



Worsthorne with Hurstwood Neighbourhood Development Plan

Consultation Statement

Worsthorne with Hurstwood Parish Council

With assistance from



February 2025





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1.0 Introduction and Background

1.1 This Consultation Statement has been prepared in accordance with the Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ which defines a “consultation statement” as a document which ;

- **contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;**
- **explains how they were consulted;**
- **summarises the main issues and concerns raised by the persons consulted; and**
- **describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.**

This Consultation Statement sets out how these requirements have been met and how, particularly, the Parish Council has sought to engage with those who live, work and carry out business in the area.

1.2 The Worsthorne with Hurstwood Neighbourhood Development Plan (WHNDP) has also been prepared by considering the advice provided in Paragraph: 107 (Reference ID: 41-107-20200925) of the National Planning Practice (NPPF).

1.3 The WHNDP has been prepared in response to the Localism Act 2011, this gives town councils and other relevant bodies, new powers to prepare statutory neighbourhood plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this framework.

1.3 The Parish Council applied to Burnley Borough Council (BBC) for the parish area to be designated as a neighbourhood area. This was approved by BBC March 2017². The designated area is shown on Map 1.

¹ <http://www.legislation.gov.uk/ukxi/2012/637/contents/made>

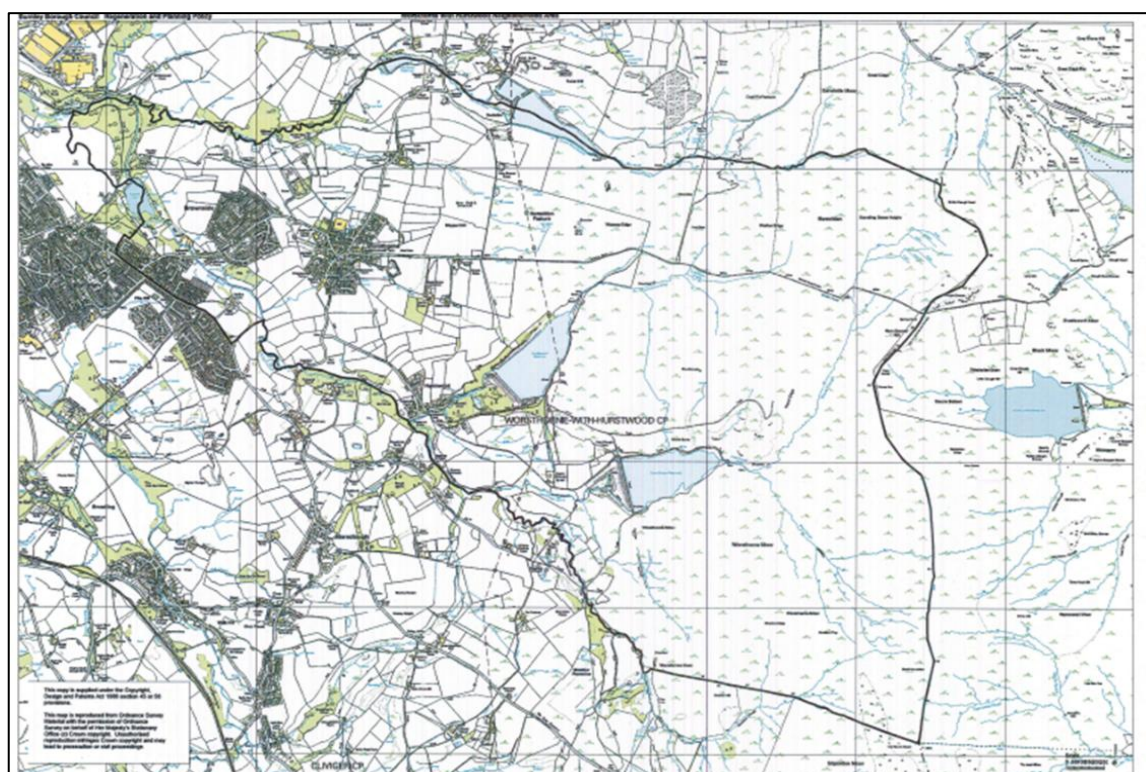
² <https://burnley.gov.uk/wp-content/uploads/2022/02/Worsthorne-with-Hurstwood-Neighbourhood-Area-Designation-Public-Notice-March-2017.pdf>





Map 1 Designated Worsthorne with Hurstwood Neighbourhood Development Plan Area

(source: Burnley Borough Council <https://burnley.gov.uk/wp-content/uploads/2022/02/Worsthorne-with-Hurstwood-Neighbourhood-Area-Designation-Public-Notice-March-2017.pdf>)



- 1.4 All information about the WHNDP at each stage has been provided in a separate section devoted to the neighbourhood plan on the Parish Council web site;
<https://worsthornewithhurstwoodpc.co.uk/neighbourhood-plan/>
- 1.5 This Statement provides further information and evidence to demonstrate how the WHNDP meets the Neighbourhood Planning Regulations and government guidance.





2.0 Pre-Regulation 14 Consultation

Neighbourhood Plan Steering Group

- 2.1 A Neighbourhood Plan Steering Group (NPSG) comprising Parish Councillors and local residents was established to progress work on the plan. They could be contacted through the web site and via the Parish Clerk.



Figure 1 Neighbourhood Plan Steering Group

Informal Consultation and Raising Awareness

- 2.2 A set of key issues were identified by the Steering Group:

Built and Natural Heritage

The neighbourhood area has a wealth of built and natural heritage assets and many of these already have other, sometimes, statutory protections e.g. listed buildings and the conservation areas. Where there are assets without such protection the neighbourhood plan could identify these and offer protection through the planning system. Note that this has not been undertaken to date but a project to identify Non designated Heritage Assets (NdHAs) could be progressed by the Parish Council working with local people at a later date. Any assessment of nominated NdHAs should be undertaken using the criteria set out in [The Local List Supplementary Planning Document \(SPD\), Adopted April 2022](#)





Landscape

Any development should be consistent with the landscape, and the setting this provides to the separate settlements that go to make up the area. Key features of the landscape such as dry-stone walls have in some places deteriorated over time and where possible these key landscape features should be restored.

Design

The neighbourhood area includes distinct settlements with their own key design characteristics and features. The neighbourhood plan should be used to ensure that any new development is consistent with and responds in a positive way to its immediate and wider surroundings. The NPSG could also consider a Design Guide for the area.

Separate and Distinct Settlements

The separation of the settlements that make up the area, which are Pike Hill, Brownside, Worsthorne and Hurstwood, due to pressure for housing development, is under threat in key locations, some of which if developed could lead to the coalescence of settlements. To avoid this the neighbourhood plan should look at protecting these key areas of open land.

Housing

The pressure to build more homes in the area is a significant one. The Local Plan already allocates land within the neighbourhood area. There is no need at this time to allocate more land. The neighbourhood plan should look to manage any future development in terms of its design, house type and tenure.

Transport

Public transport in the area is reasonable during the day, but to and from Worsthorne village disappears in the evening. This means for many it is not a viable transport option for work. The area also suffers from through traffic that is often inconsiderate and sometimes dangerous, particularly on the area's rural road network. The neighbourhood plan should consider how planning measures could respond to these problems e.g. a Worsthorne village centre re-designed along Dutch [Woonerf](#) principles, this would also have to be compatible with this area's Conservation Area designation.

Energy

The neighbourhood plan looks to encourage small scale renewable and community energy projects.

Community

The neighbourhood plan should identify and protect key social and community infrastructure.

Leisure and Tourism

To sensitively increase the time visitors, stay in the area, particularly people only visiting for the day or part of the day, so that they increase the use of the area's improving facilities including pubs and shops thereby making an additional contribution to the local economy.





