buildings, will only create further congestion, as it will also be used as a bypass link to avoid the congested centre of the village. Exiting from Parrock Rd will be dangerous. 4. 480 houses will add roughly 20% to the population of the village helping to destroy, deliberately, the precious village aspect and community life. That along with the increased traffic as a result of the Booths and Morrisons developments will completely clog the village. Is this all part of Pendle Policy? 5. Rural areas should be preserved for the enjoyment of the whole community and only vital development allowed, which should be evenly spread, not done to deliberately destroy one area. Over enlargement will adversely affect the community way of life and social structure of the village. 6. Will the surrounding community facilities cope with an expansion of approximately 1500 extra people? NHS Services, Education, Entertainment. Are these in place or are we building a further problem? I respectfully ask you to look again at this proposal taking into consideration the points I have made, and in all truth, is it really necessary considering the amount of property that is already for sale or to let in the Borough? You know as well as I, that any affordable housing will be snapped up by the buy to let brigade, and not help young couples to get a foot on the housing ladder.

The proposed strategic housing site will provide a mix of house types, sizes and tenures to help meet the needs of the borough. With regards to the amount of housing to be developed, the policy indicates that around 481 dwellings could be provided. However, this figure is likely to change when more detailed plans are finalised. The policy indicates that 20% of the housing on the site will be of an affordable tenure. The affordable housing policy in the Core Strategy requires affordable housing to be tenure blind so that it is indistinguishable from market housing provided on the site. The National Planning Policy Framework (NPPF) aims to create sustainable, inclusive and mixed communities and the requirement to provide some affordable housing on this site is therefore appropriate in achieving this aim. Trough Laithe can be well accessed from both Nelson and Barrowford and its allocation as a strategic site looks to provide housing for the wider M65 Corridor area. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The siting of the access point off Riverside Way is to limit the impact the development of the site could have on Church Street and the junction with Gisburn Road. The site at Trough Laithe is proposed to help to accommodate the expected growth in the population of the borough. The people moving in to this new housing will help to support and sustain the services and facilities in both Barrowford and Nelson. Policies in the Core Strategy aim to protect the rural hinterlands, only allowing sustainable development under certain criteria. However, Barrowford is part of the M65 Corridor Spatial Area. It forms an integral part of the urban belt in Pendle running from Brierfield to Colne. With regards to infrastructure and service provision, the Council has engaged with the utilities and service providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site.
							No change proposed in response to this comment.
327423	282					Policy LIV2 Strategic Site: Trough Laithe is identifies a strategic housing site in Barrowford. United Utilities requests the Council to consider the following operational comments: - the landowner / developer is encouraged to engage in discussions with United Utilities at the earlier possible stage to ensure that an assessment of the capacity of the wastewater network can be completed. There are local separate systems for foul and surface water which should be continued and maintained.	<p>It is accepted that landowners/developers of proposed sites should engage in early discussions in relation to infrastructure provision. Policy SDP6 already requires developers to work with infrastructure providers to identify any potential issues. However, it is considered that the wording of Policy SDP6 could be improved to include the term 'early engagement'. It is also proposed to make additional references to infrastructure provision in the justification text of Policy LIV2 to acknowledge the need to assess the capacity of the wastewater network. Bullet point 2 of Policy LIV2 will also be amended to reference to the requirements of Policy SDP6.</p> <p>Amend the second paragraph of Policy SDP6 to include the wording 'early engagement'. Amend the justification text of Policy LIV2 to include a reference to the need to assess the capacity of the wastewater network. Amend the second bullet point of Policy LIV2 to include a reference to the requirements of Policy SDP6.</p>
818201	285					1 JPL welcomes the identification of the land at Lidgett Triangle (S161) within the potential supply to meet housing requirements over the period of the Emerging Pendle Core Strategy (2015 to 2030). 2 JPL considers that the site fits well with the special priorities set out in the Emerging Core Strategy as:- 2.1. The site is adjacent to Colne which is one of the three highest order settlements in the hierarchy set out in Policy SDP2. The Further Options Report confirms that these towns provide “ the main facilities and services that are needed to support the local population and their surrounding rural hinterlands ”. It also confirms that “ the accessibility of these towns and the current level of services provide a good base for future development ”. 2.2. The site is well located to provide the type of aspirational value housing which Policy LIV5 identifies as being required in the M65 Corridor to rebalance the	The site at the Lidgett Triangle has not been identified as a strategic site in the Core Strategy as it is not of a scale or magnitude which would make a significant difference to the delivery of the strategy. This site will be given due consideration in the preparation of the Local Plan Part 2: Site Allocations and Development Policies along with all the other sites identified in the Strategic Housing Land Availability Assessment (SHLAA).
818046							

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Policy LIV2: Strategic Housing Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>housing stock. In this respect the SHMA says that Pendle should be:- “ Planning for a mix of housing which encourages the retention of residents of an economically active age or encourages younger economically active people to move into the two local authority areas. This would have a significant impact on the labour market and for the economic growth for (Pendle) going forward. The provision of better quality detached and semi-detached homes in both Boroughs may reduce the current imbalance from stigmatised two-up, two-down terraced properties and help encourage the retention of families (or conversely, attract families) on higher incomes to move into the area, thus improving overall job growth prospects. ” 2.3. The site is one of the higher value areas within the M65 Corridor. This is confirmed by the Economic Viability Study. Unlike many other potential sites in the Borough and Colne, its development would be viable and it could come forward at the time required by the local planning authority. 2.4. Because of its size and the potential land values achievable, the site could make a significant contribution to meeting the affordable housing needs of Colne. The Economic Viability Study shows that most sites within the existing built-up area of Colne would not produce any substantial number of affordable dwellings. Comment 2.5 relates to the SHLAA (see separate comments) Comments 4,5,6 relate to the SHLAA (see separate comments) 7 Junction Property Ltd considers that the site should be identified by the Core Strategy as a strategic site or a broad location to meet the identified deficiencies in the potential housing supply over the plan period, but particularly in the short and medium term.</p>	
							No change proposed in response to this comment.

715388	293				Policy LIV2: Strategic Housing Site: Trough Laithe Farm 3.35 Peel supports the proposed Strategic Site allocation at Trough Laithe Farm. By virtue of its scale, the amount and type of housing which the site will deliver and its location within the M65 Corridor, Peel agrees with the Council that the proposed housing site at Trough Laithe Farm will play a critical role in the achievement of the Core Strategy's vision and in delivering its key objectives. Its Strategic Allocation is therefore wholly justified. Most notably, Trough Laithe Farm: Will provide around 11% of the Borough's strategic housing requirement over the plan period; Ensure that sufficient housing is delivered in the early years of the plan period; Play an important role in supporting the economic growth of Pendle by providing high quality, aspirational family housing capable of attracting and retaining economically active residents in the Borough; Help to redress the imbalanced nature of Pendle, and particularly the M65 Corridor's, housing market, characterised by a predominance of smaller, low quality terraced units and a lack of larger family units in Council Tax Band D+ 3.36 Peel has submitted a comprehensive Development Framework for Trough Laithe Farm which demonstrates how the site could be delivered over the plan period. This presents a masterplan for around 481 residential units. This provides one articulation of the site's development. In view of this, and to provide added clarity and certainty with regard to the implementation of Policy LIV2, it is recommended that reference be made to the expectation	It is acknowledged that the masterplan for the site submitted by Peel represents only one articulation of how the site could be developed. Policy LIV2 will be amended to state that the site could deliver an estimated 500 dwellings over the plan period.
Ms Louise Morrissey						
Peel Holdings (Land & Property) Ltd						
714921						
Ms Anna Noble						
Turley Associates						

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Policy LIV2: Strategic Housing Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

that the site will provide approximately 500 residential units over the plan period.

Amend the justification text at paragraph 10.56 to state that an estimated 500 dwellings could be provided on the site over the plan period.

818293			303	<input type="checkbox"/>	No	It is not positively prepared.; It is not justified.; It is not effective.	We have just learned that 480 houses are to be built on the fields behind our house. We wish to strongly object to this plan. We moved here in 1969 to find a quiet rural spot, and have enjoyed the beauty of this area and its views for the last 44 years. Now this is threatened because more than a thousand people will move in behind us. This is a massive invasion, and far to big for this area to absorb. Local roads especially through Barrowford will be choked with an extra 500+ cars joining the system. The centre of Nelson will be drained as people desert the local streets and choose Barrowford new off shoot. We have not completed the form properly because we cannot understand them, not have we been given the time to study them properly. The building of these houses should be shared with other sites. Peel Holdings should not say where housing development should be.	With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The siting of the access point off Riverside Way is to limit the impact the development of the site could have on Church Street and the junction with Gisburn Road. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan’s economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. The Strategic Housing Land Availability Assessment identifies sites with the potential to be developed for housing and indicates that there is not a sufficient number of sites within the existing settlement boundaries to meet the housing requirement. The Core Strategy allocates the site at Trough Laithe as a strategic housing site to help show that the plan is deliverable. The site accounts for nearly 10% of the borough's housing requirement over the plan period and its allocation in the Core Strategy will allow for both early and medium term provision.
Mr and Mrs	N	Smith						

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Policy LIV2: Strategic Housing Site

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						Far too many houses for this field - have other sites been considered or have Peel Holdings cornered the market?	No change proposed in response to this comment.
						Yes - when we learn more about it.	

818301	304			It is not effective.	Yes	This strategy will ruin our countryside our villages, the road system cannot cope our services cannot cope Barrowford in particular will be ruined. There is to much development on greenfield sites. Use Brownfield sites. The planners are using the easiest option.	With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off the road into the Business Park. Further details of this will be made available at the application stage. With regards to infrastructure and service provision, the Council has engaged with the utilities and service providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities have not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. Policy LIV2 is clear that development of the site will only be supported where the relevant infrastructure can be provided. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan's economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these
Mr	Terence	Dowling					

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Policy LIV2: Strategic Housing Site

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										<p>two studies show that a significant amount of land will be required to meet the needs of the borough in the future. In terms of the use of greenfield land for housing, the NPPF requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites (both brownfield and greenfield) which could be used for housing development in the future. The SHLAA shows that even if all the available sites within the existing settlement boundaries are used (including brownfield sites) there will still be a need for some development on greenfield sites currently located outside of the settlement boundary. There is also a need to ensure sites are viable to develop. The current economic conditions mean that many brownfield sites are not viable and are therefore not being developed. The strategic site is greenfield and viable and can provide a significant amount of housing over the next five years.</p> <p>No change proposed in response to this comment.</p>	
818301			305				It is not effective.		Yes	The farm land proposal for Barrowford will destroy wildlife habitat concreting over will result in flooding Barrowford is going to be a sprawl of housing there has been enough development in Barrowford it needs to stop.	
Mr Terence Dowling										With regards to the environmental impact, the majority of the site has not been identified as an area of ecological interest. Policy LIV2 requires the site to be developed using a high quality landscaping scheme which incorporates the natural features of the site. It also requires open space to be provided. Furthermore, all relevant policies in the Core Strategy will apply including Policy ENV1 which looks to support development that incorporates features that are beneficial to biodiversity. These measures are intended to help mitigate against any negative impacts. In terms of the potential for flooding, the site is not located in an identified flood risk zone. Policy ENV7 requires that new developments should incorporate measures which mimic the natural surface water run-off rates to reduce any potential to increase flood risk. The strategic site is located between two areas of housing and although its development will increase the extent of the village it provides a suitable and sustainable location for new housing development.	
										<p>No change proposed in response to this comment.</p>	

Policy LIV2: Strategic Housing Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327497			308					<p>As requested through your letter on the above subject dated 9 th January 2014, herewith the official response from Barnoldswick Town Council on this issue. In relation to the Pendle Core Strategy we note that, in the latest version of this document, the major changes relate largely to Housing Delivery (Policy LIV1) and the provision of Employment Land (Policy WRK2) We also note with some dismay the allocation of the two additional development sites identified for the delivery of new housing (Policy LIV2) and employment (Policy WRK3); at Trough Laithe Farm, Barrowford and Lomeshaye Industrial Estate, near Nelson respectively. Whilst these additional areas do not affect Barnoldswick in a direct way, as far as their identification in the core strategy is concerned, it is felt that since both these locations are on Greenfield sites and we will require some redefinition of Green Belt Boundaries, they are both unwelcome and undesirable. The question of their need at all is the subject of much debate. However, as long as the National Planning Policy Framework exists in its current form and the Central Government acceptance of Pendle’s proposed Core Strategy are interdependent on matching number’s, there is little room for manoeuvre. The questionable achievability of the National Plan is a separate debate and one which is outside the remit of this consultation. We note from the supporting documentation, (The revised Strategic Housing Land Allocation Assessment and the Employment Land Review), used to justify the required changes to the Core Strategy, that in the short term at least, Barnoldswick is in a relatively healthy position in relation to supply and demand. However the latter years of the assessment period cause some concern that again Greenfield sites will have to be utilized whilst Brownfield sites remain undeveloped, for a variety of reasons, only too easily exploited by developers. How serious a problem this will turn out to be in reality we will have to wait and see. Notwithstanding our scepticism over the actual numbers used we would like to commend the research and authors of both the SHLAA and the ELR for their diligence and clarity. Both reports are well prepared and presented. In the present circumstances, Barnoldswick Town Council believes that the proposed changes are neither appropriate nor achievable, but recognises that under the current planning system there are limited practical alternatives, if the proposed Core Strategy is to be acceptable to Central Government.</p>	<p>The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan’s economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. In terms of the use of greenfield land for housing, the NPPF requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites (both brownfield and greenfield) which could be used for housing development in the future. The SHLAA shows that even if all the available sites within the existing settlement boundaries are used (including brownfield sites) there will still be a need for some development on greenfield sites currently located outside of the settlement boundary. There is also a need to ensure sites are viable to develop. The current economic conditions mean that many brownfield sites are not viable and are therefore not being developed. The strategic site is greenfield and viable and can provide a significant amount of housing over the next five years.</p>
									<p>No change proposed in response to this comment.</p>

Policy LIV2: Strategic Housing Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818417			318					I am writing to object to the proposed extension to the Lomeshaye Industrial Estate and the large housing estate which is also planned. It seems strange that you are prepared to build on a Green Belt. Where will this end you are opening a door to ruin Pendleside. You seem to be asking for trouble building a large roundabout on an already dangerous road, this is just asking for trouble. It also seems fool hardy to start building houses in an area where there are so many houses already on sale and cannot be sold. This includes Barrowford, Fence and Wheatley Lane, so why build more. Anyone buying these houses will not be coming from other areas as there are no jobs for them to come to. All you will do is move people from Nelson and Brierfield, this will leave a black hole of empty houses in these areas, making these towns a bigger slum than they already are. What a beautiful area this Pendleside once was. It fills me with dread to imagine coming along the M65 and all you will see is empty industrial units and empty houses where once there was greenfields that I remember. It is on a Green Belt, have you forgotten or are you choosing to ignore it? What are you trying to do to this area? To think of Nelson as a “Tourist Venue” is laughable. Who wants to look at empty warehouses. Pendle Council are not at the front of the queue when it comes to bringing work to the area. This seems all just pie in the sky thought up by someone who does not know the area.	The officer response to the issues relating to Lomeshaye and employment are dealt with under Policy WRK3, comment 319. The government, through the National Planning Policy Framework (NPPF), requires Local Planning Authorities to identify their objectively assessed needs for housing in their Local Plan through the preparation of a Strategic Housing Market Assessment (SHMA). The Burnley and Pendle SHMA has been prepared in accordance with government guidance and provides a robust and credible source of information which has been used to set the housing requirement in the Core Strategy. It provides details of the expected population growth of the borough up to 2030 and the likely associated housing need. In response to the issue of houses for sale, there will always be a proportion of the housing stock which is on the market to allow movement to take place. The current economic conditions are clearly having an impact on the time it takes for properties to be sold. However, this does not reduce the need for new housing and it is important to provide the necessary housing for future generations.
								No change proposed in response to this comment.	
818424			321					Site Ref S124 Land at Trough Laithe Farm I am writing in connection with the above proposed development. My property is adjacent to this land and I wish to strongly object to use of this Greenfield area. The development will significantly alter the fabric of the surroundings and it amounts to serious ‘cramming in’ in what is a low density housing area. The development, because of its size and housing density – 40dph compared to 30dph on the land at the rear of St Thomas’ Site Ref: S199 and to 16dph on Oaklands Site Ref: 240 – would have an unacceptable adverse impact on the amenities of the properties immediately adjacent to the site. The proposed site reaches to the rear fence of our small garden and we would be severely overlooked resulting in a serious invasion of our privacy and it will have an impact on the peaceful enjoyment of our home and garden. The proposed type of houses includes ‘some of affordable tenure’ i.e. rented Council houses – which are not in keeping with the 3/4/5 bedroom, privately owned properties adjacent to the land. The developments proposed for Barrowford would severely alter the relationship between it and Nelson. It is the town of Nelson that needs the influx of new inhabitants not the village of Barrowford. So many more houses would create a ‘village’ that would be much larger than any of the surrounding ones. The Primary schools of St Thomas’, Barrowford and Wheatley Lane Road are regularly over subscribed and they could not offer increased places for so many extra pupils . The development would be built on land which slopes significantly. We have concerns about the impact of this development on neighbouring properties in terms of drainage as well as ground stability. The siting of the development is on a Greenfield area and the	The strategic site is likely to be developed in phases at different densities depending on the characteristics of the site and relationship with the adjacent built-up area. The policy states that 481 houses could be provided on the site, however, this is an indicative figure and is subject to change at the planning application stage. Consideration will be given to the position of new dwellings at the application stage to restrict the potential for overlooking of existing properties. The policy requires the provision of some affordable housing in order to help create sustainable, inclusive and mixed communities. These properties will be tenure blind and therefore indistinguishable from the market housing provided. They will also be of mixed types and sizes catering for a wide range of housing needs. Trough Laithe can be well accessed from both Nelson and Barrowford and its allocation as a strategic site looks to provide housing for the wider M65 Corridor area. It is a viable site which can be delivered in the short and medium term and will help to provide an assurance that the proposed level of housing in the Core Strategy can be achieved. With regard to education provision, the Council has engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. With regard to issues of land stability and drainage, the

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								public rights of way across the land are used by many people for walking dogs and many rambling groups. Access to the proposed development is problematical. This is not obvious from the Red Edged published plan. a) Wheatley Lane Road – an already overused road would become even more dangerous with the influx of so many extra vehicles. Higher Causeway and Church Street are already impassable by two lanes of vehicles because of parked cars. The developments of the two sites behind St Thomas’ will add to the gridlock. b) Access through a Protected Employment area – cars already parked on both sides of the entry road. The exit onto the roundabout is extremely dangerous for pedestrians – limited pavement on this site of the A6068. c) Newly constructed access road from the A6068? I have serious worries and concerns about this proposed development. I would appreciate a reply to the points I have identified. Thanking you in anticipation.	landowner has carried out survey work to assess the land stability issues. Policy ENV5 requires developers to address the risks arising from unstable land. In terms of drainage, Policy ENV7 looks at issues of water management and requires that new development address issues of flooding and surface water run-off. This includes a requirement for sites to continue to mimic the current natural discharge process. The specific details relating to the access points into the strategic site have not yet been finalised. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The siting of the access point off Riverside Way is to limit the impact the development of the site could have on Church Street and the junction with Gisburn Road.
									No change proposed in response to this comment.

818431			323	Yes	No	It is not justified.	Yes	There are other possible locations for housing. There are also significant vacant premises that could be regenerated so as to reduce the impact on open land.	The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan’s economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. In determining the amount of new housing required, the SHMA has had regard to the number of vacant properties. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. The NPPF requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites (both brownfield and greenfield) which could
Mr	Simon	Stead							

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Policy LIV2: Strategic Housing Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

be used for housing development in the future. It is acknowledged that there are additional locations for new housing, however, the SHLAA shows that even if all the available sites within the existing settlement boundaries are used (including brownfield sites) there will still be a need for some development on greenfield sites currently located outside of the settlement boundary. There is also a need to ensure sites are viable to develop. The current economic conditions mean that many brownfield sites are not viable and are therefore not being developed. The strategic site is greenfield and viable and can provide a significant amount of housing over the next five years. The evidence base has been prepared in accordance with government guidance and provides a robust basis for the policies in the Core Strategy.

No change proposed in response to this comment.

Removal of Policy LIV2 or a full and fair consultation and planning process to consider other option and or stakeholder engagement in the planning process.

Part of the reason that people visit our area in Pendle is to enjoy the open spaces. To create this strategic housing site is to reduce significantly an area of open space. There is no evidence that supports the need to create new housing on this scale.

818438

MrMarkJocelyn

324

No

No

It is not positively prepared.

No

I am just writing to highlight some points and concerns over the Councils Core Strategy Plans and in particular with reference to the proposed strategic housing site at Trough Laithe, Barrowford. - Have the team behind this strategy investigated all potential brownfield sites. Developing derelict and redundant industrial & manufacturing sites must take priority over the development of green field sites which will have an impact on the natural wildlife and inhabitants of these areas. - I have read through the supporting information and there does not appear to be any proposal for new primary schools, nursery facilities to accommodate the growth in population in this area that new housing will bring. I have children and the local primary schools and entry in to the existing schools in the area is already difficult due to the current demand. - Introducing the number of new homes into this area will create huge pressure on the local roads and transport infrastructure. The current road network already struggles to cope with current traffic volumes at peak times. The Barrowford area with Wheatley Lane Road in particular has poor public transport links and unsuitable roads and lanes to cope with the increased traffic that this development will bring. - Any plans should harness the skills and needs of the local population, not just of Barrowford, but of the Borough of Pendle and the area of Pennine Lancashire. Its needs to support sustainable growth, forward thinking and intelligent solutions. The profit should be in the benefit of any development to the population of the borough and not to any 3 rd party stakeholders or investors. - There are no details on the type and quality of housing that is proposed, there is a national and local shortage of Social housing with limited demand for Executive housing. What type of housing is being proposed in this area? - There are no details on the quality or design of housing that will be provided. Some of the indicated

In terms of the use of greenfield land for housing, the NPPF requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to identify potential sites (both brownfield and greenfield) which could be used for housing development in the future. The SHLAA shows that even if all the available sites within the existing settlement boundaries are used (including brownfield sites in Nelson) there will still be a need for some development on greenfield sites currently located outside of the settlement boundary. There is also a need to ensure sites are viable to develop. The current economic conditions mean that many brownfield sites are not viable and are therefore not being developed. The strategic site is greenfield and viable and can provide a significant amount of housing over the next five years. The Council has engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have

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						timescales and the proposed volume of housing built within these timetables suggest that the quality could be questioned. Further information, research, viability needs to be given by the Council to show that the best solution is being provided in terms of a legacy for the future. Taking into consideration, impact on the environment, build and design quality, local infrastructure, social impact and legacy for future generations. - Impact on the area as a whole – I am concerned not just as a local resident but as a member of the borough that visually development of this area is far reaching. Developing sites that are run down and could be seen as eyesores should take priority over filling in green areas that form the natural boundaries and areas of beauty that Pendle is famous for. I look forward to receiving further information on the strategy or would welcome any comments on the above points.	<p>also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan’s economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. The Core Strategy allocates the site at Trough Laithe as a strategic housing site to help show that the plan is deliverable. The site accounts for nearly 10% of the borough's housing requirement over the plan period and its allocation in the Core Strategy will allow for both early and medium term provision. Full details of the type and quality of the housing proposed for the site will only be available at the planning application stage. However, it should be noted that all relevant policies in the Core Strategy will apply to the application. In particular Policy ENV2 (Achieving Quality in Design Conservation) and Policy LIV5 (Designing Better Places to Live) will help to ensure that the design of the development is appropriate to the site. Policy LIV2 should be amended to include a requirement for the development of the site to be of high quality and to provide the types of housing needed in the area. The Council has engaged with the landowner in relation to allocating the strategic housing site. Additional details of the proposals for the site will be made available at the next consultation stage of the Core Strategy.</p> <p>Amend Policy LIV2 to include a requirement for high quality housing which meets the needs of the area. Include a reference to Policies ENV2 and LIV5.</p>

Policy LIV3: Housing Needs

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
714054			52					Para 10.83 – seems to start mid-sentence. Needs to be clarified. Para 10.95 – refers to ‘rural communities’ whereas elsewhere in the settlement hierarchy ‘rural villages’ are referred to and identified as suitable locations for growth to add to and maintain these smaller service centres. Rural villages should be able to offer a range of house types, sizes and tenures and not be fettered with occupier conditions.	Paragraphs 10.63, 10.66, 10.72, 10.75, 10.79 and 10.83 are a formatting error and should not appear in this section. These paragraphs will be removed. Rural communities are referred to as this term encompasses the rural service centres, rural villages and wider rural areas. This will be made clearer in this section and where appropriate standardised across the plan. Policy LIV3 indicates that housing in rural areas will be supported where they meet an identified need. Owner occupancy conditions are covered in Policy LIV4 and will only be applied where appropriate to rural affordable housing to ensure that it remains affordable for local residents - this is a sustainable approach to the development of rural settlements.
Trustees Green Emmott Trust									
817541									
Ms	Jane	Dickman							
Dickman Associates Ltd									
Delete the following paragraphs: 10.63, 10.66, 10.72, 10.75, 10.79 and 10.83. Clarify the term 'rural communities' and where appropriate standardise the terminology for rural areas across the plan.									

327387			184	No	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.		On page 123, LIV3 refers to Gypsy and Traveller Communities and states that " sites should: Be located and designed to respect the amenity and environment of the existing settled community." However, this is not consistent with other policies in the Core Strategy such as points 7 and 8 of Policy WRK2, which includes the following: 7. Does not have an adverse impact on the natural environment, in particular designated sites of international, national or local importance. 8. Makes a positive contribution to the protection, enhancement, conservation or interpretation of our natural environment and built heritage.	It is acknowledged that the points outlined in Policy WRK2 should be considered by new development proposals. However, to provide a consistent approach across the plan it is considered more appropriate to move these points into Policy ENV1 and then make reference to these policies from Policy LIV3.
Mr John Lamb									
Wildlife Trust for Lancashire, Manchester and North Merseyside									
Make LIV3 consistent with WRK2.									
The Commentary on Paragraph 5.2 of BS42020:2013 states that “ The overarching aims of ecological work used to inform the planning process are to minimize harm and to maximize benefits for biodiversity resulting from development. The generally accepted way of doing this, now embedded within the planning system, is to follow the “mitigation hierarchy”. This seeks as a preference to avoid impacts then to mitigate unavoidable impacts, and, as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures. The principles for the mitigation hierarchy have been adopted in national planning policy guidance: Technical Advice Note TAN 5 in Wales and the National Planning Policy Framework (NPPF) in England. See also Mitchell 1997 and the DCLG’s Environmental Impact Assessment: A Guide to Good Practice and Procedures]”.									

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Policy LIV3: Housing Needs

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>818047</div> <div><div></div><div></div><div></div></div> <div>Manthorpe Developments (UK) Ltd</div> <div>818046</div> <div><div>Mr</div><div>Michael</div><div>Courcier</div></div> <div>Barton Willmore</div>			210					<div>12 Policy LIV3: Specific Housing Needs 12.1 Policy LIV3 should specifically address the strategic imperative identified by the SHMA to rebalance the housing stock and increase the numbers of higher value/lower density housing (otherwise known as aspirational housing) within the housing stock. In this regard, the SHMA says that Pendle should be: “ Planning for a mix of housing which encourages the retention of residents of an economically active age or encourages younger economically active people to move into the two local authority areas. This would have a significant impact on the labour market and for the economic growth for (Pendle) going forward. The provision of better quality detached and semi-detached homes in both Boroughs may reduce the current imbalance from stigmatised two-up, two-down terraced properties and help encourage the retention of families (or conversely, attract families) on higher incomes to move into the area, thus improving overall job growth prospects. ”</div> <div>12.1 This SHMA recommendation is not fully reflected in the Core Strategy. Manthorpe therefore considers that Policy LIV3 should be amended so that the first part becomes:- In order to help rebalance the borough’s housing stock, the Council will encourage proposals in appropriate locations which incorporate lower density/higher value housing. It will also encourage provision that helps to meet the following specific needs :</div>	<div>Policy LIV3 focuses on the specific housing needs of different (types of) household groups. Policies LIV1 and LIV5 both recognise the need for new housing to meet the aspirations of the population. Policy LIV5 includes an indicative guide to the types and sizes of new housing that should be provided across the borough. This is the recommended profile taken from the SHMA and includes an allowance for aspirations. It is not considered appropriate to include reference to lower density/higher value (aspirational) housing in Policy LIV3. Policy LIV5 is better placed to deal the type, size and density of new housing and will be amended to include additional information in the context section, in line with the findings of the SHMA relating to the rebalancing of the housing stock and the need to provide aspirational housing.</div> <div>Amend the context section of Policy LIV5 to include additional details from the SHMA with regard to the need to rebalance the borough's housing stock and provide aspirational housing. Clarify the wording of Policy LIV5 in terms of aspirational housing.</div>
<div>327580</div> <div><div>Mr.</div><div>Owen G.</div><div>Oliver</div></div> <div>Lidgett & Beyond Group</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>			264					<div>Although terraced housing accounts for 56% of the Borough’s housing stock, with a significant number being in need of upgrading and/or redecorating, there is a large number of empty homes in Pendle which could meet short-term needs or shortfalls (1,400 per para 3.24 or 2,554 per the SHMA). L&B strongly supports Policy LIV3 which looks at the potential for some empty homes to be acquired and refurbished as affordable housing...as they can provide a sustainable alternative to developing new dwellings, especially on Greenfield sites.</div>	<div>This comment offers support to the approach in Policy LIV3 for the reoccupation of empty properties to deliver affordable housing.</div> <div>No change proposed in response to this comment.</div>

Policy LIV4: Affordable Housing

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
714054			53		No	It is not positively prepared.; It is not justified.; It is not consistent with national policy.			1) Paragraph 10.107 sets out the context for the Affordable Housing policy in relation to the viability of sites. It explains that the current evidence base shows that the economic viability of sites varies across the borough which in turn, has an impact of the amount of affordable housing that could be provided. The paragraph is not setting the policy, nor is it allocating affordable housing to particular locations. The NPPF (paragraphs 173-174) is clear that local planning authorities should set requirements (e.g. for affordable housing) in their Local Plan. It also explains that careful attention to viability should be made in plan making and that sites should not be subject to a scale of obligations or policy burdens that threatens their viable development. This has been the basis for the preparation of Policy LIV4 and is the reason that the policy sets a variable range of targets depending on the area in which the site is to be developed. Furthermore, the NPPF (paragraph 50) requires affordable housing policies to be sufficiently flexible to take account of changing market conditions. Policy LIV4 responds to this point by allowing the area based affordable housing targets to be changed through a review of the Development Viability Study. It also presents the targets as a range, allowing a negotiation process to take place as part of the determination of any application. 2) The NPPF (paragraph 50) aims to create inclusive and mixed communities. Grouping affordable housing together on a development site will not achieve this aim and could lead to the stigmatisation of residents. 3) Paragraph 10.130 considers local occupancy conditions to retain any new affordable housing provided in rural areas for local residents in need. This is a separate issue to that of ensuring any new affordable housing remains affordable in perpetuity - Policy LIV4 is clear that all new affordable housing throughout the borough should remain affordable in perpetuity. 4) The plan has to balance the provision of affordable housing with overall housing delivery. In the current economic circumstances the evidence shows that many sites within the M65 Corridor are not viable to provide affordable housing at this time, whereas other locations in the borough are viable and can provide some affordable housing now. The plan has to acknowledge these circumstances and therefore proposes a range of affordable housing targets for different sized sites in different locations depending on the likely levels of viability. The policy is clear that these targets are the basis for negotiation with the applicant to determine the appropriate level of affordable housing to be provided, taking account of the viability of the site. It may be the case that there are sites within the M65 Corridor that are viable to provide some affordable housing and in these cases the Council will require its provision. The target ranges do not represent absolute maximum or minimum amounts to be provided. They aim to help inform applicants as to the Council's expectations given the likely viability of sites. The negotiation process allows for more or less than the target range figures to be provided. (The policy is to be amended to clarify this
Trustees Green Emmott Trust								Para 10.107 – seems to be suggesting more affordable homes be allocated to rural areas as they are not viable in the main settlements in the M65 corridor. This seems diametrically opposed to the accessibility issues and availability of the widest range of services etc. The settlement hierarchy and the percentage of homes needed in each of the 3 defined areas in SDP2 &3 should mean most affordable homes should be in the higher order settlements where most demand is. Unsound, not justified Para 10.121 – seeks affordable spread throughout a site and to be ‘tenure blind’. Even on larger sites for maintenance purposes having groups of affordable is more cost effective than single dwellings dotted across the site. This approach is ill informed and unrealistic. Para 10.130 – proposes that affordable in rural areas should be so in perpetuity. This should apply to all affordable not just rural areas in order to ensure the stock is maintained. Policy LIV4 – sets out the percentages for affordable housing on sites of different sizes in the three main area types for the borough. Whilst the SHMA says 40% affordable is required this policy shows 0% affordable in all but Rural Pendle and then only up to a maximum of 30% on small to mid-size sites. It is totally inflexible, ill conceived, contradictory and totally mismatched to the areas of need for affordable i.e. the main urban areas. It suggests 0% in the M65 corridor yet suggests the strategic site which is in that very zone provide 20%. This policy fails on all counts to be sound. Unsound, not justified, inconsistent with NPPF not positively prepared.	
817541									
Ms	Jane	Dickman							
Dickman Associates Ltd									

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Policy LIV4: Affordable Housing

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
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							point in response to another comment). The policy is also clear that the target ranges in Table LIV4a will be reviewed as and when new viability information becomes available. Future improvements to viability will rebalance the affordable housing requirements across the borough. In terms of the requirement in Policy LIV2 for the Strategic Housing Site to provide 20% affordable housing, this target is based on site specific viability work carried out by the owner of the site. The 0% target set for the M65 Corridor in Policy LIV4 is based on a generic, broad-brush viability assessment of model sites which uses current values and is therefore likely to yield different results from the site specific work.
							No change proposed in response to this comment.

755915	150					Policy LIV 4: Affordable Housing Targets and thresholds The need for affordable housing within Pendle is not disputed given the outputs of the ‘Housing Needs Study and SHMA’ which advocates a target of up to 40%. The HBF supports the Council in not taking forward this requirement based upon the viability issues currently experienced within Pendle. The December 2013 Pendle ‘Development Viability Study’ (DVS) acknowledges that a 40% requirement would be unachievable in the current market (paragraph 6.16). Support is also provided for a zero affordable housing requirement within the M65 corridor where viability is already severely compromised. It is, however, considered that the upper limit of the proposed affordable housing requirement within the rural area (up to 30%) is too high and is likely to create viability issues. The DVS indicates a maximum affordable housing requirement of 20% within this area (Table, paragraph 6.16). Whilst it is recognised that the council is willing to negotiate within a range the upper limits should be viable in the majority of cases. Indeed it is considered that a 20% affordable housing requirement may, in itself, be too high as the DVS does not include the costs of Section 106 or Section 278 agreements (paragraph 4.67), nor does it take account of the costs of the government’s push towards zero carbon. These additional mandatory costs will have a significant impact upon development viability in Pendle. The quoted percentages of tenures and types of affordable housing identified in the policy should be clearly identified as being for indicative purposes only. Flexibility will be required in the percentage of each tenure delivered based not only upon current needs but also location and development viability.
Mr	Matthew	Good				
Home Builders Federation Ltd						

1) The Development Viability Study tested a number of model sites of different sizes to determine the maximum level of affordable housing that could be achieved in each market area. In terms of the assumptions made about costs - it is acknowledged that the DVS does not account for site specific Section 106 or 278 contributions and that the residual sum resulting from the viability appraisals needs to be adjusted to include such costs and potential CIL levy. In terms of taking account of the costs associated with the government's move to zero carbon development the DVS has based the appraisals on costs associated with the Code for Sustainable Homes (CfSH) level 3. This is an appropriate approach to considering this issue as the costs associated with future changes relating to zero carbon development are not yet known. Furthermore, these changes will be mandatory through the building regulations and not a cost imposed by policies within the plan. In terms of the target ranges set in Table LIV4a of the policy, these have been derived from the financial viability appraisals in the DVS. Although it is acknowledged that for some site size thresholds the figures are higher than those recommended by the DVS in its conclusion, they are in line with the scenarios tested in the DVS. Indeed, with regard to schemes for 15 dwellings in the Rural Areas, the DVS explains that the affordable housing policy could increase the requirement to 30% and development would still remain viable, although this does not include S106/278 contributions or CIL. The Council has agreed not to introduce CIL at the current time and the regulations relating to S106 will restrict pooled contributions. It is therefore likely that the viability of sites in the rural areas will not be threatened by the proposed level of affordable housing. However, it is suggested that the range of targets set out in Table LIV4a should be amended to more robustly reflect the findings of the DVS. Furthermore, the wording of the policy will also be amended to clarify that the range of targets is the basis for negotiation and that lower or higher levels of affordable housing may be sought depending on the viability of the specific site. 2) The policy is already clear that the

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Policy LIV4: Affordable Housing

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments		Officer Response and Recommendation	
<div><div>327387</div><div><div>Mr</div><div>John</div><div>Lamb</div></div><div>Wildlife Trust for Lancashire, Manchester and North Merseyside</div><div></div><div><div></div><div></div><div></div></div><div></div></div> <div><div>185</div><div>No</div><div>No</div><div>It is not positively prepared.; It is not effective.; It is not consistent with national policy.</div><div></div><div><div>Recommendation It is recommended that the Council take account of the additional costs associated with development including likely Section 106/278 agreements and the governments push towards zero carbon. The additional considerations should be used to set a viable affordable housing requirement, which given current evidence is unlikely to exceed 20% anywhere in the district.</div><div>On page 129 its states that applicants will need to “ show that any potential impact on the environment can adequately mitigated.” However this is not consistent with the mitigation hierarchy outlined in paragraph 118 of the National Planning Policy Framework and is not consistent with other policies in the Core Strategy e.g. Policy WRK2, which includes the following: 7. Does not have an adverse impact on the natural environment, in particular designated sites of international, national or local importance. 8. Makes a positive contribution to the protection, enhancement, conservation or interpretation of our natural environment and built heritage.</div><div>Amend the wording on page 129 by, for example, inserting the following wording highlighted in bold text: “ show that any potential impact on the environment can be avoided or adequately mitigated.” It would also be better if the text in LIV4 was consistent with other policy wording such as that in WRK2.</div><div>The Commentary on Paragraph 5.2 of BS42020:2013 states that “ The overarching aims of ecological work used to inform the planning process are to minimize harm and to maximize benefits for biodiversity resulting from development. The generally accepted way of doing this, now embedded</div></div></div> <div><div>tenure percentages can be varied where circumstances exist. Such circumstances may include issues of site viability.</div><div>Amend the second paragraph of Policy LIV4 to read: "It is recognised that a fixed target is not flexible enough to respond to changing economic circumstances and site specific viability issues. Current viability information[1] shows that the Council can reasonably expect to seek levels of affordable housing within the target ranges set out in Table LIV4a. To ensure that the deliverability of new housing is not restricted by efforts to secure the maximum amount of affordable housing, these target ranges will be used as the basis for negotiation with the applicant, to help determine the appropriate amount of affordable housing to be provided. As part of the negotiation process, the Council will take account of the financial viability of the proposal[2], which may result in a requirement to provide more or less affordable housing than indicated by the target ranges. [1] Development Viability Study, 2013. [2] The applicant should demonstrate the financial viability of the scheme through the submission of a viability assessment." Amend Table LIV4a: For the rural areas change the ranges to: 15-49 dwellings = 20-30% 50-99 dwellings = 20-25% 100+ dwellings = 20-25%</div><div>It is agreed that the final sentence of the penultimate paragraph of Policy LIV4 should be reworded to improve its consistency with the NPPF. It is also accepted that the criteria in Policy WRK2 outlined in this consultation comment should apply to the majority of new development. As such, and in response to this and other comments made to the Further Options consultation, it is considered appropriate to incorporate the criteria in to Policies ENV1 and ENV2. In addition, Policy LIV4 will be amended to make reference to the criteria in these policies.</div><div>Amend the final sentence of the penultimate paragraph of Policy LIV4 to read: "In all circumstances applicants will need to provide details of the specific local needs the proposed development will address and show that any potential impact on the environment can be avoided or adequately mitigated. Proposals should also have regard to the requirements relating to protecting the natural and built environment set out in Policies ENV1 and ENV2."</div></div>											

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Policy LIV4: Affordable Housing

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

within the planning system, is to follow the “mitigation hierarchy”. This seeks as a preference to avoid impacts then to mitigate unavoidable impacts, and, as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures. The principles for the mitigation hierarchy have been adopted in national planning policy guidance: Technical Advice Note TAN 5 in Wales and the National Planning Policy Framework (NPPF) in England. See also Mitchell 1997 and the DCLG’s Environmental Impact Assessment: A Guide to Good Practice and Procedures]”.

818047

Manthorpe Developments (UK) Ltd

818046

Mr

Michael

Courcier

Barton Willmore

211

13 Policy LIV4: Affordable Housing 13.1 Manthorpe considers that Policy LIV4 as currently drafted is not in accordance with national policy. 13.2 The NPPF (paragraph 173) requires that affordable housing targets and other standards and requirements should not impose a scale of obligations and burdens that their ability to be developed viably is threatened. It is clear from the Council’s viability study that a 40% affordable target is unrealistic. 13.3 Manthorpe considers that that the policy should specify that the targets set out in Table LIV4a should be the basis for negotiations with applicants. In line with national policy, if these targets are met, there should be no need for the submission of a viability assessment. 13.4 The requirement should be deleted for renegotiation of the affordable housing element if planning permissions are not implemented in two years. It is unduly onerous and there is no similar requirement in national policy. 13.5 To facilitate increased viability, the tenure split should be 50% affordable rent and 50% intermediate tenure.

1) Policy LIV4 already clearly states that the targets in Table LIV4a provide a basis for negotiation. The submission of a viability assessment provides the evidence for demonstrating the amount of affordable housing that can be provide on the proposed site, even if the base targets can be met. The policy explains that there is an overall need to provide 40% affordable housing in the borough. Table LIV4a sets out the level of affordable housing that is likely to be viable on different sized sites in different locations at the present time. However, the policy is clear that these are only the basis for negotiations. There may be individual site circumstances where greater levels of affordable housing could be provided and the submitted viability assessment will help to demonstrate the most appropriate (viable) level. 2) The requirement to retest the viability of a scheme after two years, if work has not started, gives the developer the opportunity to adjust the amount of affordable housing to be provided in order to ensure that a scheme remains viable and deliverable. This renegotiation may result in an increase or decrease to the amount of affordable housing to be provided in the development. The market can change significantly within a two year period and the renegotiation requirement is considered to be an appropriate mechanism to respond to the market in order to maintain the viability of development sites and achieve the maximum amount of affordable housing for the borough. The government has introduced measures to allow S106 agreements relating to affordable housing provision to be modified on viability grounds. Policy LIV4 reflects this measure. Furthermore paragraph 205 of the NPPF indicates that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. Where a development has not been started within two years of a planning approval, it is considered reasonable to require a reassessment of the viability of the site to establish whether the affordable housing requirement is preventing the site from being brought forward. 3) The tenure split in Policy LIV4 is taken from the recommendations set out in the Strategic Housing Market Assessment (SHMA). The policy explains that in certain circumstances the tenure split may be varied - this may include issues

Policy LIV4: Affordable Housing

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							relating to the viability of providing the recommended split. Furthermore, footnote 140 acknowledges that the 'social rented' element could be substituted for affordable rent.
							No change proposed in response to this comment.

715388	294					Policy LIV4: Affordable Housing Provision of a viability appraisal 3.37 The clarity of the policy would be improved by confirming that a viability appraisal is only required where viability is used to justify a level of affordable housing, through either on site provision, off site provision or a financial contribution, less than the relevant percentage figure set out in Table LIV4a. As set out at paragraphs 3.31 to 3.33 there can be no justification for requiring a financial viability as standard on all housing schemes. Reassessment of viability 3.38 Peel objects to the requirement that where a residential development has not commenced within two years of the granting of planning permission, the viability of the scheme to accommodate affordable housing should be retested. Such an approach has not been justified by the Council. 3.39 Section 91 of the Town and Country Planning Act 1990 stipulates that the default life of a planning permission is three years. This period was reduced from five years a number of years ago in order to encourage early delivery of development and to allow a review of the principle of development to be undertaken. If development does not lawfully commence within this timeframe, or if applications for the approval of reserved matters pursuant to an outline planning permission are not submitted within this timeframe, the permission would lapse. 3.40 This enables a scheme and its acceptability as a whole and in terms of individual matters (e.g. design, affordable housing, ecological impact etc) to be reassessed if development has not commenced in this time frame. In view of this, there can be no justified reason for a measure which, in effect, seeks to reduce the lifespan of a planning permission, albeit only in respect of the issue of its affordable housing contribution, as proposed by Policy LIV4. Not only does this conflict with Section 91 of the 1990 Act but it will also serve to constrain development by adding another layer of appraisal to an already complicated planning application process. Developers will need certainty of delivery in order to secure funding for development. The prospect of a review of a key component of a development proposal before a permission lapses will deter developers from investing and bringing forward development in Pendle. 3.41 This measure goes against recent efforts by the Government to reduce the burden of Section 106 Agreements relating to affordable housing provision in recognition of the impact this continues to have on the delivery of sufficient levels housing across the country and on the achievement of the Government’s objective to boost significantly the supply of new housing. Recent measures to achieve this include a new appeal and review process for the provision of affordable housing secured by Section 106 Agreement. The context to and arrangements for this procedure are explained in Guidance issued by the Government in April 2013. Paragraph 2 of the Guidance states that: ‘Unrealistic Section 106 agreements negotiated in differing economic conditions can be an obstacle to house building. The	1) The submission of a viability assessment provides the evidence for demonstrating the amount of affordable housing that can be provided on the proposed site, even if the base targets can be met. The policy explains that there is an overall need to provide 40% affordable housing in the borough. Table LIV4a sets out the level of affordable housing that is likely to be viable on different sized sites in different locations. However, the policy is clear that these are only the basis for negotiations. There may be individual site circumstances where greater levels of affordable housing could be provided and the submitted viability assessment will help to demonstrate the most appropriate (viable) level. 2) The requirement to retest the viability of a scheme after two years, if work has not started, gives the developer the opportunity to adjust the amount of affordable housing to be provided in order to ensure that a scheme remains viable and deliverable. This renegotiation may result in an increase or decrease to the amount of affordable housing to be provided in the development. The market can change significantly within a two year period and the renegotiation requirement is considered to be an appropriate mechanism to respond to the market in order to maintain the viability of development sites and achieve the maximum amount of affordable housing for the borough. The government has introduced measures to allow S106 agreements relating to affordable housing provision to be modified on viability grounds. Policy LIV4 reflects this measure. Furthermore paragraph 205 of the NPPF indicates that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. Where a development has not been started within two years of a planning approval, it is considered reasonable to require a reassessment of the viability of the site to establish whether the affordable housing requirement is preventing the site from being brought forward. 3) In the interests of clarity, the section of the policy relating to the provision of on-site or off-site affordable housing will be amended to make clear the order of preference.
Ms Louise Morrissey Peel Holdings (Land & Property) Ltd							
714921							
Ms Anna Noble Turley Associates							

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Policy LIV4: Affordable Housing

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

Government is keen to encourage development to come forward, to provide more homes to meet a growing population and to promote construction and economic growth. Stalled schemes due to economically unviable affordable housing requirements result in no development, no regeneration and no community benefit. Reviewing such agreements will result in more housing and more affordable housing than would otherwise be the case.’ (Section 106 Affordable Housing Requirements: review and appeal (DCLG April 2013)). 3.42 The proposal in Policy LIV4 is therefore not supported by a clear need for such a measure and is not in line with the Government’s stance and general approach on this matter. This proposal is therefore not consistent with the aims and objectives of the NPPF and undermines the delivery of the whole Core Strategy. It is therefore unsound and should be removed. Preference of onsite provision 3.43 The fourth paragraph of the policy states that ‘In the first instance, affordable housing should be provided on-site and incorporated into the scheme so that it is ‘tenure-blind’ . Whilst Peel does not object to the intention of this statement, the term ‘in the first instance’ is somewhat ambiguous.

