

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives

Reserved Site List

Barrowford Parish Council's comments on Oaklands, Barrowford, Site (P104, page 206)

Barrowford Parish Council considers some aspects of the assessment of this site are not a true reflection of the detrimental effect the development of the site would have on Barrowford, and would like the following sections of the assessment to be reconsidered:

SA Objective 2: The site is stated as being within 2000m of the Riverside Business Park which although true does not take on board access problems through the local road infrastructure. The two main vehicle accesses are:

1. via Higher Causeway, Newbridge, Gisburn Road, then a figure of 8 through the roundabouts and the Padiham bypass. All of these roads have problems during the morning and evening rush hours.
2. via Wheatley Lane Road, Carr Hall Road and the Padiham Bypass. Although this is a less congested route it is regularly used as a rat run with the junction of Carr Hall Road and the bypass having seen several crashes in recent years.

The site is not therefore well located for access to employment opportunities.

SA Objective 3: The site, although only 800m from the town centre, involves driving down Church Street which has both a natural narrowing of the highway at a point beyond Lupton Drive and a semi-blind corner. The subsequent stretch through to either Hill Top or the junction with Gisburn Road is virtually a single lane road through residents' parked cars. There is no possible provision for off street parking due to the steeply sloping nature of the land across the highway.

The site would therefore detract from urban regeneration and sustainable living.

SA Objective 4: Development of up to 60 houses would significantly increase pressure on local services, as any existing spare capacity in both schools and GP surgeries will be taken by the development of the Strategic Housing Site at Trough Laithe which has its first phase already under construction.

SA Objective 5: This site is not served by public transport, with the nearest service being several hundred meters distant. This service only operates twice an hour to Nelson, with the last bus leaving at 9.45pm. The assessments allude to the possibility of planning contributions towards the provision of cycle links but in reality, every time the Parish Council suggests such contributions to improve links between developments and the local Barrowford amenities these are ignored by planning officers, whereas County or Borough wide schemes are put forward and supported even if they don't meet the needs of either the development or Barrowford.

The Appraisal states that there are no known capacity issues on the local highway network, but as stated above, access from the likely site entrance to Gisburn Road is very poor.

SA Objective 7 & 8: Although this site is not located within 50m of a water course or water body it still plays an essential role in the drainage of the uplands above Oaklands House. The main function of this and is to slow down surface water runoff, a function that it has not fulfilled for several years

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

owing to blocked drains and periods of prolonged rainfall as a result of climate change. The significant drainage problems on this land in recent years have culminated in flooding to Church Street.

The main drainage for the site is through a culvert located at the Oaklands Lodge end of the site. This culvert feeds down to Rushton Street and along Gisburn Road where it links into a culvert at the junction of Portland Street and Gisburn Road. Prolonged rain causes problems at this link causing drainage covers to lift. Recent works to drainage in the field have not seen enough rain to see if they have been successful. If the site is developed, major water attenuation would be critical to prevent problems lower down the drainage system.

SA Objective 9: To promote air quality, as the site is within close proximity of St Thomas Primary School, travel by sustainable transport modes will effectively mean electric cars and all new developments should contain the infrastructure to charge electric vehicles.

SA Objective 10: Sustainable design, construction and operation conditions should be imposed on this site, if developed, so it can meet the UK national objective of being Carbon Neutral by 2030.

SA Objective 12: The site is currently fulfilling a role as a link between the open countryside and the river corridor connecting the countryside beyond the settlement boundary to the disused St Thomas Churchyard and cemetery, the allotments at Back Church Street, the open space adjacent to Rushton Street School, the land at Broadway/Gisburn Road and across Gisburn Road via Back Harry Street and Corlass Street to the river corridor. The site is regularly used by Barn Owls and Bats as part of their hunting range. Deer, Rabbits, Weasels and Stoats have been seen on this site along with numerous species of birds and insects.

SA Objective 13: The lower portion of the site is within Barrowford Conservation Area which includes both Oaklands Lodge and the Estate Boundary wall for Oaklands House. The development of this site would have a detrimental effect on the openness and amenity of the Barrowford Conservation Area and undermine the setting of Oaklands House, a large former mill owner's house. The site has access problems, with the current Oaklands House entrance next to the Lodge not being wide enough for the volume of traffic from 60 dwellings; similarly, the access to the rear of St Thomas Church (in the ownership of the Church) and also being single track would not create sufficient access for 60 dwellings.

Both these possible accesses are situated either near or adjacent to other junctions. If it was proposed to create a new entrance through the old boundary wall this would involve the demolition of a considerable length of the wall to create an adequate visibility splay due to the fact that there is no pedestrian footpath to the site side of Church Street. The demolition of a considerable length of this wall and the felling of trees to the rear of the wall would forever disfigure one of the distinguishing features of this part of the Barrowford Conservation Area. This would not therefore be "a minor adverse effect" as stated in the appraisal.

SA Objective 14: The removal of the limited boundary trees and potential alteration of the boundary wall would do nothing to conserve or enhance the landscape character of the conservation area and local townscape

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P065 Land at Higher Parrock Farm page 142

SA Objective 1: The site appraisal indicates capacity for 38 dwellings and indicates a minor positive effect from the short to medium term but the potential damage to the Conservation Area far outweighs the minor positives.

SA Objective 3: The inclusion of this site will not improve urban renewal as it is a greenfield site outside the urban core.

SA Objective 4: Although the site is located within 800m of both Nelson and Barrowford doctors' surgeries, both locations have capacity issues with patients experiencing considerable delays in obtaining appointments. The 500 House Strategic Site at Trough Laithe adjacent to this site will take up any spare capacity at these Surgeries and aggravate the problem.