Economy

To ensure the area remains sustainable and does not become just a residential area, business and employment development should be encouraged, where appropriate in terms of the rural nature of much of the area, to its open land and landscape setting.

Crime and ASB

Often not planning matters the neighbourhood plan could look at the planning aspects of this such as designing out crime. Other matters, including anti-social behaviour could be identified within the plan as non-planning supporting parish council actions that could be taken up with relevant agencies.



- 2.3 The key issues were then used as a basis for a wide-ranging informal consultation and awareness raising programme.
- 2.4 In early 2023 an informal consultation was held. All households were leafleted, this signposted people to the NP web site that contained a set of key issues that had been identified as a starting point for the WHNP to address. To supplement this face-to-face drop-in sessions were organised for Worsthorne, Hurstwood and Pike Hill.

Community Consultation and Engagement

The '**Locality – Listen, Learn, Adapt ... Engaging your community in a meaningful way**' document was considered in the process and its recommendations taken in part as the consultation discussion progressed.

The document provided a toolkit to guide the Neighbourhood Plan process and stated that a key factor in the success of the project is community engagement.

The toolkit explores and explains various traditional and digital community engagement tools and techniques, providing an overview of how they work and when best to use them.

Traditional and in-person engagement techniques, such as drop-in sessions, stalls and focus groups remain important and effective ways of reaching people. These methods





were particularly useful for communicating with hard-to-reach, digitally excluded parts of the community – this included some disabled groups, older people, and those on low incomes.

Leaflet Drop

The Neighbourhood Plan was announced to the local community via a leaflet drop campaign.

A professional marketing agency, [root fifty-two](#) was engaged to get the message across and includes a three-leaflet campaign with the messaging - ***Get Ready, Get Set, Go*** to announce the idea and to communicate its progress to the local community and gain traction ahead of drop-in sessions. Details of media content and format are given in Appendix 1.

The ***Get Ready*** leaflet was distributed ahead of the 2023 drop-in sessions to announce their dates and venues.

Get Set leaflets were distributed prior to a second consultation in early 2024 to announce its successful progression and attempt to engage further with the local community.

Go leaflets will be distributed ahead of the referendum.

Digital Marketing

Root fifty-two used a digital marketing approach aimed at engaging further and deeper into the community through Social Media, Facebook, Instagram as well as regular email communication.

A £100 win competition was included in the first leaflet drop in order to gain data from the local community and to facilitate future communication and engagement for the NP project.

In an important spin off from the NP process the Parish Council took the decision to completely overhaul the WWHPC Website with a new and striking design format as part of the project.

The website included a 'landing page' specifically dedicated to the NP project, where the community could find further information and interact if they wished.





Drop-In Sessions

The first “Get Ready” leaflet advertised a series of drop-in sessions with the message ***“We’d love to hear your views and suggestions on any aspects you feel need to be addressed. Join us at one of our drop-in sessions.”***

- Wednesday 8th February 2023, 5pm-7pm**
 at Pike Hill Library, Langwyth Road, BB10 3JX
- Thursday 9th February 2023, 6pm-8pm**
 at Hurstwood Church, Hurstwood Lane, BB10 3LF
- Saturday 11th February 2023, 10am-12pm**
 at The Reading Rooms, Church Square, Worsthorne, BB10 3NH

An A1 Information Board was produced for the meetings, which gave an overview of the key issues identified by the NPSG and could be studied by members of the community helping to kickstart discussions on many occasions.





The drop-in sessions were manned by members of the WWHPC and the Neighbourhood Plan Steering Group.

The majority of visitors who did attend did not question the validity of the topics shown on the board, these are now a *given*, and discussions did help in adding important detail to the topics.

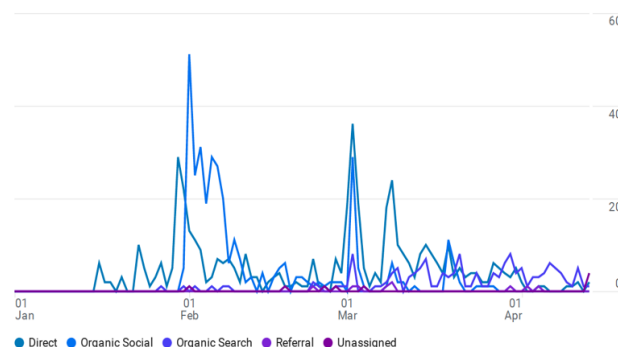
Quite apart from notes made by members of the community on especially formatted lead forms the attending staff also collated information based on the discussions held.

Below is a digital marketing results summary for the Worsthorne with Hurstwood Parish Council site since the website went live:

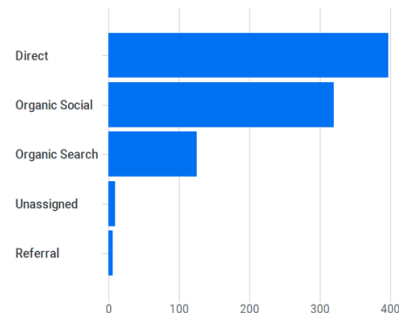
- 843 individual users visited the new website.
- 397 came directly from the leaflets or typing the full URL.
- 320 came directly from social media.
- 125 came from searching for the website on Google or Bing.
- 6 came from referral – email marketing.
- The website was viewed 1,215 times.

The graph and data on the following Google Analytics report, shows that when the NP advertisement was running on social media and content was going out regularly on the page it produced a significant spike of users viewing the WWHPC website from social media.

Users by Session default channel group over time



Users by Session default channel group





Session default channel group ▾ +		↓ Users *****	Sessions *****	Engaged sessions *****	Average engagement time per session *****	Engaged sessions per user *****	Events per session *****
		843 100% of total	1,215 100% of total	675 100% of total	0m 38s Avg 0%	0.80 Avg 0%	6.33 Avg 0%
1	Direct	397	639	309	0m 40s	0.78	5.85
2	Organic Social	320	368	234	0m 22s	0.73	6.10
3	Organic Search	125	189	124	1m 04s	0.99	8.43
4	Unassigned	9	9	0	0m 14s	0.00	2.22
5	Referral	6	15	7	0m 22s	1.17	5.93

The main purpose of having this social media presence during the NP consultation stage was to engage with the community, reach new audiences, build awareness, and ultimately send traffic to the website.

It succeeded in those aims, overall, the advertisement which ran on Facebook and Instagram reached a total of 8,160 users, it was seen 20,495 times, 178 people clicked on the advert and the average cost per click (CPC) was 30p.