The policy’s clarity would be improved by replacing this sentence with the following: ‘The Council’s preference is for affordable housing to be provided on-site and incorporated into the scheme so that it is ‘tenure-blind.’ However, it is recognised that this is not always possible or appropriate. In these cases, the Council will accept the provision of affordable housing off site or the provision of a financial contribution towards off-site provision’

Insert the following heading after the third paragraph of Policy LIV4: "On-site / Off-site Provision" Reword the fourth and fifth paragraphs of Policy LIV4 to read: "Affordable housing should be provided in order of preference: 1) On-site and incorporated into the scheme so that it is 'tenure-blind'. OR 2) Where the applicant can adequately demonstrate that it is not possible to provide the affordable housing on-site, make arrangements to: i) provide the affordable housing on an alternative site within the same settlement as the proposed development; OR ii) provide a financial contribution towards the cost of off-site provision[1]."

844180

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Ms

Elinor

George

Persimmon Homes Lancashire

4.0 Policy LIV4: Affordable Housing (pg128) The decision not to take forward the 40% identified affordable need is supported by Persimmon Homes; it is felt that the policy of no affordable housing would help to encourage development along the M65 by increasing the viability of urban sites, encouraging the development in this location and assisting the council in meeting its 70% target for the M65 corridor. The flexible policy on affordable housing in the rural areas of the borough I commended and encourages affordable housing provision to be considered on a site by site basis, it is again thought that this will help to encourage development within the borough.

Support for the affordable housing policy approach is noted.

No change proposed in response to this comment.

Policy LIV5: Designing Better Places to Live

Person Details			Comment ID		Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
714054			54			It is not justified.			Policy LIV5 – para 10.142 informs that there are too many 1 and 2 bed properties in Pendle, yet the need in this policy shows that 52.5% of dwellings is 1 & 2 bed. Then looking at the percentages more detached and semi-detached (60%) are required but only 47.5% need to be 3 or 4 bed. The percentages seems to be utterly contradictory. In regard to rural Pendle lower densities are suggested depending on the area but LIV5 seeks 30-50dph in accessible areas so does this include the accessibility corridors on the key diagram? If so some rural villages could end up with high density schemes. House type and size in those areas to encourage retention of employment in the borough not outmigration. There should be more family housing provision which would mean average not high density. Not justified.	Paragraph 10.142 states that the current housing stock consists of a higher proportion of dwellings with 1 or 2 bedrooms. It does not say that there are too many properties with 1 or 2 bedrooms. The policy sets out an indicative guide for the types and sizes of dwellings to be provided to help rebalance the housing stock and to meet the needs and aspirations of the borough's population. The guide indicates that 7.5% of new dwellings should be properties with one bedroom and 45% should be properties with two bedrooms. Both of these percentages reflect the needs of the population and are derived from the evidence in the SHMA. The different percentages outlined for detached/semi-detached dwellings and properties with three or more bedrooms are not inconsistent. Not all detached and semi-detached properties have to have three or more bedrooms. The evidence points to the need to change the mix of the housing stock in terms of housing types but indicates that the size of dwellings (in terms of number of bedrooms) needed is mainly 2 bedroomed properties. Policy LIV5 is structured in a way which deals with overall borough-wide requirements and then provides further guidance as to the approach to be taken in each spatial area. In terms of the density of new housing development the policy takes a pragmatic approach by requiring that developments take account of their location. It recommends that a density of 30dph would provide a good starting point but acknowledges this may not be appropriate in some locations such as conservation areas, or in highly accessibly locations where a higher density development would provide a more sustainable option. In each spatial area this generic guidance has been tailored to best meet the needs of those areas. The policy wording will be amended to clarify the application of the density requirements to development. With regard to whether the transport corridors marked on the key diagram represent areas of high accessibility and whether those rural areas that are within these transport corridors will have to provide high density housing, it is acknowledged that the strategy section of the policy needs to be clarified as to the definition of high accessibility corridors. As stated above the density requirements in the policy are separated between borough-wide requirements and more tailored guidance for the spatial areas. In the rural areas the guidance suggests that lower densities may be appropriate. The intention of the policy is to achieve densities which are both sustainable and suitable to the location of the development. If a particular village has a transport hub or high frequency public transport service then a higher density housing development in that village may be appropriate.
Trustees Green Emmott Trust										
817541										
Ms	Jane	Dickman								
Dickman Associates Ltd										
Move the eighth paragraph of the policy to after the second paragraph and reword to read: "The overall borough-wide requirements for the design of new housing are set out below. These are supported by more tailored guidance for each spatial area to address local circumstances." Insert a new heading following this new third paragraph: "Borough-wide requirements" Amend the final two sentences of paragraph										

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Policy LIV5: Designing Better Places to Live

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
								10.160 to read: "In areas where there is good accessibility (insert footnote), developments should achieve a range of densities between 30 and 50 dph to make the most effective use of such sustainable locations." Footnote to read: "for the purpose of this policy good accessibility is defined as being within 400m of a high frequency bus route (a bus route with at least four services an hour), within 400m of a transport hub (e.g. a bus or train station or motorway junction), or within a town centre."
814953		95	Yes	Yes		Yes	Site Ref 1036 - SHLAA - Railway Sidings Colne is within the settlement boundary for the current Local Plan	This comment is not applicable to this Policy. A full review of the Settlement Boundaries will be carried out as part of the preparation of the Local Plan Part 2: Site Allocations and Development Policies. It will be for this process to consider whether the settlement boundaries will need to be changed to include sites for development needs over the plan period. The Strategic Housing Land Availability Assessment (SHLAA) is a precursor to this process as it identifies sites with the potential for future housing development - some of which are located outside of current settlement boundaries. The preparation of the Local Plan Part 2 will use this evidence to select the most sustainable site options for allocation. This may involve redefining the settlement boundaries. With specific regards to the Railway Sidings at Knotts Lane, Colne (SHLAA Site Ref 1036), this site is currently allocated in the Replacement Pendle Local Plan as Housing Market Renewal reserved housing land. The Inspector at the Public Inquiry identified that it is a suitable site for housing development. The continued need for this site for development will be examined as part of the allocation of sites in the Local Plan Part 2.
Mrs	Pam	Slater						No change proposed in response to this comment.
							Would like the settlement boundary and designation for this area to be reviewed as part of the Local Plan Review process. This site provides valuable informal open space to the existing settlement and is a Greenfield buffer between Colne and Nelson, which forms part of an important wildlife corridor. The site could also become part of a Country Park with Gib Hill fields if designated as such by PBC within the Local Plan Review.	

Policy LIV5: Designing Better Places to Live

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327620		137	Yes	No		Yes	Provision of open space within this policy is dependent on deficiencies identified in the Open Space Audit 2008. This audit is out if date and there is no current update that provides a demand and supply analysis that identifies deficiencies. Sport England considers this policy to be contrary to paragraph 73 of NPPF	The Council is putting in place measures to update the Open Space Audit and incorporate it into a wider Green Infrastructure Strategy. This will include an assessment of needs and demands for open space, identifying where there are quantitative and qualitative deficiencies and surpluses. The Council are also in the process of pursuing the possibility of joint working with neighbouring authorities and Sport England to carry out a playing pitch assessment. The policy will be amended to remove reference to the Open Space Audit and replace it with reference to the most relevant evidence. It is considered that by the time the Core Strategy is adopted, or shortly afterwards, sufficient progress will have been made on the Green Infrastructure Strategy for the findings to be used in conjunction with the requirements of Policy LIV5.
Sport England North West								

The Council should provide a robust Needs Assessment in accordance with paragraph 73 of NPPF. This should include all open space typologies. Please be aware there is a separate methodology for indoor and outdoor sports facilities because of the different role and function of sport to any other open space typology. For pitch provision this is a step by step guide adopted October 2013, and for sports facilities this is the emerging Assessing Needs and Opportunities Guidance. Both guidance will be linked from the NPPF section of the DCLG website to Sport England’s website in the near future. In the interim the guidance can be found at: <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

Amend Policy LIV5 by removing reference to the Open Space Audit. Include wording which explains that areas that are deficient in open space are to be identified in the Pendle Green Infrastructure Strategy. In addition, amend the justification text where appropriate.

755915		151					Policy LIV 5: Designing Better Places to Live It is noted that the policy advocates the use of Building for Life standards. Whilst the HBF supports this standard and many developers accord to its requirements the Council should not seek to make a voluntary standard a mandatory requirement upon developers. Tables LIV 5a and 5b provide property types and sizes. It is recommended that these tables are retained as indicative only. To ensure the viability of schemes developers will need to vary the type and size of properties dependent upon location, site characteristics and prevailing market conditions.	The wording of the second paragraph will be amended to clarify that the use of Building for Life standards are not mandatory. The policy is clear that Tables LIV5a and LIV5b are only an indicative guide which can be used by developers to help design a housing scheme to meet the needs and aspirations of people living in Pendle.
Mr	Matthew	Good						
Home Builders Federation Ltd								

Amend the wording of the second paragraph to read: "To achieve this, the Council will; require proposals to follow the design approach in Policy ENV2; support proposals that are of a high quality and innovative design; and strongly encourage the use of the Building for Life standards."

Policy LIV5: Designing Better Places to Live

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818047			212					14 Policy LIV5: Designing Better Places 14.1 Policy LIV5 should encourage proposals for higher value/lower density family housing in the M65 Corridor.	Policy LIV5 includes an indicative guide to the types and sizes of new housing that should be provided across the borough. This is the recommended profile taken from the SHMA and includes an allowance for aspirations. Additional information will be provided in the context section, in line with the findings of the SHMA, relating to the rebalancing of the housing stock and the need to provide aspirational housing.
Manthorpe Developments (UK) Ltd									Amend the context section of Policy LIV5 to include additional details from the SHMA with regard to the need to rebalance the borough's housing stock and provide aspirational housing. Clarify the wording of Policy LIV5 in terms of aspirational housing.
818046									
Mr	Michael	Courcier							
Barton Willmore									
715388			295					Policy LIV5: Designing Better Places to Live 3.44 Peel welcomes the changes made to Policy LIV5 which now clarifies that the split between different types and size of dwellings set out in Tables LIV5a and LIV5b are provided as an indicative guide only rather than as a prescriptive requirement which developers are required to strictly adhere to.	This comment provides support for the approach taken in Policy LIV5 to the types and sizes of dwellings to be provided.
Ms	Louise	Morrissey							
Peel Holdings (Land & Property) Ltd									
714921									
Ms	Anna	Noble							
Turley Associates									No change proposed in response to this comment.

Policy WRK1: Strengthening the Local Economy

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327500			20	Yes	Yes		Yes		Note comments.
Mrs.	Lindsay	Alder							
Highways Agency									
<p>We are supportive of many of the statements and objectives in the Core Strategy (Further Options Report). The document reinforces the policy of the local authority to strengthen the local economy by facilitating economic growth through a process of diversification and rural regeneration. We have an integral role in assisting growth in East Lancashire and are happy to engage with local authorities and the developers to support sustainable development, whilst protecting and maintaining the safety of the strategic road network (SRN).</p>									No change proposed in response to this comment.

714054			55					Policy WRK1 – seeks to promote new business and entrepreneur activity and suggests home working should increase in Rural Pendle. This needs to be reflected in house type and size in those areas to encourage retention of employment in the borough not outmigration. There should be more family housing provision.	Policy LIV5 requires "housing to be designed and built in a sustainable way in order to meet the needs of Pendle's population" including the creation of sustainable communities. Whilst this general comment offers support for homeworking (Policy WRK1), it is agreed that a more specific link to house types would be useful.
Trustees Green Emmott Trust									
817541									
Ms	Jane	Dickman							
Dickman Associates Ltd									
<p>Insert a new second sentence into the third paragraph of Policy LIV5: "They should also seek to address the specific housing needs of different sections of the local community (Policy LIV3), together with wider economic and environmental policy objectives, which seek to promote more sustainable living patterns (Policies WRK1 and ENV4)."</p>									

Policy WRK1: Strengthening the Local Economy

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
712277			57					Employment Rolls-Royce are pleased to see that the Core Strategy recognises the importance of their site at Barnoldswick and supports its growth, recognising the need for future investment. They therefore support the statement in the Core Strategy that 'The Rolls-Royce fan blade manufacturing facilities in Barnoldswick are an important focus for the large concentration of high value advanced engineering businesses throughout Pennine Lancashire. Their continued presence and future success is vital for both the sub-regional and local economy as they will be the basis for future growth in high-value, high-tech industries.' The NPPF is clear at paragraph 20 that 'to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century. As such, in supporting the employment and investment at this site, Rolls-Royce requires sufficient flexibility in planning policy terms to allow the company to invest in their facilities to continue to compete in global markets and respond to changing market and customer demands. It is therefore necessary that they are able to reconfigure their site at Barnoldswick where possible, upgrading and improving their facilities when and where required.	Note comment.
Mr	Robert	Orgill							
Rolls Royce plc									
817556									
Ms	Kate	Skingley							
David Lock Associates									No change proposed in response to this comment.
378754			117					I welcome the broad approach to economic growth that is apparent throughout the draft document. Indeed, even more could be made of Pendle's economic strengths, in particular its advanced manufacturing. In so doing the Core Strategy can, as the best examples around the country do, support and encourage investment as a document in itself whilst also fulfilling its statutory planning function. Extolling the district's economic strengths and opportunities is important in how Pendle redefines itself to the market, which if positive will assist in trying to rebalance the housing market and grow values that will encourage further development. Related to this, I would recommend that the narrative here would benefit if Pendle's advanced manufacturing strength were narrated within a countywide sub-regional context, rather than limiting itself to a Pennine Lancashire context.	Agree.
Mr	Marcus	Hudson							
Lancashire County Council									
									The following changes are proposed: Paragraph 11.22: Insert "Lancashire and" before "the Pennine Lancashire sub-region." Paragraph 11.24: From the second sentence onwards, replace the text with: "The aerospace industry supports a critical mass of businesses that are not only beacons of innovation and best practice, but are worldwide leaders in their field. The Rolls-Royce wide-chord fan blade manufacturing facilities in Barnoldswick represent the eastern of the 'Arc of Innovation', which extends west through Pennine Lancashire towards the Enterprise Zone sites at Samelsbury and Warton near Preston. Within this arc, a large cluster of businesses engaged in advanced precision engineering, electronics, high performance materials and composites have the potential to increase productivity and investment. Targeted supporting for these advanced manufacturing industries will provide a catalyst for significant growth

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Policy WRK1: Strengthening the Local Economy

Person Details		Comment ID		Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
									in Gross Value Added (GVA) and make a major contribution to the restructuring of the Lancashire economy."	
709983		160						The Lancashire Enterprise Partnership welcomes the broad approach to economic growth contained within the document. It is considered however that it would be beneficial to strengthen references to economic growth further and to emphasise the potential to attract additional growth and investment. In order to achieve this it is important to position growth potential in Pendle in the context of the wider Lancashire sub region rather than just within Pennine Lancashire. This would build on opportunities presented by the LEP's priority of focusing on Lancashire's advanced engineering and manufacturing potential and would align with the LEP's emerging Growth Deal proposals. Related to these matters the LEP supports the emphasis on highway capacity issues around the A56.	Agree	
Ms	Kathryn	Molloy								
Lancashire LEP										
								See response to Comment ID 117 for the proposed re-wording of paragraph 11.24, which is intended to address this matter.		

Policy WRK2: Employment Land Supply

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327500			21	Yes	Yes		Yes		Note comments. The potential requirement to produce a detailed transport assessment is addressed by Policy ENV4.
Mrs.	Lindsay	Alder							
Highways Agency									
With regard to employment land supply, when identified employment sites are brought forward, detailed transport assessment may be required should any site potentially have an impact on the SRN. We would be happy to share any modelling/knowledge with you in due course.									

327713			124					Policy WRK2 Employment Land Supply The Royal Mail supports the objectives of this policy, specifically the following provisions: protecting the best of the existing employment areas from competing forms of development; directing employment uses to Protected Employment Areas or the Town Centres identified in Policy SDP5; only permitting employment generating development proposals falling within Use Classes B1, B2 and B8 within Protected Employment Areas, with the exception of a small allowance for the provision of public open space, shops and leisure facilities to serve the immediate needs of the area and reduce the need to travel; and safeguarding existing employment sites and premises in accessible locations outside the Protected Employment Areas, where they are important to sustaining local employment and/or meeting regeneration objectives. The reason behind this support relates to the location of the Barnoldswick Delivery Office within a Protected Employment Area and the location of the Pendle Delivery Office directly adjacent to the boundary of Nelson Town Centre. It is considered that these employment related policy directions serve to safeguard Royal Mail’s operations so that they will not be prejudiced and can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000. It is also important to consider that locating Delivery Offices within employment areas and/or surrounding them with other employment uses addresses wider amenity considerations given that the majority of employment generating uses in such areas are insensitive to the Royal Mail’s hours of operation and noise impact. This approach accords with adopted Government guidance set out in the National Planning Policy Statement (NPPF) (March 2012), which advises at paragraph 21 that local	Note comment.
Royal Mail Group plc									
815690									
Mr	Andrew	Teage							
DTZ									

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Policy WRK2: Employment Land Supply

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						planning authorities should support existing business sectors.	No change proposed in response to this comment.

715388	296					Policy WRK2: Employment Land Supply 3.45 Peel supports the majority of Policy WRK 2 and particularly the reference to the key role of the identified Protected Employment Areas in the context of M65 Corridor and its future growth. Peel considers that specific reference should be made to Riverside Business Park at this point. Along with the proposed Strategic Site at Lomeshaye, Riverside Business Park will be a key driver of economic growth within the M65 Corridor, delivering several thousand square metres of employment floorspace.	There is no need to reference either of the sites mentioned, or any of the Protected Employment Areas, within this general policy.
Ms Louise Morrissey							
Peel Holdings (Land & Property) Ltd							
714921							
Ms Anna Noble							
Turley Associates						An additional point should therefore be added to the priorities for the M65 Corridor which reads: 'Deliver the comprehensive development of Riverside Business Park for high quality employment uses'.	No change proposed in response to this comment.

Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
674992	9					<p>Thank you for consulting the Ministry of Defence (MOD) in relation to the above consultation. The MODs principle concern with respect to development in the Borough of Pendle is ensuring that structures, particularly tall buildings do not cause an obstruction to meteorological radar transmitter/receiver facilities located in the area. As you may be aware the meteorological technical installations are protected with statutory safeguarding zones which identify height consultation zones in the area relative to topography and distance from site. The MOD height safeguarding zone for the Clee Hill meteorological radar extends over the Borough of Pendle. I would like to register the following comments the proposed sites for housing and employment at Trough Laithe Farm, Barrowford and Lomeshaye near Nelson all fall within the 45.7m height consultation zone surrounding Clee Hill Met radar. Therefore, please consult DIO Safeguarding at planning if any proposed development exceeds this height criterion.</p>	<p>The request to inform the Ministry of Defence (MOD) of development over a height of 45.7m is considered to be too detailed for a strategic policy within a Core Strategy. It is felt that the matter would be better dealt with as party of the Development Management consultation procedure for a particular planning application. Adding a constraints layer to the Council's GIS mapping system, will trigger the need to consult the MOD about any relevant development proposals.</p>
						No change proposed to the Core Strategy in response to this comment. Liaise with the Development Management team and the MOD to establish an additional constraints layer in the Council's GIS mapping system.	

327366	16				<p>Please find below the parish council's objections to the plan to expand Lomeshaye Industrial Estate up to Fence by pass. (1) The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. (2) The calculations on which the requirement for so much extra employment land are flawed and involve subjective judgements which can easily be challenged. (3) The plans apparently involve the creation of a roundabout onto the bypass which would add substantial traffic to an already busy and dangerous road. The situation will be even worse if the addition of a very large housing estate is allowed off the bypass just before the college-as is also planned. (4)The calculations on which the amount of land currently available for employment purposes (mostly brown land) have been made, have involved eliminating a substantial number of sites, usually in a very subjective manner. Adding these to the total would transform the position. (5) The borough is currently considering "rebranding itself" and pushing its attraction as a tourist venue. The current industrial estate is low lying and not very obtrusive. But to extend it up a steep slope would present a terrible vista and totally eliminate the magnificent views of Pendle Hill from the motorway as well as from Nelson and Brierfield. (6) The aim of increasing the business rates received by the borough may not happen because there is now a severe threat that the Government, and not Pendle, will receive all or part of the additional income as recompence for giving a grant to put in the initial infrastructure. (7) In the survey of businesses done by the borough in 2012, only 29% bothered to answer and of those, 70% said they were happy with their premises. That means that only a very small number were not satisfied because one can safely assume that those who didn` t answer were happy. (8) The</p>	<p>Note comments.</p>
Mrs	Rebecca	Hay				
Old Laund Booth Parish Council						

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						Government encourages boroughs to work with neighbouring boroughs to produce plans. Burnley have very substantial new estates and Pendle and Burnley should work together. (9) The current estate houses a large amount of warehousing which uses vast tracts of land of but employs very few people. If the aim is to increase the number of jobs, this is a bad way to go about it. Presumably, the same will happen again if any extension is allowed.	See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

813533	18					On the second of these proposals (extension of Lomeshaye to Fence By Pass) this involves moving into a double green belt area. The arguments in favour of the Greenbelt are vital to prevent the urban sprawl between Nelson and Fence and Higham. It is unclear whether the intention is to obtain highway access from the Fence bypass. To do so would be the height of irresponsibility given the congestion on the by pass at present and the additional pressure on junction 13 of the Motorway at the College especially if Laithe Farm is allocated for housing as well. It also has adverse implications from the traffic which uses the subsidiary roads from Barrowford, through Church Street and Wheatley Lane Road to avoid traffic congestion in the Valley bottom. On these grounds I object to the second proposal and would expect the Council to find industrial allocations from other available sites including brown field.	Note comments.
Mr. Brian Whittle							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

817520	35					I am writing to object to the proposed extension of Lomeshaye Industrial Estate, the Roundabout and connection to the Bypass, these proposals will have serious implications for the communications living in the villages along the length of the bypass. There are numerous reasons why these proposals should not be adopted:- 1.) The land between the existing Lomeshaye units and the bypass is unsuitable for any use due to the adverse ground conditions, any development of this land will result in huge stabilization costs. Remember the problems encountered during and after the construction of the M65. 2.) The existing units are generally well hidden in the valley, this new proposal requires construction on a hillside and will dominate the landscape for miles around, it will be become Pendle's own "blot on the landscape". 3.) With regards to the proposal to construct a new road connection from the bypass I wish to make the following observations/objections:- a.) The bypass is already congested and dangerous, adding what literally could be thousands of additional vehicle movements each day id totally unacceptable. b.) A connection will very quickly become a "rat run". c.) Construction of 400 homes in the vicinity (on land originally earmarked for industrial development), will in itself put additional pressures on the bypass. I am sure the Police authority will have serious reservations about this proposal. 4.) I note that these proposals are on Green Belt land, the designation of which	Note comments.
Mr Donald G.D. Smith							

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Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
								can only be changed under exceptional circumstances in my opinion this not qualify as an exceptional circumstance as there are many other areas within the Borough which will be suitable for industrial use. If these plans are adopted Fence, Barrowford, Nelson, the bypass corridor, and in the due course of time Higham, will just become an urban sprawl, it is not acceptable and these proposals need to be scrapped. This letter is by no means an exhaustive list of points of objection, indeed there are many more which I have not raised but no doubt will probably raised by others.	See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.	
817536	Mr and Mrs	J Varley	43					Regarding the proposals to expand Lomeshaye Industrial Estate, up to the bypass and create a roundabout onto the bypass, is in our view a very bad idea, we feel this would create more of another traffic hazard on an already very busy and as we know dangerous road. We live very close to the bypass and feel the proposal will increase the noise level considerably. Please take into account the people of Fence and Pendle, areas e.g schools, pubs, churches, businesses already here, we have a lovely rural area and would like to keep it that way. We would like to maintain these villages as they now are and not let them become a built up area as you propose. We would also like to keep any green belt land surrounding our villages and not link them up as you are suggesting. This lovely area must be managed better and not made into an industrial estate. Residents of Nelson and Brierfield enjoy the views of Pendle hill and surroundings, just as much as locals and our many visitors.	Note comments.	
									See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.	
712277	Mr	Robert Orgill	59					Rolls-Royce note the decision by the Council to make a strategic employment allocation at Lomeshaye Industrial Estate. They welcome the positive step in recognising the need to diversify and build on employment provision to support jobs and growth in Pendle, however they would like to stress to the Council that this must be considered in relation to the existing employment sites in the area. Their future needs for growth, diversification and expansion should not be compromised and should ensure that new employment sites have a complementary and sustainable relationship with the existing.	Note comments.	
									Add a sentence after paragraph 11.65 to read: "The strategic employment site will have a complimentary and sustainable relationship with other employment sites across the borough, ensuring that their valuable contribution to future growth, diversification and	

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Policy WRK3: Strategic Employment Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

expansion is not compromised."

807418

74

Mr

Dave

Hortin

Environment Agency

Trough Laithe and Lomeshaye Strategic Sites Both sites contain areas within Flood Zones (FZ) 2 and 3. For these sites to be allocated within the Core Strategy they will need to be evidenced by a Level 2 Strategic Flood Risk Assessment (SFRA) as we have discussed previously. The Report and accompanying Sustainability Appraisal (SA) Addendum make no explicit reference to a SFRA as having been undertaken, although Policy ENV 7 does refer to the sequential and exception tests, without the SFRA we would object to the allocation of these sites. The SA in respect of these sites does not take into account the presence of FZ 2 and 3. For the appraisal of both sites under the Sustainable Development Objective, "P6. Reduce the risk of flooding and conserve water resources", the commentary states that, "The policy makes no explicit reference to water management" and no effects are recorded. The purpose of SA is to appraise the likely significant effects of the implementation of the proposed policies. For both Strategic Sites the likely effect of development in FZ 2 and 3 is that it would significantly increase the risk of flooding to property but this is not considered. It is our opinion that the SA should be amended to reflect this or it will risk being found unsound. Policy ENV 7, and to some degree Policy ENV 2, would provide mitigation for the allocation of these sites. Additionally, further mitigation could be provided by including criteria in Policy LIV 2 and Policy WRK 3 that would ensure unsuitable development, as defined in the Technical Guidance to the National Planning Policy Framework, does not take place in FZ 2 or 3.

The matter of unsuitable development is properly dealt with under Policy ENV7, which should be read in conjunction with this policy. However, a reference to the need to refer to Policy ENV7 is considered useful. The second part of this representation relates to the accompanying Sustainability Appraisal (SA) Report, rather than Policy WRK3. The Draft Flood Risk Assessment (FRA) for the proposed strategic employment site at Lomeshaye was prepared by Michael Lambert Associates. This failed to acknowledge (Section 7.0) that parts of the site adjacent to Pendle Water are within Flood Zone 3. As such this is not reflected in the SA Report. It has since been determined that parts of the site alongside Pendle Water fall within Flood Zone 3.

Add a paragraph after 11.83 noting: "Parts of the site alongside Pendle Water lie within Flood Zones 2 and 3. This will place some restrictions on the types of development that can be accommodated on this area of the site (see Policy ENV7)." Reconsider the evaluation of Policy WRK3, in particular Objective P6, in the SA Report. Identify any mitigation measures that may be necessary to reduce the risk of flooding.

356375

77

Mr

Ronald

Burnett

I am writing to object to the proposed plan to expand the Lomeshaye Industrial Estate onto the bypass. Why should a farmer be forced to sell his farm which is on green belt land, there are more than enough brownfield sites which should be used. The A6068 is a very busy road and has many accidents. Carr Hall junction, Greenhead Lane and Cuckstool Lane. Most people I speak to think this would also cause a similar traffic situation as there is on Colne North Valley. From previous surveys there does not offer to be a demand for factory space on such a large scale. I understand there are proposals for a 400 home estate between the college and Carr Hall Road. Barnfield built a small estate recently and they seem to be unable to sell them. Modern buildings occupy a large proportion of land but employ few people. The jobs in this area seem to be taken up by Polish and other people from outside the UK. Why should the countryside be made into an eyesore.

Note comments.

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Policy WRK3: Strategic Employment Site

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
								See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.
817576		78					I am writing to object to the proposed extension of the Lomeshaye Industrial Estate onto green belt land. I can see no justification for spreading this industrial landscape onto green belt. There are so many industrial estates in our area and the majority of the sheds are unsightly and do not make economic use of land as they are all nearly single storey sheds. The addition of a roundabout off the bypass would be a major issue, as there is too much traffic and the road is already dangerous. The units would be built and put up for sale – how many business have expressed an interest in locating to Lomeshaye? There are many industrial sites around the area – how many have vacant units? Have alternative brown field sites been investigated? There are many, many empty factories and buildings in the area, why should we build more on greenbelt land? Lomeshaye is already an unsightly estate and to bring it further into view would be catastrophic for the area, which people like to visit as it is a scenic, pleasant area. It is also a place where people choose to live because it is a village community. We have lived in the village for 20 years and chose to live in a semi-rural environment and do not want to live on the edge of an industrial estate. Will you compensate us if the value of our property decreases as a result of this extension?	Note comments.
Paul & Beverley Bailey								See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.
817658		97					I wish to object to the above proposal for the following reasons:- 1) It is understood that it is proposed to create a roundabout onto the A 6068 to provide alternative access to the industrial Estate. This would definitely add substantial traffic flows onto an already busy and dangerous road which was constructed merely to serve as a by-pass to the various villages in the locality. I take the view, most strongly, that all traffic should only have access to and egress from the Estate via the M65 which was purpose built to take all forms of traffic. 2) The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. 3) The proposal would, in my view, have a detrimental effect on the appearance of the immediate locality which is generally of rural nature.	Note comments.
Mrs June Stephenson								See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
817666			98					<p>I wish to object to the above proposal for the following reasons:- 1) It is understood that it is proposed to create a roundabout onto the A 6068 to provide alternative access to the industrial Estate. This would definitely add substantial traffic flows onto an already busy and dangerous road which was constructed merely to serve as a by-pass to the various villages in the locality. I take the view, most strongly, that all traffic should only have access to and egress from the Estate via the M65 which was purpose built to take all forms of traffic. 2) The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. 3) The proposal would, in my view, have a detrimental effect on the appearance of the immediate locality which is generally of rural nature.</p>	<p>Note comments.</p> <p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>

817671	100				<p>We wish to object to the above proposal for the following reasons:- 1) It is understood that it is proposed to create a roundabout onto the A 6068 to provide alternative access to the industrial Estate. This would definitely add substantial traffic flows onto an already busy and dangerous road which was constructed merely to serve as a by-pass to the various villages in the locality. We take the view, most strongly, that all traffic should only have access to and egress from the Estate via the M65 which was purpose built to take all forms of traffic. 2) The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. 3) The proposal would, in our view, have a detrimental effect on the appearance of the immediate locality which is generally of rural nature.</p>	<p>Note comments.</p>
<p>Mr and Mrs</p> <p></p> <p></p> <p></p> <p></p>	<p>P A</p> <p></p>	<p>Rawlinson</p>				<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>

817675	101			Proposed expansion of Lomeshaye Industrial Estate I wish to object to the above proposed plan for the following reasons: I disagree with the concept of creating large industrial estates and the existing size is more than large enough already. I do not believe there is sufficient demand for industry or business. Land designated Green Belt should be sustainable and protected and I cannot see any reasons why this should be changed. Additional Industrial/Business Land will have a detrimental effect on Tourism. There will be an increase in pollution. There will be an increase in traffic on an already busy and dangerous road. The creation of the proposed roundabout on to the bypass will exasperate the existing problems with this road. The expansion of this and proposed new roundabout will provide an excellent “rat run” between junction 12 of the M65 and the bypass. The noise pollution from the increased traffic will become intolerable. There will be an adverse effect on	Note comments.
	JJ	Gilkinson			

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Policy WRK3: Strategic Employment Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

wildlife. Development will increase the likelihood of flooding. I value highly our existing landscape, countryside landscape, countryside and amenities and this development will be unacceptable disruption to the long-established public footpaths and rights of way on this land.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

817676

102

P A

Gilkinson

Proposed expansion of Lomeshaye Industrial Estate I wish to object to the above proposed plan for the following reasons: I disagree with the concept of creating large industrial estates and the existing size is more than large enough already. I do not believe there is sufficient demand for industry or business. Land designated Green Belt should be sustainable and protected and I cannot see any reasons why this should be changed. Additional Industrial/Business Land will have a detrimental effect on Tourism. There will be an increase in pollution. There will be an increase in traffic on an already busy and dangerous road. The creation of the proposed roundabout on to the bypass will exasperate the existing problems with this road. The expansion of this and proposed new roundabout will provide an excellent “rat run” between junction 12 of the M65 and the bypass. The noise pollution from the increased traffic will become intolerable. There will be an adverse effect on wildlife. Development will increase the likelihood of flooding. I value highly our existing landscape, countryside landscape, countryside and amenities and this development will be unacceptable disruption to the long-established public footpaths and rights of way on this land.

Note comments.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

817677

103

Ms

Janet

Myers

I would be very grateful if in your deliberations of the proposed plans you would take into consideration the following concerns. 1) The area proposed is Green Belt Land and as far as I believe this means it should be left as Green Land UNLESS there is NO OTHER WAY. 2) The proposal is to provide employment land. The land concerned is already in employment. It is farm land producing crops and animals. In this age of attempting to get people to source locally what benefit is there to closing down well-run local farms? 3) I believe the plan is to put a road from the estate to the A6068. This road already produces many accidents in a year. Sadly some fatal. Imagine what it would be like with a huge increase in traffic, particularly HGV’s, even more accidents and I would suspect much more serious ones. This road is also crossed by many residents of Fence and Wheatley Lane, particularly children, to access the Sports Club Facilities. It would seem lives are being put at risk. 4) Driving around the area it is very easy to identify properties that have been built to provide “employment” which have stood empty for many years. Perhaps putting them to use may be of more benefit? 5) Pendle is promoting itself as a tourist area and so it should we have some beautiful, as yet,

Note comments.

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Policy WRK3: Strategic Employment Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

unspoilt countryside. Why would the planners even think that to develop green land by the side of one of the most popular routes towards Pendle Hill from the M65 up the A6068 would be attractive? 6) I don't profess to understand the statistics of the planners and developers but am sufficiently intelligent to know that a green field is much easier and cheaper to develop than a brownfield site. Perhaps now is the time to take a stand against this before all our green fields are converted to fields of empty metal sheds. From this there is no going back. 7) On a purely selfish point of view I have lived in Fence VILLAGE for over 60 years and would like it to remain a Village and not an extension of Nelson (however nice Nelson is, it's a town!!!) 8) Interestingly having spoken to many walkers and runners who live in Nelson and Brierfield they love to use the A6068 as a circular walk because it does have green fields on most of its length. 9) Increasing the size of Lomeshaye Park would create blot on the landscape as seen from the M65. 10) And finally, IS IT REALLY NECESSARY? I THINK NOT. I thank you for your time in reading this and hope you will consider my comments in your deliberations.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

817683

Miss

N J

Clegg

104

I am writing to with regard to the above and to say that I strongly object to the proposal. The extension would have a huge impact on the local area for many reasons:- 1) To be built on Green Belt Land 2) Creation of a roundabout onto the bypass which would add substantial traffic to an already busy and dangerous road. 3) Why do we need more industrial units when many existing ones are empty. 4) The "Rebranding" of the Borough as a tourist venue will be strongly harmed as the proposed extension of the estate would create a terrible vista and totally eliminate the lovely Pendle Hill views. 5) As the current estate houses a large number of warehouses which employ very few people. Increasing the size of the estate will not create many new jobs. These are just a few reasons why I object to the expansion of the estate but also may I say I have lived in Fence my entire life and loved every minute of it and that's why I have taken time out to write this letter to hopefully stop the proposal.

Note comments.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
817686			105					I would like to add my objection to the proposal extension of the above estate. I understand it would continue up towards the by-pass and at some point would have access from it. 1. Why ruin Green Belt Land? 2. What “industrial” area proposed? 3. In the estate not already much larger than was originally envisaged? 4. Are there no more old industrial sites to be considered? Furthermore what is already an eyesore will become an even bigger one. I strongly object to the proposal.	Note comments.
Mr	Alan	Boardwell							

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

817689			106					We are contacting you to express our many strong objections to the above proposed development. Firstly to say is that the proposed development would encompass Green Belt Land and the National Planning Policy Framework states that:- The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. I am sure that you know Green Belt serves five purposes: To check the unrestricted sprawl of large built-up areas; To prevent neighbouring towns merging into one another; To assist in safeguarding the countryside from encroachment; To preserve the setting and special character of historic towns; and To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. If this proposed development was allowed to progress it would violate and/or compromise all the above elements. The Framework is also clear that sustainable development is about change for the better and we can only say that in this instance it would not, in fact would be very detrimental to the area, the well-being of its residents and the community’s health, social and cultural well-being. Tourism would be adversely affected (which enriches the locality financially and culturally); as the natural beauty of the area would be altered and the magnificent views and vistas changed beyond recognition, with the real potential of reducing the numbers of visitors we have to the area. Whenever, we travel about the country and are asked where we live; people are often aware and are envious of the beauty and rurality of this area. We note that our MP Mr A Stephenson is currently working with Lancashire County Council about a proposed dedicated half cycle and half footpath along the A6068 Fence bypass to improve cycle safety and encourage more people to visit Pendle. This is already a busy road on which there have been many accidents over the years, the impact of increased traffic both heavy and light goods in light of this proposed development would add enormously to the problem (especially in light of possible significant housing development in the area). This cycle path plan (to improve cycle safety) appears to be incongruent	Note comments.
	M and J S	Duerden							

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						with this proposal, as the plans we understand would involve the creation of a roundabout onto the bypass which would add substantial traffic to this very busy and currently dangerous road. We must keep in the forefront of our minds safety issues, as road traffic accidents can have catastrophic human costs for individuals and their families. We now follow on to the actual need for this proposed expansion of Lomeshaye Industrial Estate. The National Planning Policy Framework clearly states the Brown field sites should be utilised if indeed any developments are required. We note that in a recurrent survey of businesses your findings show that in the previous 12 months only 11% of businesses have attempted to expand or move premises, of this 67% successfully managed to expand in their current location without the need to source new suitable premises. In line with current technologies available surely many businesses will be seeking to reduce costs in the provision of lighting, heating and buildings whilst still delivering their core business and thus becoming more competitive in their particular markets. How are you substantiating the need for this expansion and what evidence is available to support it? Have alternative sites (Brown field) been identified and considered? How many jobs could be created? Has there been any local collaboration with neighbouring areas/localities? If so, this could prove to be more sustainable approach if the need has been proven for local business expansion. This approach is in line with the national framework. Could you direct us to or send us copies of the evidence to answer the above questions. Please keep us updated as to any changes/progression of this matter so that we may consider our responses in an effective and timely manner.	
							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

817691	112					I am writing to object to the proposed expansion of the Lomeshaye Trading Estate on to Green Belt Land. I do not understand why it is necessary to further spoil the countryside, when I am sure there are other brown sites in the area, which could be developed. I understand that access to the development is to be off the Barrowford Road, which is already a busy road at peak times and on which there have been numerous accidents. Another traffic island towards Nelson would mean further disruption. I accept that the Council has to be forward looking and to make plans for future business enterprises and to create jobs, but I believe that this scheme is completely unnecessary and will not substantially improve the employment situation.	Note comments.
Mr	Keith	Thomas					
							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
370713			121					<p>We wish to object to the inclusion of the Strategic Employment Site to the west of the current Lomeshaye Estate on the following grounds: 1 The land is in the Green Belt which can only be developed if there are exceptional circumstances.In view of our later comments it is clear that there are no such circumstances in this case. 2 The calculations on which the requirement for so much extra land is based are flawed. Why, for instance, has an extra 2 year’s worth of land based on historical data been added to the total? Also why is there an allowance "for losses"which have been added at such a level that it adds almost 50% to the total required of 35.6 ha before the flexibility factor is added? Is it a mere coincidence that the 16.3ha added for "allowance for losses" almost exactly equates to the calculated shortfall in supply? And in any case, surely, the Council has the power to prevent losses. 3 In view of the obvious increase in traffic on the bypass which would be generated by this proposal and the proposed major housing development at the approach to Barrowford, has any traffic study been done? I understand it has not and in the absence of such a study we fail to see how such a proposal can sensibly be put forward. 4 The calculations on which the amount of land currently available is based are seriously flawed as they take no account of parcels of land less than 0.25ha on the assumption that these are "small". We dispute this and assert that they would be more than adequate for a lot of business start ups- let alone those wishing to expand. One quarter of a hectare is in fact a very large parcel of land. It is also clear that a considerable amount of subjective decision making has been employed in the elimination of some current brown field sites. 5 It is clear that this proposal has been brought about by a small number of leading industrialists and developers who very sincerely and honestly believe there is a need for a large additional site. However, they have, quite reasonably, looked at it from a narrow perspective. It is up to the Borough Council to take a broader view which takes account of our environment, our attraction as a tourist venue and the preservation of Pendle as an attractive place to live. 6 The need for more tourism is emphasised by the Borough’s current plans to re-brand itself. This proposal would shatter any such plans. 7 The survey of local businesses taken at the start of the Core Strategy process showed a very disappointing return of only 29%.However of those 70% said they were quite happy. We can safely assume that those who didn’t respond were happy so adding these in to the mix suggests that it would be wrong to assume any great demand. 8 The current Estate houses a large amount of warehouse space which uses vast tracts of land while employing very little labour. This will happen again and therefore the presumed aim of providing job opportunities will not be achieved. 9 We understand that the reform of local government finance will encourage Boroughs to expand their business rate total .However we also understand that because government money will be involved ,should by any chance this proposal go ahead, the government may well keep all or a large part of any future business rates-thereby demolishing a major plank in the case for this proposal. 10 The Borough has a need to present any case for change in a manner which is demonstrably sensible and acceptable to the local residents. This is clearly not so in the present case where residents are perplexed by the contradiction between the claimed need for the desecration of green belt</p>	<p>Note comments.</p>
Cllr and Mrs	John and Judith	David							

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
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land and the noticeable large amount of vacant industrial premises both on the existing estate and elsewhere in the Borough. Once destroyed, such good farming land cannot be recreated. 11 Would these proposals stand up against a legal challenge at a Public Inquiry?

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

817833		
Mr	John	Danson

122

I write to object to the proposed plans to expand the above industrial estate on green belt land in the Old Laund Booth Parish. I agree totally with Coun. John David's points that I am sure you have received. To expand an estate in these circumstances seems odd. It appears there is already a large area of unused space that is set aside for economic development. Nelson and the surrounding areas have plenty of redundant buildings that could be used as places of employment. Indeed Lomeshaye itself has a large proportion of unused space. The idea of building on green belt land to create further space seems illogical. We are in very fragile climatic times. The amount of empty potential economic space is increasing in the northwest, currently at 17%. The area we are discussing is even higher. I am sure there are economic reasons or incentives that could persuade the council to go ahead with this plan. The Committee on Climate Change has released recent guidance to avoid building on green belt land and consider smarter ways to encourage growth such as utilising empty spaces first. Listening to the Today programme on Radio4 this week Nick Clegg said there were still government ministers denying climate change was occurring. If the council still decide it is in Pendle's interest now for this plan to go ahead then please ask them to think about the future. We have floods all over the country. One could say we have no floods in Pendle but is that really an attitude that we should take? One could say it is only a few tens of hectares involved but we should multiply it by every council in England and then by the number of countries in the world and it does not remain a few tens of hectares. Rather than the council agree to something that may or may not help us economically in the short term (see John David's argument) maybe we should show the way and think of our children's future. Pendle Council could present itself as ground breakers and state they have turned down whatever current Westminster incentives or directives have come their way and instead of towing the line they could find themselves gaining plaudits. The opportunity to do something good for the future and make a stand for the countryside is here. However politically naïve it may sound take a chance to make a difference.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
816133			127					I wish to object to Policy WRK 3, Strategic Employment Site : Lomeshaye, of the above report. The proposed site is within the Green Belt and, in parts, the topography is not suitable for employment development. In considering this objection I have reviewed the relevant Appendices to the Pendle Employment Land Review 2013. In my opinion the scoring criteria and site appraisal information give insufficient weight to the landscape impact and detriment to the Green Belt. If these factors were given proper weight the site would not be ranked as number 1. It is noted that the proposed allocation is qualified by three criteria. In my opinion these matters should have been evaluated before the site was put forward in a Local Plan document. In particular, the access arrangements which could involve a new junction with the A6068 should be the subject of a full Traffic Appraisal. The correct way to deal with future Employment sites is through the Local Plan Part 2 document, the Site Allocations plan. This would allow for a full and proper consideration of the options available. Bringing this site forward as part of the Core Strategy is premature and could well pre-empt proper consideration of the proposal.	Note comments.
Mr	Andrew	Walker						See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.	