SA Objective 8: Although the site is located within Flood Zone 1 it still forms an essential part of the upland drainage system by slowing the release of water. The square meterage of hard surfaces created by the construction of 38 dwellings would require water attenuation schemes consistent with the housing density.

SA Objective 12: This area has a wide range of both flora and fauna; the boundaries comprise of hedgerows and dry-stone walls providing habitat for a wide range of insects and small mammals. The dry-stone walls in particular provide a habitat for invertebrates, toads, newts and small mammals which are essential for the local owl population.

SA Objective 13: The site includes one of the last intact fields from the old Carr Hall Estate, with boundary stonework recently identified as most probably from the Middle Ages. It is unique in Pendle in that it has an ancient walkway on one boundary with public footpaths to the other three sides. The profusion of public footpaths within this area and the proximity to The Laund could possibly indicate a small settlement once stood on part of the site.

SA Objective 14: This site is contained wholly within the Carr Hall & Wheatley Lane Road Conservation Area. Application for inclusion as a Housing Site should be judged against the impact to the Conservation Area. The ethos of this Conservation Area Appraisal is of low density larger mixed style properties set within larger plots of land.

The Sustainability Appraisal states there is capacity for 38 houses, which directly conflicts with the Character Appraisal of the Conservation Area. An application in 2017 for 16 houses was refused both on access problems and impact on the Conservation Area.

The creation of Trough Laithe as a Strategic Housing site will diminish the setting and amenity of the Conservation Area. But the remaining fields of this site and the land above represent a buffer zone from which the Conservation Area can be viewed and as such should be preserved as a natural break between the higher density Trough Laithe and the Conservation Area's low density, often Arts and Crafts Style housing. It was disappointing that no mention was made in the Sustainability Appraisal of the fact that the site contains essential vistas highlighted in the Barrowford Neighbourhood Plan.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P078 Land at Higher Parkhill Farm page 158:

The assessment shows this as a large greenfield site with a potential capacity of 165 dwellings. The Site is designated Green Belt and currently fulfils the important function of separation between Barrowford and Colne. It also meets the function of enhancing and improving the setting and amenity of the Barrowford Conservation Area, Barrowford Memorial Park and the cluster of listed buildings located at Pendle Heritage Centre. This area of Green Belt also enhances the setting and amenity of the Grade II Listed Barrowford Locks and the wider Canal Corridor. The site also provides a natural habitat for the wildlife that use the banking's and verges on the M65 as a corridor for travelling from one area to another.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P112 Land Adjacent to 12 Wheatley Lane Road page 554:

The assessment shows that this site is suitable for 4 dwellings but it is within the Green Belt and is situated at a point where recent developments between Clough Spring and St Thomas's Church have seen ribbon development into green field sites. One of the Green Belt's functions is to prevent this type of sprawl. A recent appraisal of the Green Belt concluded that this site contributes to the Green Belts purpose. Barrowford Parish Council supports the conclusion in SA Objective 14 that the development of this site would not be consistent with National Planning Policy.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P115 Land off Carr Hall Road, page 238:

The assessment shows that this site is suitable for 68 dwellings. But it lies within both the Green Belt and the Carr Hall Conservation Area, an area of historical interest dating from the 16th century.

SA Objective 5: Although this site is located near to the A6068, Carr Hall Road would be the link road between the site and the wider area. But Carr Hall Road varies from a reasonably wide street at the junction with Park Avenue, with its fine terraces of Victorian/Edwardian housing, to a narrow country lane at the point where the site will be accessed. The line of sight at this point is totally inadequate for a development of this size.

SA Objective 8: The site is located within Flood Zone 1 and is highlighted as being at high risk of surface water flooding. This land, part of the grounds of the former Carr Hall, contained the largest of the five fish ponds surrounding the Hall, which are marked in the 1848 and subsequent maps, for example the 1893 map used in Pendle Council's Conservation Area appraisal. This pond, fed by streams above the site, becomes apparent on the lower portion of the site after even moderate rainfall and takes up a significant proportion of the site. At all times it provides natural water attenuation, reducing the rate of water run-off from this field. Furthermore, as a feature it may have some historic significance which would need further investigation.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

For all the reasons given above it was very disappointing for Parish Councillors and residents to note that the former pond was omitted from the map of the site given in the Site Plans for Reasonable Alternatives document.

SA Objective 13: This site falls wholly within the Carr Hall Conservation Area and contains the last vestige of the vistas once open to the larger late Victorian mill managers' and business owners' houses located above it. This open vista has been encroached on by the second phase extension of the Lomeshaye Industrial Estate, but the remnants of open countryside that remain include this field and the one below, which act as a natural buffer zone between Barrowford and the Lomeshaye extension. To quote the Conservation Area Appraisal: "The two open fields to the South West of Carr Hall Road allow the opportunity for wide-reaching views out of the Conservation Area, across Edge End, Lomeshaye, Brierfield and beyond to the hills above Burnley the mature trees of the Carr Hall estate also frame the views."

The development of this site would therefore have a significant adverse effect on the setting and amenity of the Carr Hall Conservation Area and in particular the larger better-appointed terraces and mews houses.

SA Objective 14: The recent independent appraisal of the Green Belt rejected Pendle Borough Council's suggestion that this piece of land should be removed from the Green Belt and confirmed that the site still meets the Green Belt criteria. It separates rural-edge Carr Hall from the Lomeshaye Industrial Estate. Development here would see these two distinct areas merge.

Together with the adverse effect any development would have on the Carr Hall Conservation Area, as outlined above, and the constraints of existing Tree Preservation Orders reducing the developable area, the decision for this land to remain Green Belt clearly indicates there is no justification for including this site as a housing land site in the Local Plan.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives: Site

P123 Land North of East Stone Edge Barnoldswick Road page 254:

This currently greenfield site has an assessed capacity for 119 dwellings.