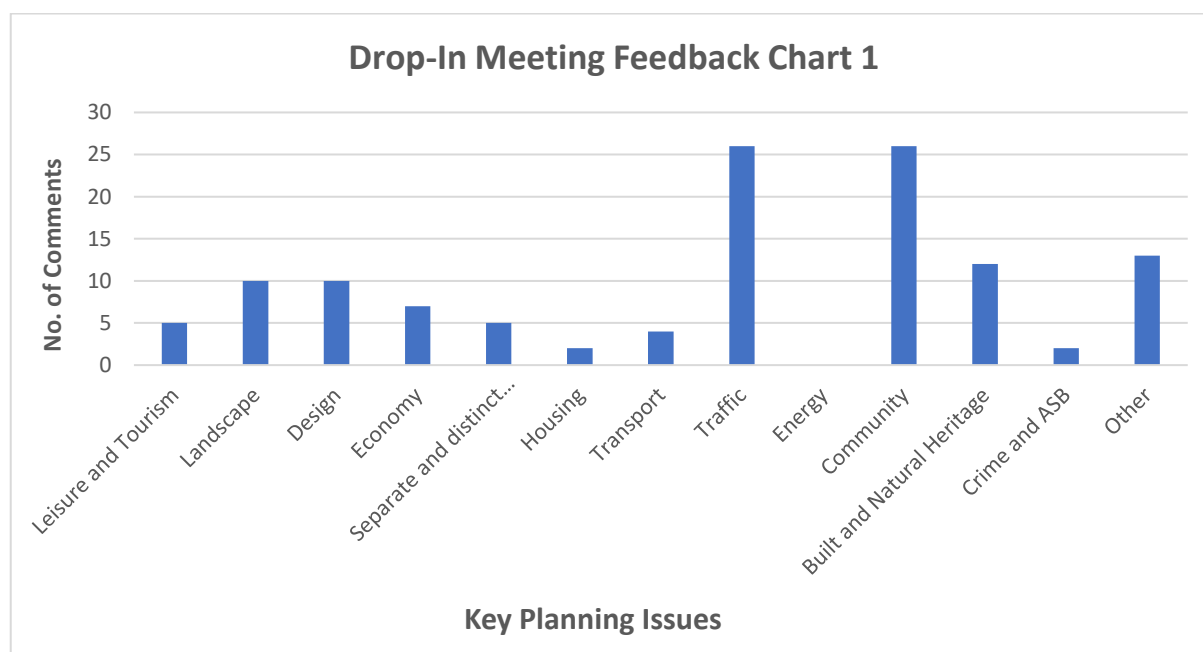
As a result of the email marketing campaign which went out, a total of 73 users opened the email, 56 users clicked the links in the email and visited the website and 0 users unsubscribed from the mailing list.

Digital marketing for this project had a significant impact on awareness in and beyond the local community.





The number of responses relating to the key issues identified by the NPSG were collated and are shown on the following Bar Chart 1 as they were discussed and originally listed by the NPSG.



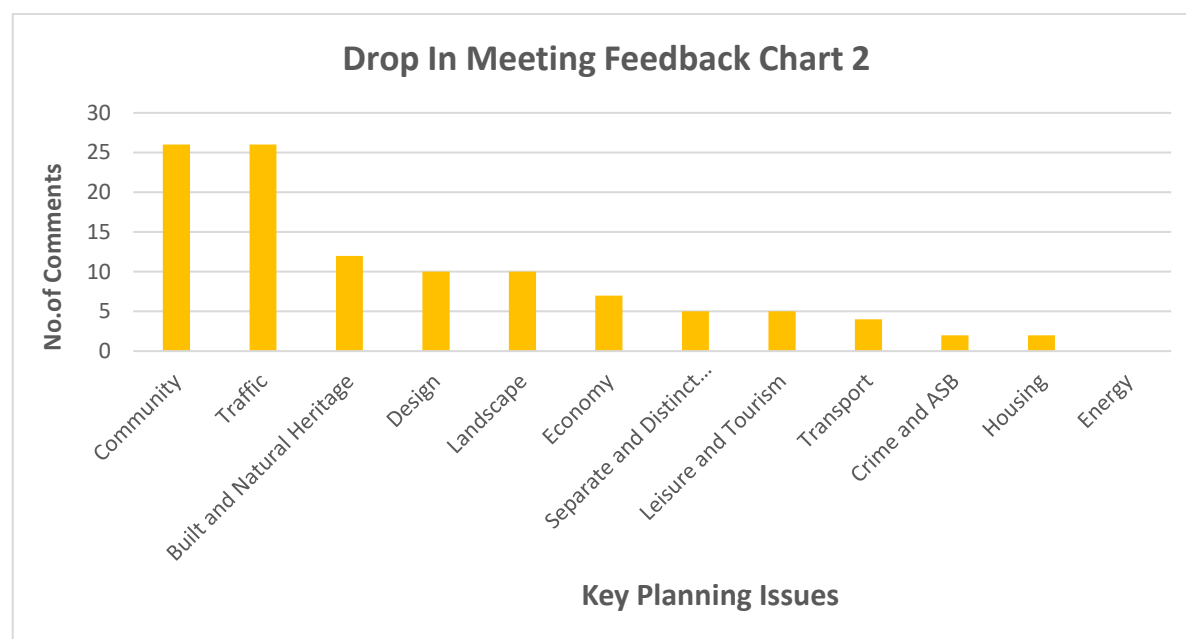
Included in the chart are 13 **Other** responses and comments which related to day to day matters rather than NP issues.

Issues such as litter, road and path infrastructure in poor condition, car parking signs, communication issues, lack of gritting to roads in winter etc..... which can be pursued by the Parish Council outside of the NP project.





Chart 2 shows the data, without non-NP issues, in order of priority to the local community who took the time to engage at the drop-in sessions.



Informal Consultation Feedback

From this consultation process the key input points are summarised as below;

Built and Natural Heritage

The neighbourhood area has a wealth of built and natural heritage assets.

- Preserve local ancient monuments and buildings, repair and protect all local dry-stone walls and improve Gorple Road as a means of walking and riding access to the moors.
- Provide more support for the diversification and protection of local wildlife including migratory birds.

Landscape

Its development should be consistent with the landscape and the setting this provides to the separate settlements that go to make up the area.

- Protecting the landscape and ensuring that any development plans are consistent with our natural landscape features is a theme running through other categories.





Design

The neighbourhood area includes distinct settlements with their own key design characteristics and features.

- Few inputs were received from the drop-in sessions, however, most residents and visitors to the area agree that it is important to design new developments for the area in a way that complements our wider surroundings.

Separate and Distinct Settlements

The Neighbourhood Plan should look at protecting the key areas of open land separating the settlements of Pike hill, Brownside, Worsthorne and Hurstwood that make up the area.

- It was widely commented upon and agreed that the areas of open land in the parish should be protected from inappropriate development. Any development, rural or otherwise, should maintain the separation and green spaces between the settlements, keeping the character of the area.

Transport

Public transport in the area is reasonable during the day but to and from Worsthorne village disappears in the evening.

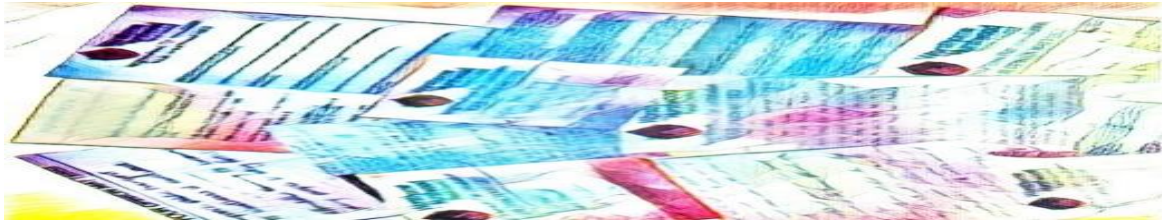
- Increase public transport to and from Worsthorne on an evening and reinstate the circular bus route from Burnley Bus Station through Brunshaw, Pike Hill and Worsthorne. Review bus services generally including a potential service to Hurstwood which currently does not exist.

Community

The neighbourhood plan should identify and protect key social and community infrastructure.

- Development of community assets, such as the Thursby allotment project, should be pursued and all be included in a 5-year plan.
- Involve the community at WWHPC owned land in Hurstwood to improve the area around the car park, install a wildflower area, human sundial and seating for picnics.
- Promote the Reading Rooms and Pike Hill Library as community hubs.
- Set up a “men in sheds” group for older men to practice their skills in a social environment and share them with the younger generation.
- Set up groups to look after and renovate dry stone walls in such areas as Salterford and Hurstwood Lanes.
- Install benches outside local shops for elderly residents and improve shopping areas with flower boxes and baskets.
- Create an environment in Worsthorne Village centre and at Pike Hill where people would be able to move around easily and socialise, made possible by well-designed street furniture and traffic calming methods.
- Pike Hill residents feel isolated from the community. Pike Hill should be a “Gateway” to Worsthorne with Hurstwood Parish with signage advertising the fact at or near the junction.