817915		159					We are writing to you to express our objections to the planned proposals to expand Lomeshaye Industrial Estate up to the Nelson/Padiham bypass. We recently moved to Fence to a bigger house for our new family. Fence was an ideal area; it is a safe and friendly village with beautiful green landscape (which we are fortunate to enjoy at both the front and back of our property) which provides both an aesthetic and recreational experience. Along with the other residents in the village we believe the expansion will have a negative impact on the village and the Pendle area. We fully support the Parish Councils objections as follows: The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. The calculations on which the requirement for so much extra employment land are flawed and involve subjective judgments which can easily be challenged. The plans apparently involve the creation of a roundabout onto the bypass which would add substantial traffic to an already busy and dangerous road. The situation will be even worse if the addition of a very large housing estate is allowed off the bypass just before the college - as is also planned. The calculations on which the amount of land currently available for employment purposes (mostly brown land) have been made; have involved eliminating a substantial number of sites, usually in a very subjective manner. Adding these to the total would transform the position. On a regular basis driving through or around the Pendle area there are already a large number of derelict warehouses or available land that has the appropriate infrastructure in place and more needs to be done to promote these areas to be redeveloped and utilised. The borough is currently considering "rebranding itself" and pushing its attraction as a tourist venue. The current industrial estate is low lying and not very obtrusive. But to extend it up a steep slope would present a terrible vista and	Note comments.
Ms	Claire	Brennan						

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Policy WRK3: Strategic Employment Site

Person Details		Comment ID		Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
								<p>totally eliminate the magnificent views of Pendle Hill from the motorway as well as from Nelson and Brierfield. The aim of increasing the business rates received by the borough may not happen because there is now a severe threat that the Government, and not Pendle, will receive all or part of the additional income as recompense for giving a grant to put in the initial infrastructure. In the survey of businesses done by the borough in 2012, only 29% bothered to answer and of those, 70% said they were happy with their premises. That means that only a very small number were not satisfied because one can safely assume that those who didn't answer were happy. The Government encourages boroughs to work with neighbouring boroughs to produce plans. Burnley has very substantial new estates and Pendle and Burnley should work together. The current estate houses a large amount of warehousing which uses vast tracts of land but employs very few people. If the aim is to increase the number of jobs, this is a bad way to go about it. Presumably, the same will happen again if any extension is allowed. Thank you for taking the time to read through our points of view. We have chosen to contact you as we believe you have the power to stop such proposals and hope that you support the points we have raised and are in full support of objecting the plans.</p>		
									<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>	
327370		163						<p>National Trust does not propose to comment upon the principle of allocating this substantial area of green belt land as an employment development site – it notes the case made in the context of Pendle and its employment needs and through the detailed review of potential sites. No doubt these matters will be carefully tested by the appointed Inspector and others through the Examination process. However, the Trust does note that if the site is allocated for development as proposed that there are several strategic and many detailed matters that will need to be addressed in bringing the site forward for development. Critical ones for the Trust, having regard to its interests in the wider area at Gawthorpe, would include the phasing of development and related hard & soft infrastructure, provision of structural landscaping, and the height, external materials and external lighting in respect of the proposed built development. In this context the criteria at a) and b) beg a number of questions, especially about timing related to the phasing of the development. Criterion c) raises a similar issue [arguably advance planting works in relation to boundaries and strategic routes would be appropriate]; in addition it is poorly worded [presumably the initial ‘a’ is superfluous], and makes no specific reference to wider landscape character or to ecological considerations such as nature conservation corridors, or neighbourliness. It is requested that if development does take place that it is in accordance with a Masterplan/ Development Brief [or a site specific SPD] that has been the subject of public consultation and ensures that both the wider context of the site and its own features are recognised, respected and reinforced as part of the development. Alongside this the document should also address the matter of</p>	Agree	

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Policy WRK3: Strategic Employment Site

Person Details

Comment ID

Q1

Q2a

Q2b

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Consultee comments

Officer Response and Recommendation

phasing/timing of different elements as part of the considered development of the site to ensure that not only ‘roads and sewers’ but also, for example, green infrastructure, renewable energy technologies and public transport provision, are secured in a timely manner.

Amend criterion c) to read: “ a high quality landscaping, including structural planting in particular to the boundaries with the green belt,isdeveloped,incorporatingandenhancingnaturalenvironmentalfeatures and respecting the wider landscape character, where as appropriate.” Add a new paragraph after criterion c) as follows: “The above matters and the phasing of the different elements of the development of the overall site will be the subject of a Masterplanning (or similar) process, that will include public consultation, in order to ensure that an appropriate high quality development is secured which includes public transport provision and the enhancement of the natural and built environment.” [Whilst it is not a site which National Trust proposes to comment upon separately, it does appear that a similar approach is warranted in respect of the Strategic Housing Site at Trough Laithe and Policy LIV2.]

Amend criterion to read: c) A high quality landscaping scheme is developed, incorporating and enhancing natural and environmental features, as appropriate, but particularly where they relate to wider landscape character or ecological considerations. N.B. Make a similar change to the same requirement in Policy LIV2.

817923

164

Mr

Chris

Brennan

We are writing to you to express our objections to the planned proposals to expand Lomeshaye Industrial Estate up to the Nelson/Padiham bypass. We recently moved to Fence to a bigger house for our new family. Fence was an ideal area; it is a safe and friendly village with beautiful green landscape (which we are fortunate to enjoy at both the front and back of our property) which provides both an aesthetic and recreational experience. Along with the other residents in the village we believe the expansion will have a negative impact on the village and the Pendle area. We fully support the Parish Councils objections as follows: The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. The calculations on which the requirement for so much extra employment land are flawed and involve subjective judgments which can easily be challenged. The plans apparently involve the creation of a roundabout onto the bypass which would add substantial traffic to an already busy and dangerous road. The situation will be even worse if the addition of a very large housing estate is allowed off the bypass just before the college - as is also planned. The calculations on which the amount of land currently available for employment purposes (mostly brown land) have been made; have involved eliminating a substantial number of sites, usually in a very subjective manner. Adding these to the total would transform the position. On a regular basis driving through or around the Pendle area there are already a large number of derelict warehouses or available land that has the appropriate infrastructure in place and more needs to be done to promote these areas to be redeveloped and utilised. The borough is currently considering "rebranding itself" and pushing its attraction as a tourist venue. The current industrial estate is low lying and not very obtrusive. But to extend it up a steep slope would present a terrible vista and totally eliminate the magnificent views of Pendle Hill from the motorway as

Note comments.

Policy WRK3: Strategic Employment Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

					<p>well as from Nelson and Brierfield. The aim of increasing the business rates received by the borough may not happen because there is now a severe threat that the Government, and not Pendle, will receive all or part of the additional income as recompense for giving a grant to put in the initial infrastructure. In the survey of businesses done by the borough in 2012, only 29% bothered to answer and of those, 70% said they were happy with their premises. That means that only a very small number were not satisfied because one can safely assume that those who didn't answer were happy. The Government encourages boroughs to work with neighbouring boroughs to produce plans. Burnley has very substantial new estates and Pendle and Burnley should work together. The current estate houses a large amount of warehousing which uses vast tracts of land but employs very few people. If the aim is to increase the number of jobs, this is a bad way to go about it. Presumably, the same will happen again if any extension is allowed. Thank you for taking the time to read through our points of view. We have chosen to contact you as we believe you have the power to stop such proposals and hope that you support the points we have raised and are in full support of objecting the plans.</p>	<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>
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817925	165					<p>I wish to object strongly to the proposal to extend Lomeshaye to the A6068 by-pass. My objections in the main are as follows:- 1 The figures in support of the extension are flawed and do not take account of empty facilities in the area and/or other more suitable, particularly"brown field" sites. 2 No account appears to have been taken of the impact on the A6068 and surrounding roads. The said road is already too fully used and is well known as being dangerous. 3 The impact on the countryside in developing up the hillside would be enormous. At the moment, Lomeshaye is relatively low lying but the proposed extended estate would be visually tremendously unsightly. This would also affect tourism. 4 Green Belt land should only be developed in special circumstances and these don't exist in this case. 5 There is no evidence to support the view that there is a demand. 6 The possible number of extra jobs available (if any) would be extremely small given the type of development proposed and this is therefor a factor to be discounted in taking any decision. Please note my strong objection and advise of any further opportunity, which I shall strongly pursue.</p>	<p>Note comments.</p>
<div>Mr</div> <div>Alan</div> <div>Riley</div>							<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327467			168					Extension to Lomeshaye Industrial Area 1. The Parish Council agrees in principle to the extension of the Lomeshaye Industrial Estate and the construction of an access road onto Barrowford Road as long as any such access has appropriate means of preventing HGV use. 2. The Parish Council feels that additional industrial is often being sought because approved sites such as Lomeshaye have been allowed to deviate from their original purpose with retail; car dealerships, dance centres and other uses have proliferated. This extension should purely be for industrial and manufacturing use. With retail or other service businesses sited more appropriate in either town centres or Barrowford Riverside or other business parks.	The stated purpose of the strategic employment site is to cater for businesses whose operations fall within one of the following B use classes: B2 (General Industry), B1b (Research and Development), B1c (Light Industry) and B9 (Warehousing and Distribution). Some B1a (Office) uses may be appropriate, although the existing Riverside Business Park at Barrowford would be the preferred location for such development. Parts of the existing Lomeshaye Industrial Estate, close to the entrance, were reserved for retail car sales (Sui Generis use). Many of the other non-traditional employment uses on the site arise from permissions granted under the Enterprise Zone regime 1983-1993, when planning controls were relaxed to promote business growth, and subsequent change of use applications. Improved monitoring of the Protected Employment Areas has been put in place following the adoption of the Replacement Pendle Local Plan in 2006, to help to implement Policy 22 by highlighting where any proposed change of use applications contravene the purpose of providing employment land and premises for B uses.
Mr	Iain	Lord							
Barrowford Parish Council									

No changes proposed in response to the comment relating to non-employment uses. Also refer to Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818002			191					I am writing to object most strongly about the plans for a massive expansion of Lomeshaye Industrial Estate. Firstly, the land in question is green belt land which must be preserved and only taken where there are exceptional circumstances. This seems absolutely absurd when there are a percentage of units empty on the site. A unit can be changed for different uses but once you take away green belt land ie the fields they are gone forever! Secondly, there is a proportion of brown land available which should first be used before even considering compulsory purchasing green belt land. As I have lived in the countryside most of my life, I value the benefits it gives us. We must preserve all our green belt land and areas of natural beauty as they irreplaceable. Furthermore, there is to be a roundabout onto the Nelson Padiham bypass. This road is already extremely busy with a variety of vehicles both large and small. Adding more traffic in would be a disaster waiting to happen. I live at Fence Gate Farm, nearly opposite the Greenhead Lane turn off from the bypass. On a daily basis I witness long traffic queues also frequent accidents, some of which have been fatal. Finally if the proposed housing estate materialises at the bottom end of the bypass this will egzasibate the traffic situation further. This would be disastorous for the people living in the villages bordering the bypass, not to mention all the disruption and mess it would cause to an already dangerous road. We have the M65 motorway to take traffic away from the towns & villages if this proposal is allowed we would end up with two motorways! I would be extremely grateful if the council would take my objections into consideration when deciding this application.	Note comments.
Mrs	Jan	Parkinson							

Policy WRK3: Strategic Employment Site

Person Details			Comment ID		Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
										See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.	

818005			192				I fully endorse all Old Laund Booth Parish Councils objections to this plan. I want this noted.	Note comment and refer to Comment 16.		
Ms	Barbara	Hodkinson								

818012			194				I am writing to object most strongly about the plans for a massive expansion of Lomeshaye Industrial Estate. Firstly, the land in question is green belt land which must be preserved and only taken where there are exceptional circumstances. This seems absolutely absurd when there are a percentage of units empty on the site. A unit can be changed for different uses but once you take away green belt land ie the fields they are gone forever! Secondly, there is a proportion of brown land available which should first be used before even considering compulsory purchasing green belt land. As I have lived in the countryside most of my life, I value the benefits it gives us. We must preserve all our green belt land and areas of natural beauty as they irreplaceable. Furthermore, there is to be a roundabout onto the Nelson Padiham bypass. This road is already extremely busy with a variety of vehicles both large and small. Adding more traffic in would be a disaster waiting to happen. I live at Fence Gate Farm, nearly opposite the Greenhead Lane turn off from the bypass. On a daily basis I witness long traffic queues also frequent accidents, some of which have been fatal. Finally if the proposed housing estate materialises at the bottom end of the bypass this will egzasibate the traffic situation further. This would be disasterous for the people living in the villages bordering the bypass, not to mention all the disruption and mess it would cause to an already dangerous road. We have the M65 motorway to take traffic away from the towns & villages if this proposal is allowed we would end up with two motorways! I would be extremely grateful if the council would take my objections into consideration when deciding this application.	Note comments.		
Mr	Alan	Parkinson								

										See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.	
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Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818016			195					<p>I am writing to object most strongly about the plans for a massive expansion of Lomeshaye Industrial Estate. Firstly, the land in question is green belt land which must be preserved and only taken where there are exceptional circumstances. This seems absolutely absurd when there are a percentage of units empty on the site. A unit can be changed for different uses but once you take away green belt land ie the fields they are gone forever! Secondly, there is a proportion of brown land available which should first be used before even considering compulsory purchasing green belt land. As I have lived in the countryside most of my life, I value the benefits it gives us. We must preserve all our green belt land and areas of natural beauty as they irreplaceable. Furthermore, there is to be a roundabout onto the Nelson Padiham bypass. This road is already extremely busy with a variety of vehicles both large and small. Adding more traffic in would be a disaster waiting to happen. I live at Fence Gate Farm, nearly opposite the Greenhead Lane turn off from the bypass. On a daily basis I witness long traffic queues also frequent accidents, some of which have been fatal. Finally if the proposed housing estate materialises at the bottom end of the bypass this will egzasibate the traffic situation further. This would be disasterous for the people living in the villages bordering the bypass, not to mention all the disruption and mess it would cause to an already dangerous road. We have the M65 motorway to take traffic away from the towns & villages if this proposal is allowed we would end up with two motorways! I would be extremely grateful if the council would take my objections into consideration when deciding this application.</p>	<p>Note comments.</p>
Mrs	Kathleen	Worden							

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818019			196					<p>I am writing to object most strongly about the plans for a massive expansion of Lomeshaye Industrial Estate. Firstly, the land in question is green belt land which must be preserved and only taken where there are exceptional circumstances. This seems absolutely absurd when there are a percentage of units empty on the site. A unit can be changed for different uses but once you take away green belt land ie the fields they are gone forever! Secondly, there is a proportion of brown land available which should first be used before even considering compulsory purchasing green belt land. As I have lived in the countryside most of my life, I value the benefits it gives us. We must preserve all our green belt land and areas of natural beauty as they irreplaceable. Furthermore, there is to be a roundabout onto the Nelson Padiham bypass. This road is already extremely busy with a variety of vehicles both large and small. Adding more traffic in would be a disaster waiting to happen. I live at Fence Gate Farm, nearly opposite the Greenhead Lane turn off from the bypass. On a daily basis I witness long traffic queues also frequent accidents, some of which have been fatal. Finally if the proposed housing estate materialises at the bottom end of the bypass this will egzasibate the traffic situation further. This would be disasterous for the people living in the villages bordering the bypass, not to mention all the disruption and mess it would cause to an already dangerous road. We have the M65 motorway to take</p>	<p>Note comments.</p>
Mr	Granville	Worden							

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Policy WRK3: Strategic Employment Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

traffic away from the towns & villages if this proposal is allowed we would end up with two motorways! I would be extremely grateful if the council would take my objections into consideration when deciding this application.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818023

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J S

Heap

I am writing to you to strongly object to the proposed extention to the Lomashaye Industrial Estate. I believe that green belt land can be developed, only under exceptional circumstances. I would assume these would include an overwhelming demand for available sites and buildings due to a shortage of such within the locality, and to fulfil what is called a need for employment land. Within Pendle and the surrounding boroughs there are many redundant, available brown sites of varying sizes, in the vicinity of both road and rail networks. These must surely deal with whatever demand there may be at this time and for the foreseeable future. With regards to the phrase 'EMPLOYMENT LAND', green belt land such as that in the proposal, is employment land through agriculture and the many related industries with which it operates. Existing brow field sites and properties can be re-vampt and changed over the years to satisfy a variety of demands, but once any part of the countryside has been built on it is lost forever, not only to agriculture but also the tourist industry which this area proudly promotes. I ask you and all the other relevant officials to think long and hard for the benefit of all the people in this borough and beyond, not just for the present time but for years to come before you destroy something valuable and irreplaceable forever. Please respect and protect our countryside and it will sustain and reciprocate that respect for many years to come. Industrialists and speculators come and go, what Pendle has in terms of rural splendour is timeless, promote and sustain it.

Note comments.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818075

214

Mr

Scott

Riley

As a resident in the rural village of Fence for the majority of my life, I was astonished to learn that there were proposals to carpet further areas of our treasured countryside with ugly, industrial buildings and warehouses. First and foremost the exceptional circumstances for which ‘green-belt’ land can be altered appear not to exist, particularly in the current economic climate we are all trying weather. It is difficult to see where the necessity for extra employment land for these structures could exist, particularly in light of the many redundant commercial premises not just in Pendle, but spread throughout the surrounding towns in Lancashire. Surely a demand for existing commercial property should be addressed, before the case for further development is considered. I understand there is a balance the council must strike when it comes to enterprise, but the development of green-belt land such as this, undoes all the good work the council do in relation to attracting

Note comments.

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>tourism to the area and rebranding itself as such. Few would agree there is any attraction in the existing vista over Lomeshaye, let alone after further development. There is little argument otherwise in respect of the safety of the Barrowford / Padiham bypass, A6068. An increase in what is already a heavily used and abused road cannot be a sensible path forward. There is already provision for further traffic on the roundabout created most recently at the foot of Parrock Road. Can the council seriously hope that consideration for a further juncture elsewhere can be sensible, quite apart from the added rat-run that would be created through the industrial estate from the Brierfield side? Thank you for your time. Please note that my partner and I have strong objections to this plan, and please notify us should we have any further opportunity to object.</p>	<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>

[illegible]

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818087			216					Having been recently made aware of the Proposed Town Plan and that there is a deadline for the general public to express their views I felt it imperative to write and make my views available to you all. Both regularly using and living within the locality of the proposed area, I am particularly and deeply concerned that you would even consider to earmark an enormity of rural, agricultural land, some of which is actively used, Greenbelt farming land, as an extension of Lomeshaye Industrial Estate, from it's current boundary right through to the Padiham bypass, A6068. I cannot begin to comprehend how such an obviously wrong proposal came to be. Firstly, the land in question is, and always has been Greenbelt land and as I am aware it's status can only be changed under exceptional circumstances - of which I am yet to be convinced of from within your proposal. Your plan states a highly questionable demand for future business needs on such a scale - largely slanted in a bid to justify the proposal. I have seen no evidence over the last 10-15years or looking forwards that there has ever been or will be the need for a development for business growth on this scale. Furthermore if there was such a demand it would surely call in to question the clear cut fact that there are currently a large number of units of the current Lomeshaye site that remain empty - unoccupied, as they have been for some time. Again, I can't help feeling that this calls in to question your argument that there is a concrete need, an assured readiness of businesses lining up to fill the expanse of space for development. It is my understanding that the original purpose for the development of Lomeshaye Industrial Estate, was to create a substantial amount of new employment opportunities for the area. At present a large proportion of the business that occupy the buildings on the current site are factory warehouses, which in fact employ only a very small number of people. There are numerous local business within the area which offer countless more benefits to employment and career development and at the same time require far smaller, less costly sites. From this, it is therefore reasonable to assume that should the proposed expansion be regrettably allowed to go ahead, it too would have a nominal benefit to the local and surrounding areas in creating an influx of new employment opportunities. But at what cost to the local environment when ample alternative sites already exist for a fraction of the cost and detrimental impact on the area? It is my opinion that the proposed plan is attacking the situation for completely the wrong reasons when this area, which is still largely and predominantly agricultural and small town, could not possibly compete with the network and size benefits, of the surrounding localities such as Blackburn, Keighley or even Manchester, at not too far a distance. These larger more accommodating areas surely have more desirable draws for these large businesses with their links to rail, road and even fight to the rest of the country. Again this must support the thought that our council should be supporting the growth of more local small - medium businesses which could enable the sustainability of industry within our area with minimal environmental and commercial cost? Secondly, I would like to move my argument forwards to address the potentially devastating impact of the sheer volume of traffic that would result from developing the industrial site to such a scale. The traffic already located within Lomeshaye currently causes countless issues when attempting to leave the site. My partner and I	Note comments.
Ms	Kate	Endersby							

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
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have a small local business and he regularly travels to and from Lomeshaye to purchase supplies, almost every time my partner finds it both time consuming and frustrating trying to leave and return to work. The junction leaving Lomeshaye and rejoining the M65 consistently poses a problem with traffic jams, this leads me to be extremely concerned what the impact of a development of this scale would have on an already over stretched situation? I have heard, worryingly that the proposal could contain a potential new entrance to Lomeshaye on the A6068, Padiham bypass which concerns me furthermore as the volume of traffic both at the roundabout by Nelson and Colne College and almost every junction up to the M65 are regularly heavily congested. This issue is repeated upon many of the roads throughout Pendle which are frequently gridlocked and problematic, which I experience on a daily basis from both living and working directly within the area. This would also call in to question the potential risk to safety for both drivers and pedestrians within the area. The local councils have yet failed to find viable and sustainable solution to the issues with traffic in Pendle, one of which being the speed. I have fought hard with my mother to try to gain support against speeding on the roads, to which we are told frequently and publicly 'there simply is no money' to be able to do anything. My question here is, how does the council propose to deal with these issues if there is no money available to deal with the problems we already have? A third concern adds to this argument, as I believe it is Pendle Council's plan to additionally develop some 400 houses only a stones throw away from the Lomeshaye development. This would potentially create at least 800 extra cars, 800 extra children, with no schools, the majority of those already in the area are over subscribed, not to mention the impact on dentists, doctors , hospitals and other necessities in the area. This seems so unnecessary and yet another detrimental whack on the environment and aesthetic appeal of Pendle. I am well aware that the area of Pendle is renowned for it's appeal for tourists with many of the local small towns and villages benefiting from people travelling in to visit and even stay in the area. The current Lomeshaye site is situated within a small 'dip' within the land and is relatively hidden in it's vastness from most surrounding areas. I fear that yet again, expanding the industrial estate to such an extent would have negative impact on the local appeal and sheer beauty of the area, not to mention the deterrent of all the added traffic. I strongly feel that this would have a catastrophic result on the attractiveness of the area to tourists and income for local towns and village businesses. I question how this can be seen as a positive development towards the sustainability of the proposed and surrounding areas - of course it isn't. Finally and to conclude, I strongly feel that the development of the Lomeshaye Industrial Estate would be a devastating and catastrophic, completely unnecessary, unwelcome development for this area which I am most strongly against. I plead with you to see sense to the absolutely ludicrous notion of agreeing to the go ahead of this proposal and vote no. This letter has been written along with my partner, Christopher Richards, and as such he is a cosignatory of this objection.

See Appendix 3, which addresses issues concerning the proposed

Policy WRK3: Strategic Employment Site

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
								allocation of a strategic employment site at Lomeshaye.
818090		217					Having been made aware that there is a deadline for the general public to make their views known before the council deliberates on it, I am moved to write. I am particularly concerned at the proposal to earmark a great swathe of what is currently Greenbelt farming land [actively & well farmed], as a massive extension of Lomeshaye Industrial estate, from the present boundary right through to the Padiham bypass. This proposal is so obviously wrong on so many levels that frankly, I'm not sure where to begin. However, begin I must, lest something really crazy happens, and it is approved. It is Greenbelt land. As such, I understand that it's status can only be changed in exceptional circumstances. Where are they? All I've seen in the proposed plan are a number of highly questionable unsubstantiated "guess-estimates" about future business needs – all heavily slanted in an attempt to justify the plan. Nowhere have I seen evidence that future business growth in this area will be of the type that requires massive premises on this scale. It appears that every borough in the country is being pressured to decimate their local countryside in this way in readiness for dozens of mega businesses who are just chomping at the bit to fill those sites. It's a total myth. Large chunks of the existing estate are unoccupied – as is the case throughout the borough and the North of England. In the years 2008-13 my small company has had to turn away an average of a clearance per day – so many companies were closing, downsizing or relocating abroad. It is only in the last year that the deluge has slowed to a relative trickle. The number of empty premises – industrial, commercial and storage – that disaster has left behind must be phenomenal. As a founder director of the local Enterprise Trust, I have been closely involved in efforts to encourage & promote the establishment of new businesses locally for some 30 years. In that time, if there is one thing I've learned is that well supported & advised new small businesses is where the employment growth of tomorrow lies – not the establishment of yet another unoccupied warehouse and storage complex. In Pendle at the moment, there are abundant facilities for new small businesses. Even the Trust's subsidised non-profitmaking premises are not fully occupied. Indeed I am not aware that the local Enterprise Trust has even been consulted on the subject of future needs at all in relation to this latest plan. Regarding previous "editions" the Trust's recommendation was that expansion [with proper attention to the necessary infrastructure] should be kept in the valley, in the direction of Whitefield, linking the estate more closely with the town, thereby helping regeneration of the town centre. It is evident that the statistics that have been assembled to underpin this plan have ignored or eliminated many commercial sites in the borough on subjective & arbitrary grounds. How can anyone say that a piece of land is unsuitable for business use because it is under a quarter hectare [over half an acre]? How many businesses are there waiting in the wings to relocate to, or set up in, Pendle that would require premises of that size or greater? None would be my estimate. So, just why would such a threshold be set? What is the hidden agenda? I have read of a survey of local businesses that suggested that of a response of 29%, 70% said they were happy with	Note comments.

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>their premises. The unhappy 30% was used as a symptom of pressure for more business land. Typical political poppycock. Taking the survey’s own figures, that means just 8.7% of local businesses were moved to express dissatisfaction. Given over 5 years of desperate recession & for most a total lack of investment funds throughout the duration – I’m frankly very surprised the figure wasn’t several times that. Dissatisfaction does not equal “needs more space” – unless someone with an agenda wants it to. I believe the borough is planning a “rebranding project to enhance it’s appeal as a tourist venue and create new jobs. At present, Lomeshaye is a largely hidden “blot” on the local landscape, in that it’s position in the valley bottom makes it relatively unobtrusive visually from most main roads. If this plan is approved, then the whole of the hillside will become one massive warehouse complex. Just what’s needed to encourage tourists to come visit! If you want an example of the consequences of this plan, then I suggest a short trip along the M65. Get someone else to drive & spend some time admiring the scenery on either side at junction 4 & 5. I imagine that does wonders for Blackburn’s tourist industry. And then, there are the subjects of access & traffic. Everyone knows there are already horrendous bottlenecks and daily gridlocks on Pendle’s roads. Manchester Road, Scotland Road and the college roundabout grind to a halt twice daily already. I regularly see Scotland road jammed solid from the motorway roundabout up to & past the Bradley road junction. I regularly see vehicles queuing on the bypass up to the Riverside roundabout. Gisburn road in Barrowford also becomes impassable twice daily. Our planners have been totally unable to come up with effective solutions to these growing problems, and yet this plan suggests not only that some 400 new houses [800 extra children and no school!] be built in Barrowford, channelling an extra 6-800 vehicles into the Barrowford “war zone”, but also that an access road be built from the enlarged Lomeshaye onto the bypass so that up to half the industrial & commercial traffic from the massively enlarged Lomeshaye can pile into it as well. Bear in mind that many vehicles accessing Lomeshaye at present from the B & Q junction do so from that direction only because they have no choice. Many would use a Western exit if they could – not to mention the extra third in size of the estate if this plan is approved. All this commonsense observation, and yet, it is proposed to approve these plans without there having even been a traffic survey to check that the plan is viable. Could it be because such a survey might just come up with negative conclusions? To conclude, it is my submission that the proposed enlargement of Lomeshaye Industrial Estate would be an unwelcome, unwanted and unneeded intrusion on our local community, and one which, if approved, we will all live to suffer for in the future. The forthcoming needs of the business community in Pendle do not warrant this scandalous destruction of our Rural surroundings, regardless of the council’s need for grants & future funds that may or may not materialise. As such, I strongly believe that the absence of exceptional circumstances would make this plan illegal if approved, and I URGE you to do the sensible thing. Vote against it. This letter has been composed with my wife’s assistance, and she is therefore a co-signatory.</p>	
							See Appendix 3, which addresses issues concerning the proposed

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Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
									allocation of a strategic employment site at Lomeshaye.	
818101			226					While concurring with the objections raised by the Parish Council we would like to add our own voice to these. We wish to object to the proposed extension of the Lomeshaye industrial site on the following grounds:- 1. More green belt land will be lost and be replaced by ugly units creating a blot on the landscape when there are brown field sites available within the borough. 2. There will be an increase in the amount of heavy traffic using an already busy and often dangerous by-pass where there is frequent evidence of excessive speed and road rage. 3. Huge industrial units will provide massive storage with few new jobs. 4. More traffic will take the alternative routes down the narrow country roads thus endangering cyclists, pedestrians, horse riders and dog walkers as they cross the by-pass to use the footpaths on the other side. 5. The country roads are incapable of supporting an increased flow of traffic which would inevitably ensue. 6. Many families choose to live in this area because of its proximity to the open countryside and this will be blighted by both the buildings and the amount of traffic which will be generated by the development.	Note comments and also refer to Comment 16.	
									See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.	
818143			255					I am contacting you to express my objections to the proposed extension to Lomeshaye industrial estate. I believe that this will have a negative effect on the rural landscape and bring unwanted heavy traffic onto the Fence bypass. I believe that there is sufficient capacity for new business growth within the existing and planned industrial estates (e.g. Burnley Bridge Development).	Note comments.	
									See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.	

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818144			256					I am against the plan to extend the Lomeshaye Industrial Estate up to the Padiham bypass. Main reasons against: 1/ The roads on the Estate are in a terrible condition, I work on Lomeshaye and have had to have 2 new springs on my car both snapped, upkeep is very poor. 2/ Barrowford is enough of a bottle neck already. 3/ Colne is the same. 4/ The flow of traffic on the estate at busy times is already very bad. 5/ The estate is an eyesore and building ugly sheds in the lovely countryside when there are plenty of Brown Field sites in Nelson is not on. I think it would be better to keep the trading estate right on the motorway (M65)building between the canal along from Brierfield to Burnley on the lefthand side. There has already been too much concrete and tarmac laid, we will be causing floods in the area again if we keep on like this. The plus side is possibly more jobs for the area.	Note comments.
Mr	John M.	Ridehalgh							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

<div>818146</div>	<div>257</div>	<div></div>	<div></div>	<div></div>	<div>Mr and Mrs</div> <div></div> <div>Bracewell</div>	<p>I am writing to object to the proposal of the extension of Lomeshaye industrial estate up to the Padiham bypass. This area is green belt and would have a huge impact onto what is already an extremely busy bypass. If you go round the industrial estate you would have noticed that most of the buildings are either empty or just used for storage. There are many other industrial parks in the area with plenty of empty buildings for example the Barrowford site at the end of the bypass which has many empty units and has put in plans for a new housing estate. Would it not make sense to use the buildings that are empty before building any new buildings. At the moment Lomeshaye industrial estate is low lying and cannot be seen from the bypass. Many coaches come through our area to look at the beautiful landscape and to learn about our local history. By expanding the bypass we would lose this tourism business which creates income to local businesses. Burnley already has new modern estates that have many empty units, if Pendle and Burnley worked together these units could be filled creating employment during these difficult times. The units are Lomeshaye are mainly used for warehousing and employ very little staff so the roads and entrances that are available at the minute are fine so there is no need to expand the road up to the bypass. Therefore we strongly object to the plans of extending Lomeshaye industrial estate.</p>	<div>Note comments.</div> <hr/> <div>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</div>
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Policy WRK3: Strategic Employment Site

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818148		258					<p>As you are no doubt aware, Pendle council will be meeting in March to discuss, amongst other things, the proposed extension of Lomeshaye Industrial Estate. We hope you are also aware that this proposed building will be on greenbelt land, which as we understand it can only be built on under exceptional circumstances. We recently attended a public meeting on this issue, where members of the public, and parish and borough councillors expressed the view that these “exceptional” conditions were no-where near being met. Some of the statistics produced by the planning department would appear to be subjective, with some assumptions being made that are certainly open to challenge. Along with a great many Pendle residents, we have concerns regarding the increase of traffic on the A6068 Barrowford Road due to the addition of a permanent access to the proposed site. This road is already an extremely busy, and occasionally dangerous, road to drive on and added volumes of traffic will surely only exacerbate the situation. We understand that there are a considerable number of “brown field” sites, both in Pendle and in the neighbouring borough of Burnley. Surely it is time that local areas united in order to find the best – not necessarily the cheapest or easiest – solution to providing new industrial land. We believe that this is already the case with regard to house building. The land to be used is, we understand, part of the Council’s 15 year plan, which we appreciate the council is obliged to put together by the government. However, the idea for the extension to the estate is to provide considerable, projected, future employment. As many of the buildings on Lomeshaye industrial estate are currently used for warehousing, we wonder how many new jobs would be provided with an extension? We would also hope that it will be recognised by councillors that farmland is not unused, but employment land in its own right. My husband and I very much appreciate the beauty that much of Pendle has to offer to locals and visitors alike, and by living in Fence potentially could be accused of NIMBYism. However, we are led to believe that Pendle is in the process of promoting tourism for the area, and the arrival of more highly visible industrial buildings can only succeed in damaging this aspiration. Thank you for taking the time to read this letter, which we hope will help to ensure that when the time comes to vote for the proposed extension that you will certainly vote against it.</p>	<p>Note comments.</p>
	Alison and Huw	David						
								See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818149			259					I would like to add my objection to the proposed plans to Lomeshaye Ind Est. I truly believe there is little that can be gained from this plan when there are so many Brown Belt areas within the borough that are under utilised and wasted without the need to take more of our beautiful greenbelt. As a resident of Fence I have serious concerns regarding the increased amount of traffic in the area - the A6068 bypass is already used to excess and additional traffic coming off the M65 at Nelson will just be a nightmare. This double roundabout already sees traffic queuing back onto the motorway at peak times. I have seen no justifiable reasons or evidence to prove what this expansion will bring to the area other than total chaos and destruction of an area of beauty. Therefore I would really appreciate it if you would add my name to the list of objectors to this plan and I hope and pray the no campaign has success.	Note comments.
Ms	Claire	Whittam							
See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.									

818150			260					Re: proposed industrial estate extension Subsequent to the public meeting held at Wheatley Lane School on 12 th February; I wish to add my name to the list objectors. Many valid points of objection were made, some carrying more weight than others but setting aside the visual aspects and the more opinioned objections it would appear that the major negative impact of the proposal will be the inevitable increase in traffic. The Padiham by pass was originally constructed to relieve the then A56 main road from through traffic towards Preston and to take traffic away from the Fence- Wheatley Lane-Higham road. The construction of the M65 and the extension of the A6068 to J8 of the M65 has partly superseded the original purpose but also ensured that the “by pass” is now an alternative route for traffic destined for Colne and beyond. This traffic exits at the Reedyford roundabout now adding to the congestion there. Developments around that area, allowed by Pendle Council, have contributed to the problem. The construction of a new roundabout allowing access to Lomeshaye Estate will amount to a wilful escalation of the traffic problems which will be compounded if more houses are built between Wheatley Lane Rd and the N&C College. There are already several accident blackspots on the A6068, notably Carr Hall Rd., Greenhead Lane and Slade Lane evidenced by the plethora of extra warning signs and speed restrictions. Furthermore the existence of the “by pass” should not be used as a convenience for an increase in industrial development: that defeats its objective. The traffic congestion in Colne and Barrowford has led to yet another by pass project (Foulridge) but Lancashire County Council have indicated (see Nelson Leader letter of 14 th February) that this project can only be sustained through increased economic growth which implies extra industrial/commercial estates to be built in that area. A brownfield site, of over 6 acres, formerly Pendle Street Mill, has been ignored. Why then do Pendle Council need to consider extending at Lomeshaye.? It is arguable that much of the present traffic problem in Colne has been brought about by allowing commercial development along North Valley which is the principle	Note comments.
Mr	J. Stephen	Halstead							

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						route towards the M65. Yet Pendle Council have approved another Boundary Mill development close to this route. All of this development forces more traffic towards the same point and Pendle Council seem oblivious to the point that drivers will seek alternative routes. This aspect will tempt drivers to use more minor and unsuitable roads such as Carr Hall Road and the whole length of Wheatley Lane Road from Fence to Barrowford to avoid the increasing congestion. It is my point of view that Pendle Council has not got a cohesive strategy to accommodate the need for industrial development with the housing needs in the area and completely fails to take the traffic effects into account. On the grounds of safety alone this scheme should be rejected. NB In the interests of brevity I have omitted detail of such observations as the appalling design of the Reedyford roundabout system.	
							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

327423	283					Policy WRK3 Strategic Employment Site: Lomeshaye identifies a strategic employment site for B1, B2 and B8 uses. United Utilities requests the Council to consider the following operational comments: - significant infrastructure is identified as passing through the strategic site. The infrastructure will have easements to protect the assets. Early discussions with United Utilities is encouraged. It is also requested that the site drains to separate systems, ensuring surface water does not enter the public sewerage system.	Early engagement between the Council's Planning Manager and Special Projects team, with United Utilities, other infrastructure providers and the Environment Agency, has helped to identify potential constraints to development and to determine the net developable area. These discussions revealed that a 225mm foul sewer crosses the site, but does not interfere with any development proposals. The concerns about drainage are addressed under policy ENV7.
Mr	David	Sherratt					
United Utilities							
							No change proposed in response to this comment.

818252	299					I am writing to you personally expressing the strongly held view of most residents of Higham, Fence and Barrowford with regard to the plan to Develop Lomeshaye Industrial Estate. This plan is utterly flawed in many ways, and after a very well attended (in spite of the weather) meeting on Wed 12 th Feb, no one could see any reason or benefit to the plan and we were unanimous in the opinion that it should be turned down. GREEN BELT land was never allocated for butchering in the way the plan advocates, either for Commercial or Residential development. There is already plenty of potential to extend this site by utilising existing empty units and BROWN belt space before vandalising GREEN belt land which will only cause a highly visible blot on this rural landscape. Particularly when there are other BROWN belt sites in this Borough and elsewhere locally which could be developed as and when necessary in a much more sympathetic fashion. An EXTRA roundabout for access to the site can and will attract even more traffic on the A6068 which is already overloaded, and is unnecessary when there is already good	Note comments.
Mr	Stuart K.	Kerr					

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Policy WRK3: Strategic Employment Site

Person Details

Comment ID

Q1

Q2a

Q2b

Q3

Consultee comments

Officer Response and Recommendation

connecting links via the M65 Junction 12. THIS PLAN WILL MAKE MATTERS WORSE ON THE BY-PASS. The A6068 is always very busy and accidents are happening on a daily basis, some minor but some fatal, the volume of traffic and very often excess speed are major contributing factors. THIS PLAN WILL MAKE THE A6068 WORSE. Motorists, Cyclists, Walkers, Joggers and Horse Riders (as there are many bridle paths in this RURAL area) use this road and I would suggest that if you or any of your colleagues are in any doubt as to what our issues are, then please walk a short distance from Cuckstool Lane to Greenhead Lane on a working day and witness first hand the volume AND speed of some users of this road. THIS PLAN WILL MAKE THE BY-PASS WORSE. From an economical point of view, we cannot see the benefit of this plan, as it would seem that the Financial gain is in no way certain. In addition to the Commercial Development Plan, we are also equally concerned (for ALL the same reasons) about the Residential Plan for 431 new houses near the college. Potentially this could equate to an extra 800 or so vehicles using what is already an overloaded (“B”) road. THIS EXTRA PLAN WILL MAKE THE MATTER MUCH WORSE. As the speeding on this road has been a VERY long standing issue, the OLD LAUND BOOTH PARISH COUNCIL recently applied to LCC for the 40mph MAX speed limit to be extended from Carr Hall as far as Greenhead Lane. This was refused on the grounds of insufficient funds for “signage” and “policing”!!! THIS PLAN WILL MAKE INCREASE THE PROBLEMS. I do hope I have illustrated some of the many reasons why this plan can NOT go ahead, and I do hope that you and your colleagues can help this RURAL community to resist this plan and say NO!!! Thanking you in anticipation of a positive response.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818267

300

Mrs

K

Glover

This is a letter of objection for the plan to extend Lomeshaye Industrial Estate and instead to keep it a Green Belt. The traffic congestion would be appalling on the already overcrowded bypass, which has already had many accidents. Not only will cars be involved, but heavy lorries etc and the volume of traffic does not bear thinking about. Lots of buildings on Lomeshaye stand currently empty and the economic climate is closing even more. There are buildings on Brown Field sites which could be used. The current Green Belt land already has employment for rural businesses and if this is taken away by the extension more jobs will be lost. I therefore strongly object to the proposed plan and hope that my letter will be of strength.

Note comments.

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818285		301					I wish to lodge a complaint against the proposed plan to extend the Lomeshaye Industrial Estate, which would change the current Green Belt land and Brown Belt land. According to information this entails putting a new roundabout at the bottom of the bypass to cope with extra traffic coming off the estate, the A6068 is already a very busy road, housing frequent accidents, resulting in a dangerous road for both vehicles and people trying to cross the road when walking. Furthermore if houses are built near the Nelson and Colne college, this would create more cars again using the bypass. I believe many units on the existing Lomeshaye Industrial Estate are lying empty, due to the economic climate, and when a survey was carried out by the Borough, of the 29% who replied 70% were happy with their premises, this assuming the 71% who did not respond to the survey, were also satisfied with their premises. I feel sure there are plenty other premises available on Brownfield sites which would be used, and should be used before taking up more Green Belt land. Also if more land is covered by concrete for the erection of further buildings this would eventually lead to flooding and we have all witnessed the results of such happenings all over the country. I feel that the proposed extension to Lomeshaye Industrial Estate is absolutely unnecessary, and I strongly object to this idea.	Note comments.
								See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818290	302				I am writing to you to object to the proposed plan to extend Lomeshaye Industrial Estate, thereby changing current Green Belt land to Brown Field. My objection is for the following reasons. Firstly, the proposed creation of a new roundabout to serve an extended industrial estate will further contribute to increased traffic congestion on the bypass and nearby roads which access it. The bypass is an already busy and dangerous road with frequent accidents. The addition of large vehicles accessing the industrial site from it, would most certainly contribute to more serious and frequent accidents. Satellite Navigation systems, which most vehicles are now fitted with, would take the heavy traffic off the M65 at junction 8, (the shortest route) directing them along the entire length of the bypass, causing potential hazards near already dangerous junctions along its length. The traffic situation would be further exacerbated if the proposed large housing development, near Nelson & Colne College is allowed. The addition of over 400 homes to the area, with an average of two cars per home would make a significant increase to the traffic in the area, with an average of two cars per home, would make a significant increase to the traffic in the area. To my knowledge, no traffic survey has been carried out to accompany the proposed plans. Secondly, the calculations on which the requirements for so much additional employment land are based, should be challenged. Many units on the existing Lomeshaye and Riverside industrial Estates are currently lying empty and these should be taken into account when calculating future requirements as well as the fact that the economic climate is causing businesses to close on a daily basis. In a recent survey of businesses carried out by the Borough, of the 29% who	Note comments.
Mrs Eileen Coulton						

Q1 = Do you consider the Core Strategy to be legally compliant?

Q2a = Do you consider the Core Strategy to be sound?

Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						responded 70% were happy with their current premises, meaning only a very small number were not. One can assume that 71% who did not respond to the survey are also happy with their current premises and not looking to expand. In addition, there are many smaller existing available Brownfield sites in the Borough which could be used for future employment, thereby avoiding the loss of more Green Belt land and further congestion. The government encourages neighbouring Boroughs to work together when producing plans and Burnley already has very substantial new industrial estates with easy, established motorway links, which could fulfil the need for future employment land for our Borough. Furthermore, the aim of increasing the number of jobs in the area would not necessarily be achieved by extending the Lomeshaye Industrial Estate. This currently houses a large amount of warehousing which uses large areas of land, yet employs very few people. Presumably, the same would happen if a further extension were allowed. The current Green Belt land is already providing employment for rural businesses, which if swallowed up in the proposed Lomeshaye extension, would result in the loss of jobs. Consideration should be given to preserving our rural communities rather than destroying them. In the conclusion, I feel that the proposed extension to the Lomeshaye Industrial Estate would not be the most effective and safe way for the Council to address future employment. The requirement for so much extra employment land is unnecessary and the calculations for such, flawed. Sufficient employment land is available by using existing Brown Field sites and the industrial estates in neighbouring Boroughs.	

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818311	306	Yes	Yes			Proposed Extension to Lomeshaye Industrial Estate Having looked at the plan shown on the display and spoken to the Planning Officer that day, I am fully in agreement with the proposal. The Industrial Estate did a great deal to keep employment in Pendle when mills were closing and consequently the area was not as badly affected as were other parts of the country. I agree that very large vehicles would come on the motorway rather than the by-pass. I think as your Officer said that it would be better if there was separation between the bottom of the site and the top (adjacent to the By-Pass) possibly by tree planting. To have a roundabout on the By-Pass would be good, as it would help reduce speed traffic as many do exceed the speed limit. The existing hedge could be allowed to grow higher as a barrier. Planning conditions relating to the height of the Buildings and the colour of cladding would keep visual impact to a minimum. I appreciate the Government guidelines have to be met and this is a logical place to meet the criteria laid down. I wish you well in your endeavour.	Note support for the policy.
Mr	Peter	Jackson					No change proposed in response to this comment.

Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818314	307					<p>I wish to object to the plan to extend the Lomeshaye Industrial Estate up to the bypass for the following reasons:-</p> <ol style="list-style-type: none"> 1. Green Belt land should only be built on in exceptional circumstances and as a last resort and this extension is not an exceptional case. 2. Business units at Lomeshaye and near the college still remains empty so where is the demand for more units? 3. Cycling on the bypass is already hazardous and with more and heavier traffic it will be even more dangerous. This development will not encourage local cycling but reduce it. Cycling should be encouraged. 4. Walking from Fence to Nelson through the fields is a constant delight. Walking through industrial units will hardly encourage more active walking. 5. Part of the area known as Bluebell Wood will be destroyed. 6. How accurate are the calculations that have been made with regard to employment possibilities? 7. Many of these large units only employ a few people so the “employment benefits will be limited” 8. Do we want to build so that the town meets the village and consequently concrete over all the land? 9. In a time of recession and austerity where is the demand from businesses calling for extra industrial units. 10. On Noggarth Road is a sign saying it is an Area of Outstanding Beauty so how can industrial development close by ever be considered? 11. Much of Pendle is a beautiful area and tourism should be encouraged. Industrial development will not encourage visitors. 12. Cycling around the area reveals many Brownfield sites which should be used before developing on any Green Belt land. 13. Are specific building companies pushing and lobbying for development sites and not considering the environment that people live in? 14. What exceptional circumstances are there that would result in losing beautiful open countryside that should be enjoyed and protected for all people within the area? Once gone the countryside cannot be replaced. I would appreciate it if you could make the contents of this letter available to all other Councillors in Pendle. 	<p>Note comments.</p>
<div> <div>P</div> <div>Daniel</div> </div>							<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>

327497	309			<p>As requested through your letter on the above subject dated 9 th January 2014, herewith the official response from Barnoldswick Town Council on this issue. In relation to the Pendle Core Strategy we note that, in the latest version of this document, the major changes relate largely to Housing Delivery (Policy LIV1) and the provision of Employment Land (Policy WRK2) We also note with some dismay the allocation of the two additional development sites identified for the delivery of new housing (Policy LIV2) and employment (Policy WRK3); at Trough Laithe Farm, Barrowford and Lomeshaye Industrial Estate, near Nelson respectively. Whilst these additional areas do not affect Barnoldswick in a direct way, as far as their identification in the core strategy is concerned, it is felt that since both these locations are on Greenfield sites and we will require some redefinition of Green Belt Boundaries, they are both unwelcome and undesirable. The question of their need at all is the subject of much debate. However, as long as the National Planning Policy Framework exists in its current form and the Central Government acceptance of Pendle’s proposed Core Strategy are interdependent on matching number’s, there is</p>	<p>Note those comments relating to Policy WRK3 Strategic Employment Site: Lomeshaye. Those relating to Policy LIV2 (Trough Laithe) are addressed under the heading Strategic Housing Site.</p>
<p>Ms. Joanne Geldard</p> <p>Barnoldswick Town Council</p>					

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Q2b = If No, why?