SA Objective 3: The site is stated to be within 2000m of a primary school which presumably refers to Blacko School. This school has low capacity and is already full every year, is unable to expand, and would not sustain the children generated by 119 new houses. The two primary schools in Barrowford will exceed capacity with the Strategic Housing Site currently under development at Trough Laithe.

SA Objective 4: The assessment states that there is a GP surgery within 2000m but the two Barrowford surgeries are almost at capacity. Any spare capacity will very likely be taken by the Trough Laithe site currently under construction.

SA Objective 5: The nearest bus stop is at Dickie Nook, Higherford, a considerable distance below the site; due to the hilly topography of the area and regular inclement weather it is unlikely that it will be used regularly. The site is a significant distance from local amenities and would necessitate many more car journeys than a site in a more urban setting. Vehicular access to the site would be from Barnoldswick Road, which at that point is a narrow country lane. The road currently has a high volume of traffic for that type of road, as it is used as a rat run both to Barnoldswick and from

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Barnoldswick to Junction 13 of the M65, Nelson, as commuters attempt to circumvent the bottleneck at the North Valley/ Vivary Way junction in Colne. The visibility splay at any entrance would be reduced by the narrow nature of the road, and the junctions and 90-degree bends both below and above the development. Speeding on this stretch of road, which is derestricted, is notorious. Residents are constantly reporting excessive speeds to Higherford Residents Action Group and Barrowford Parish Council.

SA Objective 13: The site has several Public Rights of Way crossing the site, as well as Tree Preservation Orders and Listed Buildings in close proximity. The 119 dwellings suggested will necessitate the re-routing of the PROW's and may interfere with the TPO trees; furthermore, the development will significantly diminish the setting and amenity of both nearby Listed Buildings and the setting and amenity of the PROW's and the open countryside.

SA Objective 14: The development of this rural site would diminish the separation between Barrowford and Blacko whist having a severely detrimental effect on the Industrial Foothills and Valleys Landscape Character Area 6. The site is a prominent one: development would undoubtedly detract from the enjoyment and amenity of the surrounding countryside.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P130 Land to rear of St Thomas's Primary School Wheatley Lane Road page 277:

With regard to any commentary on this site it is important to note that the map showing the outline of the site in red may not be a true representation of what actually exists on Wheatley Lane Road. The nine new houses built between St Thomas's School and Clough Springs ("St Thomas Close") are not shown and the narrow strip down to Wheatley Lane Road is not as wide as the map shows.

SA Objective 3: This site is rural and outside the current Barrowford Settlement boundary. As such it will not promote urban regeneration; indeed, it will possibly have the opposite effect. As there are neither employment opportunities nor other facilities proposed for this site how can it support rural areas, tackle deprivation or promote sustainable living?

When a Outline Application for the Trough Laithe Strategic Housing Site development was submitted the Lancashire County Council assessment showed a lack of places at primary level within 2 km of that site, and a Section condition for the developer to contribute up to a maximum of £1,330,824.60 towards school place provision was applied. This (P130) site is further away from primary school provision within Nelson and Colne than Trough Laithe, which will exclude some of the schools in those towns due to distance. Although it is nearer to Barrowford's Schools, the LCC assessment for Trough Laithe identified a lack of local capacity this situation will only deteriorate when planning for phase 2 of Trough Laithe is approved and the houses built. The additional number of children generated from building 140 new houses over and above the 2nd phase of Trough Laithe would necessitate the extension of one or both Barrowford schools to create the necessary additional capacity. This would not be feasible at the late Victorian era Barrowford Primary School.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

SA Objective 4: The site may be within 800m of Barrowford GPs' surgeries, but so are the projected 500 houses at Trough Laithe. Neither of the two Barrowford surgeries has the spare capacity required to cater for 640 new houses (including the 500 Strategic Housing Site).

SA Objective 5: The site is not within 400m of a main bus route so vehicular access will be frequent. But the strip of land to Wheatley Lane Road is not wide enough for even a single-track road and footpath. The only feasible access is therefore onto Pasture Lane, which is currently the main access to Roughlee, Barley, the water treatment plant at Ridgaling, commercial vehicle access to Ridgaling Farm and associated businesses, and approximately 100 allotments situated opposite it. Pasture Lane has capacity issues due to narrowing of the road and several bends near its junction with Gisburn Road. The increase in traffic by perhaps 300-350 vehicles would lead to an increase in vehicles using Kent Court or Appleby Drive as a rat run through to Church Street, which again has capacity problems particularly during the school run times. The probable ingress/egress to the site will be just above a 90-degree bend on a road that currently allows travel at up to the National Speed Limit. There have been numerous accidents at this bend, with most cars involved ending up going through the garden wall at the corner house on Kent Court. Contributions toward cycle and pedestrian access would be unlikely to solve the problem on Pasture Lane as there is no footpath, or space to create within the highway a footpath or safe cycle path.

SA Objective 7: The site is within 10m of a water body as it abuts the former Albert Mill's lodge, currently used for fishing. There is also a vaulted water collection tank within the vicinity of the site which collected drinking water for Oaklands House. The area formed part of a larger Victorian water collection system to supply water to Albert Mill, Oaklands House, the Gaumless Trough, which was situated at Fountains Square, and the drinking trough located adjacent to Oaklands Barn on Church Street. Much of this water collection system is unmapped and if inadvertently damaged could have serious implications for the rate of surface water run-off.