Leisure and Tourism

To sensitively increase the time visitors, stay in the area.

- Boost our economy by encouraging visitors to stay longer, enjoy the area and spend more time within local businesses.
- Improve access to the countryside for walkers, cyclists, and horse riders by improving paths and stiles especially on the Gorple Road route.
- Set up information boards at key points describing walking routes, local wildlife, local history, and things to do around Rowley, Worsthorne and Hurstwood.
- Set up a sculpture trail.
- Facilitate arts events with local artists and involve the whole community and especially young people.

Economy

To ensure the area remains sustainable.

- The plan should help ensure that the local economy flourishes by encouraging businesses to invest and grow within the area.
- Rural development and farm diversification are issues which are important to the agricultural community and should be supported where proposals are in line with other key points within the overall plan.

Crime and Anti-Social Behaviour (ASB)

Often not a planning matter the Neighbourhood Plan could look at the planning aspects of this by designing out crime.

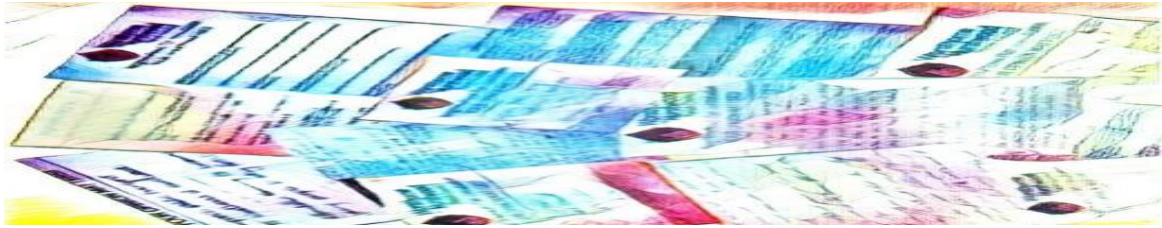
- Actions are required aimed at reducing and eradicating instances of crime and ASB in the Parish including suggestions that more monitoring cameras could be installed.

Housing

The pressure to build more homes in the area is a significant one.

- Comments were received relating to the provision of suitable and affordable housing for all members of the community and especially young people wishing to stay locally;
- Concerns were expressed that the existing and proposed property developments in the parish did not give enough consideration to the provision of social or affordable housing. In order to test this assertion and establish if there is indeed a significant need for this type of property a Housing Needs Assessment was commissioned. This has provided an evidence base to support the Neighbourhood Plan in exerting more influence on the housing mix in future planning applications.





Energy

The neighbourhood plan should look to encourage small scale renewable community energy projects.

- No comments were received relating to energy although some discussion within the NPSG did take place in relation to encouraging small scale renewable and community energy projects.

General

- The concept of the Woonerf principle was accepted at an early NPSG Meeting providing traffic calming measures linked to social space development for people in Worsthorne.
- The Woonerf concept should also be applied to Pike Hill as well which is a busy place to navigate for pedestrians, cyclists, equestrians, and motorists alike.
- The Pike Hill development could match features incorporated into the Worsthorne Village re-design and be a striking and visible *Gateway* to the Parish. Also consider similar features to be added along Brownside Road with heritage signage leading visitors into Hurstwood Village.
- Such an approach would not only provide calmer traffic flows but also enable Social Spaces to exist in these distinct areas.
- It would have the effect of providing local identity for Pike Hill, Brownside, Worsthorne and Hurstwood proud residents whilst at the same time stitching together the distinct areas into the Worsthorne with Hurstwood Parish Community.
- Properly thought out, designed, and applied to the Parish, the Woonerf concept would provide a superb environment for residents to live, socialise and go about their daily business safely.

2.5 In addition a number of non-planning issues were identified, such as litter, road and path infrastructure in poor condition, car parking signs, lack of gritting to roads in winter, policing in the area, communication issues on how local information is disseminated via parish noticeboards as well as information on planning applications by the council. The Parish Council, outside of the NP project, can start to address these issues.

2.6 A full Review Report on the informal consultation was published in May 2023.





Key issues, Vision and Objectives

2.7 The Steering Group then proceeded to develop a Vision and Objectives for the WHNDP.

WHNP 2032 Vision

By 2032 the Parish of Worsthorne with Hurstwood will continue to be a vibrant and thriving community and a safe and pleasant place to live and visit. It will have retained its attractive and unique identity of strongly linked rural and semi-rural communities separated by valued open, green spaces. There will be a good range of local amenities and community services for residents and visitors.

The area will embrace sustainable innovation and small-scale economic development without greatly changing its inherent character and heritage. New buildings and housing will be well sited, proportional to the landscape and built to a high quality and design. Development will minimise its impact on the environment, support carbon neutrality and limit climate change. Local infrastructure will be improved to support the demands of future development on residents and the landscape.

The natural environment, local ecology and open spaces will be preserved. Access to the countryside will be improved to promote the health and well-being of local residents and visitors whilst protecting habitats and wildlife.





- 2.8 To achieve this Vision we identified the following objectives for the WHNDP. These were amended in response to comments submitted during the Regulation 14 consultation.

WHNP Objectives

- To protect the natural and built environment of the area and to promote nature's recovery.
- To ensure that new development is of good quality design appropriate to its local context and setting.
- To maintain the identity and distinct physical separation of each of the neighbourhood area's individual communities.
- To ensure that future housing development meets the needs of the local area in terms of house type and tenure.
- To improve local connections to other areas for jobs, services, and other uses and to ensure that road traffic within the area is managed in a safe and respectful way of both residents and the environment within which it moves through.
- To support the development of small-scale renewable and community energy projects.
- To protect and enhance key community assets and services including educational provision and infrastructure and to ensure the area is safe for all.





Strategic Environmental Assessment

- 2.9 The plan has also been screened by BBC for any environmental impacts as part of the Strategic Environmental Assessment (SEA) process. The SEA was consulted on with the relevant statutory bodies.

3.0 Regulation 14 Consultation 1st March – 15th April 2024

- 3.1 The public consultation on the Regulation 14 Draft Worsthorne with Hurstwood Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must.

3.1.1 Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:

- Details of the proposals for a neighbourhood development plan.
- Details of where and when the proposals for a neighbourhood development plan may be inspected.
- Details of how to make representations.
- The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised.

3.1.2 Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan.