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>little room for manoeuvre. The questionable achievability of the National Plan is a separate debate and one which is outside the remit of this consultation. We note from the supporting documentation, (The revised Strategic Housing Land Allocation Assessment and the Employment Land Review), used to justify the required changes to the Core Strategy, that in the short term at least, Barnoldswick is in a relatively healthy position in relation to supply and demand. However the latter years of the assessment period cause some concern that again Greenfield sites will have to be utilized whilst Brownfield sites remain undeveloped, for a variety of reasons, only too easily exploited by developers. How serious a problem this will turn out to be in reality we will have to wait and see. Notwithstanding our scepticism over the actual numbers used we would like to commend the research and authors of both the SHLAA and the ELR for their diligence and clarity. Both reports are well prepared and presented. In the present circumstances, Barnoldswick Town Council believes that the proposed changes are neither appropriate nor achievable, but recognises that under the current planning system there are limited practical alternatives, if the proposed Core Strategy is to be acceptable to Central Government.</p>	<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>

818326	310				<p>I understand that a plan to expand Lomeshaye Industrial Estate up to the Bypass has been proposed. The current estate actually employs few people because it is mostly warehousing which uses an enormous amount of land without creating new jobs. If any extension is allowed the same situation will happen again. The current estate is low lying and therefore not very obtrusive if the Borough hopes to push the tourist trade surely we should be considering this is planning. The wonderful views of Pendle Hill and the surrounding area should be protected if we wish to attract walkers, cyclists and nature lovers. The bypass is already a busy and dangerous road and the creation of a roundabout adding substantial traffic would make the situation even worse. Green Belt land should be protected once it has gone it cannot be changed and future generations with hold us all to account.</p>	<p>Note comments.</p>
<p>Mr and Mrs</p> <p>Alan and Barbara</p> <p>Storey</p>						<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818329			311					<p>I am writing to object to the application to extend the Lomeshaye Industrial Estate up to the Barrowford to Padiham By-Pass. My objections are: 1. The land is Green Belt which can only be changed if there are exceptional circumstances. There appears to be no such circumstances in this case. The beautiful countryside in Pendle is in severe threat if we continue extending current industrial estates. 2. The calculations on which the requirement for so much extra employment land are flawed and in truth this isn't correct. 3. The plans apparently involve the creation of a roundabout onto the bypass which would add substantial traffic to an already busy and dangerous road. The situation will be even worse if the addition of a very large housing estate is allowed off the bypass just before the college – as is also planned. The bypass is already an extremely busy local road and extra traffic would create more traffic hazards which could endanger local lives. 4. The calculations on which the amount of land currently available for employment purposes (mostly brown land) have been made, have involved eliminating a substantial number of sites, usually in a very subjective manner. Adding these to the total would transform the position. 5. The Borough is currently considering “rebranding itself” and pushing its attraction as a tourist venue. The current industrial estate is low lying and not very obtrusive. But to extend it up a steep slope would present a terrible vista and totally eliminate the magnificent views of Pendle Hill from the motorway as well as from Nelson and Brierfield. 6. The aim of increasing the business rates received by the borough may not happen because there is now a severe threat that the government, and not Pendle, will receive all or part of the additional income as recompense for giving a grant to put in the initial infrastructure. 7. In the survey of businesses done by the Borough in 2012, only 29% bothered to answer and of those, 70% said they were happy with their premises. That means that only a very small number were not satisfied because one can safely assume that those who didn't answer were happy. 8. The Government encourages Boroughs to work with neighbouring Boroughs to produce plans. Burnley have very substantial new estates and Pendle and Burnley should work together. 9. The current estate houses a large amount of warehousing which uses vast tracts of land but employs very few people. If the aim is to increase the number of jobs, this is a bad way to go about it. Presumably, the same will happen again if any extension is allowed. 10. I firmly believe that is Pendle Council approve this planning application many local residents will reluctantly leave this specific area as it transfers from a picturesque rural place to an unwelcoming industrial site which doesn't provide additional employment yet potentially will increase the number of road accidents. Please reject this planning application.</p>	<p>Note comments.</p>
Ms	Kathryn	Heyworth							
<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>									

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818333			312					<p>We are writing to object to the application to extend the Lomeshaye Industrial Estate up to the Barrowford to Padiham By-Pass. Our objections are: 1. The land is Green Belt which can only be changed if there are exceptional circumstances. There appears to be no such circumstances in this case. The beautiful countryside in Pendle is in severe threat if we continue extending current industrial estates. 2. The calculations on which the requirement for so much extra employment land are flawed and in truth this isn't correct. 3. The plans apparently involve the creation of a roundabout onto the bypass which would add substantial traffic to an already busy and dangerous road. The situation will be even worse if the addition of a very large housing estate is allowed off the bypass just before the college – as is also planned. The bypass is already an extremely busy local road and extra traffic would create more traffic hazards which could endanger local lives. 4. The calculations on which the amount of land currently available for employment purposes (mostly brown land) have been made, have involved eliminating a substantial number of sites, usually in a very subjective manner. Adding these to the total would transform the position. 5. The Borough is currently considering “rebranding itself” and pushing its attraction as a tourist venue. The current industrial estate is low lying and not very obtrusive. But to extend it up a steep slope would present a terrible vista and totally eliminate the magnificent views of Pendle Hill from the motorway as well as from Nelson and Brierfield. 6. The aim of increasing the business rates received by the borough may not happen because there is now a severe threat that the government, and not Pendle, will receive all or part of the additional income as recompense for giving a grant to put in the initial infrastructure. 7. In the survey of businesses done by the Borough in 2012, only 29% bothered to answer and of those, 70% said they were happy with their premises. That means that only a very small number were not satisfied because one can safely assume that those who didn't answer were happy. 8. The Government encourages Boroughs to work with neighbouring Boroughs to produce plans. Burnley have very substantial new estates and Pendle and Burnley should work together. 9. The current estate houses a large amount of warehousing which uses vast tracts of land but employs very few people. If the aim is to increase the number of jobs, this is a bad way to go about it. Presumably, the same will happen again if any extension is allowed. 10. I firmly believe that is Pendle Council approve this planning application many local residents will reluctantly leave this specific area as it transfers from a picturesque rural place to an unwelcoming industrial site which doesn't provide additional employment yet potentially will increase the number of road accidents. Please reject this planning application.</p>	<p>Note comments.</p>
Mr and Mrs	Harold and Shelia	Duerden							
<p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>									

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818401			313					I wish to object to the expansion of Lomeshaye Industrial Estate up to the bypass on the grounds that the land to be used is Green Belt land. Green Belt land was designated as such in order to prevent the urbanisation of the countryside and the creation of urban sprawl, which is precisely what will happen if you go ahead with the development. If it goes ahead this development will fill in the countryside between Nelson and Fence and create the urban sprawl I have alluded to above. I understand that previous attempts to develop this land were blocked because it is Green Belt; if the reasons for not going ahead were valid in the past, why are they no longer valid? Many of the units in the existing estate are empty, so why do we need more? There is an abundance of brownfield sites in neighbouring areas eg Burnley – I realise this is not in Pendle, but do you really want to destroy the attraction of Pendle? I know that you wish to promote Pendle as a tourist area and an attractive place in which to live; this development would certainly undermine both those objectives.	Note comments.
Mr	Anthony J	Peacock							

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

818408			314					I am writing to object to the proposal to extend the Lomeshaye Industrial site for the following reasons:- 1. I feel strongly that the area planned for development at the moment acts as a sponge for a lot of the rainfall dispersing it slowly into the land and river below. If it was built on, the rain water would run off quickly flooding the units below before reaching the river. 2. There is a push to promote Tourism in this area. This itself would bring a lot of money and employment into the area. The industrial site at the moment is low lying and can't easily be seen, but will not be the case if expanded - in fact it will be an eye sore! Do you really think this would help tourism! 3. It is Green Belt land and I fail to see why it is necessary to build on this land when there are units which are not occupied and there is plenty of Brown Belt land available in the area especially in Burnley which also has easy access to the motorway. 4. A lot of the industries on the site only employ small numbers of staff a lot of whom are not skilled so it will generally not help with unemployment. 5. It will spoil the nearby villages as it will mean the area is linked up with Nelson and Brierfield so that the "village" feel will be lost which is something that attracts people to this area.	Note comments.
Mrs	Vanessa	Peacock							

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818410			315					<p>Plan to Expand the Lomeshaye Industrial Estate up to the By Pass A6068 I attended the public meeting organised by the Old Laund Booth Parish Council on Wednesday 12 th February, 2014 and wish to object to the above plan on the following grounds – 1. The land is Green Belt which can only be changed in exceptional circumstances which is far from clear in this case. 2. I understand that the figures used to calculate so much extra employment land are flawed and that if other available sites had not been eliminated the figures would be transformed. 3. The bypass is a busy and dangerous road with a history of many accidents over the years and to add any substantial increase in traffic from the Lomeshaye Estate would exacerbate the situation, plus traffic from a planned very large housing estate just before Nelson and Colne College would make the situation worse. 4. Pendle Borough is at present considering “rebranding itself” as a tourist area and to extend the present Lomeshaye site, which is low lying and reasonably unobstructive, up a steep slope to the bypass would in no way enhance Pendle as a tourist area. 5. The aim of increasing business rates received by Pendle may not happen as there is now a threat that the Government and not Pendle will receive all or part as recompense for giving a grant for the initial infrastructure. 6. In the Borough 2012 survey of businesses there was a reply of only 29% of which 70% said they were happy with their premises. Therefore, only a very small number were not satisfies and it can be assumed that those who didn’t bother to reply were happy. 7. The Government encourages neighbouring Boroughs to work together and as Burnley has large new estates Pendle should work together with them. 8. The current Lomeshaye estate has large warehousing taking up a vast amount of land but actually employs few people, this will most probably happen again and if the aim is to create a large number of jobs this will not be achieved. Please would you give the above points your earnest consideration.</p>	<p>Note comments.</p>
818412			316					<p>I am becoming increasingly concerned about the possibility that the Lomeshaye Industrial Estate may be extended over the Green Belt and up to the by-pass. What are the exceptional circumstances behind this idea? The Industrial Estate does not create a lot of employment relative to its area, but this idea would create a lot of extra traffic on the by-pass, which is already a busy and dangerous road. This does not enhance the areas attraction as a tourist venue. Indeed, it would detract from the views of Pendle Hill and what countryside we have left. Industrial estates do not give pleasurable views. It is up to us to decide whether we keep our lovely countryside, or allow it to descend into man made sprawling monstrosity, which is unlikely to empty many people. Perhaps the Council would take another look at its neighbouring Boroughs and work with then to make good use of existing facilities. Look at the available areas that are not being occupied. I hope that a good sensible solution will be the outcome of all this.</p>	<p>Note comments.</p>

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.
818414	317					Proposed Expansion of the Lomeshaye Industrial Estate I strongly disagree with above, for the following reasons:- 1. The Green Belt possession will be an immediate loss of existing farm, livelihoods and jobs. 2. It would appear there is very little demand from businesses in the area for extra premises from the results of the Boroughs survey undertaken in 2012. 3. I assume from previous experience, that a lot of the buildings will be warehouse type premises, employing very few people, yet these will be a numerous heavy vehicles delivering manufactured goods, then more vehicles re-delivering customer orders. 4. I understand the plan includes for the building of a new roundabout on the A6068 Bypass, to service the industrial estate. Surely, this will result in a massive increase of heavy goods vehicles using an already very busy and dangerous road, likely to a be a probable doubling or even trebling the amount of traffic. I hope you will not expand this estate for these valid reasons.	Note comments.
Mr Bryan Morris							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.
							Note comments.
818417	319					I am writing to object to the proposed extension to the Lomeshaye Industrial Estate and the large housing estate which is also planned. It seems strange that you are prepared to build on a Green Belt. Where will this end you are opening a door to ruin Pendleside. You seem to be asking for trouble building a large roundabout on an already dangerous road, this is just asking for trouble. It also seems fool hardy to start building houses in an area where there are so many houses already on sale and cannot be sold. This includes Barrowford, Fence and Wheatley Lane, so why build more. Anyone buying these houses will not be coming from other areas as there are no jobs for them to come to. All you will do is move people from Nelson and Brierfield, this will leave a black hole of empty houses in these areas, making these towns a bigger slum than they already are. What a beautiful area this Pendleside once was. It fills me with dread to imagine coming along the M65 and all you will see is empty industrial units and empty houses where once there was greenfields that I remember. It is on a Green Belt, have you forgotten or are you choosing to ignore it? What are you trying to do to this area? To think of Nelson as a “Tourist Venue” is laughable. Who wants to look at empty warehouses. Pendle Council are not at the front of the queue when it comes to bringing work to the area. This seems all just pie in the sky thought up by someone who does not know the area.	Note comments.
Mr Peter Wray							See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.
Pendle Angling Agency							

Policy WRK3: Strategic Employment Site

[illegible]

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Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>reps etc. This will require a major traffic island to be installed at the entrance to the estate and traffic lights. All this for a bypass that is already overcrowded and dangerous. I also note that the council are looking to re brand Nelson and bring in new tourist business and Industry to the area. Currently as you approach Nelson from Burnley Lomeshaye is virtually out of site and you can see Pendle hill, however should you build any more units it will be on the hill heading towards the bypass and what a site that will be as you approach Nelson with factory units dominating the skyline. It would appear to me that many questions need to be asked before you build any more industrial units in Nelson that we don't want or need.</p>	

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

844179		328			<p>Can I say how shocked and disappointed I am to discover you are considering increasing the size of Lomeshaye Ind Estate by building all the way up to the Fence Bypass. I gather this comes on the back of a 15 year study into the area that concludes we need to create enough industrial units for 500 jobs on land exceeding 65 hectors. I would personally question those figures as the actual figure is nearer -250. We have enough empty units in the Burnley and Pendle area to not have to build any more and spoil our natural countryside and ruin greenbelt land. In fact there are currently empty units on the existing Lomeshaye site so why more units are needed is more than a little confusing. It has also come to my attention that no feasibility studies have been done with regards to the impact on the Bypass with traffic. I find this staggering as there are about to be four hundred houses built at the Nelson end of the Bypass This will bring between four hundred and eight hundred extra cars per day to the bypass and if your figures are correct (which they are not) up to another five hundred cars per day also fifty plus forty foot wagons + delivery vans, sales reps etc. This will require a major traffic island to be installed at the entrance to the estate and traffic lights. All this for a bypass that is already overcrowded and dangerous. I also note that the council are looking to re brand Nelson and bring in new tourist business and Industry to the area. Currently as you approach Nelson from Burnley Lomeshaye is virtually out of site and you can see Pendle hill, however should you build any more units it will be on the hill heading towards the bypass and what a site that will be as you approach Nelson with factory units dominating the skyline. It would appear to me you really haven't thought this through clearly and not only do we not need any more industrial units in Nelson we don't want any either.</p>	Comments noted.
Mr and Mrs	D	Guest				
See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.						

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Policy WRK3: Strategic Employment Site

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
844188		333					<p>I am writing to object to the proposed extension of the Lomeshaye Industrial Site. I apologies that you are receiving this letter after the deadline date of February 21 st , but this is my first opportunity to write to you since returning from Africa where I have been to attend meetings. Please find below my reasons for the objection: The land is Green Belt which can only be changed if there are exceptional circumstances. It is far from clear that there are such circumstances in this case. The calculations on which the requirement for so much extra employment land are flawed and involve subjective judgments which can easily be challenged. The plans apparently involve the creation of a roundabout onto the bypass which would add substantial traffic to an already busy and dangerous road. The situation will be even worse if the addition of a very large housing estate is allowed off the bypass just before the college - as is also planned. The calculations on which the amount of land currently available for employment purposes (mostly brown land) have been made; have involved eliminating a substantial number of sites, usually in a very subjective manner. Adding these to the total would transform the position. On a regular basis driving through or around the Pendle area there are already a large number of derelict warehouses or available land that has the appropriate infrastructure in place and more needs to be done to promote these areas to be redeveloped and utilised. The borough is currently considering "rebranding itself" and pushing its attraction as a tourist venue. The current industrial estate is low lying and not very obtrusive. But to extend it up a steep slope would present a terrible vista and totally eliminate the magnificent views of Pendle Hill from the motorway as well as from Nelson and Brierfield. The aim of increasing the business rates received by the borough may not happen because there is now a severe threat that the Government, and not Pendle, will receive all or part of the additional income as recompense for giving a grant to put in the initial infrastructure. In the survey of businesses done by the borough in 2012, only 29% bothered to answer and of those, 70% said they were happy with their premises. That means that only a very small number were not satisfied because one can safely assume that those who didn't answer were happy. The Government encourages boroughs to work with neighbouring boroughs to produce plans. Burnley has very substantial new estates and Pendle and Burnley should work together. The current estate houses a large amount of warehousing which uses vast tracts of land but employs very few people. If the aim is to increase the number of jobs, this is a bad way to go about it. Presumably, the same will happen again if any extension is allowed.</p>	<p>Comments noted.</p>
Mr	J P	Keighley						

See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK3: Strategic Employment Site

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
844189			334					<p>We would like to express our extreme concern and opposition regarding the extension of Lomeshaye Industrial Estate. Green belt land should only be built on in exceptional circumstances of which there are none! We have ample brown sites to build on so why are you even contemplating these proposals? This proposal along with plans to build a major housing development is obviously going to result in significantly more traffic on the by-pass which is already a notoriously dangerous road having claimed many lives over the years. If there was a major incident on the M65 it would result in a rat run onto the by-pass,. Apparently no traffic study has been carried out. Why when so many industrial units are empty are Pendle council even considering the proposal. Surely this is a short term project that will result in more empty warehouses employing very few people. Extending the industrial estate will also mean ancroaching on the land of a local farmer. This is a producing farm which does employ people therefore the livelihood of the farmer and workers will be destroyed. Is this not counter productive? Pendle hopes to attract tourists to the surrounding villages surely visitors do not want to encounter half empty industrial estates!</p>	<p>Comments noted.</p> <p>See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.</p>
Mr and Mrs	Brian and Lynne	Newman							

844259		335				<p>As you are no doubt aware, Pendle Council will be meeting to discuss, amongst other things, the proposed extension of the Lomeshaye Industrial estate. My husband and I would like to put forward our objections to the proposal. We recently attended a public meeting on this issue, where members of the public, and parish and borough councillors expressed the view that these "exceptional" conditions were no-where near being met. Some of the statistics produced to support the extension would appear to be subjective, with some assumptions being made that are certainly open to challenge. Along with a great many Pendle residents, we have concerns regarding the increase of traffic on the A6068 Barrowford Road due to the addition of a permanent access to the proposed site. The road is already an extremely busy, and occasionally dangerous, road to drive on and added volumes of traffic will surely only exacerbate the situation. We understand that there are a considerable number of "brown field" sites, both in Pendle and in the neighbouring borough of Burnley. Surely it is time that local areas united in order to find the best - not necessarily the cheapest or easiest - solution to providing new industrial land. We believe that this is already the case with regard to house building. The land to be used is, we understand, part of the Council's 15 year plan, which we appreciate the council is obliged to put together by the government. However, the idea for the extension to the estate is to provide considerable, projected, future employment. As many of the buildings on Lomeshaye industrial estate are currently used for warehousing, we wonder how many new jobs would be provided with an extension? We would also hope that it will be recognised by councillors that farmland is not unused, but employment land in its own right. We very much appreciate the beauty that much of Pendle has to offer top locals and visitors</p>	Comments noted.
Mr and Mrs	Huw and Allison	David					

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Q2b = If No, why?

Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Policy WRK3: Strategic Employment Site

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						alike, and by living in fence potentially could be accused of NIMBYism. However, we are led to believe that Pendle is in the process of promoting tourism for the area, and the arrival of more highly visible industrial buildings can only succeed in damaging this aspiration.	See Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Policy WRK4: Retailing and Town Centres

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
378754			118					Primary Shopping Centre(s) Whilst it is understood why Nelson has been identified as the primary shopping area I would question whether it actually fulfils this role or whether Colne plays at least a significant Primary Shopping Centre role. Colne is busier, clearly more prosperous and with the purchase of the market and shopping centre by Pearl 2 has the best chance to be re-invented as the primary shopping location for the borough. Additionally, Colne benefits from the presence of Sainsburys and Asda, as well as to the edge of town Next, Argos and Boundary Mill. Future development, in the form currently of proposals on Valley Road for a new Lidl store would suggest that demand for Colne continues to exist. Nelson's retail offer is more limited, albeit it provides an offer to local residents and is a significant drawer for employment, notably to the Council offices and Marsdens.	Paragraph 11.94 acknowledges that Nelson's pre-eminent role has diminished. Neither the justification, nor the policy distinguishes between Nelson and Colne in terms of primacy of their shopping function, and both are regarded as Town Centres in Policy SDP5.
Mr	Marcus	Hudson							
Lancashire County Council									
No change proposed in response to this comment.									

784722			128		No	It is not positively prepared.; It is not justified.; It is not effective.; It is not consistent with national policy.	Objection to Policy WRK 4 ‘Retailing and Town Centres’ and Policy SUP 2 ‘Health and Well-being’ 1. This objection relates to the above polices and relevant supporting text, each of which is considered unsound for the reasons set out below. In principle, it is inconsistent with the Framework. 2. Planning policy must be consistent with the principles set out within the Framework. Each policy should “plan” positively for development; be justified; effective; and consistent with the Framework. If any policy that is not compliant with one of these four tests, it cannot be considered sound (see the Framework). 3. We have identified why we consider the policy is not sound having regard to paragraph 182 of the Framework. 4. We consider that the policy should be deleted along with the relevant supporting text. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices, nor is there any adequate evidence to justify the underlying assumption of the policy that locating any A5 use within certain distances of schools, youth centres, parks and playgrounds causes adverse health consequences, which would in turn have negative land use planning consequences. The evidence does not support this chain of reasoning or the restriction on A5 uses which the policy seeks to impose. The policy is not positively prepared, justified, effective or consistent with the Framework. 5. The policy will restrict growth and is inconsistent with the framework. 6. The policy will restrict almost all new take-away (A5) proposals within the borough, thus is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic, environmental and social progress for this and future generations. 7. As worded, Policy WRK 4 and supporting text takes an ambiguous view of hot food takeaways in relation to youth establishments, parks and playgrounds. It applies a blanket approach to restrict development with little sound planning reasoning or planning justification. The policy is overly restrictive and not positive in its approach. This is contrary to para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area. 8. Thus the policy is inconsistent with	Policy WRK4 provides a framework for consideration of proposals for retailing and town centres. The National Institute for Health and Social Care Excellence (NICE) advise councils to consider using planning to restrict fast food outlets within a wider strategy to prevent obesity. The momentum behind efforts to create living environments that promote better health, thereby helping to reduce healthcare costs over the long-term, is evident. In November 2013, three organisations launched reports addressing the issue: Public Health England (PHE) launched a new programme called ‘Healthy People, Healthy Places’ designed to ensure that ‘health, wellbeing and inequalities are addressed in planning and development of the built environment’. One of the two briefing papers issued is titled ‘Obesity and the environment: regulating the growth of fast food outlets’ which includes an appraisal of existing evidence and identifies where there are gaps in our knowledge. Together with the Town and Country Planning Association (TCPA), PHE also launched ‘Planning Healthier Places’, a guide for local authorities on how to better integrate public health into planning and a range of other built environment professions. The Landscape Institute published ‘Public Health and Landscape’, its position statement on integrating green infrastructure into efforts to improve public health. Whilst barriers to effective collaboration remain, there are ongoing efforts to create healthier living environments that will help to improve people's health and reduce the cost of healthcare. Support is also included in National Planning Practice Guidance, which references the PHE report in the section on health and well-being (Paragraph: 002, Reference ID: 53-002-20140306).
Mr.	Oliver	Mitchell						
Planware Ltd.								

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Policy WRK4: Retailing and Town Centres

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>para 19 and 21 of the Framework. Para 19 states: Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. 9. Para 21 states: Investment in business should not be over-burdened by the combined requirements of planning policy expectations. 10. The Councils approach to restrict takeaways is not positive planning and thus also inconstant with paras 19 and 21 as set out above. No justification has been provided to define ‘close proximity’ and no plan illustrating the significance of these restricted zones has been produced, relating to schools, youth centres, parks and playgrounds. 11. The policy takes a generic approach to restricting the location nor does it make explicit reference to the sequential test of A5 uses, rather than consideration of each application on a site by site basis. It does not differentiate between differing types of businesses within Class A5. No consideration has been given to the menu on offer or the services an operator may provide. This is also not justified. 12. McDonald’s for instance has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice and to reformulate products. For example, McDonald’s has: Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu; Completely removed hydrogenated trans-fats from its menu Introduced menu board calorie labelling, in addition to the nutritional information provided on its website, trayliners, and packaging Reduced salt in Chicken McNuggets (36%), and fries (25%) since 2003 Reduced fat in milkshakes (34% since 2010), and deli rolls (42% since 2011) 13. In addition, as the Community Partner of the four home nations Football Associations, McDonald’s has helped to train and recruit more than 30,000 coaches over the last 10 years. They in turn, have provided more than 2 million hours of free, quality coaching. 14. No justification is given for the inclusion of youth centres, parks and playgrounds within the policy. 15. The policy does not allow for exceptions, rather resists all A5 development. This is also unjustified. 16. The policy has a disproportionate effect on land use planning and the economy when taking into account the limited purchases made by school children who may only have the potential to visit A5 establishments at the end of the school day, and only during term time. 17. No consideration is given to the achievement of sustainable development as required throughout the Framework. 18. Notwithstanding our objection to the principle of the policy, ‘close proximity’ requires clarification and justification. If it refers to a specific distance, this should be stated within the policy. It is our view that the distance should be from the principle school entrance (if at all) and should not include playing fields or the like. Measuring from a property boundary is likely to provide significantly more walking distance in most circumstances and thus is overly restrictive. This should be amended accordingly. Not only is this negative planning but should be considered unjustified. 19. The Framework cannot be interpreted to allow blanket restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local plan (and thus by definition its policy) should be based on adequate, up-to-date and relevant evidence.</p>	

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Policy WRK4: Retailing and Town Centres

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<p>Compliance with the soundness test is still required. The presented policy fails the relevant tests. 20. No consideration has been given to other A1 class uses and their contribution or impact on daily diet or wellbeing. The policy is therefore not holistic in its approach and will not achieve the aim set out in the plan. 21. Professor Jack Winkler’s research into ‘The School Fringe’, for London Metropolitan University for instance found that just 3/10 purchases were at A5 takeaways. 70% of purchases within the 400m school fringe were at A1 or A3 units, and his research concluded ‘the most popular shop near Urban was the supermarket, with more visits than all takeaways put together’. 22. The policy does not restrict new A1 uses within the planned exclusion zones and therefore the sale of food and drink will still occur. There is no evidence to assume that food or drink sold from an A1 shop is any more or less healthy than that available from an A5 use. The planned policy approach is therefore not effective and unjustified. The policy will place a moratorium against one use class of development, but will not meet the ambition set out in the policy. 23. No consideration has been given to the potential negative impact that the policy may have on the local community, employment provision or to sustainability. No alternative considerations to this blanket approach have presented. 24. We have demonstrated above that the policy is not consistent with national planning policy. 25. The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. The policy potentially stifles economic development and is not consistent with the policy framework. 26. We have presumed reference to health refers to Section 8 of the Framework. No other “health” related matters are considered to be planning related. The policy is not supported by the Framework. Indeed it appears that the policy incorrectly interprets section 8 of the Framework - “healthy communities”. That section does not refer to or mention dietary choices or takeaways or make reference to medical health. The section only refers to land use planning matters specifically relating to the community, ie social, recreational and cultural facilities. This is later confirmed in para 171 of the Framework. There is no reference to medical health in the Framework. 27. No mention of the sequential test is made in the policy. Reference should be made rather than excluding all A5 uses. The sequential test sets out the criteria by which the merits of the location of an A5 use are to be judged. Proximity to youth establishments is not relevant to the sequential test. Moreover, the proposed policy could potentially restrict A5 uses which would comply with the sequential test, and therefore it will operate in conflict with the Framework. 28. Such a policy conflict is considered inconsistent with the Framework. Soundness – summary 29. The proposed policy is considered unsound and fails to meet the four tests of the Framework. It is not positively prepared; justified; effective; or consistent with national planning policy. It should therefore be deleted in its entirety. No alternative wording or alterations can be suggested that would make the proposed policy or supporting text sound. 30. We reserve the right to expand on, and provide evidence to support the points raised above at any examination in public.</p>	
							Replace paragraph 11.116 with the following text: "The Framework

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Policy WRK4: Retailing and Town Centres

Person Details			Comment ID			Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation		
											requires local planning authorities to understand and take account of the health status and needs of the local population. There are acknowledged gaps in the existing evidence, linking retail activity and poor health. However, where such effects can be evidenced, detailed planning policies in Pendle Local Plan (Part 2): Site Allocations and Development Policies, or any neighbourhood development plans that may be produced, will seek to put in place measures to help improve the health and well-being of the local populace."		

784722	129	<input type="checkbox"/>	No	<div></div>	<div></div>	<p>Objection to supporting text of Policy WRK 4 ‘Retailing and Town Centres’ and Policy SUP 2 ‘Health and Well-being’ Para 11.116 1. The paragraph appears to allow operation of existing outlets to be a consideration of any new proposal. The operation of each “new” operator should be considered on their merits and not be judged by other operators. No justification has been provided within the policy or supporting text of how is to be controlled or monitored. 2. With regards to the Council approach to controlling the location of A5 uses, we refer to our objection to the principle policy. No evidence has been provided within the supporting text to justify such policy. 3. Notwithstanding our objection to the principle of the policy, the wording ‘close proximity’ requires clarification and justification. 4. This paragraph is unsound and therefore should be removed.</p>	<p>The use of primary and secondary shopping frontages is well-established in planning policy. Whilst a relaxation of the current restrictions will be explored through the Site Allocations & Development Policies DPD, the principle of restricting non-shopping uses (including those covered by the A5 use class) in such frontages will be retained.</p>
							<p>Changes are proposed to paragraph 11.116, which would remove specific reference to hot food takeaways (see Comment 131). The restriction on non-shopping uses within specified frontages addressed at paragraph 11.107 should remain unchanged.</p>

784722	131	<input type="checkbox"/>	<input type="checkbox"/>	<div></div>	<div></div>	<p>Inspectors approach to similar policy elsewhere 1. We agree with the Planning Inspector’s decision in relation to South Ribble District Council, which proposed ‘400m exclusion zones around any primary, secondary, or special school and sixth form college’. She concluded that: ‘the evidence base does not adequately justify the need for such a policy’ ‘Restrictions within the exclusion zones relating to the town, district and local centres only... [are] inconsistent’ Due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’ 2. Similarly, in regard to a policy proposed by Newham Borough Council, the Planning Inspectorate called for the ‘deletion of an exclusion zone for A5 use class within 400m of secondary schools. Again, this conclusion was reached because: ‘the policy is not supported by evidence at present’; 3. The Planning Inspectorate had ‘strong reservations that the approach to the problem is proportionate, as claimed by the Council’; and ‘This part of the policy would be ineffective and therefore unsound’. 4. We feel there are strong parallels with the proposal put forward by Pendle, South Ribble and Newham, and call for the deletion of this policy in its entirety.</p>	<p>Policy WRK4 provides a framework for consideration of proposals for retailing and town centres. The National Institute for Health and Social Care Excellence (NICE) advise councils to consider using planning to restrict fast food outlets within a wider strategy to prevent obesity. The momentum behind efforts to create living environments that promote better health, thereby helping to reduce healthcare costs over the long-term, is evident. In November 2013, three organisations launched reports addressing the issue: Public Health England (PHE) launched a new programme called ‘Healthy People, Healthy Places’ designed to ensure that ‘health, wellbeing and inequalities are addressed in planning and development of the built environment’. One of the two briefing papers issued is titled ‘Obesity and the environment: regulating the growth of fast food outlets’ which includes an appraisal of existing evidence and identifies where there are gaps in our knowledge. Together with the Town and Country Planning Association (TCPA), PHE also launched ‘Planning Healthier Places’, a guide for local authorities on how to better integrate public health into planning and a range of other built environment professions. The Landscape Institute published ‘Public Health and</p>
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Policy WRK4: Retailing and Town Centres

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div></div>							<p>Landscape', its position statement on integrating green infrastructure into efforts to improve public health. Whilst barriers to effective collaboration remain, there are ongoing efforts to create healthier living environments that will help to improve people's health and reduce the cost of healthcare. Support is also included in National Planning Practice Guidance, which references the PHE report in the section on health and well-being (Paragraph: 002, Reference ID: 53-002-20140306).</p> <p>Replace paragraph 11.116 with the following text: "The Framework requires local planning authorities to understand and take account of the health status and needs of the local population. There are acknowledged gaps in the existing evidence, linking retail activity and poor health. However, where such effects can be evidenced, detailed planning policies in Pendle Local Plan (Part 2): Site Allocations and Development Policies, or any neighbourhood development plans that may be produced, will seek to put in place measures to help improve the health and well-being of the local populace."</p>
<div>327609</div> <div>MsRoseFreeman</div> <div>The Theatres Trust</div> <div></div> <div></div> <div></div>	<div>133</div> <div></div> <div>Yes</div>	<div></div>				<div>Note support for the policy.</div> <div>No change proposed in response to this comment.</div>	
<div>Policy WRK 4 will encourage the provision of arts, culture and entertainment facilities in town centres.</div>							

Policy WRK4: Retailing and Town Centres

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327935			157					Sainsbury's contend that the case for new retail development should be based on an assessment of retail capacity, using up to date evidence at the time of a planning application, as retail requirements can alter over the plan period. Similarly, future retail development in Barnoldswick, should be based on the relevant tests of the National Planning Policy Framework and up to date information relevant to the specific case for development in this area.	When preparing a local plan it is not possible to simply have regard to information presented in support of the most recent planning application. The primary source of evidence for the retail policies in the Core Strategy is the Council's Retail Capacity Study (NLP, 2007), which was updated in 2012. Annual monitoring returns are used to update this information, which is then published in the Authority's Monitoring Report. Whilst the Core Strategy use information on the quantum of provision from these studies, development management decisions on individual applications are determined on the basis of up to date evidence at the time of application. The wording relating to Local Shopping Centres supports the objectives of Policy SDP5, which seeks to direct new retail growth to the appropriate scale of shopping centre, thereby promoting sustainable patterns of development.
Sainsbury's									
817889									
Mr	George	Wilyman							
Turley Associates								The Council should amend the policy to note that the basis for future retail development ought to be on up to date evidence at the time of the application. The reference to retail development not serving a borough wide catchment should be removed from the policy.	No change proposed in response to this comment.

Policy WRK5: Tourism, Leisure and Culture

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
712277			68					Community Facilities Quality of the environment and the cultural and leisure offer is another important part of creating a strong and attractive place to live. This is perhaps captured best at paragraph 12.16 of the plan when it states 'we recognise the important role that culture and leisure can play in creating strong, confident communities' As such Rolls-Royce support the principles set out in Policy SUP 1 and WRK 5 which serve to build on the current social offerings in Pendle and encourage the Council to explore every opportunity to build on the cultural and leisure offer in Pendle, particularly in light of the planned housing and employment growth set out in the plan. This will ensure that Pendle is an area which will be attractive to prospective employees and investors.	Note support for Policy WRK5 and SUP1, which seek to promote tourism and leisure in Pendle.
Mr	Robert	Orgill							
Rolls Royce plc									
817556									
Ms	Kate	Skingley							
David Lock Associates									
No change proposed in response to this comment.									

327609			134		Yes				Note support for Policy WRK5.
Ms	Rose	Freeman							
The Theatres Trust									
We also support Policy WRK 5 which reinforces the importance of your leisure and cultural facilities in providing vitality for the town centres' evening and night-time activities.									
No change proposed in response to this comment.									

Policy WRK6: Designing Better Places to Work

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
712277			58					In reflection of this point, Rolls-Royce are pleased to see that section 11 of the Local Plan, recognises the desire to provide 'working environments that function efficiently, enhance the local environment and provide employment in a place people want to work.' The plan recognises that this will not only retain local employment and business but that it will attract more investment and growth and Rolls-Royce therefore support this.	Note support for Policy WRK6.	
Mr	Robert	Orgill								
Rolls Royce plc										
817556										
Ms	Kate	Skingley								
David Lock Associates										
										No change proposed in response to this comment.

712277			63					Design and sustainability Rolls-Royce support the statement at paragraph 11.140 of the plan that 'quality in design extends beyond the adaptation and construction of better buildings. We want the centre of our towns and other key employment areas to be attractive and welcoming places' Rolls-Royce work hard to ensure that they build the highest quality buildings possible and therefore recognise the importance of this within the Plan. Rolls-Royce, as an organisation are ever striving to improve the efficiency and energy usage of their buildings, and will continue to ensure that the new development proposals achieve the highest standards that are achievable and viable. Whilst Rolls-Royce support the synergy between their own Environmental objectives and those of the Council, Rolls-Royce suggest that a degree of flexibility is demonstrated in Policy ENV 2 and Policy WRK 6 to recognise the economic and viability implications of energy efficiently initiatives. This will ensure that in line with the NPPF, policy requirements to not overly burden development proposals and prevent them from coming forward (para 174).	The policy is not intended to require developers to strictly adhere to published standards, but seeks to promote sustainable business growth, whilst ensuring that environmental efficiency is maximised.	
Mr	Robert	Orgill								
Rolls Royce plc										
817556										
Ms	Kate	Skingley								
David Lock Associates										
										Replace the second paragraph in the policy with the following wording to better align with Policy LIV5: "To achieve this, the Council will require all development proposals to follow the design approach in Policy ENV2; support schemes that are of a high quality and innovative design; and strongly encourage developments to meet the highest possible level of the appropriate BREEAM standard."

Policy WRK6: Designing Better Places to Work

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
327387			186	No	No	It is not positively prepared.; It is not effective.; It is not consistent with national policy.	Yes	On page 166, Policy WRK 5, Tourism, Leisure and Culture, point 5 includes the statement “ will not have a significant detrimental effect on the environment, local amenity or character of the area ”. However, this is not consistent with other policies in the Core Strategy e.g. Policy WRK2, which includes the following: 7. Does not have an adverse impact on the natural environment, in particular designated sites of international, national or local importance. 8. Makes a positive contribution to the protection, enhancement, conservation or interpretation of our natural environment and built heritage.	It is acknowledged that the points outlined in Policy WRK2 should be considered by all new development proposals. However, to provide a consistent approach across the plan it is considered more appropriate to move these points into Policy ENV1 and then make reference to this policy from Policy WRK2.
Mr	John	Lamb						It would also be better if the text in WRK5 was consistent with other policy wording such as that in WRK2.	Remove the natural environment criteria (6, 7 & 8) from Policy WRK2, and include them in Policy ENV1, to acknowledge that these requirements relate to both urban and rural areas. Include an additional bullet point in Policy WRK2 to make reference to the criteria outlined in Policy ENV1 relating to the impact on the natural environment.
Wildlife Trust for Lancashire, Manchester and North Merseyside								This is consistent with the definition of sustainable development in paragraph 7 of the National Planning Policy Framework and the policies outlined in paragraphs 109, 117 and 118 of the Framework.	

327387	187	No	No	<p>It is not positively prepared.; It is not effective.; It is not consistent with national policy.</p>	<p>No</p> <p>1. On page 171 WRK6 Designing better Places to Work, states that “ To help minimise any negative impacts on their immediate surroundings developers should also have regard to the requirements of Policies ENV5 and ENV7.” Policy ENV 5 applies to Pollution and Unstable Land and ENV 7 relates to Water Management. However, Policy ENV1 is also relevant in that existing buildings may be used by nesting birds such as Swallow and Swift, which are legally protected whilst they are nesting, or by roosting bats, which are a European Protected Species. Hence when existing buildings are re-used or extended, care needs to be taken to safeguard populations of statutorily protected species that utilise buildings, in particular nesting birds and bats. 2. On page 172 it is stated that “ In rural locations the re-use and extension of existing buildings will be prioritised, particularly where these support farm diversification. New build should respect local distinctiveness, or be of a high quality and innovative design that incorporates the use of sustainable and green principles “. However, this is not consistent with other policies in the Core Strategy e.g. Policy WRK2, which includes the following: 7. Does not have an adverse impact on the natural environment, in particular designated sites of international, national or local importance. 8. Makes a positive contribution to the protection, enhancement, conservation or interpretation of our natural environment and built heritage.</p>	<p>Agree.</p>
<p>Mr John Lamb</p> <p>Wildlife Trust for Lancashire, Manchester and North Merseyside</p>					<p>1. Reference should be made in WRK6 to when existing buildings are re-used or extended, care needs to be taken to safeguard populations of</p>	<p>Add the following text to the end of the third paragraph: "However, when existing buildings are to be re-used and extended, care needs to</p>

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Policy WRK6: Designing Better Places to Work

Person Details		Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
<div>715388</div> <div><div>Ms</div><div>Louise</div><div>Morrissey</div></div> <div>Peel Holdings (Land & Property) Ltd</div> <div>714921</div> <div><div>Ms</div><div>Anna</div><div>Noble</div></div> <div>Turley Associates</div>		297					<div>statutorily protected species that utilise buildings, in particular nesting birds and bats. 2. It would also be better if the text in WRK6 was consistent with other policy wording such as that in WRK2.</div> <div>This is consistent with the definition of sustainable development in paragraph 7 of the National Planning Policy Framework and the policies outlined in paragraphs 109, 117 and 118 of the Framework.</div>	<div>be taken to safeguard populations of any statutorily protected species that may be present, in particular nesting birds and bats (see Policy ENV1).</div>
							<div>Policy WRK 6: Designing Better Places to Work 3.46 Peel fully supports the strategic objectives of the policy which is to create more sustainable places to work. 3.47 With regards to the request to secure the highest level of the appropriate BREEAM scheme , Peel is generally supportive of the use of BREEAM but experience of utilising this standard across the UK confirms that it is not suitable on certain projects, such as refurbishment of existing buildings. Securing the highest level of BREEAM could entail an Excellent or Outstanding certification which adds significant cost onto a development which may not be appropriate under certain circumstances. In addition, the Building Research Establishment are currently developing new BREEAM assessment methodologies for certain projects and building types (such as BREEAM Non-domestic refurbishment) which may not be in place at the time of a planning application.</div> <div>3.48 Peel requests that the policy wording be amended as set out below to allow flexibility in requesting the use of BREEAM and the standard applied to new development: ‘Where appropriate, all development proposals should seek to deliver the highest possible standards of design in terms of both their built form and sustainability, by meeting the highest level of the appropriate BREEAM scheme unless it can be demonstrated that it is not commercially or technically viable.'</div>	<div>The policy seeks to promote sustainable business growth, whilst ensuring that environmental efficiency is maximised. It encourages rather than requires adherence to the BREEAM Standards, which do include one that is appropriate to refurbishment. The main thrust for energy efficiency measures will come through changes to the Building Regulations.</div> <div>Replace the second paragraph in the policy with the following wording to better align with Policy LIV2: "To achieve this, the Council will require all development proposals to follow the design approach in Policy ENV2; support schemes that are of a high quality and innovative design; and strongly encourage developments to meet the highest possible level of the appropriate BREEAM standard."</div>

Policy SUP1: Community Facilities

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
712277			67					Community Facilities Quality of the environment and the cultural and leisure offer is another important part of creating a strong and attractive place to live. This is perhaps captured best at paragraph 12.16 of the plan when it states 'we recognise the important role that culture and leisure can play in creating strong, confident communities' As such Rolls-Royce support the principles set out in Policy SUP 1 and WRK 5 which serve to build on the current social offerings in Pendle and encourage the Council to explore every opportunity to build on the cultural and leisure offer in Pendle, particularly in light of the planned housing and employment growth set out in the plan. This will ensure that Pendle is an area which will be attractive to prospective employees and investors.	Note support for Policy SUP1.
Mr	Robert	Orgill							
Rolls Royce plc									
817556									
Ms	Kate	Skingley							
David Lock Associates									
No change proposed in response to this comment.									

378754			116					Paragraph 12.6 could benefit from a reference to the register of Assets of Community Value (Localism Act).	Agree.
Mr	Marcus	Hudson							
Lancashire County Council									
Revise paragraph 12.6 by adding a third bullet point to read "ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable" Add a new paragraph after 12.6, to read: "The Localism Act 2011 introduced the requirement for local councils to maintain a list of community assets (Assets of Community Value). Nominations for inclusion can be made by parish councils, or by groups with a connection with the community, but not by individuals. Where an asset is placed on the list the community group is given an opportunity to bid for the asset should the owner decide to dispose of it (there is no compulsion to do so). [Footnote: The owner may appeal against the listing of an asset and can claim compensation if it can be demonstrated that its value has been reduced.] The community group will not have first refusal to buy the asset, merely an opportunity to bid.									

Policy SUP1: Community Facilities

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation	
327609			132		Yes				Note support for Policy SUP1.	
Ms	Rose	Freeman								
The Theatres Trust										

Policy SUP1: Community Facilities

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
755915			152					Policy SUP 1: Community Facilities The policy requires new developments to contribute towards the provision of any community needs generated by the development, where viable. The policy therefore appears to indicate that contributions towards community facilities will be pooled. The Council will be aware that the use of section 106 agreements are being scaled back from April 2015 with the pooling of contributions severely limited. The HBF is unaware of the Council’s intentions regarding the introduction of the Community Infrastructure Levy (CIL), it is however clear that the government intends that this will be the only mechanism for collecting cumulative contributions towards infrastructure.	It is not the intention of this policy to reference the pooling of Section 106 contributions or the use of CIL. This issue is covered in Policy SDP6 Future Infrastructure Requirements and a reference to this is made in Policy SUP1. The policy requires that single developments contribute to the provision of community needs generated by that specific development. The wording will be amended to reference 'development' rather than 'developments' to avoid confusion.
Mr	Matthew	Good							
Home Builders Federation Ltd									
								Within the policy amend the first paragraph under the heading 'New provision' by removing the 's' from 'development'.	

Policy SUP2: Health and Well-being

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
816751			29	Yes	Yes		Yes	We welcome in particular the references in Policy SUP2 and in para 12.39 to the importance of giving people access to the natural environment in promoting health and well being. You could improve the policy still further by referring to the specific role which trees and woods can play in this regard, both by providing areas for healthy exercise and also by removing pollutants from the air and providing shade and evaporative cooling of the air during periods of hot weather.	Agree.
Mr	Nick	Sandford							
The Woodland Trust									

Policy SUP3: Education and Training

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
712277			66					Education Rolls-Royce recognise the importance of education and invest a significant amount in the training and education of their workforce. The provision of high quality education is a key component in not only attracting employment and investment, but investing in the futures of young people and the community. As such, the part of the Local Plan vision that recognises the importance of education and training in creating a more knowledgeable and skilled workforce, which will attract new business opportunity in the area is supported. Whilst there are clear spatial components of education provision in Pendle, the need to plan comprehensively and to invest in education with a long term vision is important. As such Rolls-Royce support the priorities set out in policy SUP 3 in improving education offerings in the borough, and ensuring educational facilities are adequately planned for. However to support the overall vision set out in the Local Plan, Rolls-Royce suggest that the Council explores opportunities to make better use of the unique high quality skills base in Pendle and neighbouring authorities to build upon educational attainment and improve education in the area.	Note support for the priorities set out in Policy SUP3.
Mr	Robert	Orgill							
Rolls Royce plc									
817556									
Ms	Kate	Skingley							
David Lock Associates									
									No change proposed in response to this comment.