SA Objective 8: Although this land is situated in an elevated position above the valley floor the number of natural springs along the hill side, either within the site or the in fields above lead to continuous water run-off even in dry periods. The site already exhibits severe drainage problems in periods of heavy rain, with massive problems if this is prolonged. During these events water runs down Pasture Lane and onto Kent Court and Appleby Drive causing flooding problems, as well as down the PROW from the site to Appleby Drive near the junction with Lupton Drive. The excess surface water runs down Lupton Drive causing flooding at Mint Avenue and pooling on Church Street. Water running through the field to the side of Oaklands House, along with the Lupton Street run-off, causes localised flooding in the dip on Church Street; in addition, surface water runs down the strip of land leading onto Wheatley Lane Road, increasing the flooding risks at both Wheatley Springs and Newbridge. Prolonged heavy rain, once termed a once-in-a-hundred-year event should now be called a once-in-a-decade event.

The topography of this hillside slopes in two distinct directions: from Ridgaling down towards the valley bottom, and diagonally towards Clough Springs. In the second of these water leaves via Wheatley Springs through culverts and open stretches until it enters a Victorian culvert under Lower Clough Mill and reaches Pendle Water. This water drainage system has seen numerous flooding incidents in recent years; the introduction of measures that only see water run-off at current rates will not be acceptable on this site, as it is just moving water retention problems from the site to further down the system.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

SA Objective 14: The site forms part of the Industrial Foothills and Valleys Landscape Character Area 6a and is an essential part of the vista of foothills and skyline enjoyed by a large swathe of Nelson and Colne. The open aspect of this area is part of the setting and amenity of several Public Rights of Way popular with both local residents and visitors to the area.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P136 Land Ralph Laithe page 277:

SA Objective 3: This Site has a capacity for 66 dwellings and will increase pressure on local services.

The site is within 2000m of Blacko, Barrowford CP and Red Lane primary schools. Blacko School is a small village school situated at a dangerous junction and has little on-street parking for dropping off children. With an annual intake of only about 15 pupils it has little or no spare capacity.

The onset of phase 1 of the 500 house Strategic Housing Site at Trough Laithe will see 239 houses coming on stream over the next couple of years. The Lancashire County Council assessment at the time of the Outline Planning Application showed a lack of places at primary level within 2km of that site, and a Section 106 up to a maximum of £1,330,824.60 was imposed on the developer to contribute to school places provision. This will mean that there will be no spare capacity at Barrowford County Primary School.

The school located at Red Lane in Colne also has a new development on its doorstep which will put pressure on places at that school.

SA Objective 4: GP Surgeries from either Barrowford or Colne will be the main health services nearest to this site. Barrowford's will probably have no spare capacity once the Strategic Housing Site at Trough Laithe is completed, reducing local availability for this site.

SA Objective 5: This site is situated away from the local bus service, which only has two buses per hour, and a limited number of destinations. A cycle route down Barnoldswick Road would be problematic owing to the lack of carriageway width. Foot access will not be suitable as there is no pavement on the site side of the highway for some distance in both directions. Lack of carriageway width will preclude the construction of a viable disability-compliant footway. Access into and egress from the site would be difficult, as the existing access is a single track entrance to a large private dwelling. Widening to accommodate simultaneous entry and exit would need considerable improvements to the visibility splay, as there is no pavement to this side of the road which could increase visibility before entering the carriageway.

SA Objective 12: The site is part of the Green Belt that runs through to Red Lane down into the Canal Corridor and the wider area. The site will be within the natural feeding range of many species found within the Canal Corridor, including larger mammals such as deer, foxes and badgers, bats, birds of prey such as owls, kestrels and sparrow hawks as well as numerous species of smaller field dwelling birds, amphibians and insects. The loss of diversity of habitat would probably have an impact on the vitality of the Leeds-Liverpool Canal Corridor, the canal itself being less than 250metres away.

SA Objective 14: The site enhances the setting of Higherford from the Canal Corridor. Its status as Green Belt prevents urban sprawl along Barnoldswick Road, which, if allowed, would significantly diminish the setting and amenity of both the Canal Corridor and the Grade II Listed Locks. The Canal

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Corridor in recent years has not only become a wildlife super highway, but also a popular walking and holiday destination, with canal trips and barge holidays becoming more popular. This is further enhanced by the designation of the canal towpath as a main link in the local cycle network, joining up the wider cycle path destinations.

As Tourism becomes more essential to the local economy through the decline of heavy industry, preserving and enhancing the setting and amenity of these visitor assets should be one of the core principles within the Local Plan, protecting them for future generations.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P188 Land off Mint Avenue Barrowford page 341:

The site falls within the settlement boundary, is part of the urban core of Barrowford and has been brought forward in past Housing Land Site Allocations. But with Pasture Lane being the sole access it has always been rejected, largely owing to the problems of accessibility and visibility surrounding the use of Factory Lane as the sole entrance onto Pasture Lane.

The only change to the submitted plan from the previous submissions is that an access onto Mint Avenue is proposed, as opposed to Pasture Lane. However, this change in access point does not negate the access problems; it only moves them into a different area.

Part of the site contained a car dismantlers and scrap yard. The yard operated until around 10 years ago with this area being heavily polluted with vehicle fluids, burnt rubber and battery acid over a very prolonged period (at least 40 years).

SA Objective 3: When a detailed planning application for the 1st phase of the Trough Laithe Strategic Housing Site development was submitted the Lancashire County Council assessment showed a lack of places at primary level within 2km of that site. A section condition was imposed on the developer, to contribute to school places provision. This site (P188) is further away from primary school provision within Nelson and Colne and excludes some of those towns' schools because of distance. Although the site is nearer to Barrowford Schools the lack of local schools capacity within 2km will only deteriorate when planning for phase 2 of Trough Laithe is approved and built. The additional number of children generated from building 50 new houses on top of the planned 500 houses at Trough Laithe would necessitate the extension of one or both Barrowford schools. However, this would not be feasible at the late Victorian era Barrowford Primary School.