3.1.3 Send a copy of the proposals for a neighbourhood development plan to the local planning authority.





3.2 The Regulation 14 Draft WHNDP was published for formal consultation from 1st March 2024 until 15th April 2024.

3.3 Publicity of the above process and the WHNDP was widespread. This included:

- **Get Set** Leaflet Drop
- Parish Council web site
- Parish Noticeboards
- Social Media including Twitter, Facebook and Instagram.
- Mailing list – businesses and formal consultees

Drop-In Sessions

The second “**Get Set**” leaflet advertised the Regulation 14 Consultation at drop-in sessions with the message “**We’d love to hear your views & suggestions. Additionally, we’re holding a number of drop-in sessions in March to discuss the plan in further detail.**”

- **Thursday 7th March 2024, 6pm-8pm**
at Hurstwood Church, Hurstwood Lane, BB10 3LF
- **Saturday 9th March 2024, 10am-12pm**
at The Reading Rooms, Church Square, Worsthorne, BB10 3NH
- **Saturday 16th March 2024, 10am-12pm**
at Pike Hill Library, Langwyth Road, BB10 3JX

3.4 Copies of the plan and supporting documents were made available on the Parish Council website.

3.5 Hard copies of the plan were also made available from the Parish Council on request.





3.6 Responses to the Regulation 14 consultation could also be made in the following ways:

- By email
- By using the online response from
- By post

3.7 All consultation materials included the date by which comments must be made and to whom.

3.8 A copy of the plan and supporting documentation was sent to Burnley Borough Council.

3.9 A list of the consultation bodies' contact details was compiled and all those on the list were sent a letter by email or post notifying them of the Regulation 14 public consultation and inviting comments . This list included:

- Individuals and businesses, including landowners and developers
- Local groups and interest bodies
- Adjoining parishes
- Environment Agency and other statutory bodies
- Local ward and county councillors
- Emails were also sent to local individuals and groups on the Town Council mailing list

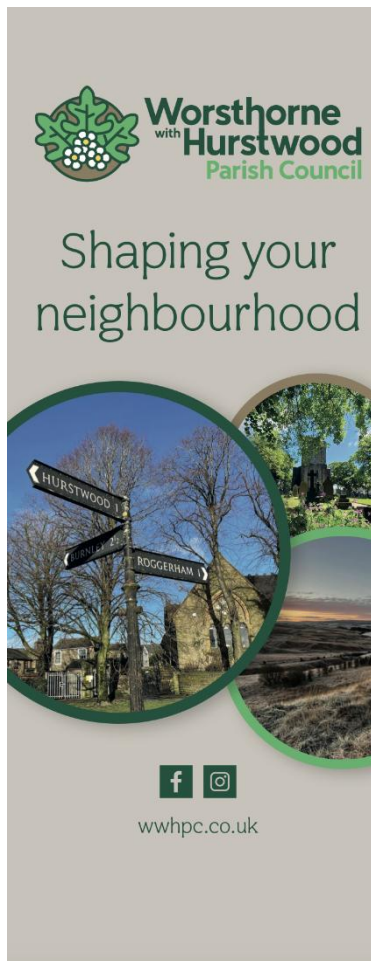
3.10 Appendices 2, 3 and 4 of this document set out the responses received to the Regulation 14 Consultation. The tables include how the Parish Council considered and agreed amendments to the plan and other non-NDP actions. These tables were used to make amendments to the Regulation 14 Draft prior to submission. In this way, the WHNDP has been a collaborative effort lead by the Parish Council and Steering Group, but supported by responses and feedback from local residents, agencies, business and others.





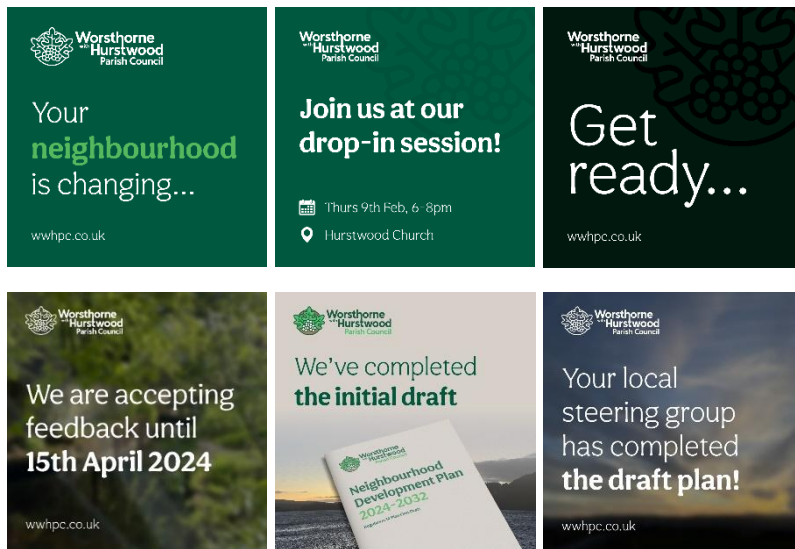
Appendix 1

Banners, Posters and Flyers





Social Media Campaign



Appendix 2

Burnley Borough Council Comments

Worsthorne with Hurstwood Neighbourhood Development Plan (NDP) 2024 – 2032

Comments from Burnley Council

The Council is supportive of the scope of the NDP. These comments are not provided in response to a formal request for comments but in the Council's role of supporting the preparation of the NDP, screening for SEA/HRA and ensuring that the plan provides a clear policy framework for development management colleagues in decision-making.

Comments	Changes to Draft Plan
Front Cover Full Title and Date?	<u>Change to:</u> 'Worsthorne with Hurstwood Neighbourhood Development Plan 2024 – 2032 Submission Version' 0 Insert Council Logo and Date
Key Issues Query re: Built and Natural Heritage. Assets without protection. What level of protection was meant here?	<u>Change to:</u> Where there are assets without such protection the neighbourhood plan could identify these and offer protection through the planning system. (Note – this has not been undertaken to date but a project to identify Non designated Heritage Assets (NDHAs) could be progressed by the Parish Council working with local people at a later date.)
WHNDP 2032 Vision Query re: Development that minimises the impact on the environment, supports carbon neutrality and limits climate change will be encouraged. This	<u>Change to:</u> The area will embrace sustainable innovation and small-scale economic development without greatly changing its inherent character and heritage. New building and housing will be well sited, proportional to the landscape and built to a high quality and design.



Comments	Changes to Draft Plan
could be development that otherwise wasn't in conformity with the Local Plan.	Development that minimises <u>will minimise</u> the its impact on the environment, supports carbon neutrality and limits climate change will be encouraged . Local infrastructure will be improved to support the demands of future development on residents and the landscape.
Query re: Access to the countryside will be improved to promote the health and well-being of local residents and visitors. The HRA/Appropriate Assessment for Burnley's Local Plan identified issues related to off site habitat loss - the erosion, trampling or disturbance of the SPA and recreation impacts - there is likely to be an increase in overall trips to the South Pennine Moors SPA and SAC from the increased population within Burnley which could result in adverse effects on the integrity of the SPA and SAC. Suggest caveating this sentence with regard to safeguarding the SPA/SAC – including to avoid the need for a formal Appropriate Assessment.	<u>Change to:</u> The natural environment, local ecology and open spaces will be preserved. Access to the countryside will be improved to promote the health and well-being of local residents and visitors <u>whilst protecting habitats and wildlife</u> .
Para 3.4 – Should the final location be Pike Hill as Worsthorne already mentioned?	<u>Change to:</u> This local geography also means that the neighbourhood area includes 4 <u>3</u> distinct settlements <u>and</u> communities; the villages of Worsthorne and Hurstwood and the rural/urban fringe areas of Brownside and Worsthorne .
Para 4.13 – insert “and it states that” before quotation from Policy H2.	<u>Change to:</u>