Appendix A: Infrastructure Delivery

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
807418			75					In Appendix A – Future Infrastructure, no mention is made of flood defences. I will contact our flood defence team and see if there are any proposals in Pendle during the lifetime of the plan.	Following discussions with the Environment Agency (EA) it was agreed that they currently had no flood defence schemes programmed, that would impact on delivery of the plan objectives. However, once the agency has finalised its medium to long-term funding programme - expected to be complete within the next few months - if there are any new flood defence projects worthy of inclusion in Appendix A, these should be identified in the Schedule of Proposed Changes submitted to the Inspector at the Submission stage.
Mr	Dave	Hortin							
Environment Agency									
									No change proposed in response to this comment.
327432			110					Having said this I am somewhat concerned that the Appendix A of the Core Strategy papers titled “Infrastructure Delivery”, says that although capacity on the road network is of high priority in relation to delivery of the plan, no action is needed. This statement seems to contradict what has been stated in other parts of the Core Strategy about the importance of connectivity and roads. I would ask that the “no action” designation be reviewed.	Improving connectivity is a key aspiration of the plan, but the levels of development proposed within it are not contingent on this. Similarly whilst there is a need to increase the capacity of the road network at key locations - M65 Junction 13 and the A6068 (North Valley Road) are both identified at Appendix A - the evidence base underpinning the plan indicates that elsewhere existing capacity can absorb the proposed levels of growth proposed in the Core Strategy.
Mr.	Steve	Biddle							
Road Haulage Association									
									Amend 'Action' to read: "With the exception of the two congestion hotspots (identified below), no concerns have been identified with regard to the existing capacity of the road network."
327620			139	Yes	No		Yes	It is noted that the capacity of sports/leisure centres is included but requires no action as it is considered the proposed level of development is acceptable. However, there is no up to date needs assessment in place to provide the evidence for this. Given the level of new housing proposed there is no evidence that the current provision is adequate. Paragraph 73 of NPPF requires an up to date assessment of need to identify needs and opportunities for facilities that include sports. The IDS identifies a deficiency of pitches throughout the area. However, this deficiency is based on the 2008 Open Space Audit that does not provide an appropriate assessment of demand and supply. The baseline data is considered to be out of date and not robust in accordance with paragraph 73 of NPPF. The council are about to begin a Playing Pitch Strategy (PPS) which will include a site specific action plan that will help address any deficiencies and in pitch provision. Sport England has been asked to assist with the preparation of the PPS.	Pendle Council has commenced work to update the Open Space Audit (Pendle Council, 2008). This will form part of a wider Green Infrastructure (GI) Strategy, which will also include an assessment of the needs assessment for sports and leisure provision, including the Joint Playing Pitch Strategy highlighted within the representation. The GI Strategy will assess existing and projected demand to highlight where there may be a surplus, a qualitative or a quantitative deficiency in supply. The new GI Strategy will be adopted before the Preferred Options Report for Pendle Local Plan (Part 2): Site Allocations and Development Policies is made available for public consultation in 2015. Any new information will be included within Appendix A of the Core Strategy prior to Publication, or identified as a suggested amendment in the Schedule of Proposed Changes submitted to the Inspector following Submission. It is considered that by the time the Core
Sport England North West									

Q1 = Do you consider the Core Strategy to be legally compliant? Q2a = Do you consider the Core Strategy to be sound? Q2b = If No, why? Q3 = Do you consider that the Core Strategy complies with the Duty to Co-operate?

Appendix A: Infrastructure Delivery

Person Details	Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
						<div>The Council should provide a robust Needs Assessment in accordance with paragraph 73 of NPPF. This should include all open space typologies. Please be aware there is a separate methodology for indoor and outdoor sports facilities because of the different role and function of sport to any other open space typology. For pitch provision this is a step by step guide adopted October 2013, and for sports facilities this is the emerging Assessing Needs and Opportunities Guidance. Both guidance will be linked from the NPPF section of the DCLG website to Sport England’s website in the near future. In the interim the guidance can be found at: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</div>	<div>Strategy is adopted, sufficient progress will have been made on the GI Strategy to inform relevant policies within the Core Strategy.</div> <div>No change proposed in response to this comment.</div>

Appendix B: Replacement Pendle Local Plan (2001-2016) Policies

Person Details			Comment ID	Q1	Q2a	Q2b	Q3	Consultee comments	Officer Response and Recommendation
818047			213					15 Appendix B 15.1 As it stands, Adopted Local Plan Policy 12 is no longer consistent with the NPPF as it is not a criteria-based landscape policy. Appendix B should specify its deletion from the development plan.	The NPPF states that Local Plans should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. This can be done by setting out broad locations and specific allocations of land for different purposes; through designations showing areas where particular opportunities or considerations apply (such as protected habitats); and through criteria-based policies to be taken into account when considering development. Policy 12 Maintaining Settlement Character, is an adopted Council policy "designation showing areas where particular ... considerations apply." In this instance the considerations relate to landscape and amenity. As such the policy is considered to be compliant with the NPPF.
Manthorpe Developments (UK) Ltd									No change proposed in response to this comment.
818046									
Mr	Michael	Courcier							
Barton Willmore									

Appendix 2

Responses to petitions: Lidgett & Beyond / Barrowford Road, Colne

Lidgett and Beyond Representations

Representations were received from the local community group Lidgett and Beyond. These representations were supported by 493 individuals.

Anyone who has supported Lidgett and Beyond's representations can find the officer responses and recommendations in Appendix 1 by using the following comment numbers:

262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277.

Representation / Petition relating to the site at Barrowford Road, Colne (Mr John Metcalfe)

A representation was received from Mr John Metcalfe in relation to a site at Barrowford Road, Colne. This representation was supported by a petition which included 210 named individuals.

Anyone who has supported John Metcalfe's representation can find the officer response and recommendation in Appendix 1 by using the following comment number:

326

Appendix 3

Consultation comments, officer responses and recommendations – Policy WRK3: Strategic Employment Site - Lomeshaye

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

1. GREEN BELT

Summary of issue:

Purpose of Green Belt is to keep land permanently open and at this point it is important in preventing urban sprawl and the merger of Nelson with nearby rural settlements.

Officer Response:

Green Belt covers approximately 2,070 ha, or 15% of the land within the Borough. Although it has been a feature of planning policy since 1955, the general extent of the Green Belt in Lancashire was established as recently as the early 1980's. The precise boundaries of the Green Belt in Pendle were then defined in the Pendle Local Plan (January 1999).

The National Planning Policy Framework ("The Framework") (paragraph 83) notes that:

"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."

The Pendle Core Strategy is the first stage in a review of the Replacement Pendle Local Plan 2001-2016.

The key issue is that given a defined need to find more industrial land, there is a need for the Council and the community to find a suitable site that meets this need in the most sustainable way, causing the least impact on Green Belt and other assets.

The exceptional circumstances identified by Pendle Council to justify consideration of the need to release Green Belt land for development are, therefore, as follows:

- The need to meet the employment land requirement set out in the Pendle ELR and Policy WRK2
- The need to ensure sustainable patterns of development in accordance the Core Strategy's vision and spatial strategy.

There are two main purposes to any assessment of the Green Belt:

- (1) To consider whether there are exceptional circumstances that could justify an alteration to the existing Green Belt boundary; and
- (2) To assess land within the Green Belt against the five purposes of Green Belt, to identify areas that perform the strongest Green Belt function and those that perform a lesser Green Belt function.

(1) Exceptional Circumstances

Paragraph 14 of The Framework states that:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (para 14). For plan-making this means that:

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted”

A full assessment of the evidence base has been carried out to determine:

- (a) Whether it is possible to meet the Borough’s objectively assessed need for employment land without incursion into the Green Belt; and
- (b) If not, whether the requirement to meet the objectively assessed need has the potential to be considered as an exceptional circumstance necessary to justify an alteration to the Green Belt boundary.

The results of this assessment are set-out in brief below.

The Framework requires local planning authorities to promote sustainable development and growth, using their evidence base to establish the objectively assessed needs for different types of development over the plan period (i.e. up to 2030).

The employment land requirement is set out in the Pendle Employment Land Review (Pendle Council, December 2013) and reflected in Policy WRK2. This indicates that 56.6 ha of employment land will be required in Pendle up to 2030. With the existing portfolio of employment sites accounting for just 29.2 ha, there is a shortfall of 18.3 ha.

After carefully considering the evidence base for the Core Strategy, for the plan to be found sound at examination there is a need to allocate a strategic employment site, in order to demonstrate that the strategic objectives of plan are achievable and that the quantum of employment land required can be delivered in a timely manner and early in the plan period.

The findings of the Pendle ELR also indicate that:

- (1) The demand for employment land in Pendle is greatest in the M65 Corridor.
- (2) Sites within the existing portfolio are generally small.
- (3) The location and quality of many existing employment sites are not considered to be attractive to potential inward investors, or to meet modern business requirements.

With no single site, or combination of sites, within a defined settlement boundary capable of meeting these qualitative requirements, or accommodating the quantum of employment land identified, the Council is faced with two options:

- (1) Identify one, or more, new sites outside a defined settlement boundary within Pendle. This would allow Pendle to meet its own identified need.
- (2) Negotiate with neighbouring authorities to determine whether they can accommodate some, or all, of Pendle’s employment land requirement.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

Dealing with the second of these options first; discussions have taken place with officers representing the Council's in Craven and Burnley. The outcome of these meetings revealed that whilst each of these borough's is proposing to bring forward new employment sites in their respective plans, it was anticipated that the combined capacity of these sites would be required to meet their own objectively assessed needs. As a result there is no potential to accommodate significant levels of 'overflow' from Pendle.

Moving back to the first point. The Pendle ELR assessed 13 potential employment sites located outside a defined settlement boundary, nine of which are located in the M65 Corridor. Of these sites, two are likely to be developed for alternative uses. Trough Laithe Farm, Barrowford is proposed as a strategic housing site in the Core Strategy (Policy LIV2) whilst a planning application has been submitted for retail use on the site at Greenfield Road, Colne. A third site at Cotton Tree, near Colne is relatively small and reserved for future expansion by an existing business. Of the six remaining sites, three – land at Robinson Lane, Brierfield, land at Greenhead Lane, Fence and land occupied by Swinden Playing Fields, Nelson – are for a number of reasons not considered to be a sustainable option for development.

The three remaining sites: land at Colne Road, Barrowford; land off Heirs House Lane, Colne and land west of Lomeshaye lie within the Green Belt. Of these three sites Lomeshaye received the most favourable sustainability rating, largely because of its direct access to the motorway network. The two other sites would require a connection to the proposed bypass to the west of Colne, before they could be reasonably be opened up for development.

The results of more detailed site assessment work for five of the potential employment sites (see below) can be found in the Pendle Strategic Employment Land Site Selection Report (Pendle Council, December 2013)::

- Land west of Lomeshaye
- Land off Heir House Lane, Colne
- Land off Colne Road, Barrowford
- Land off Greenhead Lane, Reedley Hallows
- Land north of Foulridge

This report once again concluded that Lomeshaye was the most sustainable location for a strategic employment site.

The Framework states that the mechanism for defining Green Belt boundaries is in Local Plans. Boundaries should only be altered in exceptional circumstances through the preparation or review of a local plan. The provision of land to fulfil the economic needs of a Borough would satisfy the exceptional circumstances test. It would also facilitate a sustainable pattern of development for the Borough.

(2) Purpose of Green Belt

The Framework states that the “fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence” (paragraph 79).

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

The five purposes of Green Belt as set out in The Framework (paragraph 80) are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Framework does not offer further explanation of the five purposes, or set out how they should be assessed, although it is clear that it does not give any particular weighting to the different purposes. The key consideration in any assessment of the Green Belt is the need to keep the land permanently open, as this openness is so critical to the Green Belt.

Whilst the review of purpose is strategic in nature, it is based on an assessment of ‘strategic parcels’ of land within the current Green Belt to determine the extent to which each of these continues to fulfil the function of Green Belt.

An extensive review of Green Belt boundaries will be carried out in the preparation of Pendle Local Plan (Part 2): Site Allocations & Development Policies.

With only one realistic option for a strategic employment site, the Green Belt assessment focussed on:

- (a) Whether the removal of the Green Belt designation would have an adverse effect on the strategic objectives of the Green Belt;

AND, if the answer is no:

- (b) Whether the economic and social benefits accruing from its development for employment, would outweigh any negative impacts for the environment (i.e. can it be regarded as sustainable development).

The main purpose of the Green Belt designation at this location is to check the growth of the built-up areas to the south, thereby preventing the towns of Nelson and Brierfield merging with the linear village of Fence.

The focus of the assessment was to consider the potential impact of sprawl and encroachment, where:

- Sprawl is defined as “... the straggling expansion of an urban or industrial area, irregular or straggling form, spread out over a large area in an untidy or irregular way”; and
- Encroachment is defined as “to intrude, advance gradually beyond an acceptable or established limit”.

The parcel of land in question has strong boundaries to the north (A6068), east (Lomeshaye Industrial Estate), south (Pendle Water) and west (Old Laund Clough). The topography of the site also means that it is relatively isolated from adjacent areas of open countryside. As such its role in safeguarding the countryside from encroachment is somewhat circumspect. Development of

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

the site represents an opportunity for planned growth rather than the “unchecked sprawl” Green Belt status is intended to safeguard against.

The area of Green Belt affected by this proposal has little influence in preserving the setting and special character of historic towns and could arguably have been screened out. The nearest properties in the Carr Hall Road Conservation Area (CHRC) lie some 400m to the east of the site. Those houses facing the site occupy a sylvan setting, with the mature trees and intervening fields doing much to screen the proposed development from view.

Similarly the site has little visual impact on the setting of Fence to the north west. The village contains a mixture of modern and older housing and some commercial buildings, but is of little historic significance in itself. The settlement occupies an elevated position and can be seen from vantage points across the valley in Nelson and Brierfield. The proposed employment site would be set between the village and the exiting industrial estate. Although it would be visible in the landscape, a green wedge to the north of the A6068, which will remain in Green Belt, will continue to separate it from the village, which would continue to be visually distinct in distant views from the south.

When looking out from the village the fields forming the green wedge, referred to above, together with mature trees in the area of Ancient Semi-natural Woodland provide visual separation between properties on the edge of the village and the estate.

The criterion concerning urban regeneration can be applied equally to all land within the Green Belt and is not site specific. Green Belt status has helped to reduce the pressure to allocate or develop a number of urban fringe sites in Pendle. To date the emphasis has been to look at meeting the development needs of the Borough elsewhere and in particular to recycle previously developed land within a defined settlement boundary. However, the evidence base underpinning the Core Strategy demonstrates that this is no longer possible.

The strength of the boundaries to the north and west, particularly if structural planting is carried out alongside the A6068, provide assurance that the revised Green Belt boundary would endure well beyond the end of the plan period, thereby:

- checking the unrestricted sprawl of the built-up areas to the south;
- preventing any merger between the industrial towns of the M65 Corridor and the Pendleside villages to the north; and
- safeguarding the countryside from encroachment.

The final issue to consider is whether a strategic employment site at this location would help to fulfil the requirements of The Framework and bring about “positive growth – making economic, environmental and social progress for this and future generations.”

The three pillars of sustainable development are economic, social and environmental.

The economic and social benefits accrue from:

- Providing new employment opportunities in close proximity to urban areas, with pockets of deprivation that are amongst the worst in the country.
- Safeguarding existing jobs, by enabling established local businesses to expand or relocate.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

- Creating a high quality employment site that would help to attract inward investment and support sub-regional economic objectives.

The environmental impacts arising from development are:

- The loss of Grade 4 (Poor Quality) agricultural land which, with the exception of a small area of woodland, has no other environmental designations and is not recognised as containing habitats or species of special importance.
- Potential impact on an area of Ancient Semi-natural Woodland close to the western boundary of the site, which is designated as a Biological Heritage Site (BHS).
- Potential impact of flooding, as a small part of the site close to Pendle Water lies within Flood Zones 2 and 3 (N.B. this has been the subject of a separate Flood Risk Assessment).

At this time, the negative environmental impacts are not considered sufficient to outweigh the social and economic benefits.

(3) Conclusion

The Green Belt land west of the existing Lomeshaye Industrial Estate represents the most sustainable option in meeting the borough's employment land requirement over the plan period.

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

2. THE EVIDENCE BASE

Summary of issue:

- Subjective judgements have been made in the exclusion of sites and the assessment of sites (e.g. sites under 0.25ha have been omitted).
- The adjustments for growth and past losses are not justified.
- Site appraisal criteria give insufficient weight to landscape impact and detriment to the Green Belt.

Officer Response:

These comments refer to site assessment in the Pendle Employment Land Review rather than Policy WRK3.

The site threshold selected reflects that in National Planning Practice Guidance on housing and economic land availability assessment (Paragraph: 010 Reference ID: 3-010-20140306). This indicates that economic land availability assessments should consider all sites capable of delivering 0.25ha (or 500m² of floorspace) and above.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

Any assumptions (adjustments) made in the calculations are addressed under the heading 'Methodology' in the Draft Pendle Employment Land Review (Pendle Council, December, 2013):

- Frictional Vacancy: Paragraphs 6.49-6.51
- Past Losses; Paragraphs 6.52-6.56

It would not be appropriate to include a detailed explanation of the adjustment for future growth in this section, as it only relates to the calculation based on the past take-up of employment land (Scenario C). However, it is acknowledged that although the source of this adjustment is properly referenced in the notes beneath Table 6.21 (page 100), it has not been addressed within the text for Scenario C (paragraphs 6.75-6.90).

The site appraisal criteria are based on those used in the Pendle Employment Land Review, adopted by Pendle Council in 2007, which in turn were based on those identified in the Government's Guidance Note on Employment Land Reviews. Desk based research compared these criteria and the scoring with that used in similar reviews carried out by other local planning authorities. Where necessary additional criteria were added to ensure that the assessment of sites would cover a full range of economic, social (policy) and environmental issues. The revised criteria were then considered and refined by members of the project steering group. The requirement for additional weighting to address landscape impact or detriment to the Green Belt was not considered necessary.

Proposed changes to the Core Strategy:

No change is proposed in respect of the minimum site threshold, which accords with government guidance, nor the site appraisal criteria, which are considered to offer a fair and balanced appraisal of all sites.

A detailed explanation of the reasons for including an allowance for future growth should be included within the text addressing Scenario C, which concerns the calculation based on past take-up rates.

3. TRAFFIC

Summary of issue:

- Access arrangements should be the subject of a full traffic appraisal.
- A roundabout on the A6068 will increase traffic to unacceptable levels on what is an already busy and dangerous road. In combination with the development of 400 homes on land at Trough Laithe Farm, Barrowford, traffic flows along the A6068 will increase still further and

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

have a negative impact on movements at Junction 13 and along Wheatley Lane Road/Church Street and lives will be put at risk.

- Noise pollution from the A6068 will increase to unacceptable levels.
- An extended Churchill Way will become a 'rat-run' between the M65 and the A6068.

Officer Response:

Agree. The findings of the Preliminary Transport Review (Traffic Transport and Highways Consultancy, March 2014) indicate that "with appropriate improvements, the highway network is capable of delivering the full extent of development at the Lomeshaye Extension site without compromising the performance of the local highway network and local amenity." More detailed modelling will take place as development proposals for the site advance.

Speed limits on all A and B classified roads in Lancashire were recently reviewed by the County Council who concluded that those on the A6068 are appropriate.

Traffic flows associated with a possible link from Lomeshaye onto the A6068 have yet to be fully assessed as information on vehicle trip rates and traffic flows has yet to be finalised. Whilst flows will increase on the A6068 if a link is provided, there is available capacity. Associated improvements to the exit from the estate onto the M65 at Junction 12, the possible installation of traffic lights at the junction of Kenyon Road and Churchill Way will help to improve permeability within the site. On balance the creation of a new link is considered to be a positive step for both highway users and the businesses currently situated on the Lomeshaye Estate.

The design of the new junction, speed restrictions and associated improvements to the A6068 will be critical to ensure that road safety isn't compromised and at this time a signalised junction rather than a roundabout is proposed.

Traffic levels will almost certainly increase if an access/egress from Lomeshaye is constructed.

However, the current speed limit of 50mph would need to be reduced in advance of the proposed junction (i.e along the section closest to the village of Fence). This would help to reduce both noise pollution and improve traffic safety on a dangerous stretch of the bypass.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

Natural traffic flows to Fence (outlined below) suggest that the potential for an extended Churchill Way to become a 'rat-run' are extremely limited, particularly if traffic lights are installed at the junction with Kenyon Road (in the estate) and at the exit onto the A6068.

- From M65 westbound (i.e. Colne) exit at Junction 13 for the A6068.
- From M65 eastbound (i.e. Manchester, Blackburn or the M6) exit at Junction 8, onto the Shuttleworth Link Road and onto the A6068.
- From Padiham exit via the A6068.
- From Burnley exit via Barden Lane towards the A6068.

The only apparent potential for increased traffic would emanate from the west of Nelson (via Lomeshaye Road) and parts of Brierfield. Such flows could have potential benefits as they would reduce traffic using the A682 through Junction 13 and on the dangerous B6248 Cuckstool Lane.

On leaving the village of Fence, exits onto the A6068 suggest that joining the motorway at Junctions 8 or 13 are likely to be more desirable alternatives.

Proposed changes to the Core Strategy:

No changes proposed in response to these comments.

4. VISUAL IMPACT

Summary of issue:

Landscape impact would be unacceptable and have an adverse impact on initiatives to promote tourism.

Officer Response:

The proposed site is only prominent in views from the A56 Colne Road, immediately to the south. It is not visible in more distant and elevated views from Marsden Cross.

Eastbound on the M65, the site is only visible at the last minute as they are restricted by the bridge carrying Cuckstool Lane over the motorway, the Ancient Semi-natural Woodland along Old Laund Clough and the site topography. Westbound the curvature of the motorway and the elevated Junction 12 also restrict views into the proposed site.

Distant views into the site from the north are extremely limited due to its southerly aspect. The rooftops of units on the existing estate will be more prominent in views

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

from the area around Noggarth Road. The site is not visible from Pendle Hill or other popular tourist vantage points to the north.

Proposed changes to the Core Strategy:

No changes proposed in response to these comments.

5. BUSINESS RATES

Summary of issue:

The objective of increasing Council income from business rates is unlikely to be achieved.

Officer Response:

The principal purpose in allocating a strategic employment site is to meet the borough's objectively assessed need for employment land over the plan period. However, the formation of new businesses will generate increased business rates. The full benefit of this increase should benefit the borough, as the proposal to pool resources to support the Lancashire Enterprise Partnership's Growth Plan now looks increasingly unlikely to proceed.

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

6. EVIDENCE OF DEMAND

Summary of Issue:

Limited demand for employment land and premises, as revealed by:

- Results of the 2012 Employment Land Survey.
- Poor response to the 2012 Employment Land Survey.
- Large number of vacant industrial premises.

Officer Response:

These comments concern evidence in the Draft Pendle Employment Land Review (Pendle Council, December 2013) rather than Policy WRK3.

The results of the 2012 Employment Land Survey revealed a potential demand for 86,034m² of employment space between 2012 and 2017. This would equate to approximately 21.42ha of employment land, or 4.3ha per annum. The past take-up rate of 2.65ha per annum suggests that

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

there is business optimism and aspiration in these figures, but they show a confidence in the economy of the Borough. Of concern is that over half of this requirement can be attributed to businesses that have indicated that they would consider relocating outside Pendle if suitable sites and premises cannot be identified within the borough.

Whilst the percentage response to the 2012 Survey was lower than for the 2007 Survey, a 29.1% response rate cannot be considered poor. The number of responses received (150) was only 35 fewer than the previous survey.

The latest edition of the Council's Property Register (August 2013) indicates that a relatively large number of business units are currently available across Pendle, but many of these are small units of poor quality in former textile mills. Whilst these have a useful role to play in helping new businesses start-ups find their feet, and providing cheap space for storage uses, they cannot be regarded as part of the strategic employment land supply. The analysis carried out at Stage 1 of the Employment Land Review shows that only 16 units, which do not form part of a larger complex, offer 500m²+ of floorspace, the threshold recommended in government guidance. Vacancy rates on the three established business parks in Pendle range from nil at West Craven Business Park, Earby to 6.5% (floorspace) and 15.6% (units) at White Walls, Colne. Vacancy rates are higher at the Riverside Business Park, Barrowford at 21.9% (floorspace) and 19.0% (units), but reflect the fact that these are speculative builds on a newly established site. At Lomeshaye, the comparable vacancy figures are 1.8% (floorspace) and 5.7% (units).

OFFICER RECOMMENDATION: No change proposed in response to this comment.

Proposed changes to the Core Strategy:

7. ADDRESS EMPLOYMENT NEED ACROSS BOROUGH BOUNDARIES

Summary of issue:

The Councils in Burnley and Pendle should work together to meet employment needs across the two boroughs.

Officer Response:

The Framework requires Pendle Council to meet its objectively assessed needs in full, unless these cannot be accommodated within the borough.

The evidence bases for the employment land requirement is established in the Pendle Employment Land Review (Pendle Council, December 2013) and set-out in Policy WRK2. Similar evidence for Burnley is still emerging.

The proposed allocation of a strategic employment site at Lomeshaye, demonstrates that Pendle Council can meet its employment land requirement for the plan period, within the borough –i.e. where the need arises.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

Since the introduction of the Duty to Cooperate, Pendle Council has held regular meetings with officers from Burnley Council to discuss matters concerning planning policy. Additional exchanges of information have taken place at themed workshops held as part of the plan preparation process in both Burnley and Pendle and at the quarterly meetings of the Lancashire Development Plan Officer Group in Preston.

The most recent meeting was the consultation workshop for the Burnley Local Plan (Issues and Options Report), held on 25 February 2014. The information presented at this meeting revealed that a number of the major growth options being considered in Burnley will also result in the loss of Green Belt sites.

The available evidence indicates that neither borough can readily accommodate the needs of the other on sites that are readily available and sequentially preferable.

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

8. POTENTIAL FOR JOB CREATION

Summary of issue:

The high level of warehousing and distribution on the existing Lomeshaye Industrial Estate suggests that an extension is likely to yield few new jobs.

Officer Response:

The Framework requires Pendle Council to meet its objectively assessed needs in full. Premises on the existing Lomeshaye Industrial Estate provide 147,063m² of floorspace. Of this total 144,464m² (98.2%) is currently occupied (February 2014). Of the 122 units, 33 (27%) are occupied by businesses engaged primarily in warehousing and distribution (B8 uses). Together they occupy 49,920m² (34.6%) of the floorspace that is currently occupied and employ a total of 653 people, or 16.3% of all employees.

If similar figures are achieved on the proposed extension, which has a net developable area of 15.97ha, it would accommodate a total of 1,256 jobs of which 702 would be industrial (B2, B1b and B1c), 278 warehousing and distribution (B8) and 276 office based (B1a).

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

9. GREENFIELD VS BROWNFIELD

Summary of issues:

No need to develop on Greenfield sites as sufficient Brownfield sites are available.

Time to take a stand against developers and promote development on Brownfield sites rather than Greenfield sites.

Officer Response:

The Pendle Employment Land Review (Stage 1) demonstrates that there are insufficient Brownfield sites or vacant premises currently available to meet the borough's employment land requirement as set out in Policy WRK2.

Policy SDP2 seeks to promote development on previously developed sites by directing new development towards the most appropriate settlement(s). To ensure the best use of land and other resources it then employs a sequential approach to site selection, which encourages the re-use of vacant buildings and previously developed (Brownfield) land in the first instance.

In the absence of a site or combination of sites within a defined settlement boundary, which is large enough to provide either the quantity, or the quality, of land necessary for a strategic employment site, the Council must identify what it considers to be the most sustainable site option.

Viability is also an issue. Brownfield sites are not as viable as Greenfield sites and a delicate balance needs to be struck in order to encourage economic growth rather stifle it.

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

10. PREMATURITY

Summary of issue:

Bringing the site forward through the Core Strategy is premature it should be fully evaluated alongside other sites through the site allocations process.

Officer Response:

The proposed extension to the Lomeshaye extension was fully evaluated, alongside other potential sites, in the Pendle Employment Land Review (Pendle Council, December 2013). In addition, further and more detailed assessment work has been carried out in-house, confirming the outcome of the ELR appraisal.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

The need to bring forward a strategic employment site is considered necessary to demonstrate early deliverability of the plan.

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

11. IMPACT ON WILDLIFE

Summary of issue:

- Development of the site for employment use will have an adverse impact on wildlife.
- What is the benefit of closing down well-run local farms, when the Council is promoting 'buy local' initiatives?
- Criterion c) is poorly worded and makes no reference to wider landscape or ecological considerations.

Officer Response:

Records indicate there are no habitats or species of special interest on the site.

A small area of mature woodland to the north of the existing estate (Pendleside) will be retained within the employment site.

Old Laund Clough, which forms the western boundary of the site, is an area of Ancient Semi-Natural Woodland. As required in the Natural England Standing Advice for Ancient Woodland (Para 7.5.1), a minimum buffer of at least 15 metres in width will be maintained between the ancient woodland and the development boundary.

An ecological scoping survey of the site will be undertaken to inspect the site and its surroundings. This will identify any features, habitats or species which may represent a constraint to development of the site.

Whilst Wheatley Laithe Farm may be well-run it occupies Grade 4 (Poor Quality) agricultural land.

TBD

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

12. UNSTABLE LAND

Summary of issue:

Land unsuitable for development due to adverse site conditions (stability).

Officer Response:

There is no evidence to indicate that the land is unstable.

The Environmental Review (RPS Health Safety & Environment, July 2005) indicates that the local geology is Boulder Clay and Lower Coal Measures, which comprise rhythmical sequences of sandstone, mudstone and shales with inter-layered beds of coal the first of which is 80m beneath the site.

Coal reserves in the locality exist, which could be worked at some time in the future subject to feasibility, licences and planning consents. The Coal Authority have no record of any notice of the risk of the land being affected by subsidence being given under S.46 of the Coal Mining Subsidence Act 1991, as amended by the Coal Industry Act 1994.

The site is located on a minor aquifer related to the underlying Lower Coal Measures, but is not within a Groundwater Source Protection Zone (SPZ).

The NRPB Radon Atlas of England and Wales indicates that radon issues are not considered to be significant at this site.

Proposed changes to the Core Strategy:

No change proposed in response to this comment.

13. CLIMATE CHANGE AND FLOODING

Summary of issue:

- Development of the site for employment will have a negative impact on climate change and flooding.
- Site is partly within Flood Zones 2 and 3 requiring a Level 2 Strategic Flood Risk Assessment (SFRA).
- Policy should acknowledge that 'unsuitable development' cannot take place in Flood Zones 2 or 3. [See Policy ENV7].

Officer Response:

Any potentially negative impacts are picked up in the accompanying Sustainability Appraisal (SA) Report and where possible suitable mitigation measures have been identified.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

Agree. A detailed Flood Risk Assessment (FRA) has been produced for the lower part of the site alongside Pendle Water, parts of which are within Flood Zones 2 and 3.

This matter is properly dealt with under Policy ENV7, which should be read in conjunction with this policy. However, a reference to the need to refer to Policy ENV7 is considered useful.

Proposed changes to the Core Strategy:

No changes proposed in response to these comments.

14. OTHER

Summary of issues:

- Consultation zone for Clee Hill meteorological radar extends over Pendle, requiring all structures over 45.7m high to DIO Safeguarding.
- The Sustainability Appraisal Report does not acknowledge the presence of Flood Zones 2 and 3, or address the need to reduce the risk of flooding under Objective P6.
- Development should only take place in accordance with a Masterplan / Development Brief / SPD that has been subject to public consultation. This document should include details of phasing.

Officer Response:

The request to inform the Ministry of Defence (MOD) of development over a height of 45.7m is considered to be too detailed for a strategic policy within a Core Strategy. It is felt that the matter would be better dealt with as part of the Development Management consultation procedure for a particular planning application. Adding a constraints layer to the Council's GIS mapping system, will trigger the need to consult the MOD about any relevant development proposals.

This representation relates to the accompanying Sustainability Appraisal (SA) Report, rather than Policy WRK3.

The Draft Flood Risk Assessment (FRA) for the proposed strategic employment site at Lomeshaye was prepared by Michael Lambert Associates. This failed to acknowledge (Section 7.0) that parts of the site adjacent to Pendle Water are within Flood Zone 3. As such this is not reflected in the SA Report. It has since been determined that parts of the site alongside Pendle Water fall within Flood Zone 3.

KEY ISSUES & OFFICER RESPONSES

Pendle Core Strategy – Policy WRK 3 Strategic Employment Site: Lomeshaye

A Masterplan / Design Brief will be prepared and this will address phasing. Whilst this document will be informed through engagement with key stakeholders it will not be subject to wider public consultation, unless localised community consultation is considered to be appropriate

Proposed changes to the Core Strategy:

No change proposed to the Core Strategy in response to this comment. Liaise with the Development Management team and the MOD to establish an additional constraints layer in the Council's GIS mapping system.

Reconsider the evaluation of Policy WRK3, in particular Objective P6, in the SA Report. Identify any mitigation measures that may be necessary to reduce the risk of flooding.

No change proposed to the Core Strategy in response to this comment.

Appendix 4

Schedule of proposed changes – Core Strategy (Further Options Report)

Core Strategy - Summary of Officer Recommendations / Changes

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
327467	166	Pendle Core Strategy Further Options Report	Any proposed changes to the Core Strategy are highlighted in the responses to the Policies LIV2 (Comment 167) and Policy WRK3 (Appendix 3).
618699	173	About the Core Strategy	Policy specific issues are dealt with under the appropriate heading.
817990	179	About the Core Strategy	See Appendix 2 of the Core Strategy (Further Options Report) Consultation Statement which addresses the representations made by the Lidgett and Beyond Group.
715388	298	About the Core Strategy	When reviewing the Sustainability Appraisal (SA) Report, re-consider the appraisal of Objectives E1, E2, E3, P2 and P4 in respect of Policy LIV2. Any amendments to be reflected in the SA Report accompanying the Core Strategy (Publication Report).
713082	39	Our Spatial Issues: Pendle Today	Remove the reference in paragraph 3.125 to Earby being a village.
378754	113	Our Spatial Issues: Pendle Today	Amend the Core Strategy as shown below: Paragraphs 3.39-3.41 - replace with the following text: "The health of children and young people in Pendle is generally worse when compared to the nation as a whole. The proportion of children who are physically active is the eighth worst in England. Childhood obesity in reception classes and Year 6 are correspondingly high. Immunisation rates for children are significantly below county, regional and national comparators and successive surveys have shown that the rate of tooth decay in children has tended to be well above the national average." "Figures for life expectancy at birth for males (78) and females (82) are both below the national average [ONS, October 2013]. Within Pendle there are also wide disparities by location with men in the least deprived areas living on average 12.4 years longer than those in the most deprived areas. The comparative figure for females is 9.7 years." "Over the last 10 years, all-cause mortality rates have fallen. The early death rate from heart disease and stroke has fallen, but remains above the national average. There has been a 21% reduction in the mortality rate from cancer since 1993-95, which is once again higher than the comparable figure for England, but significantly below that for the North West." Paragraph 3.127 - Remove references to commuter inflows and outflows. Paragraph 3.88: Amend paragraph 3.88 to read: "Significant progress is already being made with more than seven out of ten residents satisfied with Pendle as a place to live in 2011. This represents a 15% increase compared to when the same question was asked in 2007, but is still below comparable scores for Lancashire (79%) and England (80%). Satisfaction levels vary from as low as 46% in Brierfield and Reedley to 82% in Barrowford and the Western parishes."
755915	145	Our Strategic Objectives: What We Need to Do	Remove the word 'sufficient' after 'Deliver' and add 'for current and future residents' after 'affordable' from Strategic Objective 5.
327370	161	Our Strategic Objectives: What We Need to Do	Amend Strategic Objective 10 to read: "Ensure that new development respects our natural and man-made heritage, by seeking to protect, maintain and enhance those sites and habitats (including their wider settings) which are valued for the positive contribution they make to the character of our landscape, townscape or biodiversity."
328012	227	The Key Diagram	Add the following explanatory text to the Key Diagram: "The Transport Corridor shows the principal direction of travel of people and goods in to, out of, and through the borough. It provides an indication of the direction of the routes that transport services should take."
327623	231	The Key Diagram	Add the following explanatory text to the Key Diagram: "The Transport Corridor shows the principal direction of travel of people and goods in to, out of, and through the borough. It provides an indication of the direction of the routes that transport services should take."
378959	243	The Key Diagram	Add the following explanatory text to the Key Diagram: "The Transport Corridor shows the principal direction of travel of people and goods in to, out of, and through the borough. It provides an indication of the direction of the routes that transport services should take."
713082	38	Policy SDP2: The Role and Function of Our Towns and Villages	Clarify the status of Earby as a town in the Spatial Portrait and at any other point in the document where it occurs.

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
714054	48	Policy SDP2: The Role and Function of Our Towns and Villages	Amend Policy SDP2 as follows: (Delete footnote 98 and part of 99 and insert the following wording into the policy after "Proposals for new development should be located within a settlement boundary as defined on the Proposals Map."): "These boundaries may be amended as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies where there is a need to identify additional sites to meet development needs." Replace the wording under the heading "Site Selection" with: "In order to encourage the effective use of land and other resources, the selection of sites for new development (including the allocation of sites in the Pendle Local Plan Part 2) should prioritise (in order) the use of the following types of land, provided they are not of high environmental value: Vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies."
817583	82	Policy SDP2: The Role and Function of Our Towns and Villages	Amend the first sentence of Policy SDP2 to read: "Proposals for development will be supported in the settlements listed below, provided that they are of a nature and scale that is proportionate to the role and function of that settlement or where they have been specifically identified in this plan to help meet the strategic growth needs of the borough."
378754	114	Policy SDP2: The Role and Function of Our Towns and Villages	Add the Lancashire Enterprise Partnership into the list of delivery agencies in the monitoring and delivery table in Policy SDP2.
755915	146	Policy SDP2: The Role and Function of Our Towns and Villages	Amend Policy SDP2 as follows: (Delete footnote 98 and part of 99 and insert the following wording into the policy after "Proposals for new development should be located within a settlement boundary as defined on the Proposals Map."): "These boundaries may be amended as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies where there is a need to identify additional sites to meet development needs." Replace the wording under the heading "Site Selection" with: "In order to encourage the effective use of land and other resources, the selection of sites for new development (including the allocation of sites in the Pendle Local Plan Part 2) should prioritise (in order) the use of the following types of land, provided they are not of high environmental value: Vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies." Make reference to the National Planning Practice Guidance (NPPG) in the justification text relating to the measures which can be taken to improve the viability of Brownfield sites.
818047	201	Policy SDP2: The Role and Function of Our Towns and Villages	Amend the justification text of Policy SDP2 as follows: 1) Move paragraph 7.24 from the Strategy to the Context section and combine it with paragraph 7.18. 2) Add the following wording to the beginning of paragraph 7.26: "The settlement hierarchy provides the basis for the growth strategy in Pendle." 3) Combine paragraph 7.26 with paragraph 7.27 and add the following wording to the end: "The role each settlement category will play in the future growth of the borough is explained below: 1. Key Service Centres - these will provide the focus for future growth in the borough and accommodate the majority of new development. 2. Local Service Centres – these will play a supporting role to the Key Service Centres and accommodate levels of new development to serve a localised catchment. 3. Rural Service Centres – these settlements will provide the focus for growth in Rural Pendle. 4. Rural Villages – these settlements will accommodate development primarily to meet local needs." Amend Policy SDP2 as follows: Replace the list of settlements with four tables, one for each settlement category and include the relevant settlements under each category, differentiating between the three spatial areas. (Delete footnote 98 and part of 99 and insert the following wording into the policy after "Proposals for new development should be located within a settlement boundary as defined on the Proposals Map."): "These boundaries may be amended as part of the preparation of the Pendle Local Plan Part 2: Site Allocations and Development Policies where there is a need to identify additional sites to meet development needs." Replace the wording under the heading "Site Selection" with: "In order to encourage the effective use of land and other resources, the selection of sites for new development (including the allocation of sites in the Pendle Local Plan Part 2) should prioritise (in order) the use of the following types of land, provided they are not of high environmental value: Vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies."

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
328012	228	Policy SDP2: The Role and Function of Our Towns and Villages	Make reference in the context section of Policy SDP2 to paragraphs 17 and 111 of the NPPF explaining that the reuse of previously developed land is encouraged. Make reference in the context section of Policy SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.
327623	232	Policy SDP2: The Role and Function of Our Towns and Villages	Make reference in the context section of Policy SDP2 to paragraphs 17 and 111 of the NPPF explaining that the reuse of previously developed land is encouraged. Make reference in the context section of Policy SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.
378959	244	Policy SDP2: The Role and Function of Our Towns and Villages	Make reference in the context section of Policy SDP2 to paragraphs 17 and 111 of the NPPF explaining that the reuse of previously developed land is encouraged. Make reference in the context section of Policy SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.
327580	267	Policy SDP2: The Role and Function of Our Towns and Villages	Reword Policy SDP3 to read: " In order to achieve sustainable housing growth over the plan period, the location of new housing, including the allocation of sites in the Pendle Local Plan Part 2: Site Allocations and Development Policies, should be guided by the percentages in Table SDP3a. Within each spatial area, the provision of housing should follow the settlement hierarchy set out in Policy SDP2. The housing requirement figures are set out in Policy LIV1 and should be read in conjunction with this policy." Amend Policy SDP2 to clarify the relationship between the settlement hierarchy and the three spatial areas.
327580	270	Policy SDP2: The Role and Function of Our Towns and Villages	Make reference in the context section of Policy SDP2 to the National Planning Practice Guidance in relation to measures which can be used to help improve the viability of brownfield sites.
715388	289	Policy SDP2: The Role and Function of Our Towns and Villages	Amend the wording of the first sentence of Policy SDP2 to read: "Proposals for development will be supported in the settlements listed below, provided that they are of a nature and scale that is proportionate to the role and function of that settlement or where they have been specifically identified in this plan to help meet the strategic growth needs of the borough. " Replace the wording under the heading "Site Selection" with: "In order to encourage the effective use of land and other resources, the selection of sites for new development (including the allocation of sites in the Pendle Local Plan Part 2) should prioritise (in order) the use of the following types of land, provided they are not of high environmental value: Vacant buildings and previously developed land within a defined settlement boundary Other land within a defined settlement boundary Land outside of a defined settlement boundary for appropriate rural uses(fn) (fn - Appropriate rural uses are defined in The Framework and other policies in the Core Strategy, with further details to be provided in the Pendle Local Plan Part 2: Site Allocations and Development Policies."
713082	40	Policy SDP3: Housing Distribution	Reword the policy to clarify the flexibility of the housing distribution: "In order to achieve sustainable housing growth over the plan period, the location of new housing, including the allocation of sites in the Pendle Local Plan Part 2: Site Allocations and Development Policies, should be guided by the percentages in Table SDP3a. Within each spatial area, the provision of housing should follow the settlement hierarchy set out in Policy SDP2. The housing requirement figures are set out in Policy LIV1 and should be read in conjunction with this policy."
714054	49	Policy SDP3: Housing Distribution	Change the reference to Policy SDP1 to Policy SDP2. Reword the policy to read: "In order to achieve sustainable housing growth over the plan period, the location of new housing, including the allocation of sites in the Pendle Local Plan Part 2: Site Allocations and Development Policies, should be guided by the percentages in Table SDP3a. Within each spatial area, the provision of housing should follow the settlement hierarchy set out in Policy SDP2. The housing requirement figures are set out in Policy LIV1 and should be read in conjunction with this policy."
713082	41	Policy SDP4: Employment Distribution	To help improve flexibility and make the wording of the policy more compatible with its 'sister policy' SDP3; two changes are proposed. (1) Reword the first two paragraphs of the policy to be consistent with Policy SDP3. (2) Amend the table within the policy by removing the second and third columns.
327713	125	Policy SDP6: Future Infrastructure Requirements	No change to the Core Strategy is required, but it is recommended that a reference to the potential need for a new delivery office is included in the accompanying Pendle Infrastructure Strategy. Should sound evidence for such a requirement become available, an allocation will be made within Local Plan (Part 2): Site Allocations and Development Policies document.
818047	203	Policy SDP6: Future Infrastructure Requirements	Include a footnote linked to paragraph 7.66 stating that: " S106 contributions towards the provision of off-site infrastructure and services will only be required where they meet the tests set-out in paragraph 204 of the National Planning Policy Framework."