SA Objective 4: The site is within 800m of the two doctors' surgeries located at Ridgeway and Lee Street. But there is very likely to be a capacity issue at both surgeries owing to the need for health services from the 500 house Strategic Housing Site situated at Trough Laithe.

SA Objective 5: This site is centrally situated, close to services, and although over 400m to the nearest bus stop its central location would enable easy access to services by either cycle or foot. But where the site falls down is vehicular access.

Mint Avenue forms part of an early 1970's estate, with roads designed to cope with the smaller volume of car ownership prevalent then. It must also be borne in mind that most cars were shorter and narrower than today's models, with the streets being correspondingly narrower.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Mint Avenue was built to service 23 houses, which would probably have equated to 25-30 vehicles at that time, with the highway infrastructure being built to cater for that volume of cars. Most households had one car, with only a few having two. Today most houses have two cars, with a smaller proportion having more than two. If residents' cars were counted today you would probably have 46 vehicles. Add on the new access created from Helton Close into the back of the Old Vicarage, and the total comes 50 vehicles.

The proposal to use Mint Avenue as sole access to a new 50 house development would triple the current vehicle usage. This would put pressure on the other estate roads and the wider local road network.

Driving from Mint Avenue there are a number of options, all with greater or lesser traffic problems:

- Turning left down Lupton Drive: at the junction with Church Street, you can either turn left and into the narrowest part of Church Street which, due to parking issues, is normally a single lane carriageway; it is on the school run for both St Thomas's and the rear entrance of Barrowford CP school. The road is frequently used as a rat run by drivers trying to avoid heavy congestion on Gisburn Road during peak travelling times and the school run.
- If you turn right from Lupton Drive onto Church Street, the residential street, Higher Causeway, takes you down to join Gisburn Road; alternatively, you can reach Gisburn Road via the end of Nora Street in Newbridge and a semi blind junction. Continuing along Wheatley Lane Road brings you to where it narrows at the junction with Carr Hall Road and then to the junction with the A6068 which has to be taken with extreme care, close to the 500 house Strategic Housing Site.
- Turning right up Lupton Drive, right onto Appleby Drive and right again down Pasture Lane past the original proposed entrance at Factory Lane takes you down the narrow Lane through two semi-blind corners to the junction with Gisburn Road. This is close to the busy roundabout on Halstead Lane that gives access to Booth's supermarket.

The local road infrastructure problems are therefore just as great if not greater than the original proposed entrance off Factory Lane onto Pasture Lane. The new entrance does not mitigate the problems that led to rejection in the past. Furthermore, the access off Mint Avenue is uncertain as there is a possible ransom strip between Mint Avenue and the site.

SA Objective 8: This site currently suffers from excessive water run-off, particularly in prolonged rain. This is evident from the amount of water that leaves the field to the rear of Church Street. The Lamb Working Men's Club has had several flooding episodes directly attributable to surface water runoff from this field. The unadopted access to the Club and two cottages next door has seen large amounts of water discharging down Church Street onto Gisburn Road. Recent remedial works to the side of the Club may have alleviated some of the problems but until we suffer a prolonged bout of rain the effectiveness of this scheme will be hard to gauge.

SA Objective 13: The site is located outside but adjacent to the Barrowford Conservation Area and The Grade II Listed Lamb Club. Development here will affect to the setting and amenity of the Conservation Area, in particular on the setting of the Listed Lamb Club, one of the oldest buildings in the village.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Site P189 Land off Middleton Drive Barrowford page 562:

SA Objective 1: This is a very small-scale site, highlighted for 7 dwellings. The site sits at the top of Middleton Drive which is development of 9 larger detached houses set in large plots. The curtilages of the three nearest houses are each some 50 to 75% of the size of the proposed 7 house site. This significantly higher density will spoil the setting and amenity of these larger dwellings.

SA Objective 5: It is disputable whether the site is within 400m of the bus terminus at Dickie Nook. The narrowness and steepness of Middleton Drive would preclude much access by either cycle or foot. The narrow width and incline at the junction, coupled with the oblique angle at which Middleton Drive joins Gisburn Road, could be problematic for vehicles entering or leaving Middleton Drive.

SA Objective 14: Blacko and Barrowford are only joined at this point by mainly large houses set in extensive gardens. Developing into the green fields above Middleton Drive will further reduce the separation between the two villages and lead to further merging of the two villages at a higher housing density. The adoption of Alternative Site P123 in conjunction with this site would see the boundary between Barrowford & Blacko being covered with development from Gisburn Road through to Barnoldswick Road, diminishing the setting and amenity of rural Blacko and semi-rural Barrowford. If the Ralph Laithe sites are also brought forward, the merging of Barrowford and Blacko with the town of Colne will be one step nearer, reducing the village identities so important to these two communities.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P283 Ralph Laithe Farm (site B) Barnoldswick Road Barrowford page 472:

SA Objective 3: This Site has a capacity for 48 dwellings and will increase pressure on local services. The site is within 2000m of Blacko, Barrowford CP and Red Lane primary schools. Blacko School is a small village school situated at a dangerous junction and has little on-street parking for dropping off children. With an annual intake of only about 15 pupils it has little or no spare capacity.

The onset of phase 1 of the 500 house Strategic Housing Site at Trough Laithe will see 239 houses coming on stream over the next couple of years. The Lancashire County Council assessment at the time of the Outline Planning Application showed a lack of places at primary level within 2km of that site, and a Section 106 up to a maximum of £1,330,824.60 was imposed on the developer to contribute to school places provision. This will mean that there will be no spare capacity at Barrowford County Primary School.