Comments	Changes to Draft Plan
	Policy HS2 deals with affordable housing provision, <u>and it states that</u> “all housing developments of over 10 units, unless the applicant can demonstrate that a site, which would otherwise be supported by the policies in the Plan and meets the requirements of Policies SP4 and SP5, would not be viable with affordable housing provision on-site or off-site by way of a contribution.”
Policy WHNDP1A – Landscape 1st sentence of the policy is considered to be very open and too permissive, therefore would be difficult to apply. Applications for development that would not be considered appropriate in their location could be considered to conform with this sentence.	<u>Change to:</u> Policy WHNDP1 – Landscape Development proposals that <u>will be expected to</u> conserve and enhance the local landscape will be supported. Landscape impacts of planning proposals will be assessed against the following:
Para 5.10 – Final sentence refers to managing increased recreational demand. As referred to previously this is not mentioned in the vision and is not in the policy.	<u>Insert additional wording in Policy:</u> f) <u>Demonstrate how any increased recreational demand will be managed to ensure the protection of the sensitive landscape and habitats.</u>
Figure 6 – acknowledgment of source	<u>IDENTIFY AND INSERT SOURCE</u>
Policy WHNDP1B – Worsthorne and Hurstwood Conservation Areas c) – amend to key views/public views h) – amend to unsympathetic	<u>Change to:</u> c) <u>key public</u> views of open moorland and the surrounding countryside h) ensuring building alterations are not alien or <u>un</u>sympathetic to the Conservation Area;



Comments	Changes to Draft Plan
Policy WHNDP2 – Worsthorne with Hurstwood Neighbourhood Design Guide 1st sentence of the policy is considered to be very open and too permissive, therefore would be difficult to apply. Applications for development that would not be considered appropriate in their location could be considered to conform with this sentence. In addition – what are sustainable buildings?	<u>Change to:</u> The design of Proposals will be expected to deliver high quality, beautiful and sustainable buildings and spaces will be supported. Refer to design guide for examples of how buildings may be made more sustainable. Note - Design Guide should be referred to as an Appendix of the NDP.
Para 5.22 – Is this the sustainable buildings referred to? Which Building Regulations are being referred to? If it is the 2021 Building Regulations and is intended to go above and beyond the Local Plan it may be “screened in” with regard to SEA and will also need evidence with regard to the viability. The last sentence states that the policy encourages developers to go beyond the minimum standards, but this is not referred to in the policy.	<u>Change to:</u> The WHNDP, through Policy WHNDP3 encourages developers to go beyond the minimum standards in the Building Regulations, so that new development in the neighbourhood area makes the move to zero carbon sooner rather than later. <u>Worsthorne with Hurstwood Neighbourhood Design Guide provides advice and guidance about how developments may be designed and built to be more sustainable.</u>
Policy WHNDP3 – Separation Need to consider rewording the opening sentence as Pike Hill and Brownside are not different settlements in the Local Plan. They are both	<u>Change to:</u> The following key open land areas will be retained in order to maintain the separation of settlements the following distinct areas:



Comments	Changes to Draft Plan
within Burnley in the settlement hierarchy set out in policy SP4	• Land between Pike Hill and Brownside • Land between Brownside in <u>Burnley</u> and Worsthorne <u>Main Village</u> • Land between Worsthorne <u>Main Village</u> and Hurstwood <u>Small Village</u> <u>The open area of land between Pike Hill and Brownside will also be retained in order to maintain the separation between these two built up areas of Burnley.</u>
Para 5.23 – include reference to the SP4 stating that development proposals should not lead to the coalescence of settlements	<u>Insert additional wording:</u> Burnley Local Plan Policy SP4: Development Strategy sets out the following: <u>“Development in the Open Countryside</u> <u>4) The open countryside is defined as land beyond any Development Boundary. In the open countryside development will be strictly controlled.</u> <u>Coalescence</u> <u>5) Development proposals should not lead to the coalescence of settlements.”</u>
Para 5.24 – final sentence amend to additional protection as it is already protected by SP4	<u>Change to:</u> Three key open land areas are, therefore, identified between Pike Hill and Brownside; between Brownside and Worsthorne; and between Worsthorne and Hurstwood for <u>additional</u> protection through the WHNDP.
Policy WHNDP4 – Housing Need and Mix Policy not considered to be in conformity with Policy HS2 of Burnley’s Local Plan or national policy	Change to: WHNDP5 – Housing Need and Mix



Comments	Changes to Draft Plan
Policy does not refer to delivery being subject to viability with is included in clause 1 c) of Policy HS2 Policy does not allow for off-site contributions which is allowed in clause 3 ii) of Policy HS2 Clause a) only refers to home ownership but the evidence in the policy justification and the HNA refers to the need for affordable rent	In seeking to meet the requirements of Local Plan Policy HS2: <i>Affordable Housing Provision</i> all private housing developments of over 10 units within the neighbourhood area should, <u>subject to viability</u>: a) Provide <u>Prioritise</u> on-site affordable housing provision. This should be a mix of Starter Homes, discounted market sales housing and other affordable routes to home ownership <u>and affordable rented housing</u>; and b) In seeking to meet the requirements of Local Plan Policy HS3 <i>Housing Density and Mix</i> planning proposals should include opportunities for smaller <u>(1 to 2 bedroomed)</u> dwellings that provide opportunities for first time buyers and residents looking to downsize. <u>Overall housing proposals should support a suitable mix of house types and tenures in line with the conclusions and recommendations set out in the Worsthorne with Hurstwood Housing Needs Assessment, December 2023 or more up to date parish housing needs assessment.</u>
Para 5.28 – the need is 52 per annum and not 52 over the plan period. 2nd bullet point would benefit from including the actual figure. 3rd bullet point 2nd sentence needs re-wording – presumably this is also affordable for higher income families so it is not only affordable to the households mentioned.	<u>Change to:</u> • In 2021 the neighbourhood area had a significantly higher proportion of households that owned their own home than Burnley and England. • The 2022 median house price in Worsthorne with Hurstwood was <u>£180,000</u> - approximately 84% greater than the median house price across Burnley (£98,000) in the same year. Local households on average incomes are unable to access even entry-level homes unless they have the advantage of a very large deposit. Private renting is generally only



Comments	Changes to Draft Plan
	<u>affordable becomes available</u> to households with two lower quartile earners <u>or above</u>. Households made up of one lower quartile earner cannot afford the given rental thresholds.
Para 5.30 – Refers to the policy seeking an increase in on-site affordable housing. What level is this referring to as the policy does not set a level? This para also omits affordable rent which forms part of the evidence and is most likely underestimated as it is based on 2018 based household projections. It is important to remember that the neighbourhood can/must also play a role in delivering the borough wide need which includes for affordable rent.	<u>Change to:</u> Policy WHNDP4 seeks to increase <u>deliver</u> on-site affordable housing provision. Based on evidence from the HNA this should be a mix of Starter Homes, discounted market sales housing and other affordable routes to home ownership <u>and affordable rented housing</u>.
There is no reference to the Developer Contributions SPD in the NPD	<u>Change to:</u> Policy WHNDP4 seeks to increase <u>deliver</u> on-site affordable housing provision <u>as a priority</u>. Based on evidence from the HNA this should be a mix of Starter Homes, discounted market sales housing and other affordable routes to home ownership <u>and affordable rented housing</u>. These routes to home ownership are as defined in Annex 2 of the NPPF. This affordable housing provision differs from that in the Burnley Local Plan; this seeks Affordable Rent or Social Rent: of 80% and Intermediate tenure of 20%. The WHHNA provides the evidence base for departing from the Local Plan and would better meet the need for affordable routes into home ownership in the neighbourhood area. <u>Burnley Borough Council's adopted Developer Contributions: Supplementary Planning Document</u>