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
327773	6	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Add an additional sentence at the end of the Historic environment and built heritage section of Policy ENV1 to read: "Where harm to or loss of significance of a heritage asset is permitted (in line with the criteria in The Framework paragraphs 132-135), the developer will be required to undertake appropriate investigation and recording and make the results of that work publicly available through the Historic Environment Record."
816751	27	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Add the following text to the end of the first sentence of Policy ENV1: " ..., aged and veteran trees"
807418	70	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Add the following text to the end of paragraph 4 in the policy: "This may also require the identification of buffer zones to protect the integrity of the borough's ecological network."
814953	86	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Amend chapter 8 and ENV1 to include reference to Local Green Space and its potential for designation.
378754	115	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Amend wording of the final paragraphs of the Historic environment and built heritage section of Policy ENV1 to read: " New development proposals should have regard to the National Heritage List for England, the Historic Environment Record and where appropriate the Lancashire Historic Landscape Assessment and Lancashire Extensive Urban Survey, to assess the impact of the development and to show how the proposal fits within the landscape and townscape character. Policy ENV2 provides further guidance on the connections between design and heritage. Proposals that are likely to affect a heritage asset and/or its setting (including archaeological assets) should be accompanied by a heritage statement and/or an archaeological assessment."
327620	135	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Amend ENV1 second paragraph on page 71 to read: "In circumstances where a development proposal would result in the loss of open space or sports and recreational buildings and land, the applicant must comply with the criteria and requirements of paragraph 74 of The Framework. A financial contribution may be acceptable where a specific replacement site has been identified and the contribution provides the full cost of implementing the works required. "
327387	188	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Amend chapter 8 and ENV1 to include reference to Local Green Space and its potential for designation.
818047	204	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Amend the justification text at paragraphs 8.26 and 8.44 and the tenth paragraph of the policy text relating to the circumstances where green belt boundary amendments are acceptable and where development in the green belt is acceptable. The policy text should read: "The general extent of the Lancashire Green Belt in Pendle will be maintained. A review of the Green Belt boundaries in Pendle will be carried out as part of the preparation of the Local Plan Part 2 to establish whether exceptional circumstances exist, which would allow alterations to the boundaries to be made. Inappropriate development in the Green Belt will not be permitted. Only in very special circumstances, where any harm is clearly outweighed by other considerations, should development be allowed in the Green Belt. The Framework sets out those exceptions where development is not considered to be inappropriate." Amend footnote 110 relating to the types of open space to which the policy applies so it reads as follows: "This policy applies to the following types of open space as set out in the Open Space Audit or its replacement: Parks, Woodland, Natural Greenspaces, Green Corridors, Outdoor Sports, Amenity Greenspaces, Play Areas, Equipped Areas for Play, Allotments, Cemeteries, Civic Spaces. Policy SUP2 Health and Well-Being covers aspects relating to built sports and recreation facilities." Amend the twelfth paragraph of the policy text relating to the loss of open space so that it reads as follows: "In circumstances where a development proposal would result in the loss of open space or sports and recreational buildings and land, the applicant must comply with the criteria and requirements of paragraph 74 of The Framework. A financial contribution may be acceptable where a specific replacement site has been identified and the contribution provides the full cost of implementing the works required. "

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
327623	242	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Amend 8.45 and ENV1 to include enhancement more specifically. Amend ENV1 paragraph 1 to make it clear that partners do not assist with making TPO. Amend Policy ENV1 to explain that the Council will work with local communities to designate Local Green Spaces. Amend Key linkages on page 72 to substitute UK Biodiversity Action Plan with UK Post-2010 Biodiversity Framework.
378959	254	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	Amend 8.45 and ENV1 to include enhancement more specifically. Amend ENV1 paragraph 1 to make it clear that partners do not assist with making TPO. Amend Policy ENV1 to explain that the Council will work with local communities to designate Local Green Spaces. Amend Key linkages on page 72 to substitute UK Biodiversity Action Plan with UK Post-2010 Biodiversity Framework.
818431	322	Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments	See changes proposed to Policies ENV1 and LIV2 in response to comment 183 made against Policy LIV2.
327935	158	Policy ENV2: Achieving Quality in Design and Conservation	Amend the second paragraph under the heading 'Allowable Solutions' in Policy ENV2 to include the following wording: "The Council will provide a list of suggested allowable solution projects which applicants could use and will update this list in the AMR."
715388	291	Policy ENV2: Achieving Quality in Design and Conservation	Amend the policy wording under the heading 'On-site low-carbon heat and power' to read: " New development should incorporate on-site low or zero carbon heat and power technologies in the following order of preference: a. The installation of, or connection to, an on-site decentralised energy network. The council will encourage new development to connect to an existing decentralised energy network where one exists on-site and capacity is sufficient or can be viably increased. Where no on-site network exists the preference will be for their creation, where technically feasible and commercially viable. The development of decentralised energy networks, which utilise renewable or low carbon technologies will be encouraged. b. The on-site installation of renewable technologies Where the scale or density of the proposed development is not sufficient to support the creation of a decentralised energy network, or connection to one does not make the development carbon compliant, it will be necessary - where technically feasible and commercially viable - to install RLC energy generation equipment on-site. This element of the proposal will also be assessed against Policy ENV3."
379105	2	Policy ENV4: Promoting Sustainable Travel	Include the following additional wording in the context section of the policy: "Along with the proposal for the bypass the Masterplan also identifies some potential short-term measures which could help to manage the flow of traffic through the North Valley Corridor."
817517	34	Policy ENV4: Promoting Sustainable Travel	Include the following additional wording in the context section of the policy: "Along with the proposal for the bypass the Masterplan also identifies some potential short-term measures which could help to manage the flow of traffic through the North Valley Corridor."
712277	62	Policy ENV4: Promoting Sustainable Travel	Include the following wording into the strategy section of the policy at paragraph 8.134: "It should be acknowledged that certain types of employment require people to work shift patterns which cannot always be accommodated, in terms of the availability of public transport provision."
378754	119	Policy ENV4: Promoting Sustainable Travel	Include the following wording in the justification text of Policy ENV4: "The provision of the bypass is likely to offer more relevant economic benefits , given the existing businesses based in the area." Reword the second sentence of the first paragraph of Policy ENV4 to read: "In addition, the Council will lobby for, and support the following strategic transport schemes:".
818047	206	Policy ENV4: Promoting Sustainable Travel	Reword the fourth paragraph of Policy ENV4 to read: "Proposals for new development should have regard to the potential impacts they may cause to the highways network, particularly in terms of safety and the potential to restrict free flowing traffic causing congestion. Where an adverse impact is identified, applicants should ensure adequate cost effective mitigation measures can be put in place. Where the residual cumulative impacts of the development are severe planning permission should be refused."
818047	207	Policies ENV5 & ENV6: Pollution, Unstable Land and Waste Management	Air Quality - Amend the start of the first bullet point to read: "minimise pollutant emissions and ..." Waste Management - No changes to the Core Strategy are considered necessary to address the main thrust of this objection (viability testing). However, it is felt that the policy could be improved further by making the following changes: (1) Including a detailed reference to the EU Waste Framework Directive and the waste hierarchy within the reasoned justification. (2) Amend the sentence introducing the final two bullet points in the policy to read "All new developments will be encouraged to follow the waste hierarchy. In particular the Council will:"
816751	28	Policy ENV7: Water Management	Amend paragraph 8.189 to include native woodland creation as one of the possible approaches to SuDS which will then inform policy ENV7.

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
807418	72	Policy ENV7: Water Management	<p>OFFICER RECOMMENDATION 1: Replace the introduction with the following text: "Water is a sensitive and often scarce resource that needs to be carefully managed. It is vital for all living plants and animals. For human beings it is not only essential to life, but also of importance to industry and agriculture; as a means of transport and for recreation. In the UK, flood risk is of particular concern, the primary issues being: 1. Climate change, resulting in increased severity and intensity of rainfall, and 2. New development, which may itself be at risk of flooding, and may increase the risk of flooding downstream. The potential impacts of climate change over the next 30-80 years have been assessed by the United Kingdom Climate Impacts Programme (UKCIP, 2002). In the context of flood risk the key outcomes of Climate Change are: the UK climate will become warmer; winters will become wetter and summers may become drier everywhere; heavy winter rain and snow will become more frequent; relative sea level will continue to rise around most of the UK shoreline; and extreme sea levels will be experienced more frequently. Climate change is therefore likely to significantly increase the risk of flooding over time. The most common causes of flooding in Pendle are listed below: Fluvial Flooding This occurs in the floodplains of rivers [Footnote: The term is used here to refer to both Main Rivers and Ordinary Watercourses] when the capacity a watercourse is exceeded as a result of rainfall, snow or ice melts within the upstream catchment, or blockages cause river defences to be overtopped. Groundwater Flooding Low lying areas sitting over aquifers may periodically flood as ground water levels rise. This type of flooding is often seasonal, slow in its onset and can be forecast with reasonable accuracy.</p> <p>Surface Water Flooding Surface water (pluvial) flooding often occurs outside of recognised floodplains. It is caused by rainwater run-off from urban and rural land with low levels of absorbency. High density urban development has increased the proportion of non-permeable surfaces, a problem that is often exacerbated by an overloaded and out-dated drainage infrastructure. These circumstances, combined with intense localised rainfall that is difficult to forecast, can give rise to severe localised flooding where the onset can be very rapid. Highways Flooding Water which runs off roads can influence the occurrence of local flooding and potentially impact on the quality of receiving surface waters or groundwater. Flooding from Sewers Flooding from sewers most often occurs where combined storm and foul sewers receive large amounts of surface water run-off over a short period of time and capacity is temporarily exceeded. This type of flooding is hard to predict, has significant sanitary consequences for those affected, and can occur very rapidly. Flooding from Other Man Made Infrastructure The failure of canals, reservoirs, other manmade structures, certain industrial activities, water mains or pumping stations may all give rise to the flooding of areas downstream. New development will be directed towards those areas with the lowest probability of flooding and required to minimise surface water runoff, in order to avoid the potential for increasing flood risk and introducing contaminants into the water supply.</p>
807418	72	Policy ENV7: Water Management	OFFICER RECOMMENDATION 2: That Footnote 120 is replaced by a table within the reasoned justification under the sub-heading 'Development and Flood Risk'.
807418	72	Policy ENV7: Water Management	OFFICER RECOMMENDATION 3: Insert the following text after paragraph 8.166: "In recognition of their role as the Lead Local Flood Authority (LLFA), Lancashire County Council adopted the Lancashire Local Flood Risk Management Strategy in April 2014. The County Council will also assume the role of the Sustainable Drainage System (SuDS) Advisory Body (SAB) from April 2015."
807418	72	Policy ENV7: Water Management	OFFICER RECOMMENDATION 4: That the following changes be made to the reasoned justification: Paragraph 8.165 - Amend the text to read: "EA produces a wide-range of products addressing flood risk. For land use planning the Flood Map indicates those areas considered to be at risk of flooding from rivers and the sea in England and Wales, and highlights those areas that benefit from flood defences. Other EA products show areas where a more detailed study of surface water flooding may be appropriate within a SFRA or Surface Water Management Plan (SWMP) and assist local authorities and reservoir operators in the production of emergency plans for reservoir flooding." Paragraph 8.185 - Delete the final sentence of this paragraph, as the information is out-of-date and would be better addressed under the section headed 'Context'.

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
807418	72	Policy ENV7: Water Management	OFFICER RECOMMENDATION 5: Under the heading 'Surface water run-off ' in the reasoned justification, add the following text after paragraph 8.175: "The Framework notes that "development should give "priority to the use of sustainable drainage systems" (Paragraph 103) and that "developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through ... the appropriate application of sustainable drainage systems" (Table 1, Technical Guidance). Sustainable Drainage Systems (SuDS) mimic natural drainage and reduce burden on the sewer system. Their use also offers benefits for biodiversity, water quality, and amenity. The SuDS Hierarchy (see table below) sets out the preferred method for selecting which SuDS should be used in particular circumstances. INSERT SuDS HIERARCHY TABLE Where possible surface water should be dealt with at source and not conveyed to a large attenuation structure. SuDS such as rainwater harvesting systems, waterbutts and permeable surfaces can be used to immediately deal with surface water runoff as it lands on a building, car park or road, helping to reduce flood risk and improve the quality of surface water runoff. Rainwater harvesting and waterbutts also encourage rainwater recycling, which reduces the use of potable water supplies. Elsewhere the use of soft SuDS such as ponds and swales are preferred, as they mimic natural drainage and provide a number of other benefits. They can be used to attenuate surface water flows, reduce the flow rate of surface water runoff, improve the quality of surface water runoff by removing hydrocarbons and pathogens and also promote and enhance biodiversity within a developed environment. In small developments where there is insufficient space for pond and swales, the preference is for the use of infiltration systems as these recharge natural ground water supplies, reduce the impact of excess flows to watercourses and surface water sewers and help to remove contaminants found in surface water. However, care should be taken when these are used in or near aquifer protection zones, or close to buildings or structural foundations. It is recommended that the Environment Agency is consulted prior to constructing infiltration systems and soakaways. Where space is at a premium, or simply not available, there is also merit in using storage tanks, oversized pipes and culverts This can be complemented by discharging to natural drainage system such as a reed bed or small pond to provide a final stage of treatment to the surface water runoff."
327423	281	Policy ENV7: Water Management	To reflect the fact that the investments mentioned are now complete, replace paragraph 8.180 with the following text: "United Utilities has invested £19 million to create a state-of-the-art water treatment facility at Ridgaling Farm north of Barrowford. This replaced the old facility at Barley, and provides over 40,000 people in Nelson, Colne and Barrowford with some of the cleanest drinking water in Europe. In addition, a further £11 million was spent between 2005 and 2010 to prevent sewer flooding and help deliver cleaner streams and rivers across the borough."
327423	284	Policy ENV7: Water Management	After further discussion with United Utilities, it was agreed that no change to the policy was required to address this comment.
618699	172	Living: Creating a Vibrant Housing Market	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text. The five year housing land supply calculation in the Strategic Housing Land Availability Assessment will be revised to reflect the National Planning Practice Guidance.
713082	42	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text.
714054	50	Policy LIV1: Housing Provision and Delivery	1) Insert the following wording into the context section of the justification text: "In accordance with the Duty to Co-operate, a SHMA has been prepared together with Burnley Borough Council to acknowledge that the two boroughs form a joint Housing Market Area (HMA). The SHMA examines the inter-relationships between the HMA and adjacent areas, and clearly indicates that the surrounding districts operate as separate, discrete housing markets." 7) Amend the justification text to explain that the five year supply calculation uses the Sedgfield method and deals with any under supply in the ensuing five year period.
817583	80	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text. Amend the justification text to explain that the five year supply calculation uses the Sedgfield method and deals with any under supply in the ensuing five year period.

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
755915	149	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text. Amend the policy as follows to clarify the circumstances where a financial viability assessment will be required: "To demonstrate the deliverability of their proposal applicants should provide a statement outlining details of the availability, suitability and achievability of the scheme. In line with Policy LIV4, this statement should also include a financial viability assessment, which will be used to help determine the amount of affordable housing to be provided."
618699	176	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text.
818033	198	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text.
818047	208	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text.
328012	230	Policy LIV1: Housing Provision and Delivery	Include the following additional text in Policy LIV1: "Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered." Reword the first sentence of the final paragraph of Policy LIV1 to read: "Proposals within or adjacent to a Housing Regeneration Priority Area must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken."
327623	234	Policy LIV1: Housing Provision and Delivery	Include the following additional text in Policy LIV1: "Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered." Reword the first sentence of the final paragraph of Policy LIV1 to read: "Proposals within or adjacent to a Housing Regeneration Priority Area must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken."
378959	246	Policy LIV1: Housing Provision and Delivery	Include the following additional text in Policy LIV1: "Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered." Reword the first sentence of the final paragraph of Policy LIV1 to read: "Proposals within or adjacent to a Housing Regeneration Priority Area must demonstrate that they will not jeopardise the success of any Council project that is planned or underway in that area, and should ideally show how they will complement the regeneration work being undertaken."
327580	263	Policy LIV1: Housing Provision and Delivery	Amend the spatial portrait so it is consistent with the evidence in the SHMA. Include the following additional text in Policy LIV1: "Where monitoring shows a significant deviation away from the housing trajectory or where evidence shows that there has been a significant change to the housing requirement, an early review of the plan will be considered."
715388	292	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing, ensure the objectively assessed housing needs are met, and to reflect the plan's economic aspirations, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,662 (net) dwellings, equating to an average of 298 dwellings per annum." Appropriate amendments will also be made to the justification text. To acknowledge the wider role the strategic site plays in the delivery of the housing requirement insert the following wording between "To ensure" and "early delivery": "significant and" To clarify the circumstances for requiring a financial viability assessment, amend the wording of the policy to read: "To demonstrate the deliverability of their proposal applicants should provide a statement outlining details of the availability, suitability and achievability of the scheme. In line with Policy LIV4, this statement should also include a financial viability assessment, which will be used to help determine the amount of affordable housing to be provided."

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
844180	331	Policy LIV1: Housing Provision and Delivery	In order to comply with the requirement in the NPPF to significantly boost the supply of housing and to ensure the objectively assessed housing need is met, the first sentence of Policy LIV1 should be revised as follows: "Over the 19 year period from 2011 to 2030 provision will be made to deliver 5,966 (net) dwellings, equating to 314 dwellings per annum." Appropriate amendments will also be made to the justification text.
674992	8	Policy LIV2: Strategic Housing Site	No proposed change to the Core Strategy in response to this request. Liaise with the Development Management team and the MOD to set up an additional constraints layer.
327658	24	Policy LIV2: Strategic Housing Site	Amend the justification text to make reference to the need for early engagement between infrastructure providers and the applicant to identify and resolve any infrastructure capacity issue which are likely to result from the proposed development of the site. Include a reference to Policy SDP6 in the policy text.
327467	167	Policy LIV2: Strategic Housing Site	Amend Policy LIV2 to make reference to the types, sizes and density of the new housing to be provided, and link this to Policy LIV5.
327387	183	Policy LIV2: Strategic Housing Site	Amend Policy ENV1 to include the natural environment criteria outlined in Policy WRK2. Include an additional bullet point in Policy LIV2 to make reference to the criteria outlined in Policy ENV1 relating to the impact on the natural environment.
327423	282	Policy LIV2: Strategic Housing Site	Amend the second paragraph of Policy SDP6 to include the wording 'early engagement'. Amend the justification text of Policy LIV2 to include a reference to the need to assess the capacity of the wastewater network. Amend the second bullet point of Policy LIV2 to include a reference to the requirements of Policy SDP6.
715388	293	Policy LIV2: Strategic Housing Site	Amend the justification text at paragraph 10.56 to state that an estimated 500 dwellings could be provided on the site over the plan period.
818438	324	Policy LIV2: Strategic Housing Site	Amend Policy LIV2 to include a requirement for high quality housing which meets the needs of the area. Include a reference to Policies ENV2 and LIV5.
714054	52	Policy LIV3: Housing Needs	Delete the following paragraphs: 10.63, 10.66, 10.72, 10.75, 10.79 and 10.83. Clarify the term 'rural communities' and where appropriate standardise the terminology for rural areas across the plan.
327387	184	Policy LIV3: Housing Needs	Amend Policy ENV1 to include the natural environment criteria outlined in Policy WRK2. Amend Policy LIV3 to make reference to the criteria outlined in Policy ENV1.
818047	210	Policy LIV3: Housing Needs	Amend the context section of Policy LIV5 to include additional details from the SHMA with regard to the need to rebalance the borough's housing stock and provide aspirational housing. Clarify the wording of Policy LIV5 in terms of aspirational housing.
755915	150	Policy LIV4: Affordable Housing	Amend the second paragraph of Policy LIV4 to read: "It is recognised that a fixed target is not flexible enough to respond to changing economic circumstances and site specific viability issues. Current viability information[1] shows that the Council can reasonably expect to seek levels of affordable housing within the target ranges set out in Table LIV4a. To ensure that the deliverability of new housing is not restricted by efforts to secure the maximum amount of affordable housing, these target ranges will be used as the basis for negotiation with the applicant, to help determine the appropriate amount of affordable housing to be provided. As part of the negotiation process, the Council will take account of the financial viability of the proposal[2], which may result in a requirement to provide more or less affordable housing than indicated by the target ranges. [1] Development Viability Study, 2013. [2] The applicant should demonstrate the financial viability of the scheme through the submission of a viability assessment." Amend Table LIV4a: For the rural areas change the ranges to: 15-49 dwellings = 20-30% 50-99 dwellings = 20-25% 100+ dwellings = 20-25%
327387	185	Policy LIV4: Affordable Housing	Amend the final sentence of the penultimate paragraph of Policy LIV4 to read: "In all circumstances applicants will need to provide details of the specific local needs the proposed development will address and show that any potential impact on the environment can be avoided or adequately mitigated. Proposals should also have regard to the requirements relating to protecting the natural and built environment set out in Policies ENV1 and ENV2."
715388	294	Policy LIV4: Affordable Housing	Insert the following heading after the third paragraph of Policy LIV4: "On-site / Off-site Provision" Reword the fourth and fifth paragraphs of Policy LIV4 to read: "Affordable housing should be provided in order of preference: 1) On-site and incorporated into the scheme so that it is 'tenure-blind'. OR 2) Where the applicant can adequately demonstrate that it is not possible to provide the affordable housing on-site, make arrangements to: i) provide the affordable housing on an alternative site within the same settlement as the proposed development; OR ii) provide a financial contribution towards the cost of off-site provision[1]."

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
714054	54	Policy LIV5: Designing Better Places to Live	Move the eighth paragraph of the policy to after the second paragraph and reword to read: "The overall borough-wide requirements for the design of new housing are set out below. These are supported by more tailored guidance for each spatial area to address local circumstances." Insert a new heading following this new third paragraph: "Borough-wide requirements" Amend the final two sentences of paragraph 10.160 to read: "In areas where there is good accessibility (insert footnote), developments should achieve a range of densities between 30 and 50 dph to make the most effective use of such sustainable locations." Footnote to read: "for the purpose of this policy good accessibility is defined as being within 400m of a high frequency bus route (a bus route with at least four services an hour), within 400m of a transport hub (e.g. a bus or train station or motorway junction), or within a town centre."
327620	137	Policy LIV5: Designing Better Places to Live	Amend Policy LIV5 by removing reference to the Open Space Audit. Include wording which explains that areas that are deficient in open space are to be identified in the Pendle Green Infrastructure Strategy. In addition, amend the justification text where appropriate.
755915	151	Policy LIV5: Designing Better Places to Live	Amend the wording of the second paragraph to read: "To achieve this, the Council will; require proposals to follow the design approach in Policy ENV2; support proposals that are of a high quality and innovative design; and strongly encourage the use of the Building for Life standards."
818047	212	Policy LIV5: Designing Better Places to Live	Amend the context section of Policy LIV5 to include additional details from the SHMA with regard to the need to rebalance the borough's housing stock and provide aspirational housing. Clarify the wording of Policy LIV5 in terms of aspirational housing.
714054	55	Policy WRK1: Strengthening the Local Economy	Insert a new second sentence into the third paragraph of Policy LIV5: "They should also seek to address the specific housing needs of different sections of the local community (Policy LIV3), together with wider economic and environmental policy objectives, which seek to promote more sustainable living patterns (Policies WRK1 and ENV4)."
378754	117	Policy WRK1: Strengthening the Local Economy	The following changes are proposed: Paragraph 11.22: Insert "Lancashire and" before "the Pennine Lancashire sub-region." Paragraph 11.24: From the second sentence onwards, replace the text with: "The aerospace industry supports a critical mass of businesses that are not only beacons of innovation and best practice, but are worldwide leaders in their field. The Rolls-Royce wide-chord fan blade manufacturing facilities in Barnoldswick represent the eastern of the 'Arc of Innovation', which extends west through Pennine Lancashire towards the Enterprise Zone sites at Samelsbury and Warton near Preston. Within this arc, a large cluster of businesses engaged in advanced precision engineering, electronics, high performance materials and composites have the potential to increase productivity and investment. Targeted supporting for these advanced manufacturing industries will provide a catalyst for significant growth in Gross Value Added (GVA) and make a major contribution to the restructuring of the Lancashire economy."
709983	160	Policy WRK1: Strengthening the Local Economy	See response to Comment ID 117 for the proposed re-wording of paragraph 11.24, which is intended to address this matter.
327500	21	Policy WRK2: Employment Land Supply	Add the following sentence to the end of the sixth paragraph in the policy: "Where an identified employment site is to be brought forward, which could potentially impact on the strategic road network, a detailed transport assessment may be required (Policy ENV4)."
674992	9	Policy WRK3: Strategic Employment Site	No change proposed to the Core Strategy in response to this comment. Liaise with the Development Management team and the MOD to establish an additional constraints layer in the Council's GIS mapping system.
712277	59	Policy WRK3: Strategic Employment Site	Add a sentence after paragraph 11.65 to read: "The strategic employment site will have a complimentary and sustainable relationship with other employment sites across the borough, ensuring that their valuable contribution to future growth, diversification and expansion is not compromised."
807418	74	Policy WRK3: Strategic Employment Site	Add a paragraph after 11.83 noting: "Parts of the site alongside Pendle Water lie within Flood Zones 2 and 3. This will place some restrictions on the types of development that can be accommodated on this area of the site (see Policy ENV7)." Reconsider the evaluation of Policy WRK3, in particular Objective P6, in the SA Report. Identify any mitigation measures that may be necessary to reduce the risk of flooding.
327370	163	Policy WRK3: Strategic Employment Site	Amend criterion to read: c) A high quality landscaping scheme is developed, incorporating and enhancing natural and environmental features, as appropriate, but particularly where they relate to wider landscape character or ecological considerations. N.B. Make a similar change to the same requirement in Policy LIV2.
327467	168	Policy WRK3: Strategic Employment Site	No changes proposed in response to the comment relating to non-employment uses. Also refer to Appendix 3, which addresses issues concerning the proposed allocation of a strategic employment site at Lomeshaye.

Person ID	Comment ID	Chapter / Policy	Officer Recommendation
784722	128	Policy WRK4: Retailing and Town Centres	Replace paragraph 11.116 with the following text: "The Framework requires local planning authorities to understand and take account of the health status and needs of the local population. There are acknowledged gaps in the existing evidence, linking retail activity and poor health. However, where such effects can be evidenced, detailed planning policies in Pendle Local Plan (Part 2): Site Allocations and Development Policies, or any neighbourhood development plans that may be produced, will seek to put in place measures to help improve the health and well-being of the local populace."
784722	129	Policy WRK4: Retailing and Town Centres	Changes are proposed to paragraph 11.116, which would remove specific reference to hot food takeaways (see Comment 131). The restriction on non-shopping uses within specified frontages addressed at paragraph 11.107 should remain unchanged.
784722	131	Policy WRK4: Retailing and Town Centres	Replace paragraph 11.116 with the following text: "The Framework requires local planning authorities to understand and take account of the health status and needs of the local population. There are acknowledged gaps in the existing evidence, linking retail activity and poor health. However, where such effects can be evidenced, detailed planning policies in Pendle Local Plan (Part 2): Site Allocations and Development Policies, or any neighbourhood development plans that may be produced, will seek to put in place measures to help improve the health and well-being of the local populace."
712277	63	Policy WRK6: Designing Better Places to Work	Replace the second paragraph in the policy with the following wording to better align with Policy LIV5: "To achieve this, the Council will require all development proposals to follow the design approach in Policy ENV2; support schemes that are of a high quality and innovative design; and strongly encourage developments to meet the highest possible level of the appropriate BREEAM standard."
327387	186	Policy WRK6: Designing Better Places to Work	Remove the natural environment criteria (6, 7 & 8) from Policy WRK2, and include them in Policy ENV1, to acknowledge that these requirements relate to both urban and rural areas. Include an additional bullet point in Policy WRK2 to make reference to the criteria outlined in Policy ENV1 relating to the impact on the natural environment.
327387	187	Policy WRK6: Designing Better Places to Work	Add the following text to the end of the third paragraph: "However, when existing buildings are to be re-used and extended, care needs to be taken to safeguard populations of any statutorily protected species that may be present, in particular nesting birds and bats (see Policy ENV1).
715388	297	Policy WRK6: Designing Better Places to Work	Replace the second paragraph in the policy with the following wording to better align with Policy LIV2: "To achieve this, the Council will require all development proposals to follow the design approach in Policy ENV2; support schemes that are of a high quality and innovative design; and strongly encourage developments to meet the highest possible level of the appropriate BREEAM standard."
378754	116	Policy SUP1: Community Facilities	Revise paragraph 12.6 by adding a third bullet point to read "ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable" Add a new paragraph after 12.6, to read: "The Localism Act 2011 introduced the requirement for local councils to maintain a list of community assets (Assets of Community Value). Nominations for inclusion can be made by parish councils, or by groups with a connection with the community, but not by individuals. Where an asset is placed on the list the community group is given an opportunity to bid for the asset should the owner decide to dispose of it (there is no compulsion to do so). [Footnote: The owner may appeal against the listing of an asset and can claim compensation if it can be demonstrated that its value has been reduced.] The community group will not have first refusal to buy the asset, merely an opportunity to bid.
327620	138	Policy SUP1: Community Facilities	To avoid confusion amend the first sentence in the policy under the heading 'Loss of Provision' to read: "With the exception of sports and recreational facilities, which are addressed under Policy ENV1, the Council will resist the loss of community facilities that require a change of use application unless:" Amend Footnote 164 to read: "Except where otherwise noted ...
755915	152	Policy SUP1: Community Facilities	Within the policy amend the first paragraph under the heading 'New provision' by removing the 's' from 'development'.
816751	29	Policy SUP2: Health and Well- being	Insert new paragraph after 12.30 to read: "Trees and woodland offer multiple benefits for health and well-being as they provide areas for exercise; help to remove pollutants from the air and offer shading and evaporative cooling." In paragraph 12.39 insert the following text after "quality open spaces" "(including trees and woodland)"
784722	130	Policy SUP2: Health and Well- being	No changes proposed to paragraphs 12.25, 12.26 or 12.31. Delete the final sentence of Paragraph 12.41. Insert the following text prior to paragraph 12.34: "Where evidence is available, the Council will seek to introduce planning policies that promote health and well-being."
327432	110	Appendix A: Infrastructure Delivery	Amend 'Action' to read: "With the exception of the two congestion hotspots (identified below), no concerns have been identified with regard to the existing capacity of the road network."

Appendix 5

Consultation comments, officer responses and recommendations – Evidence base documents

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details	Comment ID	Consultee comments	Officer Response and Recommendation
<div><div></div><div>Mr<div>Greenwood</div></div><div>618788</div><div>Mr<div>Richard</div>Clark</div><div>Arrowsmith Associates</div></div> <div>1</div> <div><div>Site Ref<div>S093</div>Site Name<div>Field No.s 6777, 7878 & 9379, Blacko</div></div><div>On that basis, Mr Greenwood wishes to comment on the assessment of his site in the SHLAA in advance of representations that will be made in relation to the site allocations and development policies DPD at the relevant time. The assessment of site SO93 in the SHLAA indicates that it is the most suitable site for a housing allocation identified at Blacko. This is an assessment that we agree with. Of the sites in and around Blacko which are identified in the SHLAA, SO93 is the most sustainable. This is demonstrated by the following: 1. It is situated on a regular bus route and within walking distance of a primary school, public open space and a public house. Many of the other identified sites are not. 2. The SHLAA indicates it as the site as the most easily developable of the identified sites which do not have planning permission. 3. SO93 is located adjacent to the village, whereas many of the others are in isolated locations. 4. It is the only site that the assessment considers to be developable in the short term that does not already have planning permission. Mr Greenwood therefore agrees with the conclusion made by the SHLAA that site SO93 is readily developable and indeed could be developed within the next five years. Our client will make representation at the appropriate time to the effect that site SO93 should be allocated for residential development.</div></div> <div><div>Support for the inclusion of site S093 in the SHLAA and five year housing land supply is noted.</div><div>No change proposed in response to this comment.</div></div>			
<div><div>479032</div><div>Mr<div>Steve</div>Worrall</div><div></div><div></div><div></div><div></div></div> <div>2</div> <div><div>Site Ref<div>S206</div>Site Name<div>Land between 30 and 78 Barnoldswick Road</div></div><div><div>This potential site is within the designated green belt being located outside the settlement boundary in an area of ecological interest without any services/amenities, having insufficient infrastructure requiring major road improvements in a semi rural village setting which already has a shortage of places at the local schools. As such, I recommend that this site is fully removed from the SHLA Assessment and no residential development is ever considered, even if for the longer term basis of 11-15 years.</div></div><div><div>The purpose of the SHLAA is to identify sites that have the potential to be developed for housing in the future. Government guidance is clear that the SHLAA is an important evidence base document in plan making but does not itself determine whether a site should be allocated for new housing. The assessment of this site in the SHLAA acknowledges the potential constraints to development, including its current designation as Green Belt land. The Local Plan Part 2: Site Allocations and Development Policies will need to carry out a Green Belt boundary review, if this site is to be brought forward for development. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances. Furthermore, the NPPG (Reference ID: 3-034-20140306) suggests that unmet need for housing is unlikely to out-weigh harm to the Green Belt. The site has been submitted for consideration by a willing landowner. The Local Plan Part 2 will need to assess which sites are best placed to meet the development needs of the borough as set out in the Core Strategy. Looking specifically at whether there are sites available in sustainable locations. The SHLAA identifies sites for over 8100 dwellings, however, not all of these will be appropriate for allocation.</div><div>No change proposed in response to this comment.</div></div></div>			

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details		Comment ID	Consultee comments		Officer Response and Recommendation	
814795		3	Site Ref	NS1	Higher Park Hill Farm, Barrowford. New site submission.	
	B&J		Site Name			
Begley						
814798		4	Site Ref			
Mr	Joe		Site Name			
Isle						
SDS Land Ltd						
		5	Site Ref			
			Site Name			

1. There was no call for sites.

2. The Higher Park Hill Farm site is unique in that the Green Belt boundary in this location now serves no purpose - the M65 is the natural barrier to the settlement boundary.

3. Around 10 years ago this site was put forward by Pendle Council as land allocated for industry, but was not selected at that time and would now be far more conducive to the supply of sustainable housing in an very accessible location.

4. The scheme is viable, deliverable and could be considered as a windfall for the 5 year supply.

5. Some of the existing sites in the SHLAA will just not be started due to viability.

The document should mention that it will consider carefully any other suitable sites which may come forward within or abutting the settlement boundary with a view to including these in the Site Allocation DPD options. The site would be highly sustainable with good transport links. It would

1. Provide 165 dwellings on a 5.5 ha net area

2. Give an opportunity to provide local people with affordable housing close to the town centre

3. Link a comprehensive cycle network south of the M65 into the heart of Barrowford

4. Potential Access for Parking to be used by Cemetery/ Park/Town Centre/ Heritage Centre

There have been a number of 'calls for sites' for both the preparation of the SHLAA and the Local Plan Part 2: Site Allocations and Development Policies over the last six years. In addition the Council has accepted informal site submissions outside of the specific consultation periods.

It is not the purpose of the SHLAA to pre-empt/carry out a review of the Green Belt. However, sites within the Green Belt may fulfil the other criteria used in the SHLAA assessment process. The National Planning Practice Guidance (NPPG) states that 'sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness, but these constraints must be clearly set out'.

Sites included in the SHLAA which are currently designated as Green Belt have been identified in the longer term category in recognition that a Green Belt review will be necessary before the allocation / development of the site can be considered.

The NPPG (Reference ID: 3-034-20140306) suggests that unmet need for housing is unlikely to out-weigh harm to the Green Belt.

The Introduction section of the SHLAA will be amended to explain that the SHLAA does not allocate sites. It will also explain that it is the evidence base document which will help to identify site options for the preparation of the Local Plan Part 2: Site Allocations and Development Policies.

The suggested site will be assessed against the SHLAA criteria and consideration will be given as to whether it should be included in the SHLAA.

Amend the Introduction section of the SHLAA in explain its relationship with the Local Plan Part 2 in terms of site allocations.

Assess the suggested site against the SHLAA criteria and determine if it should be included in the SHLAA.

Support for the inclusion of two sites at Laneshawbridge in the SHLAA and five year housing land supply is noted.

With regards to the housing land supply calculation paragraph 4.37 clearly states that the approach used is the Sedgefield method.

No change proposed in response to this comment.

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details		Comment ID	Consultee comments		Officer Response and Recommendation
731436		5	Site Ref	S224	Based on the additional information provided by the owner the site will be rescored and the timescales for bringing the site forward will be reassessed. It is considered that the site could be included in the five year housing land supply. 2) On the basis of the additional information some of the scores will be revisited. A) Criteria S7: suitable infrastructure - although infrastructure and services are available adjacent to the site connections into the site will still need to be made - the score will be revised to 3. b) Criteria A1: access - it is acknowledged that there is an available access into the site without a ransom strip -the score will be revised to 5. c) Criteria A2: existing vehicular access - the proposal to move the access indicates that there are minor issues to be resolve and the score will be revised to 3. d) Criteria A3: visibility splays - although visibility splays may be able to be provided there may be changes to the highways required including some minor works therefore the score will remain at 3.
Mr & Mrs	Hall		Site Name	Hollin Hall Farm, Blacko	
<p>I would like to raise a couple of clarification points concerning the site that I put forward REF S224:</p> <p>1. I can confirm as set out in the attached questionnaire that I would be looking to develop the site subject to all consents in years 1-5.</p> <p>a. Appendix 3 of the Pendle SHLAA Review has placed the site in Additional Years 6-15. I believe the reason being access issues as stated in Appendix 5 Site plans and profomas Y6-15 Blacko. I can confirm there are no access issues and as further demonstrated in the attached, the proposed site can move more than adequately comply with Lancashire County Council Road Design Guide (see attachment SS24-Access)</p> <p>2. In respect to Pendle SHLAA Review 2013 Appendix 4:</p> <p>a. Sustainable Infrastructure (S7) the site has scored a 1, however all utilities run directly in front of Hollin Hall Farm within the pavement, surface water would be drained into the stream to the rear of Hollin Hall Farm as a sustainable means of disposal, foul water drains run both through the site and within Gisburn Road which the proposed development would connect to.</p> <p>b. Access (A1) - Access is straight off the main road no ransom strips all land albeit pavement is within my ownership;</p> <p>c. Existing Vehicular Access (A2) - there is existing access to the site however I propose to move this to create visibility splays; and</p> <p>d. Visibility Splays (A3) - I can confirm visibility splays can be incorporated to meet Lancashire County Councils Road Design Guide.</p>					
The site should be reassessed in line with the officer response and revised scoring and timescales should be recorded.					

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID		Consultee comments		Officer Response and Recommendation	
327994			6		Site Ref S021 Site Name Roughts Farm , Salterforth, Nr. Barnoldswick			
Mr Robert Whiteoak								

I have previously commented that this small site is redundant land which is virtually surrounded (75%) by residential properties. It has been categorised as being outside the village boundary. But it sits almost in the middle of the village with it's two private entrances within 100 metres of the village cross roads.

It is an obvious choice for an attractive small development which will enhance the appearance of the village. So why should it be neglected by being wrongly classified as being outside the village limits ? I request further consideration.

In addition, I would like to contest some of the scoring on the above site.

- SO. Settlement boundary. This site is surrounded by other residential property. It is wrongly classified. Suggested score 5
- S6. Main development location, although it is a village, it is within easy reach of many local towns by being on the transport main routes. Suggested Score 4
- S7 Suitable infrastructure. It is located adjacent to all main utility connections. Suggest score 3
- S10. Topography. This site is nearly level. Some gentle slope is advantageous. Suggest score 4
- S13a. Bus stop frequency. This is the main supply route from Barnoldswick to Colne, Earby and Skipton. Buses are very frequent. Suggest score 3
- S29. Adverse impact on LB. There are no Listed Buildings in the vicinity. Suggest score 5
- S33. Ecology. There is no adverse impact on the ecology. The field is redundant. Score 4
- S34. Natural Conservation. There is very little natural conservation required here. Score 4
- S35. Adverse impact on SA. The surroundings are mainly houses, many of which will not be affected by the view. Suggest score 4
- S40. Mineral. There has never been any suggestions of mineral deposition here. Suggest score 4
- A2. Vehicular access is very good. And parking can be provided . Suggest score 4
- A3. Visibility onto the site is good in both directions. Suggest score 4
- A4. This site is not in use. It is redundant land . Suggest score 5

There has been very little housing development in Salterforth for many years and very few come onto the market. There is brisk demand for properties here, but people cannot secure property due to the availability and price.

I have submitted similar comments previously to support the future development of this redundant site. It will help to improve the overall appearance and attractiveness of this lovely village.

Please review the assessment and scoring on this site as I believe that it is more favourable than comparable sites.

1) The SHLAA is not the mechanism for reviewing the settlement boundary. A review of the boundary will be carried out during the preparation of the Local Plan Part 2: Site Allocations and Development Policies. The site is currently adjacent to the settlement boundary and scores 3 points against the SHLAA criteria - No change.

2) Criterion S6 (Main development location) - The site is located in Salterforth which is classified as a rural village. In line with the SHLAA criteria the site scores 2 points - No change.

3) Criterion S7 (Suitable infrastructure) - it is acknowledged that suitable infrastructure could be provided on site with some minor improvements. Increase the score to 3 points.

4) Criterion S10 (Topography) - this is split into three categories: Flat (5 points), Gentle slope (3 points), Steep slope (1 point). A reassessment of the topography of the site indicates that a score of 5 points would be more appropriate.

5) Criterion S13a (Public transport corridors / bus frequency) - this is split into two categories: Site within 400m of a bus stop with a 15 minute bus frequency or within a high frequency bus corridor (5 points) and Site over 400m of a bus stop with a 15 minute bus frequency or outside a high frequency bus corridor (1 point). This site is within 400m of a bus stop which has a number of available services equating to a 15 minute frequency. The score will be increased to 5 points.

6) Criterion S29 - there are two listed buildings and a listed structure all within 100m of the site. No change to the score.

7) Criterion S33 - a small part of the site is covered by the ecology standing advice consultation zone indicating that the site may be of high ecological interest and this could be adversely affected by development. Further investigation of the site is required. The score of 3 points should remain unchanged.

8) Criterion S34 - there are nature conservation issues at adjacent sites and in line with the criteria the site scores 3 points - No change.

9) Criterion S35 (impact on surrounding uses) - this criterion is divided in to three categories: No (5 points), Partial (3 points), Yes (1 point). There is some potential for the development of this site to affect the amenity of the existing residential area. The site therefore scores 3 points in line with the criterion - No change.

10) Criterion S40 (Mineral safeguarding) - this site is within a mineral safeguarding area as designated by Lancashire County Council. In line with the criterion the site scores 1 point - No change.

11) Criterion A2 (Vehicular access) - this criterion is split into three categories: Good (5 points), Moderate/Minor issues (3 points), Poor (1 point). Improvements will still be needed to gain full access to the site. Score should remain at 3 points.

12) Criterion A3 (Visibility splays) - this criterion is split in to three categories: Adequate (5 points), Minor improvements (3 points), Major improvements (1 point). Some improvements will still be required the score will remain at 3 points.

13) Criterion A4 (use of the site) - it is acknowledged that the site is not in use and therefore the score will be increased to 5 points.

House building across the borough has been low due to the recession. Planning permission has been granted for housing at the Silentnight site in Salterforth, although work has yet to be started. The development of the Silentnight site will bring new housing to the village.

Amend the SHLAA in accordance with the officer response.

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID	Consultee comments	Officer Response and Recommendation
<div>327994</div> <div><div>Mr</div><div>Robert</div><div>Whiteoak</div></div> <div></div> <div></div> <div><div></div><div></div><div></div></div> <div></div>			7	<div>Site Ref<div>S020</div></div> <div>Site Name<div>Land at Stoney Bank Road, Earby</div></div> <div>This site is available for development immediately. A clause is written into the tenancy agreement for the tenant to release the land immediately when required for development. In addition, I would like to contest some of the scoring on the above site. S7 Infrastructure – The Stoney Bank road is adjacent to the site and utility services are also easily accessible to the site. Suggest score 3 S12 Flooding. This field is high up from the rivers/streams. It is gently sloping. There has never been a flood problem. The lower small area near the steam will never be considered for building anyway. Suggest score 4 S17 Doctors Surgery. This is just 500 metres away. Suggest score 4 S23 The string of small corner shops are just at the bottom of the road approx. 300 metres away. Suggest score 4 S24 Post Office. This is approx.. 600 metres away. Suggest score 3 S25 Open Space . This field is totally open for housing /recreation . Suggest score 5 S28 Adverse impact on Conservation area. This is an open field with no particular trees, hedges, ponds or buildings etc to conserve. I have commented on this topic previously. Suggest score 4 S31 Adverse impact on Archaeological remains. There has never been any investigations of remains on this site. It is highly unlikely that this site would have been chosen for a settlement through history. Suggest score 5 S40 Mineral contamination. There has never been any mineral extraction or deposition on this site ever in recent history. Suggest score 5 A1 Ransom strip. Whilst there has been a retained strip, it is not prohibitive. Other access points are available. The gate entrance from Stoney bank road can be opened up and widened for access and other access points can be made available up the road. Suggest score 4 A2. Vehicle access can be made much better by opening up the road entrances as above. Suggest score 4 A4 Land in use. We have immediate possession on this land when it is required for development. This is written into the tenants contract for him to vacate as and when required. Suggest score 5 Could you please reconsider these points and reassess your scoring on this site.</div>	<div>The availability of the site is considered against Criterion A4 below. 1) Criterion S7 (Suitable infrastructure) - the size of the site means that a significant installation of new infrastructure will be required, not just a simple connection to the existing networks. The score for this criterion will remain at 1 point. The guidance for the scoring criteria should be amended to explain that for large greenfield developments it is unlikely that the site will be able to simply connect to the existing networks. 2) Criterion S11 (Flooding) - it is acknowledged that only a very small part of the northern boundary of the site is in Flood Zone 2 and that this part of the site would not be developed. The score for this criterion should be increased to 3 points. 3) Criterion S17 (Doctors surgery) - the doctors surgery in Earby is 870m away from the site using the shortest route measured using Geographical Information Systems. This does not use an 'as the crow flies' calculation as this is not a realistic measurement. The score will remain unchanged. 4) Criterion S23 (Corner shop) - the nearest convenience shops are on Water Street, 480m from the edge of the site. The score will remain unchanged. 5) Criterion S24 (Post Office) - the post office is 900m from the edge of the site. The score will remain unchanged. 6) Criterion S25 (Open Space) - the scoring criteria guidance clearly indicates that this criterion looks at the nearest existing open space designation (as allocated on the Local Plan proposals map or in the Open Space Audit). The nearest open space to the site is 240m away. The score will remain unchanged. 7) Criterion S28 (Impact on Conservation Area) - this site is within the Earby Conservation Area. The development of the site is likely to have an impact on the conservation area, especially in terms of landscape and townscape character and setting. 8) Criterion S31 (Impact on Archaeological remains) - Lancashire County Council has previously indicated that further assessment of this site will be necessary to establish the potential for archaeological remains. The score will remain unchanged. 9) Criterion S40 (Mineral safeguarding) - this site is within a mineral safeguarding area as designated by Lancashire County Council. In line with the criterion the site scores 1 point - No change. 10) Criterion A1 (Access) - it is acknowledged that the owner has stated that the ransom strip is not restrictive and that access can be provided, however, there is currently no immediate access into the site. 11) Criterion A2 (Vehicular access) - the site scores 1 point to reflect that there is currently no adequate vehicular access into the site. 12) Criterion A4 (use of site) - this criterion indicates that where the site is still in use, even if there is an agreement to release the site, the site will score 3 points. This site is still in use. No change to the score.</div> <div>Amend the SHLAA in accordance with the officer response.</div>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID	Consultee comments		Officer Response and Recommendation		
817872			8	Site Ref	S124	Site Name	Land at Trough Laithe Farm	
Mr	Peter	Johnson	<p>We would like to place on record our unequivocal objection to the potential housing development on this site, as outlined and contained within the Council's Strategic Housing Land Availability Assessment.</p> <p>The number of proposed houses would cause issues as follows</p> <ul style="list-style-type: none">* Traffic volumes within the area causing danger, nuisance and pollution.* The road into Barrowford is already a bottleneck, and could not sustain the increased traffic volumes.* Barrowford itself is becoming gridlocked.* No suitable local infrastructure for the size of the site - schools, shops.* No transport services. <p>The site is of natural beauty, and will create environmental issues for the wildlife inhabiting therein. The pathways for walkers would disappear.</p> <p>Flooding is a potential.</p> <p>We do not accept or understand why the countryside would have to be destroyed to fulfil your strategy. Equally, we do not understand the need for such an increased level of housing in Barrowford.</p>					<p>This response considers the site in the context of it being allocated as a Strategic Site in the Core Strategy. Its identification in the SHLAA is not an allocation. It reflects an assessment of the site's availability, suitability and achievability in line with the SHLAA methodology and government guidance.</p> <p>With regards to the impact on the highways; improvements and mitigation measures will be required to reduce the impact of any development of the proposed allocated site. Lancashire County Council has commissioned a study to look at the traffic flows at the junctions on the M65 motorway in Pendle and to identify potential improvements and measures to better manage these flows. This study has taken account of the proposed Strategic Housing Site at Trough Laithe. The owners of the Strategic Housing Site have also commissioned work to look at the impact on the highways network and to consider trigger points for when any mitigation work would need to be carried out. Both these studies indicate that sufficient improvements can be made to allow development to proceed without causing a severe cumulative impact. Access into the site is likely to be off Riverside Way (the road into the Business Park). Further details of this will be made available at the application stage. The siting of the access point off Riverside Way is to limit the impact the development of the site could have on Church Street and the junction with Gisburn Road.</p> <p>With regards to infrastructure and service provision, the Council has engaged with the utilities and service providers as part of the preparation of the Core Strategy to highlight any capacity issues or improvement works which may need to take place as a result of the proposed levels of development. United Utilities has not raised any specific objection to the allocation of the strategic housing site. However, they have requested that the policy is amended to include a requirement for early engagement between utility providers and site owners/developers. The Council has also engaged with Lancashire County Council (LCC) regarding the impact of the strategic site on the capacity of primary schools. LCC has a duty to provide sufficient school places for the local population. At the planning application stage further forecasting work will be carried out to determine whether a contribution from the developer will be required for school place provision. The relevant health authorities and emergency services have been informed of the proposed allocation of the strategic site.</p> <p>With regard to the provision of transport services, there are buses which run around the site. Policy ENV4 of the draft Core Strategy requires the provision of new or improved transport services where necessary to increase accessibility.</p> <p>With regards to the environmental impact, the majority of the site has not been identified as an area of ecological interest. Policy LIV2 requires the site to be developed using a high quality landscaping scheme which incorporates the natural features of the site. It also requires open space to be provided. These measures are intended to help mitigate against any negative impacts.</p> <p>At the application stage consideration will be given to the diversion of footpaths or their incorporation into the development scheme itself.</p> <p>In terms of the potential for flooding, the site is not located in an identified flood risk zone. Policy ENV7 requires that new developments should incorporate measures which mimic the natural surface water run-off rates to reduce any potential to</p>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details	Comment ID	Consultee comments	Officer Response and Recommendation
<div><div></div><div></div><div></div><div>Manthorpe Developments</div><div>497333</div><div>MrMichaelCourcier</div><div>Bartonwillmore</div></div>	9	<div>Site RefS012</div> <div>Site NameWindermere Avenue, Colne</div> <div>16.1 Manthorpe welcomes the inclusion of the Windermere Avenue site in the 0-5 years supply in the 2013 SHLAA. For the reasons already given, the Company confirms that the site meets the criteria for deliverability set out in Footnote 11 of the NPPF.</div>	<div>increase flood risk.</div> <div>The evidence base which supports the preparation of the Core Strategy shows that the needs of the borough have increased significantly since the previous review of the plan 10 years ago. The Strategic Housing Market Assessment (SHMA) and Housing Needs Study (HNS) Update report indicate that to meet the objectively assessed needs (OAN) for housing (a requirement of the National Planning Policy Framework) in the borough over the plan period (up to 2030), between 250 and 320 dwellings per annum will be required. In order to reflect the plan’s economic aspirations and the increase in population that this may generate, it is considered that the Core Strategy should set the housing requirement figure at 298 dwellings per annum. The Employment Land Review also indicates that there is an increased need for new employment sites. Together these two studies show that a significant amount of land will be required to meet the needs of the borough in the future. The Strategic Housing Land Availability Assessment identifies sites with the potential to be developed for housing and indicates that there is not a sufficient number of sites within the existing settlement boundaries to meet the housing requirement. The Core Strategy allocates the site at Trough Laithe as a strategic housing site to help show that the plan is deliverable. The site accounts for nearly 10% of the borough's housing requirement over the plan period and its allocation in the Core Strategy will allow for both early and medium term provision.</div> <div>No change proposed in response to this comment.</div>
		<div>Site Ref</div> <div>Site Name</div> <div>16.1 Manthorpe welcomes the inclusion of the Windermere Avenue site in the 0-5 years supply in the 2013 SHLAA. For the reasons already given, the Company confirms that the site meets the criteria for deliverability set out in Footnote 11 of the NPPF.</div>	<div>Support for the inclusion of land at Windermere Avenue in the SHLAA and five year housing land supply is noted.</div> <div>No change proposed in response to this comment.</div>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID		Consultee comments		Officer Response and Recommendation	
820432			10		Site Ref S093 Site Name Field Nos 6777, 7878 & 9379 Blacko.			
Mr John Daly								

I must object to this proposed site. I understand that there is a need for additional housing in rural villages however this site is completely detrimental to the landscape of Blacko with massive environmental constraints, any proposed development on this site will totally destroy Blacko and the landscape of Pendle, In summary the site is:

1. Very steep site will cause major environmental impacts. Destruction of Blacko Hill and the iconic landmark of Blacko Tower. I cannot see how any planning policy would allow building on top of the existing site. The proposed houses would tower over neighbouring buildings and look totally out of character, the site would need to be levelled down to road level with the need for huge retaining walls not in keeping with the local character.