The school located at Red Lane in Colne also has a new development on its doorstep which will put pressure on places at that school.

SA Objective 4: GP Surgeries from either Barrowford or Colne will be the main health services nearest to this site. Barrowford will probably have no spare surgery capacity once the Strategic Housing Site at Trough Laithe is completed, thus reducing local availability for this site.

SA Objective 5: This site is situated away from the local bus service which only has two buses per hour and a limited number of destinations. A cycle route down either Barnoldswick Road or Red

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

Lane would be problematic owing to the lack of carriageway width. Foot access will not be suitable as there is no pavement on the site side of the highway. Lack of carriageway width will preclude the construction of a viable disability-compliant footway. Access to and egress from the site would be problematic as it would be impossible to get an adequate visibility splay on Red Lane, due to both the close proximity to the junction with Barnoldswick Road and the 90° bend. Access on to Barnoldswick Road would be at one of the narrowest lengths of the road. The lack of footways to the site side would mean extensive re-modelling of the existing banking and removal of a hedgerow to create an adequate visibility splay. There are already local concerns regarding the number of vehicles and the speed of vehicles using this narrow country lane as a rat run to avoid congestion at North Valley Road in Colne.

SA Objective 12: The site is part of the Green Belt that runs through to Red Lane down into the Canal Corridor and the wider area. The site will be within the natural feeding range of many species found within the Canal Corridor including larger mammals such as deer, foxes and badgers, bats, birds of prey such as owls, kestrels and sparrow hawks as well as numerous species of smaller field dwelling species of birds, amphibians and insects. The loss of diversity of habitat would probably have an impact on the vitality of the Leeds-Liverpool Canal Corridor.

SA Objective 14: The site enhances the setting of Higherford from the Canal Corridor and its status as Green Belt prevents urban sprawl along Barnoldswick Road, which if allowed would significantly diminish the setting and amenity of both Canal Corridor and the Grade II listed Locks. The Canal Corridor in recent years has not only become a wildlife super highway, but also a popular walking and holiday destination, with canal trips and barge holidays becoming more popular. This is further enhanced by the designation of the canal towpath as a main link in the local cycle network, joining up the wider cycle path destinations.

As Tourism becomes more essential to the local economy through the decline of heavy industry, preserving and enhancing the setting and amenity of these visitor assets should be one of the core principles within the Local Plan, protecting them for future generations.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P284 Ralph Laithe Farm (site C) Barnoldswick Road Barrowford page 472:

SA Objective 3: This Site has a capacity for 195 dwellings this number of dwellings will significantly increase pressure on local services.

The site is within 2000m of Blacko, Barrowford CP and Red Lane primary schools. Blacko School is a small village school situated at a dangerous junction and has little on-street parking for dropping off children. With an annual intake of only about 15 pupils it has little or no spare capacity.

The onset of phase 1 of the 500 house Strategic Housing Site at Trough Laithe will see 239 houses coming on stream over the next couple of years. The Lancashire County Council assessment at the time of the Outline Planning Application showed a lack of places at primary level within 2km of that site, and a Section of up to a maximum of £1,330,824.60 was imposed on the developer to contribute to school places provision. This will mean that there will be no spare capacity at Barrowford County Primary School.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

The school located at Red Lane in Colne also has a new development on its doorstep which will put pressure on places at that school.

SA Objective 4: GP Surgeries from either Barrowford or Colne will be the main services nearest to this site. Barrowford will probably have no spare surgery capacity once the Strategic Housing Site at Trough Laithe is completed, reducing local availability for this site.

SA Objective 5: This site is situated away from the local bus service which only has two buses per hour and a limited number of destinations. A cycle route down either Barnoldswick Road or Red Lane would be problematic owing to the lack of carriageway width. Foot access will not be suitable as there is no pavement to the site side of the highway. Lack of carriageway width will preclude the construction of a viable disability compliant footway.

The site is essentially landlocked and only abuts Red Lane on the apex of a 90° bend. This cannot be safe as an entrance to a site of 195 dwellings. Indeed access to a development on this land is impossible unless either P136 or P283 are included. From a traffic point of view, Barnoldswick Road would not be able to provide a safe entrance for between 245-255 houses.

SA Objective 12: The site is part of the Green Belt that runs through to Red Lane down into the Canal Corridor and the wider area and abuts the Canal Corridor. The site will reduce the natural feeding range of many species found within the Canal Corridor including larger mammals such as deer, foxes and badgers, bats, birds of prey such as owls, kestrels and sparrow hawks as well as numerous species of smaller field dwelling species of birds, amphibians and insects. The loss of diversity of habitat would probably have a significant impact on the vitality of the Leeds-Liverpool Canal Corridor.

SA Objective 14: The site enhances the setting of the Canal Corridor and its status as Green Belt prevents urban sprawl along Barnoldswick Road, which if allowed would significantly diminish the setting and amenity of both Canal Corridor and the Grade II listed Locks. The Canal Corridor in recent years has not only become a wildlife super highway, but also a popular walking and holiday destination, with canal trips and barge holidays becoming more popular. This is further enhanced by the designation of the canal towpath as a main link in the local cycle network, joining up the wider cycle path destinations.

As Tourism becomes more essential to the local economy through the decline of heavy industry, preserving and enhancing the setting and amenity of these visitor assets should be one of the core principles within the Local Plan, protecting them for future generations.

This site represents development along the Parish Boundary and represents a significant risk of merging of Barrowford with Colne. One of the main functions of the Green Belt is to prevent urban sprawl and this site along with the other Alternative Sites P136 and P283 are by their size and location near to parish or town boundaries a classic case of urban sprawl.