Comments	Changes to Draft Plan																		
	<u>(SPD) December 2020 includes an affordable housing calculator (as set out on page 31 of the SPD) used for calculating the amount of contribution required towards off-site affordable housing in circumstances where on site delivery is agreed not to be necessary or desirable.</u>																		
Para 5.32 – 2 nd sentence replace “has” with “in/of” before Burnley	<u>Change to:</u> The historical development has <u>is of</u> Burnley																		
Para 5.35 – Smaller houses and house types is too vague. The actual sizes and types needs to be referred to in the policy. Have concerns over the demand for and delivery of smaller units. Also sites allocated to provide a certain type/s of housing to meet Local Plan strategy.	The Policy has been amended to include reference to 1-2 bedroomed properties – see above. <u>Change to:</u> Burnley Local Plan Policy HS3 <i>Housing Density and Mix</i> provides an indicative dwelling mix for sites of 0.4 hectares or 10 units or more: DELETE TABLE: <table><tr><td>Property Type:</td><td>Proportion:</td><td>Size (bedrooms)</td></tr><tr><td>Detached</td><td>20%</td><td>3 to 4+</td></tr><tr><td>Semi-detached</td><td>35%</td><td>2, 3, 4</td></tr><tr><td>Terraced</td><td>15%</td><td>2 to 3</td></tr><tr><td>Bungalow / accessible flat</td><td>20%</td><td>1, 2, 3</td></tr><tr><td>Other flats / maisonette</td><td>10%</td><td>1, 2</td></tr></table> <u>The WHHNA includes a suggested dwelling size mix in the Parish up to 2032 in Table 5-9 (p41) – reproduced below:</u>	Property Type:	Proportion:	Size (bedrooms)	Detached	20%	3 to 4+	Semi-detached	35%	2, 3, 4	Terraced	15%	2 to 3	Bungalow / accessible flat	20%	1, 2, 3	Other flats / maisonette	10%	1, 2
Property Type:	Proportion:	Size (bedrooms)																	
Detached	20%	3 to 4+																	
Semi-detached	35%	2, 3, 4																	
Terraced	15%	2 to 3																	
Bungalow / accessible flat	20%	1, 2, 3																	
Other flats / maisonette	10%	1, 2																	



Comments	Changes to Draft Plan																								
	Table 5-9: Suggested dwelling size mix to 2032, Worsthorne with Hurstwood <table><tr><th>Number of bedrooms</th><th>Current mix (2011)</th><th>Suggested mix (2032)</th><th>Balance of new housing to reach suggested mix</th></tr><tr><td>1</td><td>3.6%</td><td>10.7%</td><td>32.6%</td></tr><tr><td>2</td><td>25.6%</td><td>38.7%</td><td>67.4%</td></tr><tr><td>3</td><td>50.4%</td><td>39.2%</td><td>0.0%</td></tr><tr><td>4</td><td>17.6%</td><td>9.3%</td><td>0.0%</td></tr><tr><td>5+</td><td>2.8%</td><td>2.0%</td><td>0.0%</td></tr></table> Source: AECOM Calculations	Number of bedrooms	Current mix (2011)	Suggested mix (2032)	Balance of new housing to reach suggested mix	1	3.6%	10.7%	32.6%	2	25.6%	38.7%	67.4%	3	50.4%	39.2%	0.0%	4	17.6%	9.3%	0.0%	5+	2.8%	2.0%	0.0%
Number of bedrooms	Current mix (2011)	Suggested mix (2032)	Balance of new housing to reach suggested mix																						
1	3.6%	10.7%	32.6%																						
2	25.6%	38.7%	67.4%																						
3	50.4%	39.2%	0.0%																						
4	17.6%	9.3%	0.0%																						
5+	2.8%	2.0%	0.0%																						
Policy WHNDP5 – Transport Query re: the inclusion of “woonerf” traffic calming and the appropriateness of an engineered solution more appropriate to an urban or suburban area than a village and Worsthorne Conservation Area. Impact may lead to the requirements to be “screened in” with regard to SEA if impact different to that considered to come from the Local Plan – or even if screened out due to scale it would be identified as potentially negative. Is such a scheme necessary or deliverable in any case?	<u>Change to:</u> The following transport improvements will be supported in the neighbourhood area <u>where they are sensitively designed to avoid adverse impacts on heritage assets and their settings:</u>																								
Para 5.37 – 2nd sentence – would traffic calming reduce environmental impacts?	<u>Change to:</u> One project that the Parish Council seeks to progress is the reduction of traffic impacts in the heart of Worsthorne village. This would reduce environmental impacts <u>contribute to a more attractive, less car dominated environment</u>, improve safety and potentially lead to a more active village centre.																								



Comments	Changes to Draft Plan
Policy WHNDP – Renewable and Low Carbon Energy Projects Suggest referring to other policies they should be in accordance with including Conservation Area policies, Listed Building policies	Change to: WHNDP6 – Renewable and Low Carbon Energy Projects Domestic and community renewable energy projects will be supported where they are in accordance with Burnley Local Plan policies <u>HE1, HE2 and HE3 and</u> CC1, CC2 and CC3 and guidance in the Worsthorne with Hurstwood Neighbourhood Design Guide. Related Burnley Local Plan policies: <u>Policy HE1: Identifying and Protecting Burnley’s Historic Environment</u> <u>Policy HE2: Designated Heritage Assets: Listed Buildings; Conservation Areas; and Registered Parks and Gardens</u> <u>Policy HE3: Non-Designated Heritage Assets</u> Policy CC1: Renewable and Low Carbon Energy (not including Wind Energy) Policy CC2: Suitable Areas for Wind Energy Development Policy CC3: Wind Energy Development



Appendix 3

Worsthorne with Hurstwood Draft Neighbourhood Development Plan Regulation 14 Consultation Responses from Agencies

Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
Environment Agency 1.1	All		Comment	Dear Sir/Madam DRAFT WORSTHORNE NEIGHBOURHOOD PLAN WORSTHORNE WITH HURSTWOOD PARISH COUNCIL, READING ROOMS, 5 CHURCH SQUARE, WORSTHORNE, BB10 3NH Thank you for consulting the Environment Agency on the above draft neighbourhood plan, which we received 8 March 2024. Environment Agency Position We have reviewed the draft design guide which has been submitted as a supporting document to the neighbourhood plan.	Noted.	No change.
1.2	All		Comment Support	We agree with document in so far as it relates to our remit and it is positive to see that climate	Noted.	No change – but refer to 1.3 below.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				change is identified as theme for new development, however little reference is made to the natural environment. We believe that the guide could be more ambitious in how it illustrates new development could improve the natural environment, which in turn could contribute to biodiversity net gains where required.	Objective 1 of the NDP is to protect the natural and built environment of the Parish. The NDP Contains Policy WHNDP1A – Landscape which supports development that conserve and enhance the local landscape including woodlands, hedgerows and the network of habitats and the pastoral character of moorland fringes including pastures and meadows. Policy WHNDP2 – Worsthorne with Hurstwood Neighbourhood Design Guide. Design of new development should be informed by and respond positively to and will be assessed in relation to the guidance set out in this document. Part 4.7 Sustainability and Climate Change sets out that existing trees should be retained where possible and all proposed planting should be native species to promote and increase biodiversity.	