2. Blacko tower is an iconic landmark the proposed development would spoil the openness of Blacko the location is inappropriate and not a good use of land due to its very narrow and linear dimensions creating a huge loss to the openness of the countryside for very little benefit. The site offers no community or environmental benefits only destruction of the landscape and the openness of the countryside.

3. A new wall has recently been constructed by LCC Highways costing hundreds of thousands of pounds of tax payers money, will the developer refund LCC and the tax payer as the wall is likely to require demolition, this was not accounted for in any assessment. Is this not a ransom strip, or in the ownership of LCC?

4. when it rains water flows through the walls and down the track on to Gisburn Road, the site is susceptible to flash flooding from the hill behind the proposed site.

It is unclear if you have visited this site however can you please re-assess this site given the above criteria.

The overall impact of this site is not beneficial and is detrimental to the landscape protection areas of Blacko, it does not protect or enhance the landscape character of the area. The site should be removed from the SHLAA as a non-viable site due to the many constraints and non-compliance with planning policy. I urge the Council to re-asses this site given the detriment it will have to Pendle.

1) This site is a small strip of land fronting Gisburn Road, Blacko. Its development would be of a similar nature to the terraced properties to the west of the site - Numbers 440-460 which are built on a similar topography.

2) At the application stage an assessment of the impact on landscape character would be carried out.

3) The construction of the new wall is not a planning consideration in terms of the preparation of the SHLAA. Discussions between the landowner and LCC will need to take place as part of any planning application.

4) Potential flooding issues will need to be considered at the application stage. The SHLAA looks at the broad issues of flooding in terms of identifying whether the site is within a flood risk zone or whether there are known water issues on site. Policy ENV7 of the draft Core Strategy requires that surface water run-off continues to mimic the natural processes.

The inclusion of this site in the SHLAA does not guarantee that it will gain planning permission or that it will be allocated for housing in the Local Plan. However, the site owner has indicated that it is a viable site to develop and there are no currently identified constraints which cannot be overcome.

No change proposed in response to this comment.

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID	Consultee comments		Officer Response and Recommendation	
327623			11	Site Ref	385	Site Name	Gib Hill
Dr	John	Plackett	<p>Gib Hill, on the Nelson/Colne boundary, has been put forward as a possible site for housing in the next 6-10 years. It is an ideal site to be designated a Local Green Space (see below). Gib Hill should be removed from the SHLAA list because:</p> <p>(i) it is a biodiversity asset. Before the inception of the last Local Plan, the fields on the Colne side were surveyed by the Lancashire Wildlife Trust, who found that 5 fields were especially rich in interesting flora. When the survey evidence was presented to Lancashire’s Biological Heritage Site (BHS) committee, they awarded fields 461, 462, and 750 BHS status as upland hay meadow, meaning their wildlife value was important at a county/regional level. Two further fields, 748 and 749, met the criteria to be of Sites of Local Natural Importance (SLNI). Further survey work by an entomologist, a bryophyte expert, the BHS partnership and local amateur naturalists has reinforced the value of its biodiversity. In particular, in summer, it supports large numbers of butterflies. With restoration work, more of the fields would attain BHS status.</p> <p>(ii) the boundary between the Colne side and the Nelson side is marked by what could be a Hedge of Importance. The Nelson side has woodland, planted to celebrate the Millennium.</p> <p>(iii) it is situated on the Colne/Nelson boundary, close to a main road with bus routes, so it could be developed as a green space for local people to visit to enjoy nature in a peaceful setting.(iv) the land is seasonally wet: the hillside containing a number of issues and sinks. Given its elevation of around 180 metres, it is useful for allowing water to drain away slowly, thus reducing the risk of flooding lower down the hill.</p> <p>(v) the site is hemmed in by a railway track, a local school (with two more close by) and a golf course, which makes access problematical at some times of day.</p> <p>As a new plan is in the process of preparation and review, now would be the time to designate it as a Local Green Space. It matches the criteria for designation in paragraph 77 of the NPPF closely, ie,</p> <p>b) it is a valuable asset for the local community with its walks, views of Pendle Hill, proximity to Castercliffe Iron Age fort with its nearby RIGS site and the value of its flora and fauna. It is used by local schools as a study area and for cross country running.c) it is local in character consisting of small fields surrounded by hedges and, at 12.1 hectares, it is not an extensive tract of land.</p>				
i) The SHLAA acknowledges the potential ecological issues relating to the site. A revised and updated ecological survey of the site will be required if the site is to be considered for allocation or if a planning application is submitted.					<p>ii) The development of the site would not necessarily involve the removal of the hedges and trees. A sympathetic development incorporating the site's natural features and assets could be considered.</p> <p>iii) The location of the site close to public transport links also makes it a sustainable site for development with access to services.</p> <p>iv) The SHLAA acknowledges the water features on site. Any development would need to take account of these and comply with the relevant policies on water management. Policy ENV7 of the draft Core Strategy requires the management of surface water run-off and that new development should incorporate measures to continue the current natural discharge process.</p> <p>V) In terms of access - there are a number of options available to access the site. Improvements to the road infrastructure will be required.</p> <p>It is not the purpose of the SHLAA to allocate land for housing. Its aim is to identify sites which have the potential to be developed for housing in the future based on a number of established criteria. Furthermore, the Inspector at the previous Local Plan inquiry indicated that the site is suitable for housing development by allocating it as a HMR Reserved Housing site.</p> <p>However, the review of the Local Plan through the preparation of the Site Allocations and Development Policies plan provides the opportunity to look again at the sites which are needed for future development and also for other uses such as open space or Local Green Space. It will be for that process to consider the most suitable/appropriate use for the site.</p>		
No change proposed in response to this comment.							

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details	Comment ID	Consultee comments	Officer Response and Recommendation
<div>378959</div> <div> <div>Mrs</div> <div>Alison</div> <div>Plackett</div> </div> <div></div> <div></div> <div> <div></div> <div></div> <div></div> </div> <div></div>	12	<div>Site Ref 385 Site Name Gib Hill</div> <div> <p>Gib Hill, on the Nelson/Colne boundary, has been put forward as a possible site for housing in the next 6-10 years. It is an ideal site to be designated a Local Green Space (see below).</p> <p>Gib Hill should be removed from the SHLAA list because:</p> <p>(i) it is a biodiversity asset. Before the inception of the last Local Plan, the fields on the Colne side were surveyed by the Lancashire Wildlife Trust, who found that 5 fields were especially rich in interesting flora. When the survey evidence was presented to Lancashire’s Biological Heritage Site (BHS) committee, they awarded fields 461, 462, and 750 BHS status as upland hay meadow, meaning their wildlife value was important at a county/regional level. Two further fields, 748 and 749, met the criteria to be of Sites of Local Natural Importance (SLNI). Further survey work by an entomologist, a bryophyte expert, the BHS partnership and local amateur naturalists has reinforced the value of its biodiversity. In particular, in summer, it supports large numbers of butterflies. With restoration work, more of the fields would attain BHS status.</p> <p>(ii) the boundary between the Colne side and the Nelson side is marked by what could be a Hedge of Importance. The Nelson side has woodland, planted to celebrate the Millennium.</p> <p>(iii) it is situated on the Colne/Nelson boundary, close to a main road with bus routes, so it could be developed as a green space for local people to visit to enjoy nature in a peaceful setting.(iv) the land is seasonally wet: the hillside containing a number of issues and sinks. Given its elevation of around 180 metres, it is useful for allowing water to drain away slowly, thus reducing the risk of flooding lower down the hill.</p> <p>(v) the site is hemmed in by a railway track, a local school (with two more close by) and a golf course, which makes access problematical at some times of day.</p> <p>As a new plan is in the process of preparation and review, now would be the time to designate it as a Local Green Space. It matches the criteria for designation in paragraph 77 of the NPPF closely, ie, b) it is a valuable asset for the local community with its walks, views of Pendle Hill, proximity to Castercliffe Iron Age fort with its nearby RIGS site and the value of its flora and fauna. It is used by local schools as a study area and for cross country running.c) it is local in character consisting of small fields surrounded by hedges and, at 12.1 hectares, it is not an extensive tract of land.</p> </div>	<p>i) The SHLAA acknowledges the potential ecological issues relating to the site. A revised and updated ecological survey of the site will be required if the site is to be considered for allocation or if a planning application is submitted.</p> <p>ii) The development of the site would not necessarily involve the removal of the hedges and trees. A sympathetic development incorporating the site's natural features and assets could be considered.</p> <p>iii) The location of the site close to public transport links also makes it a sustainable site for development with access to services.</p> <p>iv) The SHLAA acknowledges the water features on site. Any development would need to take account of these and comply with the relevant policies on water management. Policy ENV7 of the draft Core Strategy requires the management of surface water run-off and that new development should incorporate measures to continue the current natural discharge process.</p> <p>v) In terms of access - there are a number of options available to access the site. Improvements to the road infrastructure will be required.</p> <p>It is not the purpose of the SHLAA to allocate land for housing. Its aim is to identify sites which have the potential to be developed for housing in the future based on a number of established criteria. Furthermore, the Inspector at the previous Local Plan inquiry indicated that the site is suitable for housing development by allocating it as a HMR Reserved Housing site.</p> <p>However, the review of the Local Plan through the preparation of the Site Allocations and Development Policies plan provides the opportunity to look again at the sites which are needed for future development and also for other uses such as open space or Local Green Space. It will be for that process to consider the most suitable/appropriate use for the site.</p> <p>No change proposed in response to this comment.</p>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID		Consultee comments		Officer Response and Recommendation	
378967			13		Site Ref 385 Site Name Gib Hill		<p>The SHLAA acknowledges the ecological issues associated with the site. The SHLAA indicates that due to the topography and nature conservation issues only a certain proportion of the site would be developed.</p> <p>The need for housing is set out in the evidence base in the form of the Strategic Housing Market Assessment (SHMA) and follows the relevant government guidance. If the Core Strategy is to be found sound at examination it needs to be based on a robust and credible evidence base which is in line with national policy. The SHMA uses both national and local data sets to look at the population trends for the borough to identify the amount of new housing required up to 2030. This is in accordance with the National Planning Policy Framework. The amount of housing currently available in the borough is not sufficient to provide for the housing needs in the future. Even if all the empty homes were reoccupied the housing need indicates that a significant amount of additional housing is required. Projects are still underway to deal with empty homes and where possible the refurbishment of the existing housing stock, however, there is little funding available to continue with these projects in the future. Alternative methods of restoring the stock will need to be identified.</p> <p>It is not the purpose of the SHLAA to allocate land for housing. Its aim is to identify sites which have the potential to be developed for housing in the future based on a number of established criteria. Furthermore, the Inspector at the previous Local Plan inquiry indicated that the site is suitable for housing development by allocating it as a HMR Reserved Housing site. The review of the Local Plan through the preparation of the Site Allocations and Development Policies plan provides the opportunity to look again at the sites which are needed for future development and also for other uses such as open space.</p> <p>No change proposed in response to this comment.</p>	
Mr William Stephenson					<p>I am writing to express my concern about the plan to put the Gib Hill site forward for development in 6-10 years.</p> <p>Gib Hill is important as a local nature reserve; it contains ancient hedgerow and range of rare species. It also functions as an open space for local people, and contains an important route up to Castercliff Iron Age fort, a Scheduled Ancient Monument. It is a route to schools and works as an outdoor classroom for these schools (Pendle Vale, Fisher More, Primet) all of which are within walking distance.</p> <p>All these advantages would disappear should the site be developed. It is important to avoid a simplistic knee-jerk response to a national government new-build policy that ignores the diversity of local situations and needs, for example those of areas such as Pendle where population is not significantly increasing and there is already sufficient housing stock to meet local need, provided the will is there to develop and restore this stock.</p> <p>I therefore wish to express my objection to the plan.</p>			

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID	Consultee comments		Officer Response and Recommendation
327580			14	Site Ref	Site Name	<p>The SHLAA identifies sites across the borough which in total could yield up to 8,112 dwellings. Given the level of housing need identified in the Strategic Housing Market Assessment (SHMA), not all these sites will be required to meet this need. Furthermore, a number of these sites have constraints which will need to be overcome before development can take place.</p> <p>The Council is required to prepare a SHLAA in order to demonstrate a five year supply of deliverable housing land and also to identify potential options to be considered in the preparation of the Local Plan Part 2: Site Allocations and Development Policies. The SHLAA itself does not allocate sites for development, but identifies sites which are available, suitable and achievable in line with government guidance.</p> <p>The Core Strategy looks to locate new development in the most suitable locations and the National Planning Policy Framework (NPPF) sets out the presumption in favour of sustainable development which should be used in both plan making and decision taking. Furthermore, the Council is required to deliver new housing to meet the needs of the population and must take account of the viability and therefore deliverability of sites. In the current economic circumstances it may be necessary to release those sites which are viable to ensure the housing requirements are deliverable. This may involve the release of greenfield sites.</p> <p>The viability assessment of sites in the SHLAA takes a broad-brush approach by using the findings from the assessment of model sites in the Development Viability Study (DVS) and applying them to similar sites in the SHLAA. This provides a useful guide as to which type of site are likely to be viable. Where site specific viability information is available this is used as it provides more accurate data.</p> <p>The 20% profit margins figure used in the financial appraisals in the DVS represents a standard profit level which has been ratified by consultation with stakeholders and developers during the preparation of the DVS. It is therefore considered to be a realistic and credible figure to use in the calculations. A lower profit margin may be acceptable to some developers on some sites and this will be considered in site specific circumstances. However, the majority of sites have been assessed in accordance with the agreed approach set out in the DVS taking account of current values and costs which is in line with the requirements of the NPPF.</p> <p>No change proposed in response to this comment.</p>
Mr	David	Cockburn-price				
<p>The SHLAA has identified land for 8,112 dwellings and L&B expresses its concern that the Council will take the easy route with profit-hungry developers to develop easily available land quickly, rather than waiting for the “right” land/site (i.e. better for the borough’s longer term strategy) to become available.</p> <p>Any potential developer must set out the availability, suitability and achievability of the scheme, with a Any potential developer must set out the availability, suitability and achievability of the scheme, with a financial viability assessment for larger schemes. The Council will employ independent specialists to evaluate the viability assessment (para 11.35), but L&B has already highlighted that such viability calculations should not automatically contain an assumed profit margin of 20%. This is a competitive marketplace and L&B wishes the Council to encourage developers to compete for lower margin work, especially where brownfield sites are involved.</p>						

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID		Consultee comments		Officer Response and Recommendation		
818207			15		Site Ref S126 Site Name Brierfield Wastewater Treatment Works				
Ms Jenny Hope			<p>PENDLE CORE STRATEGY FURTHER OPTIONS REPORT AND STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT</p> <p>United Utilities Property Services (UUPS) is the strategic property arm of United Utilities PLC. UUPS wish to make the following comments in response to the above named consultations. UUPS request the Council to consider former Brierfield Wastewater Treatment Works for future development, preferably for residential use. The site is located off Clitheroe Road, Brierfield which benefits from good access to the strategic road network. The site comprises open land, small structures including a brick building and areas of hardstanding. The site is to the south of a predominantly residential area. The site area is approximately 6.7 ha. The Replacement Pendle Local Plan (adopted 2006) and Proposals Map identifies the site as wholly within the open countryside and in a location for new housing development. It has been identified that the Council does not have a five year housing land supply. The site can offer the Council a logical extension to an existing built up settlement and contribute towards the council’s housing land supply. There is a clear requirement for investment in this part of Pendle which is encouraged through existing planning policy.</p> <p>UUPS would welcome the opportunity for the Council to consider the inclusion of the site within the urban boundary and identify the site for residential development. A plan is enclosed.</p>						
United Utilities - Developer Services and Planning									
			<p>The site of the former Brierfield Wastewater Treatment Works is already included in the SHLAA under site reference S126 as a longer term additional site (6-15+ years). The site's inclusion in the SHLAA acknowledges that it has the potential to be developed for housing in the future and will be put forward as an option in the preparation of the Local Plan Part 2: Site Allocations and Development Policies.</p> <p>The site has been assessed against the SHLAA criteria and a number of constraints to development will need to be addressed. These include: its location outside the current settlement boundary, the designation of woodland open space on part of the site, the infrastructure provision and capacity, and the potential contamination which may exist given the site's previous use.</p>						
			<p>No change proposed in response to this comment.</p>						

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details		Comment ID	Consultee comments
<div>818201</div> <div> <div></div> <div></div> <div></div> </div> <div>Junction Property Ltd</div> <div>497333</div> <div> <div>Mr</div> <div>Michael</div> <div>Courcier</div> </div> <div>Bartonwillmore</div>		16	<div>Site Ref</div> <div>S161</div> <div>Site Name</div> <div>Land at Lidgett Triangle</div>
			<p>1. JPL welcomes the identification of the land at Lidgett Triangle (S161) within the potential supply to meet housing requirements over the period of the Emerging Pendle Core Strategy (2015 to 2030). 2. JPL considers that the site fits well with the special priorities set out in the Emerging Core Strategy as:-</p> <p>i) The site is adjacent to Colne which is one of the three highest order settlements in the hierarchy set out in Policy SDP2. The Further Options Report confirms that these towns provide “the main facilities and services that are needed to support the local population and their surrounding rural hinterlands”. It also confirms that “the accessibility of these towns and the current level of services provide a good base for future development”.</p> <p>ii) The site is well located to provide the type of aspirational value housing which Policy LIV5 identifies as being required in the M65 Corridor to rebalance the housing stock. In this respect the SHMA says that Pendle should be:-</p> <p>“Planning for a mix of housing which encourages the retention of residents of an economically active age or encourages younger economically active people to move into the two local authority areas. This would have a significant impact on the labour market and for the economic growth for (Pendle) going forward. The provision of better quality detached and semi-detached homes in both Boroughs may reduce the current imbalance from stigmatised two-up, two-down terraced properties and help encourage the retention of families (or conversely, attract families) on higher incomes to move into the area, thus improving overall job growth prospects.”</p> <p>iii) The site is one of the higher value areas within the M65 Corridor. This is confirmed by the Economic Viability Study. Unlike many other potential sites in the Borough and Colne, its development would be viable and it could come forward at the time required by the local planning authority.</p> <p>iv) Because of its size and the potential land values achievable, the site could make a significant contribution to meeting the affordable housing needs of Colne. The Economic Viability Study shows that most sites within the existing built-up area of Colne would not produce any substantial number of affordable dwellings.</p> <p>v) The SHLAA pro forma for the site shows that it is highly sustainable. It is within walking distance of schools, shops, medical facilities and bus services. It also is within walking and cycling distance of the town centre and multiple job opportunities.</p> <p>3. The site is currently designated under Policy 3A of the Adopted Local Plan. As such, its potential for longer term development has been accepted. Its potential as a housing location was considered by the Local Plan Inspector. She recommended against its inclusion within the Green Belt saying:- “I am not convinced that this site will not be required for development in the longer term after 2016, or that it would be unsuitable in principle for development”.</p> <p>4. The SHLAA pro-forma shows that there are no environmental, physical or similar constraints that would prevent development in principle. In particular:</p> <ul style="list-style-type: none"> •It is within Flood Risk Zone 1 and is not prone to flooding. •There are no sites designated or features of conservation value on it. •It is surrounded by residential development and there are no bad neighbour uses adjacent to it. •The site can be appropriately accessed. <p>5. The site is within one ownership and there are no ransom strips which would prevent early development.</p> <p>6. The site is within the Lidgett and Bents Conservation Area but its character and appearance can be maintained by good design</p>
			<div>Officer Response and Recommendation</div> <div> <p>1) Support for the inclusion of the Lidgett Triangle in the SHLAA is noted.</p> <p>2i) The SHLAA already identifies that the site is within Colne.</p> <p>2ii) The type and size of housing to be provided on this site is not considered in the SHLAA. The SHLAA provides an indicative estimate of the potential capacity of the site. It is not the purpose of the SHLAA to provide details of the sizes and types of dwellings.</p> <p>2iii) The SHLAA already indicates that the site is marginally viable to develop reflecting the findings of the Development Viability Study.</p> <p>2iv) It is not the purpose of the SHLAA to determine the tenure mix of a potential site. The viability appraisals take account of the current (proposed) policy base including the potential to provide affordable housing.</p> <p>2v) It is not contended that the site meets a number of the sustainability criteria used to assess sites in the SHLAA.</p> <p>3. The SHLAA notes the current policy designation of the site. The Local Plan Inspector indicated that the need for Policy 3A sites should be reassessed at the next review of the local plan. Consideration will be given to the need for this site in the Local Plan Part 2: Site Allocations and Development Policies. The inclusion of the site in the SHLAA acknowledges the Inspector's stance relating to the suitability in principle for the development of the site.</p> <p>4. The SHLAA site proforma sets out the site specific details for each assessment criterion.</p> <p>5. The ownership details are noted. The SHLAA already identifies that there is only one owner of the site and there are no access issues.</p> <p>6. The potential impact on the Lidgett and Bents Conservation Area in relation to the potential development of the site is of key concern. The Lidgett and Bents Conservation Area Character Appraisal indicates that the Lidgett Triangle provides an important separation between the developments at Lidgett, Bents and on Keighley Road. The separation between the two historic settlements at Lidgett and Bents is an important aspect of the Conservation Area. Any potential development would erode the scattered nature of the these settlements and the intervening farmsteads.</p> <p>No change proposed in response to this comment.</p> </div>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details	Comment ID	Consultee comments	Officer Response and Recommendation
<div>379108</div> <div><div></div><div>N.B.</div><div>Clay</div></div> <div></div> <div></div> <div></div> <div></div> <div></div>	17	<div><div>Site Ref</div><div>S130</div><div>Site Name</div><div>Land to north of Barrowford Road, Barrowford</div></div> <div>I have been made aware of the potential development for housing in the above location and would like to make the following observations. The access to this site would appear to be via Parrock Road which is an un-adopted road the maintenance of which is the responsibility of the owners of 5 properties (numbers 1-9 Parrock Road) The road is also very narrow with only one pavement and is only just wide enough for two vehicles to pass each other. There is little opportunity to increase the road width. Parking issues are now arising at the Business Park with parking on both sides of the access road occurring on a daily basis. Some vehicles have now started parking on the lower section of Parrock Road. The number of houses mentioned in this development would create traffic issues for vehicles joining the By Pass and also lead further increased congestion at the roundabout especially for traffic travelling to Barrowford and for traffic leaving the M65 at Junction 13.</div>	<div>The assessment of the access into the site will be reviewed and rescored accordingly. This site is identified as a developable site in the longer term (6-15+ year period). The traffic impact from the development of the site will need to be assessed if the site is proposed for allocation or a planning application is submitted.</div> <div>Reassess the access scores of the site.</div>
<div>818007</div> <div><div>Mr</div><div>Mark</div><div>Roberts</div></div> <div></div> <div></div> <div></div> <div></div> <div></div>	18	<div><div>Site Ref</div><div>S124</div><div>Site Name</div><div>Land at Trough Laithe Farm, Barrowford</div></div> <div><div>Prior to allocating such a significant area of land outside the settlement boundary for residential development a full evidence base, specific to the proposed site allocation, should be made available/disclosed to the community to demonstrate that the proposal are deliverable. A developer "suggesting" that adequate infrastructure can be provided in a viable manner is not acceptable when forming the Core Strategy. Please suggest revised wording to overcome your objection. The land should be safeguarded as a protected area to meet future requirements once more sustainable areas of land within the settlement boundaries of Barrowford, Nelson, Brierfield and Colne have been developed.</div></div>	<div><div>The landowner has provided details of the broad scope for the development of the site. In addition, the Council has prepared a paper explaining the need for the Strategic Site and the process of site identification. These documents will be made available in due course.</div><div>The Council has engaged with infrastructure providers specifically in relation to the proposal for this site and in the majority of cases the relevant infrastructure is available or can be provided. Assessment work has been carried out to look at the highways network, school capacity and utility services.</div><div>Other sites have been identified for housing development through the SHLAA process. A number of sites are not currently viable to develop. The government requires Local Planning Authorities to significantly boost their supply of deliverable housing land and must take account of the viability of sites.</div><div>No change proposed in response to this comment.</div></div>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID	Consultee comments		Officer Response and Recommendation
713089			19	Site Ref	S219	Land to the east of Colne Road, Earby
Mr	G	Wilkinson	New site submission - Land east of Colne Road, Earby Fields Nos.4700 (part) and 3982			
713089						
Mr	Andy	Rollinson				This proposed new site is already included in the SHLAA under site reference S219. The site has previously been submitted to a 'call for sites' consultation and has been assessed against the SHLAA criteria. The SHLAA currently suggests that this site could be brought forward in the longer term 6-15+ years. The site submission details indicate that the site is immediately available for development. The SHLAA will reconsider the timescales for the delivery of this site.
Rollinson Planning Consultancy Ltd						
						Amend the timescales for the delivery of this site.
817934			20	Site Ref	S124	Land at Trough Laithe Farm, Barrowford
Mr	Paul	Henderson	The 'Strategic Housing Land Availability Assessment' is heavily flawed with no scientific evidence to back up findings.			
			Pendle Council has reacted to the requirement of Central Government by undertaking the assessment to find 'suitable' land to ensure a five year delivery programme, this land bank is to be reviewed year on year to ensure constant supply of land.			The government, through the National Planning Policy Framework (NPPF) (paragraph 159), requires Local Planning Authorities (LPAs) to prepare a Strategic Housing Land Availability Assessment (SHLAA). The NPPF also requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The Council therefore has a duty to comply with these requirements. Without a five year supply the NPPF indicates that housing policies in the development plan can not be considered up-to-date and applications for new housing should be determined in accordance with the presumption in favour of sustainable development and the NPPF. Meaning that the Council may not be able to refuse planning permission.
			However, this is very much lead by spreadsheet analysis in terms of numbers of houses, average house price receipts in particular areas and readiness to deliver by land owners and developers.			
			The report is immature in its direction and Pendle Council has allowed findings to be influenced by developers.			The SHLAA has been prepared following a robust methodology in line with government guidance.
			Paragraph 2.30 discusses current build rates suggesting that current rates reflect a decreasing average per annum from 14 to 7 units per year.			
			Pendle Council has taken advice from land owners in terms of deliverability. In the case of the Strategic Housing Site, the developer has suggested a delivery rate of 50 houses per year from 2015 to a maximum of 481 houses based on 12.96ha of land			The National Planning Practice Guidance (NPPG) (Reference ID: 3-008-20140306) indicates that LPAs should work with a range of stakeholders including developers and landowners when preparing the SHLAA.
						The assessment of build rates aims to show the current levels of delivery on typical sites across the borough. However, developers can provide more up-to-date details of their proposed delivery rates where these are available.
						No change proposed in response to this comment.

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID		Consultee comments		Officer Response and Recommendation	
<div></div>			21		Site Ref <div></div> Site Name <div></div>		<div>The SHLAA clearly explains that following the monitoring work carried out in 2011/12, the Council needed to review the SHLAA in order to identify additional deliverable sites to make up a five year supply of housing land. This is in line with both the NPPF and NPPG in terms of the requirement to update annually the supply of specific deliverable housing sites.</div> <div>The SHLAA review was carried out in 2013 and has resulted in the identification of a portfolio of viable sites across the borough.</div> <div>The Council has also made contact with the owners /developers of these sites to establish their intentions for bringing them forward. These sites have been assessed against the SHLAA criteria to determine their availability, suitability and achievability. Together this information has provided the basis for establishing the deliverability of each site and the time period in which they can be developed.</div> <div>No change proposed in response to this comment.</div>	
<div></div>					<div>4.1. The NPPF (paragraph 159) requires that local authorities prepare a SHLAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.</div> <div>4.2. Given that the Council’s most recent Annual Monitoring Report (2012) identified only 2.1 years of deliverable housing supply, the Council are required to identify a further three year supply of deliverable sites, to meet the requirements of the NPPF.</div> <div>4.3. In response to this requirement the Council has identified large allocations of open countryside in Barrowford (circa 730 homes over 3 sites) as well as further sites outside the settlement boundary in Barnoldswick.</div> <div>4.4. The Council consider these additional sites will deliver the necessary housing development to meet the five year housing land supply target required by the NPPF. However, the delivery of these sites is far from certain, as explained below, and in any event they are not well located with respect of existing services and local facilities.</div> <div>4.5. Officers have also advised that further greenfield land release is required to meet development needs in the area, though the exact location of the release will be confirmed in the Site Allocations DPD.</div>			
Stirling Investment Properties Ltd								
618699								
Mr	Robert	Crolla						
Indigo Planning								

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID	Consultee comments		Officer Response and Recommendation	
<div></div>			22	Site Ref	<div></div>	Site Name	<div></div>
<div></div> <div></div> <div></div> <div>Stirling Investment Properties Ltd</div> <div></div> <div>618699</div> <div>Mr</div> <div>Robert</div> <div>Crolla</div> <div>Indigo Planning</div>				<div>Barrowford & Barnoldswick Identified Housing Sites</div> <div>4.6. As highlighted above, the Council cannot demonstrate a five year supply of deliverable housing sites within the SHLAA, even taking into account additional housing sites outside of existing settlement boundaries.</div> <div>4.7. This section focusses on the proposed large allocations in Barrowford (one of which is of strategic importance to the emerging Core Strategy) and Barnoldswick (where our client’s site is located).</div> <div>4.8. Though the details for each site are discussed below, common themes run across all the sites as follows:</div> <div><ul style="list-style-type: none">• All the sites are identified in the SHLAA as: ‘Greenfield site. Utilities would need to be installed. Further information required in terms of capacity to provide the necessary infrastructure. Major development therefore potential impact on capacity of existing networks. New highways work will also be required.’• All are located outside the defined settlement boundaries and represent significant intrusions into the open countryside;• They are not sustainably located with respect to existing services;• The sites require significant infrastructure works before development can begin;• Two of the sites are constrained by ransom strips which could preclude development; and• Delivery on the trajectory proposed by the Council is highly uncertain.</div>			
<div>Following the public consultation on the Core Strategy Further Options report, officers have recommended that the housing requirement for the borough is increased to 298dpa in order to meet the objectively assessed housing needs in terms of population growth and economic development.</div> <div>The SHLAA will be reviewed in light of this change to the housing requirement figure to ensure that sufficient deliverable sites can be identified to demonstrate a five year supply of housing land.</div> <div>A number of standard phrases are used in the commentary in the site proformas to aid consistency in approach.</div> <div>With regard to the provision of infrastructure, all new developments will require further investigation as to whether suitable infrastructure can be put in place and there is sufficient capacity to deal with the level of development proposed. This is not a constraint which is insurmountable. This is a standard comment used to highlight that these are major development sites which will require a more detailed assessment of infrastructure provision to be carried out at application stage. However, it should be noted that the infrastructure providers have not raised any significant issues relating to the infrastructure capacity of the borough.</div> <div>In terms of sites being located outside of the settlement boundary the SHLAA explains that in order to ensure there are sufficient deliverable sites to meet the housing requirement the site search criteria has had to be amended to consider sites outside of the settlement boundary as there are not sufficient deliverable sites available within the existing settlement limits.</div> <div>Some of the sites may not have received high scores against the criteria for distance to local services, however, larger sites have the capacity to provide new services if necessary or make access to services available.</div> <div>The need for significant infrastructure works does not preclude a site from being deliverable and sites have been programmed in the five year supply accordingly.</div> <div>In terms of ransom strips, negotiations are taking place between landowners to resolve these issues.</div> <div>The housing trajectory proposed is based on the best available information provided to the Council and is calculated on a site-by-site basis.</div> <div>The SHLAA will be reviewed to identified further deliverable sites to meet the five year housing land requirement.</div>							

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details		Comment ID	Consultee comments		Officer Response and Recommendation
<div></div>		23	Site Ref	S124	<p>The site at Trough Laithe is nearly equi-distant from both Barrowford Local Shopping Centre and Nelson Town Centre. The site is just over 1km from both these centres and it is acknowledged that this is greater than the preferred distance. However, the distance to a local centre is not the only factor which makes a site sustainable and the site has to be considered in the wider context.</p> <p>Issues relating to the allocation of the site as a Strategic Site in the Core Strategy are dealt with in the response to Comment 177 made against Policy LIV2.</p> <p>The site is greenfield and viable to develop. The NPPF does not preclude the development of greenfield land but does require that the housing requirement is delivered. The current economic circumstances are preventing a number of inner urban sites from being developed and in order to ensure the timely delivery of new housing some greenfield sites outside of the currently settlement boundaries will be required as they represent the only realistic option for viable development.</p> <p>With regard to infrastructure provision, the SHLAA highlights that infrastructure will need to be provided. However, work has been carried out by both the landowner and the Council to engage with the infrastructure providers to highlight any potential capacity or provision issues and to identify how these can be resolved. This work has been carried out to provide certainty to the delivery of the site. The Core Strategy policy relating to this site includes a statement about the provision of necessary infrastructure to ensure that this will be provided as part of the application.</p> <p>Similarly with the issues relating to topography and land stability, the landowner has already undertaken work to deal with these issues.</p> <p>In terms of the current designation of the site - the Protected Area designation is not for landscape conservation. It is protected from development until 2016 or a review of the plan at which time it may be considered for development if the need exists. It was identified in the previous Local Plan as a potential area for future development. The development needs of the borough have changed substantially since the last Local Plan and the need to develop this site now exists.</p> <p>In terms of the timescales for delivery. The site is being progressed through the Local Plan process. The Council has had numerous discussions with the site owner to look at the realistic prospects of development on the site. The evidence presented to the Council shows that the delivery of the site will be phased and brought forward in the stated timescales.</p> <p>No change proposed in response to this comment.</p>
<div></div> <div></div> <div></div> <div>Stirling Investment Properties Ltd</div> <div>618699</div> <div>Mr</div> <div>Robert</div> <div>Crolla</div> <div>Indigo Planning</div>			Site Name	Land at Trough Laithe Farm, Barrowford	
<p>4.10. The site is located beyond the western edge of Barrowford, approximately 1km from Barrowford local centre. It is therefore not sustainably located.</p> <p>4.11. It is identified for 481 dwellings over the plan period, with 200 delivered in the five year supply period from 2014/15 to 2018/19 (i.e. 50 per annum).</p> <p>4.12. The Council considers that the site is of ‘strategic importance’ to the delivery of the Core Strategy, and has allocated the site through emerging Core Strategy Policy LIV2. Representations to this policy have been made under separate cover.</p> <p>Site Constraints</p> <p>4.13. The site is greenfield and located in the open countryside, lacking any form of servicing, with no indication that the necessary infrastructure can be provided. The draft Core Strategy Policy, which allocates the site, recognises that such infrastructure will be required before development can commence.</p> <p>4.14. Furthermore, the site is designated as a ‘Protected Area’ of landscaping in the adopted Local Plan. The SHLAA itself recognises that:</p> <p>‘The ability to obtain planning permission is therefore restricted by the currently planning policy base’... and the site is constrained by... ‘topography / land stability issues’.</p> <p>4.15. As such, under the current policy constraints, planning permission is not certain and even if permission was granted, the delivery of the site is uncertain.</p> <p>Timescales for Delivery / Trajectory</p> <p>4.16. The proposed trajectory of housing delivery within the SHLAA indicates that the first dwellings at the site will be completed and ready for occupation by April 2016. However, the proposed housing trajectory is without foundation or consideration of the constraints of the sites.</p> <p>4.17. Turning to the planning application process, the SHLAA confirms that only initial discussions have taken place with developers and that a planning application is yet to be submitted. It is also unclear whether an application has been prepared.</p> <p>4.19. As such it is not unrealistic to expect that a full planning application could take up to six months to prepare. The application would then have a 13 week (three month) determination period and would need referring to the Secretary of State which could take a further eight weeks (two months). A Public Inquiry would further extend the determination timescales.</p> <p>4.18. Given the scale of development and that the site is undeveloped open countryside, the application will need to be accompanied by a suite of supporting documents such as site surveys and will be subject to public consultation.</p> <p>4.20. On the above timescales, even if the application preparation began at the start of 2014, planning permission is not likely until November 2014 and will be subject to pre-commencement planning conditions. As such any scheme may not be implemented until early 2015.</p> <p>4.21. Moreover, given the site constraints identified in the Core Strategy and SHLAA, it is unlikely that the estimated 50 properties would be completed by April 2016. On this basis, a more reasonable trajectory would be for the first units to be occupied by April 2017, and therefore the number of units which contribute to the five year housing land supply reduced from 200 to 150.</p>					

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details		Comment ID	Consultee comments		Officer Response and Recommendation
<div></div>		24	Site Ref	S199	<p>This site has a willing landowner who wishes to see the site developed for housing. The delivery timescales are based on the need to overcome the constraints identified. The landowner is carrying out work to overcome the issues relating to access into the site in order to provide certainty of delivery.</p> <p>The site is greenfield and viable to develop. The NPPF does not preclude the development of greenfield land but does require that the housing requirement is delivered. The current economic circumstances are preventing a number of inner urban sites from being developed and in order to ensure the timely delivery of new housing some greenfield sites outside of the currently settlement boundaries will be required as they represent the only realistic option for viable development.</p> <p>The Council has engaged with the utility and infrastructure providers during the plan making process. They have not highlighted any site specific issues relating to the provision of infrastructure for this site.</p> <p>The viability of the site is tested against the model sites in the Development Viability Study and is shown to be marginal. However, the landowner has indicated that the availability of finance and the financial viability of the site is not restricting the site from being brought forward.</p> <p>The issues of access and infrastructure provision can be resolved and it is therefore not unreasonable to include this site as a deliverable site in the five year supply.</p> <p>No change proposed in response to this comment.</p>
<div></div>			Site Name	Land to rear of St. Thomas's Primary School, Barrowford	
Stirling Investment Properties Ltd			4.22. The site is located on the western edge of Barrowford, accessed via Wheatley Lane Road. It is approximately 800m from local services in Barrowford.		
618699			4.23. The site is identified as being suitable for 197 dwellings over the plan period, with 135 delivered in the five year supply period from 2014/15 to 2018/19 (i.e. 35 per annum).		
Mr	Robert	Crolla	4.24. The SHLAA indicates the first dwellings will be completed and ready for occupation by April 2017. However, this is without foundation or consideration of the potential site constraints.		
Indigo Planning			Site Constraints		
			4.25. The site is greenfield, in the open countryside and outside the settlement boundary to the north west of Barrowford. The Council recognises that the current planning policy position (i.e. outside the settlement boundary is a constraint on potential development), which must be overcome through the planning process.		
			4.26. It also lacks any form of servicing and infrastructure, and there is no indication that the necessary infrastructure can be provided. More fundamentally the Council concede in the SHLAA that:		
			'There is also an issue with access into the site. Discussions with the owner indicate that negotiations are taking place with the owner of a ransom strip in order to gain access to the site.'		
			Timescales for Delivery / Trajectory		
			4.27. Given the above significant constraints, development of the site as a whole is uncertain and delivery in 2017 is even more uncertain. The presence of a ransom strip not only undermines the delivery of the development but the viability of the site as a whole. The SHLAA concedes that the site is only marginally viable to develop at present; therefore the ransom strip may render the site unviable altogether.		
			4.28. Whilst it is not unreasonable to assume that a greenfield site could be delivered, in part, within three years, the specifics of this site question its fundamental delivery.		