Appendix 5: Sustainability Appraisal of Preferred Housing Sites and Reasonable Alternatives:

Site P294 Land to North of Riverside Way Barrowford page 496:

This site abuts the Strategic Housing Site at Trough Laithe and is currently identified in the Core Strategy as Employment Land. The site came forward as Employment Land around 20 years ago but only a small proportion has been developed, as a Business Park.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

SA Objective 2: This site is in the Core Strategy as Employment Land. If it was reassigned as housing it could have a significant impact on the amount of viable Employment Land within Pendle and necessitate an alternative employment site being identified. This is surely not a “minor adverse effect” on employment opportunities as stated in the Appraisal.

The addition of 120 dwellings would necessitate a significant contribution to the creation of school places. Lancashire County Council highlighted, in its school capacity assessment at the outline planning application stage for the Trough Laithe Strategic Housing Site development, a lack of places at primary level within 2km of that site, and a section condition to contribute to school places provision was applied. This site (P294) would find at application that there would be no or little spare capacity due to the Strategic Housing Site. This capacity problem would increase with the development of phase 2 at Trough Laithe and any other significant sites within the nearby area being developed.

SA Objective 4: This site through its location would probably see a split of patients between the two Barrowford practices and Yarn Spinners Health Centre. The spare capacity at these surgeries to cater for the 500 houses at the Strategic Housing Site and a further 120 dwellings at this proposed site would need further investigation.

SA Objective 5: Access to this site would be off the roundabout on the A6068, which is also the only access to the Riverside Business Park and the 500 house Strategic Housing Site; the capacity of this access would need to be proved. The site does not have a direct vehicular route into the shopping areas of Barrowford, indeed the difficulty of vehicular access to the village's shopping areas would probably mean that Nelson and Colne would be the supermarket destinations of choice.

There are several footpaths that link the site into Barrowford. Given stabilisation of the river bank (see below) the one that runs along the riverside could be upgraded to give both foot and cycle access to other parts of the village. The Parish asked for this to be conditioned when the Business Park was given outline planning permission but the request was ignored by planning officers.

SA Objective 7: The site is within 50m of the river and significant flood alleviation measures would be needed. This would also apply to development under its current designation as a Business Park.

SA Objective 8: This site is the last link between the water run-off from the hills above the site and the river. The level of run-off will be set by the robustness of the water attenuation measures applied to all phases of the Strategic Housing Site. The completed sections of the Riverside Business Park will have little or no measures to control the rate of surface run-off and this would need to be factored in.

This site side of Pendle Water suffers from riverbank erosion which has removed a significant width of land, including sections of the Public Right of Way, and exposed a large bore sewage pipe going to the sewage works located past Victoria Park. Measures would be needed to prevent this erosion and possibly a rupture of this large pipe polluting the river with untreated sewage. The flood plain once had the ability to form an oxbow lake on the playing fields of the college opposite, but since the construction of all-weather pitches the surrounding banking was raised to prevent this from happening.

Other considerations regarding site P294 Land to North of Riverside Way Barrowford are that, if it is decided to bring forward this site, it should not be treated as an extension of the Strategic Housing Site at Trough Laithe but as a separate entity. As such any houses built there should be

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

taken entirely as part of Barrowford's requirement for housing provision. If it is proposed to include this site as an extension of the Trough Laithe Strategic Housing site, and the houses are deducted from the M65 Corridor total, Barrowford Parish Council would fight this vigorously.

It should be remembered that Barrowford is classed as a Local Service Area in the Core Strategy. The requirement to provide housing for the wider Borough falls predominantly on the Key Service Areas of Nelson, Colne and, to a lesser degree, Brierfield; Local Service Areas are expected to provide housing for their immediate need.

Settlement Boundaries

Barrowford Parish Council has serious concerns regarding the extended contiguous Settlement Boundary lines between the individual towns and villages that make up the Borough of Pendle. These could lead to the merging of towns and villages into suburbs with no distinct separation between them.

This is not so crucial for those rural villages that by nature are widely separated and predominantly covered by an AONB or SSSI. But the possibility of a noticeable merging through urban creep is very high within the M65 Corridor. Barrowford currently nestles below and between the larger conurbations of Nelson and Colne and the smaller villages of Blacko and Fence, where the potential for urban creep and the merging of towns and villages is at its greatest.

Carr Hall: With the extension of the Lomeshaye Business Park coupled to the inclusion of larger housing development sites in Carr Hall on the Suitable Alternative List, potential urban creep could see a significant merging. These Alternative Sites, currently situated outside the Settlement Boundary, if included as Preferred Sites would by default be included as extensions to the Settlement Boundary, which could leave further open land susceptible to future infill housing development.

It is crucial that where Settlement Boundaries already meet through linear creep along existing highways further merging be protected against by the Settlement Boundary. Recent land use designations such as the Lomeshaye Business Park extension have extended the length of joint Settlement Boundary from the Reedyford Business Park to the meeting of the Barrowford, Nelson and Fence Town and Parish Boundaries at the extended Lomeshaye site. For most of this length Nelson and Barrowford are only separated by the canal, Pendle Water or the M65. The widest delineation is at Victoria Park which is historically a Nelson Park although it extends into Barrowford.

Equally the potential inclusion of other Alternative Sites adjacent to Carr Hall Road and the two Carr Hall Conservation Areas could lead to extended creep along Wheatley Lane Road to Carr Hall Road. The Strategic Housing Site at Trough Laithe has accelerated this urban sprawl. It is essential that the last vestiges of the green fields between Newbridge and Carr Hall Road to the rear of the Carr Hall Road and Wheatley Lane Road Conservation Area be preserved, to prevent the urban sprawl reaching Carr Hall Road adjacent to the boundary with Fence.

The potential for future urban creep in this area could see a merging of Carr Hall into Nelson with the separation between Barrowford/Nelson and the village of Fence disappearing.

Barrowford/Blacko: Currently the only continuous development between Barrowford & Blacko is the ribbon development along the A682. The developments of both Middleton Drive and the housing estate at Stone Edge Road over the last 40 years have seen Barrowford inextricably creep towards Blacko. Several sites on the Suitable Alternative List, if brought forward, would merge the

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

two villages from Gisburn Road through to Barnoldswick Road. The presumption that a site once selected automatically becomes part of the settlement boundary is completely at odds with the purpose of the Settlement Boundary and its function on preventing unwanted urban creep and the loss of distinct settlements as separate entities within the area.

Barrowford/Colne: The separation between much of Colne and Barrowford is formed for the most part by the Leeds and Liverpool Canal. The potential bringing forward of the sites on the Suitable Alternative list at Lower Parkhill and Ralph Laithe would again see a merging effect on the settlement boundaries between the Barrowford and Colne town/parish boundary. The possibility of a future bypass running from Colne towards Skipton following the former railway line would by its nature lead to urban creep along its route of both housing and business use. This potentially necessary evil may, if built, reduce pressure on the already overstretched local infrastructure, but a separation between Barrowford and Colne will need to be preserved to prevent Barrowford becoming a suburb of Colne.

Addressing Local Infrastructure:

The Local Plan has no real solutions to solving local infrastructure problems, does not address Borough-wide problems, or allocate the necessary land which may be needed to address these problems, although it is accepted that the Borough Council is not directly responsible for highway infrastructure, education or health. Furthermore, the disparity between the required housing numbers contained in the approved Core Strategy, the numbers in this consultation and the numbers resulting from the decision made mid-consultation by Pendle Borough Councillors (anything from 146 – 298 per annum) has not been clarified.

The problem of local infrastructure requirements, which was not discussed in depth in the Core Strategy, once lay within the purview of the Northwest Regional Spatial Strategy. The removal of this level of integrated infrastructural planning for a much wider area has seen a vacuum appear in infrastructure planning.

This vacuum is not being addressed by Local Plans, which rely on outside authorities such as the County Council and Health Authorities for the provision of so much local infrastructure. An example of this narrow planning is the potential future problems that will arise from large scale developments such as the Trough Laithe Strategic Housing Site; these should be planned for before a site's inclusion.

The infrastructure problems that will be encountered with large developments fall into four categories, all of which apply to the Trough Laithe Strategic Housing Site but apply equally to any other large development.

Schools: When the developers of the Trough Laithe Strategic Housing Site applied for outline planning permission, Lancashire County Council assessed the projected requirement for school places for that application, adjudging that within a 2km radius for primary there needed to be 81 places available, and imposed a Section 106 agreement to contribute £12,029.62 for each additional place up to a maximum of £1,330,824.60. Until these houses come forward and are occupied that spare capacity of 81 places within the prescribed distance is still there and could be used against other developments' school requirements. The 500 houses at Trough Laithe, combined with any other Preferred building site in the local vicinity, would mean extending several of the primary schools within the 2km radius to accommodate the additional pupils.

Agenda Item 6

Barrowford Parish Council's Response to the LP2 Consultation 06/04/21

The problem with this scenario is that the schools within the catchment area fall into two categories:

1. New Schools built under the Building Schools for the Future programme, with facilities of the latest standards and with little room for expansion without compromising either outside child space or off-road parking for staff or drop-off points for children.
2. Late Victorian or earlier schools predominantly situated near to main access roads, with inadequate outside play provision, no off-road staff parking and no provision for the dropping off of younger pupils without severe congestion on the main thoroughfares. These schools cannot be enlarged without significantly reducing existing facilities and creating further congestion problems within that area.

If a more pragmatic approach had been taken when Pendle's future housing requirement numbers were known and apportioned to the newly created three tiers, a more concerted and proactive approach could have been developed with the Education Authority, to look at schools that needed enlarging and relocating to accommodate future pupil numbers. Developers could then have been expected to significantly contribute to these new schools.

Land for these new schools could have been identified with landowners, who could have been given an expectation that former schools sites would be transferred as potential redevelopment sites. Many of the older Victorian schools are suitable for conversion to stylish apartments, often near the town centres. The removal of these schools to better situated locations would improve congestion problems at peak times and improve parking for shoppers.

Health: This is left to the vagaries of the current additional capacity at doctor's surgeries, dentists and opticians. These capacities are not attributed to specific planning permissions granted and can be cited over and over again until new patients have reached the capacity. Again, this is an area where pre-thinking at the beginning of the Local Plan and comparing actual spare capacity with actual need when the housing requirement is met may have allowed employment land to be allocated for meeting any new additional need.

Road Infrastructure: This is another factor that needs to be taken into serious consideration at the allocation of sites stage. It should extend beyond the immediate location of the site to the ability of increased traffic to negotiate narrow roads and bottlenecks in order to reach the main arterial routes, as well as including proximity to peak hour traffic problems. Consideration should further be given to whether the site is already on an existing rat-run: these don't always show up in computer or table top models and assessment should be based on more on-the-ground traffic data.

Shopping and Town Centres: It is no good saying that a development can use local shopping facilities and that a large edge of town strategic or other housing development will save or revitalise a dying shopping town or supermarket. The demographics of the potential future house owners will determine where they see themselves shopping and these should be considered when selecting sites, to help overcome road infrastructure problems if the new residents are to access preferred shopping options.