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID		Consultee comments		Officer Response and Recommendation	
<div></div>			25		Site Ref <div>S240</div> Site Name <div>Oaklands, Barrowford</div>			
<div></div> <div></div> <div></div> <div>Stirling Investment Properties Ltd</div> <div>618699</div> <div>Mr</div> <div>Robert</div> <div>Crolla</div> <div>Indigo Planning</div>					<div>4.29. This greenfield site outside the settlement boundary, site is identified as being suitable for 50 dwellings over the plan period, with 36 delivered in five year supply period (i.e. 12 per annum). 4.30. The SHLAA indicates the first dwellings will be completed and ready for occupation by April 2017. However, as with the above site this trajectory is without foundation or consideration of the development constraints of the site. Site Constraints 4.31. The site is greenfield and in the open countryside, outside the settlement boundary. As with the above site, the Council has recognised that the ability to obtain planning permission is restricted by the current planning policy base. 4.32. The site lacks any form of infrastructure or servicing and there is no indication that the necessary infrastructure can be provided. More fundamentally the SHLAA identifies that: ‘There is also an issue with access into the site. Discussions with the owner indicate that negotiations are taking place with the owner of a ransom strip in order to gain access to the site.’ Timescales for Delivery / Trajectory 4.33. The SHLAA identifies significant delivery constraints, therefore development of the site is uncertain and delivery in 2017 is even more uncertain. The presence of a ransom strip undermines delivery and the viability of the site for housing. The SHLAA also concedes that the site is only ‘marginally viable’ to develop. 4.34. Whilst it is not unreasonable for a greenfield site to be delivered, in part, within three years, the specifics of this site question its inclusion as a ‘deliverable’ housing site, i.e. the presence of a ransom strip and uncertainty on the delivery of the necessary infrastructure.</div>		<div>This site has a willing landowner who wishes to see the site developed for housing. The delivery timescales are based on the need to overcome the constraints identified.</div> <div>The site is greenfield and viable to develop. The NPPF does not preclude the development of greenfield land but does require that the housing requirement is delivered. The current economic circumstances are preventing a number of inner urban sites from being developed and in order to ensure the timely delivery of new housing some greenfield sites outside of the currently settlement boundaries will be required as they represent the only realistic option for viable development.</div> <div>The Council has engaged with the utility and infrastructure providers during the plan making process. They have not highlighted any site specific issues relating to the provision of infrastructure for this site. The landowner is carrying out work to overcome the issues relating to access into the site in order to provide certainty of delivery.</div> <div>The viability of the site is tested against the model sites in the Development Viability Study and is shown to be marginal. However, the landowner has indicated that the availability of finance and the financial viability of the site is not restricting the site from being brought forward.</div> <div>The issues of access and infrastructure provision can be resolved and it is therefore not unreasonable to include this site as a deliverable site in the five year supply.</div> <div>No change proposed in response to this comment.</div>	

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details		Comment ID	Consultee comments	Officer Response and Recommendation
<div><div></div><div></div><div></div><div>Stirling Investment Properties Ltd</div><div>618699</div><div>MrRobertCrolla</div><div>Indigo Planning</div></div>		26	<div><div>Site RefSHLAAS</div><div>Site NameLand off Skipton Road, Barnoldswick</div></div> <div><p>4.37. The site is located beyond the northern settlement boundary of Barnoldswick, almost 2km from key local services in the town centre. It is identified for 50 dwellings to be delivered over the next five years. The SHLAA indicates the first dwellings will be completed and ready for occupation by April 2017. However, this trajectory is without foundation or consideration of the development requirements.</p><p>4.38. Furthermore, given the peripheral nature of the site and the distance to local services, the site is not sustainably located.</p><p>Site Constraints</p><p>4.39. The site is located outside the settlement boundary, in the open countryside. The Council recognises in the SHLAA that the ability to obtain planning permission is restricted by the current planning policy position.</p><p>4.40. Furthermore the site is identified as a local nature site and this designation would need to be considered as part of any development proposals</p><p>4.41. The site lacks any form of servicing and infrastructure and there is no indication that the necessary infrastructure can be provided.</p><p>Timescales for Delivery / Trajectory</p><p>4.42. Given the above constraints, development of the site as a whole is uncertain and delivery in 2017 is even more uncertain.</p><p>4.43. Whilst it is not unreasonable for a greenfield site to be delivered, in part, within three years, the specifics of this site question its inclusion as a ‘deliverable’ housing site, i.e. the uncertainty on the delivery of the necessary infrastructure and the timescales for doing so.</p></div>	<div><p>The distance to the town centre is only one of a number of criteria used to determine a site's sustainability. The site is located adjacent to an existing residential area with access to public transport.</p><p>The review of the SHLAA shows that to meet the housing needs of the borough (identified by the SHMA) additional sites located outside of the existing settlement boundaries will be required. Furthermore, the current viability of sites in Pendle means that such sites present one of the only viably options to ensure the delivery of the housing requirement.</p><p>This site is located adjacent to the Leeds and Liverpool canal which is covered by a nature conservation designation. However, only a small strip of the site is covered by this designation. The area of ecological interest record only covers a small section of the site and indicates that further investigation my be required. This does not necessarily restrict development.</p><p>The Council has engaged with the utility and infrastructure providers during the plan making process. They have not highlighted any site specific issues relating to the provision of infrastructure for this site. The landowner has confirmed that utility services are located adjacent to the site.</p><p>The constraints identified can be overcome allowing delivery in accordance with the suggested timescales.</p><p>No change proposed in response to this comment.</p></div>
<div><div></div><div></div><div></div><div>Stirling Investment Properties Ltd</div><div>618699</div><div>MrRobertCrolla</div><div>Indigo Planning</div></div>		27	<div><div>Site RefS225</div><div>Site NameLand at Lane Ends Farm, Barnoldswick</div></div> <div><p>4.44. The site is identified as being suitable for 18 dwellings which would be delivered between 2016 and 2019, with the first dwellings to be completed and ready for occupation by April 2017.</p><p>Site Constraints</p><p>4.45. The site is outside the settlement boundary, and being over 1km from key services in Barnoldswick, it is not sustainably located.</p><p>4.46. The site is greenfield land located, in the open countryside and outside the settlement boundary.</p><p>4.47. It also lacks any form of servicing and infrastructure, and there is no indication that the necessary infrastructure can be provided.</p><p>Timescales for Delivery / Trajectory</p><p>4.48. Given the above constraints, development of the site as a whole is uncertain and delivery in 2017 is even more uncertain. Though the site could be delivered within three years, the specific site constraints undermine its deliverability for housing within the proposed trajectory.</p></div>	<div><p>The distance to the town centre is only one of a number of criteria used to determine a site's sustainability. The site is located adjacent to an existing residential area with access to public transport.</p><p>The site is greenfield and viable to develop. The NPPF does not preclude the development of greenfield land but does require that the housing requirement is delivered. The current economic circumstances are preventing a number of inner urban sites from being developed and in order to ensure the timely delivery of new housing some greenfield sites outside of the currently settlement boundaries will be required as they represent the only realistic option for viable development.</p><p>The Council has engaged with the utility and infrastructure providers during the plan making process. They have not highlighted any site specific issues relating to the provision of infrastructure for this site.</p><p>The constraints identified can be overcome allowing delivery in accordance with the suggested timescales.</p><p>No change proposed in response to this comment.</p></div>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details			Comment ID		Consultee comments		Officer Response and Recommendation	
<div></div>			28		Site Ref <div></div> Site Name <div></div>		<p>These sites have been all been assessed against the SHLAA criteria and are considered to be deliverable. The owners of the sites indicate that they can be delivered within the five year period.</p> <p>As stated in the responses above, the housing needs of the borough are such that a number of sites outside of the current settlement boundaries will need to be developed to deliver the housing requirement. These sites represent viable options to ensure that the current housing needs are met.</p> <p>The viability of these sites as tested against the model sites in the Development Viability Study indicate that they are either viable or marginal to develop. The owners of the sites have all indicated that the availability of finance and the viability of the sites is not a constraint to development.</p> <p>The provision of infrastructure can be resolved and the utility providers have not indicated that there are any capacity issues.</p> <p>These sites are all adjacent to existing residential areas, are close to public transport routes, are available and have willing landowners therefore representing good options for new housing.</p> <p>The suggested delivery rates are based on the best available evidence and provide a realistic estimate of when the sites will be delivered.</p> <p>No change proposed in response to this comment.</p>	
<div></div>					<p>4.49. The above sites are all within the open countryside, fall outside the defined settlement boundaries, and are not in sustainable locations. The SHLAA concedes that the sites are only marginally viable and may require significant infrastructure works, which further undermines their deliverability.</p> <p>4.50. The sites will result in significant intrusions into the open countryside which will impact significantly on nearby settlements and the character of the surrounding area.</p> <p>4.51. Moreover, none of the above sites are sustainably located. All are located in excess of 1km from the nearest town centre and have relatively poor accessibility to local services and public transport.</p> <p>4.52. As a result, the Council’s housing land supply position should reflect that as a conservative estimate circa 200 of the 850 dwellings identified in the additional sites may not come forward within the five year supply period.</p>			
Stirling Investment Properties Ltd								
618699								
Mr	Robert	Crolla						
Indigo Planning								

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<div><div></div><div></div><div></div><div>Stirling Investment Properties Ltd</div><div>618699</div><div>MrRobertCrolla</div><div>Indigo Planning</div></div>		29	<div>Site Ref<div></div>Site Name<div></div></div> <div>Five Year Supply 4.53. Irrespective of the delivery of the above sites, despite identifying additional housing sites the Council still lacks a demonstrable five year supply. 4.54. As detailed in Section 3, the Pendle & Burnley SHMA recommends that the Council adopts the higher housing demand targets of 320 dwellings per annum over the plan period. However, the Council have adopted a lower target of 280 dwellings per annum when calculating their five year target in the SHLAA. 4.55. Taking into consideration past under performance, the Council has a five year housing requirement of 2,268 dwellings (454 dwellings per annum), based on the SHMA recommendations. 4.56. However, at present the SHLAA identifies a deliverable five year supply of 2,200 dwellings (440 dwellings per annum), which includes the sites considered in Section 4 of this report, where the delivery is questionable (i.e. some 68 below the suggested requirement). 4.57. On this basis, the SHLAA fails to demonstrate a five year supply of deliverable housing sites. Summary 4.58. It is to provide a five year supply of deliverable housing sites, the Council should consider the allocation of further housing sites, such as the site to the south of Long Ing Lane in Barnoldswick. The benefits of this site are discussed in further detail in the following section</div>		<div>The Burnley and Pendle Strategic Housing Market Assessment (SHMA) does not recommend that the Council should adopt the higher housing target of 320dpa. The SHMA provides a suggested range for the housing requirement indicating that in Pendle between 280 and 320dpa would provide a realistic level of housing to deliver economic growth, whilst recognising the demographic and viability challenges that remain. The SHMA has recently been supplemented by a Housing Needs Study (HNS) Update report. This looks at the impact of the 2012-based Sub-national Population Projections (SNPP) on the housing requirement and presents a revised objectively assessed needs (OAN) range of 250 to 320 dwellings per annum. This change in the range reflects the lower levels of population growth shown by the new projections. The housing requirement figure in the Core Strategy has been revised to 298 dwellings per annum to better reflect the economic aspirations of the plan.</div> <div>On this basis the five year requirement and supply calculation will be revised and a further review of the SHLAA will be carried out to ensure sufficient sites can be identified to deliver the requirement.</div> <div>The SHLAA does not allocate land for housing. It identifies sites which are considered to be available, suitable and achievable. Consideration will be given to the sites at Long Ing Lane in Barnoldswick as to the potential contribution they can make to the housing land supply both in the five year period and over the longer term.</div> <div>Update the five year requirement and supply calculation to take account of the new housing provision figure.</div> <div>Carry out a further review of the SHLAA to ensure sufficient land can be identified to demonstrate a five year supply of deliverable housing sites.</div> <div>(Re)assess the proposed sites at Long Ing Lane, Barnoldswick in the SHLAA.</div>
<div><div></div><div></div><div></div><div>Stirling Investment Properties Ltd</div><div>618699</div><div>MrRobertCrolla</div><div>Indigo Planning</div></div>		30	<div>Site Ref<div></div>Site Name<div></div></div> <div>5.1. As detailed in Section 1, Land to the South of Long Ing Lane has been recognised as an appropriate site for residential development within the SHLAA and by Officers at Pendle Council. 5.2. The site is formed of two parts, with the merits of each site discussed in turn below. However, there are a number of common benefits to identifying both sites, namely they are:<ul style="list-style-type: none">• Deliverable within the next five years;• In a highly sustainable accessible location, within walking distance from the main facilities of Barnoldswick Town Centre.• Located in close proximity to existing employment.• Well located for public transport, being only 300m from main bus stops adjacent Barnoldswick Town Centre which link to main settlements of Colne, Burnley and Skipton;• Adjacent to public open space;• Preferably located when compared against other sites identified in the SHLAA; and• Recognised as sustainable locations during discussions with Officers.</div>		<div>The sites at Long Ing Lane will be (re)considered in the SHLAA. The site specific issues are dealt with in the following responses.</div> <div>No change proposed in response to this comment.</div>

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Person / Agent Details		Comment ID	Consultee comments		Officer Response and Recommendation
<div><div></div><div><div></div><div></div><div></div></div><div>Stirling Investment Properties Ltd</div><div>618699</div><div><div>Mr</div><div>Robert</div><div>Crolla</div></div><div>Indigo Planning</div></div>		31	<div>Site Ref<div>881</div>Site Name<div>Land behind Raikes Cottage, Barnoldswick</div></div> <div>5.3. The northern site has been identified in the SHLAA as being deliverable in the next 6 to 10 years. 5.4. However, for the reasons set out below, the site can be delivered immediately and therefore should form part of the Councils five year supply. 5.5. The majority of the site falls within the Barnoldswick settlement boundary (as defined by the Local Plan). The Local Plan (whilst out of date) and NPPF are both supportive of the development of such sites. 5.6. An outline planning application is currently being prepared for the site (shown as site 1 in Appendix 1), deliver approximately 29 units comprising a mix of two, three and four bedroom houses. 5.7. The application has been subject to positive pre-application discussions with Officers at the Council and is likely to be submitted in early March 2014, with the housing delivered within the next five years. Officers confirmed in their pre-application response that they are supportive of the scheme, the Council’s lack of a five year housing land supply and: “...this land would perform extremely well set against other land in the SHLAA...” 5.8. As such there is clear recognition that the northern portion of the site should be considered as being deliverable within the Council’s five year supply.</div>		<div>It is agreed that this site could be delivered in five years and will be brought forward in to the five year supply.</div> <div>The additional information provided by the agent and the submission of the outline planning application gives reassurance that the site is achievable and can form part of the five year supply.</div> <div>This site should be rescored based on the additional information provided by the site's agent and through the details of the planning application. The site should be included in the five year supply.</div>
<div><div></div><div><div></div><div></div><div></div></div><div>Stirling Investment Properties Ltd</div><div>618699</div><div><div>Mr</div><div>Robert</div><div>Crolla</div></div><div>Indigo Planning</div></div>		32	<div>Site Ref<div></div>Site Name<div></div></div> <div>5.9. The southern portion of the site (shown as site 2 in Appendix 1) can also be delivered within the next five years and will be subject to a separate application. 5.10. The Council has recognised in both the emerging Core Strategy and SHLAA that existing settlement boundaries will need to be relaxed to accommodate housing development required to demonstrate a five year supply of sites. 5.11. The site is bordered on 3 sides by existing development, and therefore would represent a neat infill, requiring only a minor amendment to the Barnoldswick settlement boundary. 5.12. In comparison to other sites outside the settlement boundary (such as Land off Skipton Road), this site is a preferable location for housing. In addition to the sustainability credentials identified above, initial work has demonstrated that suitable access and infrastructure can be provided to deliver residential development. 5.13. Whilst the site is covered by a Tree Protection Order, the trees are very much fledgling having been planted in approximately 2003, and include areas of unplanted land and informal footpaths. This also does not preclude development given that initial work undertaken to understand the sites deliverability has indicated that by ‘pepper potting’ development within the site, the potential visual impact of development could be mitigated. 5.14. In summary, the site could be delivered within the next five years, and therefore can contribute to the Councils five year housing land supply.</div>		<div>The majority of this site has been planted with trees and is covered by a Tree Preservation Order. Whilst it is acknowledged that this in itself does not necessarily restrict development, consideration must be given to the reasons for the planting of this site. Under its previous ownership the site was planted as part of a wider package of flood alleviation works to slow the run-off from the hillside down into the Silentnight factory. In addition the woodland now provides screening to the Silentnight site forming a substantial landscape feature and accounts for the largest wooded area in the West Craven part of the borough.</div> <div>The site is bordered by development on its eastern side and to some extent its northern side but there is green, open space to the west and south.</div> <div>Although somewhat closer to the town centre this site would require substantial infrastructure works and is reliant on the northern site being developed to provide an access to the site.</div> <div>The current tree coverage of the site presents a significant constraint to development.</div> <div>This site should be scored against the SHLAA criteria.</div>

Strategic Housing Land Availability Assessment (SHLAA)

Person / Agent Details		Comment ID	Consultee comments		Officer Response and Recommendation
<div></div>		33	Site Ref	<div></div> Site Name	
<div></div> <div></div> <div></div> <div>Stirling Investment Properties Ltd</div> <div>618699</div> <div>Mr</div> <div>Robert</div> <div>Crolla</div> <div>Indigo Planning</div>			<p>6.1. The representations are made to the evidence base which underpins the Pendle Local Plan Part 1: Core Strategy Further Options Report consultation, and should be read in conjunction with separate representations made to the draft Core Strategy itself.</p> <p>6.2. These representations demonstrates that the SHLAA, and thus the emerging Core Strategy, is unsound for the following reasons:</p> <ul style="list-style-type: none">• The trajectory of housing supply promoted in the SHLAA is unrealistic and not justified;• A number of sites identified within the 5 year supply are significantly constrained;• The SHLAA findings are not responsive to the housing market requirements set out in the SHMA; and• Despite identifying additional housing sites, the Council are still unable to identify a five year supply of deliverable housing sites (as required by National Policy). <p>6.3. In particular the larger residential sites identified in the SHLAA, namely Land at Trough Laithe Farm, Land to rear of St. Thomas's Primary School and Oaklands (Barrowford) and Land of Skipton Lane (Barnoldswick) are less than certain to come forward at the rate set out in the trajectory proposed by the Council.</p> <p>6.4. The uncertainty of these sites further undermines the housing land supply position in Pendle and further demonstrates a lack of five year housing land supply.</p> <p>6.5. To assist the supply of housing, the Council should consider land off Long Ing Lane, Barnoldswick as part of their five year supply.</p> <p>6.6. The northern part of this site is deliverable almost immediately. An outline planning application will be submitted in early March 2014 and has received a favourable pre-application response from Officers. The southern portion of the site is also deliverable within the next five years.</p> <p>6.7. Irrespective of the current lack of five year housing land supply, the site to the south of Long Ing Lane is preferable and more sustainably located than other out of settlement sites identified in the SHLAA.</p> <p>6.8. On this basis, the whole of the site to the south of Long Ing Lane should be identified for housing, and identified as being suitable for being delivered within the next five years.</p>		<p>The housing trajectory will be revised to take account of revisions made to the SHLAA. However, the SHLAA clearly sets out how the trajectory is devised and is a justified approach.</p> <p>The identification of constraints on a site does not necessarily restrict the site from coming forward within the five year period. Sites in the five year supply with constraints have been programmed for later in the period to ensure sufficient time is available to overcome the constraints.</p> <p>In response to the comments made against the Core Strategy Further Options report, the housing requirement has been reviewed and the SHLAA will be revised accordingly to ensure there is a sufficient supply of land.</p> <p>The delivery rates of sites in the five year supply have been calculated using the best available evidence. In many cases they have been provided by the landowners.</p> <p>The sites at Long Ing Lane, Barnoldswick will be (re)considered in the SHLAA. It is proposed to include the northern part of the site in the five year supply.</p> <p>The southern part of the site currently forms a large wooded area. Although in terms of distance to the centre it is closer than other sites in Barnoldswick that are in the SHLAA, its development is likely to have a much greater environmental impact due to the substantial loss of woodland which would occur.</p> <p>Revise the housing trajectory to take account of the revised housing requirement figures and amendments to the SHLAA.</p> <p>(Re)consider the sites at Long Ing Lane, Barnoldswick in the SHLAA.</p> <p>Revise the five year land requirement and supply calculation based on the updated information.</p>

Strategic Housing Market Assessment (SHMA)

Person / Agent Details		Comment ID	Consultee comments		Officer Response and Recommendation
<div></div>		1	Site Ref	<div></div>	<div>Support for the robust approach taken by the SHMA in assessing the housing need / requirement.</div> <div>With regard to the housing requirement set in the Core Strategy, this is dealt with in the response to Comment 176 made against Policy LIV1.</div>
<div></div>	Site Name		<div></div>		
<div></div>	<div>3. Pendle & Burnley SHMA</div> <div>3.1. The Burnley & Pendle SHMA was published in December 2013, providing a comprehensive review of the housing market in Pendle and Burnley Boroughs.</div> <div>3.2. Within Pendle, the SHMA identifies three sub-areas; M65 Corridor, West Craven Towns and Rural. Barnoldswick falls within the West Craven Towns area, which also includes the adjacent settlement of Earby.</div>				
<div>Stirling Investment Properties Ltd</div>					
<div>618699</div>					
Mr	Robert	Crolla	<div>SHMA Housing Targets</div> <div>3.3. The SHMA identifies three approaches for setting housing targets;</div> <div>i. Using the former North West Regional Spatial Strategy (RSS) figures (190 dwellings per annum);</div> <div>ii. 'Normal' housing demand (280 dwellings per annum); and</div> <div>iii. High housing demand (320 dwellings per annum).</div> <div>3.4. Though the SHMA identifies the West Craven Towns area as one of high housing demand, the emerging Core Strategy adopts the normal housing demand targets as these are considered to be more reflective of the housing market in the Borough. The difference in targets is set out below.</div> <div>Table 3.1 – SHMA Housing Targets Area</div> <div>Normal Demand West Craven Towns</div> <div>Five Year Target 245</div> <div>Per Annum 49</div> <div>Normal Demand Pendle (Total)</div> <div>Five Year Target 1,400</div> <div>Per Annum 280</div> <div>High Demand West Craven Towns</div> <div>Five Year Target 280</div> <div>Per Annum 56</div> <div>High Demand Pendle (Total)</div> <div>Five Year Target 1,600</div> <div>Per Annum 320</div> <div>3.5. The above figures however, do not take past underperformance into consideration. Under performance is factored in to the Councils five year supply target contained in the SHLAA.</div> <div>3.6. The implications of the housing targets are discussed in Section 4. In summary we consider that the SHMA undertakes a robust assessment of the housing market in Pendle and as such the Council should adopt the high growth targets as recommended in the SHMA.</div>		
<div>Indigo Planning</div>					
<div>No change proposed in response to this comment.</div>					

Employment Land Review (ELR)

Person / Agent Details

Royal Mail

327713

Mr

Andrew

Teage

DTZ

Comment ID

1

Consultee comments

Site Ref

Site Name

Employment Land Review - The Royal Mail supports the retention of Land at Ravencroft Way, Crow Nest Industrial Estate (Site A reference E027) within the Pendle Employment Land Portfolio, and encourages the Council to include it within the boundary of the existing and adjacent Priority Employment Area as it prepares its Site Allocation and Development Policies Local Plan. It is considered that the scenario will serve to safeguard Royal Mail's operations in Barnoldswick so that they will not be prejudiced and can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000. The specifically relates to the fact that locating Delivery Offices within employment areas and/or surrounding them with other employment uses addressing wider amenity considerations given that the majority of such employment generating uses are insensitive to the Royal Mail's hours of operation and noise impact.

Officer Response and Recommendation

Note comments.
Site E027 occupies land that was recently opened up for development by culverting part of Crow Nest Syke (Planning application 13/07/0715P). It comprises the balance of the area not developed for employment use and represents an opportunity for future B1/B2/B8 development in a sustainable location.

No change to the Core Strategy is required in response to this comment. The boundary of the Protected Employment Area at Long Ing/Crow Nest/Bankfield should be amended in Pendle Local Plan (Part 2): Site Allocations & Development Policies to include that part of site E027 not currently protected by this policy designation.

Infrastructure Strategy

Person / Agent Details	Comment ID	Consultee comments	Officer Response and Recommendation
<div>327658</div> <div><div>Ms</div><div>Kate</div><div>Grimshaw</div></div> <div>Lancashire County Council - Corporate Property Group</div> <div></div> <div></div> <div></div>	1	<div>Site Ref<div></div>Site Name<div></div></div> <div>Infrastructure Study Page 48 – Youth Centres - LCC do not run youth clubs – they operate young people's centres. - LCC do not operate a young people's centre from Barrowford Youth and Community Centre. It is now used exclusively by a private pre-school group</div>	<div>Note comments.</div> <div>Replace the introductory sentence in the section on Youth Centres [Existing] (Page 48) with the text below, and delete the reference to Barrowford Youth and Community Centre: “Lancashire County Council operates six young people’s centres across the borough”</div> <div>Note comments.</div>
<div>714648</div> <div><div>Mr</div><div>Martyn</div><div>Coy</div></div> <div>Canal Riverside Trust</div> <div></div> <div></div> <div></div>	2	<div>Site Ref<div></div>Site Name<div></div></div> <div><div>The Canal & River Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding. The Trust has a range of charitable objects including:<ul style="list-style-type: none">To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;To protect and conserve objects and buildings of heritage interest;To further the conservation, protection and improvement of the natural environment of inland waterways; andTo promote sustainable development in the vicinity of any inland waterways for the benefit of the public.The Trust wish to comment on the Infrastructure Strategy as owner and operator of the Leeds & Liverpool Canal. Canal Towpath Maintenance We support the proposal within ‘Appendix 1 – Infrastructure Delivery Schedule’ for a programme of maintenance for the canal towpath within Pendle. The towpath forms part of the local green infrastructure network providing a sustainable transport link for local residents and visitors to Pendle enabling the use of a car free route for commuting and traveling to school and connecting communities and neighbouring Local Authorities. The towpath also offers opportunities for outdoor recreation and exercise which provide both physical and mental health benefits for all users. Such a maintenance programme would help to ensure that the towpath remains fit for purpose and accessible for all We would welcome the opportunity to meet with the Council to discuss the scheme and proposed funding options.</div></div>	<div>Note comments.</div> <div>No change proposed in response to this comment. Arrange meeting with the Council’s Engineering & Special Projects team to explore the potential to increase use of the canal towpath.</div>

Infrastructure Strategy

Person / Agent Details	Comment ID	Consultee comments	Officer Response and Recommendation
<div>327423</div> <div><div>Mr</div><div>David</div><div>Sherratt</div></div> <div>United Utilities</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>	3	<div>Site Ref<div></div>Site Name<div></div></div> <div>Please also note, the following water supply investment programmes outlined in Paragraph 8.180 are now complete: £32.5m scheme to improve Pendle's water quality; and £19m scheme to replace a water treatment works in Barley which serves over 40,000 people in Nelson, Colne and Barrowford is now complete.</div>	<div>Note comments.</div> <div>Revise the second bullet point in the section on Water Supply [Existing] (Page 36) with the following text: "United Utilities has invested £19 million to create a state-of-the-art water treatment at Ridgaling Farm north of Barrowford. This replaced the old facility at Barley, and provides over 40,000 people in Nelson, Colne and Barrowford with some of the cleanest drinking water in Europe. In addition, a further £11 million was spent between 2005 and 2010 to prevent sewer flooding and help deliver cleaner streams and rivers across the borough."</div>
<div>662979</div> <div><div>Mr</div><div>Ben</div><div>Terry</div></div> <div>Lancashire County Council</div> <div></div> <div><div></div><div></div><div></div></div> <div></div>	4	<div>Site Ref<div></div>Site Name<div></div></div> <div>Firstly, please can I draw your attention to the education reference made in the Pendle Infrastructure Study document. On page 59 of the document it refers to out of date information. More up to date information has been supplied to Pendle colleagues with regard to how pupil yield is calculated. For example, the pupil yields referred to are no longer used and there is reference to an ongoing school expansion consultation and this consultation has now closed. We would be happy to work with Pendle to agree revised wording.</div>	<div>Note comments. The relevant changes will be made to the Infrastructure Strategy based on information supplied by LCC. Ongoing discussions between the council and all infrastructure providers will continue during the plan making process.</div> <div>Make changes in accordance with information supplied by LCC.</div>

Appendix 6

Schedule of proposed changes – Evidence base documents

Evidence Base - Summary of Officer Recommendations / Changes

Person ID	EBComment ID	Evidence Base Document	Officer Recommendation
814795	3	Strategic Housing Land Availability Assessment (SHLAA)	Amend the Introduction section of the SHLAA in explain its relationship with the Local Plan Part 2 in terms of site allocations. Assess the suggested site against the SHLAA criteria and determine if it should be included in the SHLAA.
731436	5	Strategic Housing Land Availability Assessment (SHLAA)	The site should be reassessed in line with the officer response and revised scoring and timescales should be recorded.
327994	6	Strategic Housing Land Availability Assessment (SHLAA)	Amend the SHLAA in accordance with the officer response.
327994	7	Strategic Housing Land Availability Assessment (SHLAA)	Amend the SHLAA in accordance with the officer response.
379108	17	Strategic Housing Land Availability Assessment (SHLAA)	Reassess the access scores of the site.
713089	19	Strategic Housing Land Availability Assessment (SHLAA)	Amend the timescales for the delivery of this site.
618699	22	Strategic Housing Land Availability Assessment (SHLAA)	The SHLAA will be reviewed to identified further deliverable sites to meet the five year housing land requirement.
618699	29	Strategic Housing Land Availability Assessment (SHLAA)	Update the five year requirement and supply calculation to take account of the new housing provision figure. Carry out a further review of the SHLAA to ensure sufficient land can be identified to demonstrate a five year supply of deliverable housing sites. (Re)assess the proposed sites at Long Ing Lane, Barnoldswick in the SHLAA.
618699	31	Strategic Housing Land Availability Assessment (SHLAA)	This site should be rescored based on the additional information provided by the site's agent and through the details of the planning application. The site should be included in the five year supply.
618699	32	Strategic Housing Land Availability Assessment (SHLAA)	This site should be scored against the SHLAA criteria.
618699	33	Strategic Housing Land Availability Assessment (SHLAA)	Revise the housing trajectory to take account of the revised housing requirement figures and amendments to the SHLAA. (Re)consider the sites at Long Ing Lane, Barnoldswick in the SHLAA. Revise the five year land requirement and supply calculation based on the updated information.
327713	1	Employment Land Review (ELR)	No change to the Core Strategy is required in response to this comment. The boundary of the Protected Employment Area at Long Ing/Crow Nest/Bankfield should be amended in Pendle Local Plan (Part 2): Site Allocations & Development Policies to include that part of site E027 not currently protected by this policy designation.
327658	1	Infrastructure Strategy	Replace the introductory sentence in the section on Youth Centres [Existing] (Page 48) with the text below, and delete the reference to Barrowford Youth and Community Centre: "Lancashire County Council operates six young people's centres across the borough"

Person ID	EBComment ID	Evidence Base Document	Officer Recommendation
714648	2	Infrastructure Strategy	No change proposed in response to this comment. Arrange meeting with the Council's Engineering & Special Projects team to explore the potential to increase use of the canal towpath.
327423	3	Infrastructure Strategy	Revise the second bullet point in the section on Water Supply [Existing] (Page 36) with the following text: "United Utilities has invested £19 million to create a state-of-the-art water treatment at Ridgaling Farm north of Barrowford. This replaced the old facility at Barley, and provides over 40,000 people in Nelson, Colne and Barrowford with some of the cleanest drinking water in Europe. In addition, a further £11 million was spent between 2005 and 2010 to prevent sewer flooding and help deliver cleaner streams and rivers across the borough."

Appendix 7

Consultation events and publicity – Core Strategy (Further Options Report)

In addition to contacting organisations and individuals directly via letter or email, publicity was also generated through the Council's website, Feedb@ck Online, social media (Facebook and Twitter), local media (press and radio) and the placement of publicity materials at key locations throughout the borough.

Figure 1: A selection of publicity materials (Clockwise from left: poster, press advertisement, schedule of document availability)

CORE STRATEGY FURTHER OPTIONS REPORT
Public Consultation
Have we got it right?

START: 9:00 Friday 10th January 2014
CLOSE: 17:00 Friday 21st February 2014

Documents are available on the Council's website and at local libraries and council shops throughout Pendle.

Consultation events will be held at:

- Colne Lower Muni 16:00-20:00 Monday 20th January
- Barnoldswick Rainhall Centre 16:00-20:00 Tuesday 21st January
- Barrowford Holmefield House 16:00-20:00 Wednesday 22nd January
- Nelson Town Hall Reception 16:00-20:00 Thursday 23rd January
- Nelson Town Hall Reception 10:00-16:30 Tuesday 11th February

Planning & Building Control, Town Hall, Market Street, Nelson, BB9 7LG
 01282 661330
 ldf@pendle.gov.uk
 www.pendle.gov.uk/corestrategy

Have your say on the future of Pendle

Pendle Core Strategy

Public Consultation: Friday 10th January to Friday 21st February 2014

What is the Core Strategy?

The Core Strategy is one of the most important documents produced by Pendle Council and will influence how the borough changes in the years to come.

Planning officers will use the Core Strategy on a daily basis to help them decide if proposals for new development make a positive contribution to our vision for the future of the Borough.

This consultation is your chance to tell us what you think about a new housing delivery target, a revised employment land requirement and the proposed allocation of two strategic development sites for housing and employment.

Have we got things just about right? Are there issues we still need to resolve? Do you favour a different approach?

How can I take part in the consultation?

Copies of the Core Strategy (Further Options Report) and all supporting documents can be viewed or downloaded from the Council's website at: www.pendle.gov.uk/corestrategy

Reference copies of these documents are available at Number One Market Street in Nelson and the main libraries in Nelson, Colne and Barnoldswick. Summary information and representation forms for your comments are also available from your local library or Council Shop.

Display panels will be on show at Number One Market Street in Nelson, throughout the six-week public consultation. Planning officers will also be available to answer your questions at the following venues during the consultation period.

Date	Time	Location	Venue
Monday 20 th January	16:00-20:00	Colne	Lower Municipal Hall
Tuesday 21 st January	16:00-20:00	Barnoldswick	Rainhall Centre
Wednesday 22 nd January	16:00-20:00	Barrowford	Holmefield House
Thursday 23 rd January	16:00-20:00	Nelson	Town Hall Reception
Tuesday 11 th February	10:00-16:30	Nelson	Town Hall Reception

Tel: 01282 661330 Email: ldf@pendle.gov.uk

Public Consultation Pendle Core Strategy Further Options Report

Availability of Consultation Documents

Town	Venue(s)	Opening Times (Mon-Sat)	Document Availability													
			1	2	3	4	5	6	7	8	9	10	11	12	13	
Barnoldswick	Council Shop	Mon-Wed-Thu-Fri 09:30-12:00 13:00-17:00	•		•	•	•	5	•	•	8	•				
	Public Library	09:30-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
Barrowford	Public Library	Closed Thu 09:30-12:30 13:30-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
	Public Library	09:30-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
Brierfield	Public Library	09:30-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
	Former Town Hall	Mon-Fri 09:00-16:00	•		•	•	•	•	•	•	•	•	•	•	•	
Colne	Public Library	09:00-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
	Council Shop	Mon-Thu-Fri 09:00-13:00 13:30-16:00	•		•	•	•	•	•	•	•	•	•	•	•	
Earby	Public Library	Closed Thu 09:30-12:00 13:00-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
	Wheatley Lane Library	Closed Fri 14:00-18:00	•		•	•	•	•	•	•	•	•	•	•	•	
Fence	Number One Market Street	Mon-Fri 08:45-16:00	•	•	•	•	•	•	•	•	•	•	•	•	•	
	Public Library	09:00-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
Trawden	Public Library	Closed Thu 10:00-12:30 13:30-17:00	•		•	•	•	•	•	•	•	•	•	•	•	
	Mobile Library	Check Location 13:30-16:30 17:00-19:00	•		•	•	•	•	•	•	•	•	•	•	•	

Key

- Core Strategy (Further Options Report)
- Sustainability Appraisal Report
- Sustainability Appraisal Report (Addendum)
- Sustainability Appraisal Report (Non-technical Summary)
- Habitat Regulations Assessment
- Equalities Impact Assessment
- Framework Newsletter
- Representation Forms
- EVIDENCE BASE DOCUMENTS
- Burnley & Pendle Strategic Housing Market Assessment (SHMA)
- Pendle Strategic Housing Land Availability Assessment (SHLAA)
- Pendle Employment Land Review (ELR)
- Pendle Infrastructure Strategy
- Pendle Development Viability Study

Much of this publicity centred on promoting a series of drop in sessions to be held throughout the Borough. These events were advertised via social media, in the local media and on posters. Four events were held in the second week of the consultation, in a late afternoon/early evening time-slot, as this had proved to be the most popular time in previous public consultations. A final drop-in session held in the fifth week of the consultation was open throughout the day. These timings gave everyone an opportunity to either attend an event near to their home, or be able to attend one at a time that was convenient to them.

All consultation documents and publicity materials were available at local libraries and Council shops throughout Pendle, a total of 14 venues. Posters and leaflets were distributed to local leisure centres, doctors surgeries and health centres, and parish councils.

A report detailing the format of the public consultation was submitted to the Council's Executive in December 2013 and a presentation was made to the Local Strategic Partnership's business sub-group (Pendle Vision Board).

Appendix 8

Sustainability Appraisal Matrix – Core Strategy (Further Options Report)

Pre-Submission Report		Sustainability Appraisal Objective (Key overleaf)																	
		H1	H2	E1	E2	E3	E4	C1	C2	C3	C4	C5	P1	P2	P3	P4	P5	P6	P7
Core Strategy Policy (Key overleaf)	SDP1	>	?	>	>	?	?	?	?	?	?	?	>	<	<	?	0	?	?
	SDP2	?	0	0	>	0	>	0	>	0	>	0	>	>	0	>	0	0	0
	SDP3	>>	?	0	>	?	0	0	>	0	0	0	>	>	0	0	0	0	0
	SDP4	0	0	>	>>	0	>	0	0	0	0	0	>	>	0	0	0	0	0
	SDP5	0	0	0	>	>	>	0	>	0	0	0	>>	>>	0	0	0	0	0
	SDP6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	ENV1	0	>	>	0	0	>>	0	0	>>	>>	>>	<	>	0	>>	0	>	>>
	ENV2	>	0	>	0	0	>>	>>	>>	>>	>	>>	>>	>>	>>	>	0	>	>
	ENV3	0	0	?	>	0	>	0	0	>	0	?	>>	>>	0	?	0	0	<
	ENV4	0	>	>	>	>>	>	>	>	0	>	>	>>	>	0	<	0	0	<
	ENV5	0	>	>	0	0	>	0	0	0	>>	0	0	>	0	>	>	0	>
	ENV6	0	0	>	>	>	0	0	0	0	0	0	>	>	>>	0	0	0	0
	ENV7	0	0	0	0	0	0	0	0	0	0	0	0	>>	0	0	>>	>>	>
	LIV1	>>	>	0	0	0	>	0	0	0	0	0	0	0	0	>	0	0	0
	LIV2	>>	0	0	0	>	?	0	0	0	<	>	>	0	0	<	0	0	>
	LIV3	>>	>>	0	0	0	0	0	0	0	0	>	0	0	0	0	0	0	0
	LIV4	>	>	0	0	0	>	0	0	0	0	>	0	0	0	>	0	0	0
	LIV5	>>	>>	0	0	0	>>	>>	0	>	>>	>	>	>>	>	0	0	0	>
	WRK1	>	>	>>	>>	>	>	0	0	0	0	>	0	>	0	>	0	0	0
	WRK2	0	0	>>	>>	>	>>	0	0	>	>	>	>	>	0	>	0	0	>
	WRK3	0	0	>>	>>	>	?	0	0	0	<	>	>	0	0	<	0	0	>
	WRK4	>	0	>>	>>	>	>>	0	>>	0	>	>>	>>	>	0	>>	0	0	0
	WRK5	0	0	>>	>>	>	>>	0	0	>>	>>	>>	>>	>	0	>>	0	0	0
	WRK6	0	0	0	>	>	>>	>>	>	>>	>	>>	>	>	0	>>	0	0	>
	SUP1	0	>	>	0	>	>>	>	>	0	0	>>	>	0	0	0	0	0	0
	SUP2	>	>>	0	0	>	0	0	>	0	>	>	>	0	0	0	0	0	0
	SUP3	0	0	>	>>	>	0	0	>	0	0	>	>	0	0	0	0	0	0
	SUP4	0	>	>	0	0	>	>>	0	>>	>	>>	>	>	>	0	0	>	>

<< Move away significantly

< Move away marginally

> Move towards marginally

>> Move towards significantly

0 No Impact

? Uncertain or mixed impact

Core Strategy Policy

Policy SDP 1	Presumption in Favour of Sustainable Development
Policy SDP 2	Spatial Development Principles
Policy SDP 3	Housing Distribution
Policy SDP 4	Employment Distribution
Policy SDP 5	Retail Distribution
Policy SDP 6	Future Infrastructure Requirements
Policy SDP 7	Sequential Approach to Development
Policy ENV 1	Protecting and Enhancing Our Natural and Historic Environments
Policy ENV 2	Achieving Quality in Design and Conservation
Policy ENV 3	Renewable and Low Carbon Energy Generation
Policy ENV 4	Promoting Sustainable Travel
Policy ENV 5	Pollution and Unstable Land
Policy ENV 6	Waste Management
Policy ENV 7	Water Management
Policy LIV 1	Housing Provision and Delivery
Policy LIV 2	Strategic Housing Site: Trough Laithe

Policy LIV 3	Housing Needs
Policy LIV 4	Affordable Housing
Policy LIV 5	Designing Better Places to Live
Policy WRK 1	Strengthening the Local Economy
Policy WRK 2	Employment Land Supply
Policy WRK 3	Strategic Employment Site: Lomeshaye
Policy WRK 4	Retailing and Town Centres
Policy WRK 5	Tourism, Leisure and Culture
Policy WRK 6	Designing Better Places to Work
Policy SUP 1	Community Facilities
Policy SUP 2	Health and Well-Being
Policy SUP 3	Education and Training
Policy SUP 4	Designing Better Public Places

Sustainability Objectives

- H1 To help meet the housing needs of the whole community.
- H2 To improve health and reduce health inequalities in Pendle.
- E1 To encourage business which is appropriately located, to maximise the benefits on local, national and global markets.
- E2 To secure economic inclusion, and develop and maintain a healthy labour market.
- E3 To develop strategic transport, communication and economic infrastructure.
- E4 To deliver urban/rural renaissance.
- C1 To reduce crime and the fear of crime, and to reduce anti-social behaviour.
- C2 To improve access to, and use of basic goods services and amenities.
- C3 To protect, enhance and maintain places, spaces. Landscapes and buildings of historic, cultural and archaeological value.
- C4 To protect and improve local environmental quality.
- C5 To develop strong and positive relationships between people from different backgrounds and communities and to value the diversity, of cultural traditions found in Pendle.
- P1 To minimise the requirement for energy use, promote energy efficiency and increase the use of energy from renewable sources
- P2 To address the need to limit and adapt to climate change.
- P3 To ensure the sustainable management of existing natural resources through consideration of depletion, waste minimisation, recycling and recovery.
- P4 To reduce contamination, regenerate degraded environments, maintain soil resources and minimise development on Greenfield sites.
- P5 To improve water quality and meet the requirements of the Water Framework Directive.
- P6 Reduce the risk of flooding and conserve water resources.
- P7 To protect and enhance biodiversity and protect European sites.

Appendix 9

Summary of previous public consultations

You Choose the Future of Pendle

The Town and Country Planning (Local Development) (England) Regulations 2004

- Regulation 25

Dates of consultation

- 22nd June to 3rd August 2007

Summary of organisations/individuals contacted

- Pendle Council – LDF database (specific, general and other consultees)..... 307
- Pendle Partnership – LSP database 200
- Staff at Pendle Council, Pendle Leisure Trust, Liberata and Housing Pendle 1,150
- Members of Pendle Citizens Panel 1,350
- Schools and Colleges 44
- Invitations to attend LDF Workshops 247
- Invitations to attend SCS Workshops..... n/a
- **Total** **circa 3,300**

Number of organisations/individuals submitting representations.....

- Written representations 266
- Attendees at LDF Working Groups 112
- Attendees at SCS Working Groups 77
- **Total** **455**

Number of individual comments within representations

- Via written representations 903
- Via LDF Working Groups 285
- Via SCS Working Groups 135
- **Total** **1,323**

Where can I find a summary of the issues raised?

- Issues & Options Consultation Statement (Pendle Council, June 2008)

How have the main issues been addressed in the DPD?

- Issues & Options Consultation Statement (Pendle Council, June 2008)

Pendle Core Strategy (Issues and Options Report)

The Town and Country Planning (Local Planning) (England) Regulations 2004

- Regulation 25

Dates of consultation

- 4th July to 18th August 2008

Summary of organisations/individuals contacted

- LDF and LSP databases (specific consultees) 77
- LDF and LSP databases (general and other consultees) 672
- Pendle Council – Company, town centres and tourism databases 1,168
- Pendle Council website (registered users)..... 805
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) 1,020
- Pendle Citizens Panel (members) 1,153
- Local Councillors 49
- Schools and Colleges 44
- **Total** **circa 5,000**

Number of organisations/individuals submitting representations

- Written representations 58
- Attendance at LDF Workshops 71
- **Total** **129**

Number of individual comments within representations

- Via written representations 1,171
- Via LDF workshops 1,630
- **Total** **2,801**

Where can I find a summary of the issues raised?

- Issues & Options Consultation Summary of Responses (Pendle Council, December 2008)
- Preferred Options Consultation Statement (Pendle Council, September 2011) – Appendix 5

How have the main issues been addressed in the DPD?

- Preferred Options Consultation Statement (Pendle Council, September 2011) – Appendix 5

Pendle Core Strategy (Preferred Options Report)

The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2008

- Regulation 25

Dates of consultation

- 28th October to 12th December 2011

Summary of organisations/individuals contacted

- Pendle Council – Planning Policy database (specific consultees) 78
- Pendle Council – Planning Policy database (general and other consultees) 1,604
- Pendle Partnership – LSP and Vision Board databases..... 175
- Pendle Council – Company, town centres and tourism databases 457
- Pendle Council website (registered users)..... 1,834
- Pendle Council Facebook friends 887
- Pendle Council Twitter followers 1,259
- Pendle Citizens Panel (members) and Feedb@ck Online (registered users) 495
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) 784
- Local Councillors 49
- Schools and Colleges 44
- **Total** **circa 8,000**

Number of organisations/individuals submitting representations

- Written representations (letter)
- Written representations (email / online)
- **Total** **246**

Number of individual comments within representations

- **Total** **1,118**

Where can I find a summary of the issues raised?

- Publication Report Consultation Statement (Pendle Council, August 2012) – Appendix 6

How have the main issues been addressed in the DPD?

- Publication Report Consultation Statement (Pendle Council, August 2012) – Appendix 7

Pendle Core Strategy (Publication Report)

The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 19

Dates of consultation

- 19th October to 3rd December 2012

Summary of organisations/individuals contacted

- Pendle Council – Planning Policy database (via letter) 692
- Pendle Council – Planning Policy database (via email) 916
- Pendle Partnership – LSP database and Vision Board 175
- Pendle Council – Company, town centres and tourism databases 475
- Pendle Council website (registered users)..... Not known
- Pendle Council Facebook ‘likes’ 1,439
- Pendle Council Twitter followers 2,459
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) 370
- Pendle Citizens Panel (members) and Feedb@ck Online (registered users) 495
- Local Councillors 49
- **Total** **over 7,000**

Number of organisations/individuals submitting representations

- Written representations (letter) 4
- Written representations (email) 20
- Written representations (online) 9
- **Total** **33**

Number of individual comments within representations

- Not applicable (references to ‘soundness’ only)

Where can I find a summary of the issues raised?

- Framework Issue 24 (Pendle Council, January 2013)

How have the main issues been addressed in the DPD?

- Further Options Report Consultation Statement (Pendle Council, April 2014)

Pendle Core Strategy (Further Options Report)

The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 18

Dates of consultation

- 10th January to 21st February 2014

Summary of organisations/individuals contacted

- Pendle Council – Planning Policy database (via letter) 679
- Pendle Council – Planning Policy database (via email) 764
- Pendle Partnership – Vision Board 38
- Pendle Council – Company, town centres and tourism databases 475
- Pendle Citizens Panel (members) 1,101
- Feedback Online (registered users – Pendle)..... 122
- Pendle Council website (registered users)..... 9,264
- Pendle Council Facebook ‘likes’ 2,476
- Pendle Council Twitter followers 4,971
- Pendle Council, Pendle Leisure Trust and Liberata (members of staff) 498
- Local Councillors 49
- **Total** **circa 20,000**

Number of organisations/individuals submitting representations

- Written representations (letter) 77
- Written representations (email) 42
- Written representations (online) 9
- **Total** **128**

Number of individual comments within representations

- **Total** **326**

Where can I find a summary of the issues raised?

- Further Options Report Consultation Statement (Pendle Council, April 2014) – Appendices 1-3

How have the main issues been addressed in the DPD?

- Further Options Report Consultation Statement (Pendle Council, April 2014) – Appendix 4

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Planning & Building Control
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Lancashire BB9 7LG

Tel: 01282 661330

Fax: 01282 661720

Email ldf@pendle.gov.uk

Website: www.pendle.gov.uk/corestrategy



**If you would like this information
in a way which is better for you,
please telephone us.**

اگر آپ یہ معلومات کسی ایسی شکل میں چاہتے ہیں، جو کہ
آپ کے لئے زیادہ مفید ہو تو برائے مہربانی ہمیں ٹیلیفون کریں۔