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
					Residential development should make space for wildlife to facilitate BNG and designs should offer habitat connections.	
1.3	All		Comment	Similarly, with the neighbourhood plan as a whole, we would recommend that the plan consider where specific any opportunities within the plan area where opportunities for enhancing and improving the natural environment may exist. Such opportunities may then be seen as options for developers to provide biodiversity net gain on and off-site. These in turn could be incorporated into the Lancashire Local Nature Recovery Strategy, as it is being developed. Yours faithfully	Noted. Refer to the PC for discussion. A wildlife survey of the Parish could be commissioned from Lancashire Wildlife Trust or local ecologist. This would identify areas of high, medium and low habitat distinctiveness and wildlife networks which could be used to support BNG on site and within the Parish. A wildlife survey would provide locally detailed information to support a new policy on BNG. PC to discuss.	Wildlife Survey Completed
Historic England 2.1		Policy WHNDP1B – Worsthorne and Hurstwood Conservation Areas	Comment	Worsthorne with Hurstwood Neighbourhood Development Plan 2024-2032 (Regulation 14 first draft, February 2024) As the public body that advises on England's historic environment, we are pleased to	Noted. The PC has liaised with BBC and the Conservation Officer during the preparation of the Draft Plan.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
		WHNDP2 – Worsthorne with Hurstwood Neighbourho od Design Guide		offer our comments on the draft Worsthorne with Hurstwood Neighbourhood Plan. The area contains designated heritage assets (such as listed buildings, scheduled monuments and conservation areas). The plan area is also likely to contain many other features of local historic, architectural or archaeological value. The planning and conservation staff at Burnley Council are best placed to assist with the development and refinement of your plan in relation to the historic environment. However, we do offer our general advice below.	BBC comments are provided in Appendix 2	
2.2		Policy WHNDP1B – Worsthorne and Hurstwood Conservation Areas	Comment	If you have not already done so, we also recommend that you also speak to the staff at Lancashire County Council who manage the Historic Environment Record (HER, formerly SMR). They should be	Noted. The PC have not progressed work on identifying NdHAS as part of the NDP.	Include link to the HER and add reference to this in the supporting text for the policies related to built heritage and design.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
		WHNDP2 – Worsthorne with Hurstwood Neighbourho od Design Guide		able to provide up to date details of locally important buildings, archaeological remains and landscapes as well as designated heritage assets.	A reference to the HER could be added to the supporting text for the built heritage and design policies.	
2.3	All		Comments	To ensure that the protection and enhancement of the historic environment is fully embedded within Worsthorne with Hurstwood Neighbourhood Plan, we recommend that you refer to our advice on neighbourhood planning, and particular our Neighbourhood Planning and the Historic Environment Advice Note No.11 (HEAN11) and information sheets, which are available on our website here: https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/ This should be the first port of call for advice on heritage in neighbourhood plans. Other Historic England advice that you may find of use include: • HE Advice Note 2 - Making Changes to Heritage Assets	Noted. The PC is content to rely on the higher level / strategic policies set out in the Burnley Local Plan for most of these issues. The Design Guide describes the distinctive character and historic features of the Parish and sets out locally appropriate design principles for new development and conversions, taking into account built heritage.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				(HEAN2): https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/ • HE Good Practice Advice in Planning 3 - The Setting of Heritage Assets (GPA3): https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ • HE Advice Note 7 - Local Heritage Listing (HEAN7): https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7 • HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment (HEAN8): https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ The National Planning Policy Framework (NPPF) indicates that plans should set out a		



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				positive strategy for the conservation and enjoyment of the historic environment (para 196) and can include detailed policies on conserving and enhancing the historic environment and establishing design principles (para 28). It is important that your plan identifies heritage assets in the area and includes a positive strategy to safeguard those elements that contribute to their significance. This will ensure they can be appropriately conserved and enjoyed now and in the future. The plan might, for example, address the following: • Consider how the plan's objectives can be achieved by maximising the wider social, cultural, economic and environmental benefits of the area's heritage, e.g. regeneration, tourism, learning, leisure, wellbeing and enjoyment. • Locate new development to protect the significance of heritage assets and their settings.		



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				• Give detail on the expected scale, density, massing, height, landscape, layout, materials and access of new development. • Offer solutions to heritage assets that are at risk from their condition or vacancy; or are vulnerable to becoming so during the life of the plan. The national register does not ordinarily cover Grade II listed buildings or non-designated heritage assets, so your plan could usefully consider whether there are any are at risk. • Consider how the significance of heritage assets can be enhanced. As well as designated heritage assets, your plan presents an opportunity to include a positive strategy for local heritage assets (these may include buildings, monuments, sites, places, areas, landscapes or views that are important to the local community for their heritage value). Government's National Planning Practice Guidance (PPG) is clear that neighbourhood plans need to		



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. The strategy and policies in your plan should be based on proportionate, robust evidence. For heritage, this might include a characterisation study, historic area assessment or archaeological appraisal, for example. Rather than just the presence or absence of heritage assets, evidence should focus on what makes them significant and, where relevant, vulnerable. In terms of the plan's policies, rather than re-writing higher-level policy, we suggest that neighbourhood plan policies add local depth to their application. For example, setting out specific themes, characteristics or features to be protected, or what measures would be acceptable to mitigate the impact of development that higher-level		



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				policy might allow. Policies can set out good design principles, local characteristics and appropriate materials to which new development will be required to respond. Paragraph 132 of the NPPF supports this, saying that neighbourhood planning groups can play an important role in identifying the special qualities of the area and explain how this should be reflected in development. We also recommend that you familiarise yourself with the terminology of historic environment planning (such as “historic environment”, “conservation”, “significance”, “heritage asset”, and “setting”) by referring to the glossary in the NPPF, and ensure that your plan maintains consistency with the terminology used in the NPPF. We also suggest copying these and other terms across to your plan's own glossary. Finally, and to avoid any doubt, this guidance does not reflect our obligation to provide further		



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				advice on, or potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment. Thank you for providing Historic England with the opportunity to comment. Yours sincerely,		
2.4			Comment / Advice	Neighbourhood Planning and the Historic Environment Historic England Advice Note 11 (Second Edition)	Noted.	No change.
National Highways 3.1	All		No comment	Thank you for the opportunity to comment on the Worsthorne with Hurstwood Parish Council Neighbourhood Plan Regulation 14 consultation. I can confirm that National Highways has no objection to this proposal. We have no specific comments with regard to the draft document but look forward to working with you in the future.	Noted.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
National Gas Transmission 4.1	All		Comment	Dear Sir / Madam Worsthorne with Hurstwood Neighbourhood Plan Regulation 14 Consultation March – April 2024 Representations on behalf of National Gas Transmission National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where	Noted.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				pressure is reduced for public use.		
4.2	All		Comment	Proposed sites crossed or in close proximity to National Gas Transmission assets An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. • https://www.nationalgas.com/land-and-assets/network-route-maps Please also see attached information outlining guidance on development close to	Noted.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				National Gas Transmission infrastructure. Distribution Networks Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com		
4.3	All		Comment	Further Advice Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included: National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.	Noted. These are detailed matters and would be addressed as part of the development management process if and when planning applications are submitted.	No change.
4.4	All		Comment	Gas assets	Noted.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines. National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement. National Gas Transmission's 'Guidelines when working near National Gas Transmission assets' can be downloaded	These are detailed matters and would be addressed as part of the development management process if and when planning applications are submitted.	



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				here: https://www.nationalgas.com/document/82951/download		
4.5	All		Comment	How to contact National Gas Transmission If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/ For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com	Noted.	No change.
National Grid 5.1	All		Comment	Dear Sir / Madam Worsthorne with Hurstwood Neighbourhood Plan Regulation 14 Consultation March – April 2024 Representations on behalf of National Grid Electricity Transmission	Noted.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid Electricity Transmission National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission,		



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				which is a separate entity and must be consulted independently. National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.		
5.2	All		Comment	Proposed development sites crossed or in close proximity to NGET assets: An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.	Noted.	No change.



Consultee Name Address Ref. No.	Page No. Para No	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				NGET has identified that it has no record of such assets within the Neighbourhood Plan area		
5.3	All		Comment	NGET provides information in relation to its assets at the website below. • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ Please also see attached information outlining guidance on development close to NGET infrastructure.	Noted.	No change.
5.4	All		Comment	Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Further Advice Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown	Noted. These are detailed matters and would be addressed as part of the development management process if and when planning applications are submitted.	No change.



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				below to your consultation database, if not already included: If you require any further information in respect of this letter, then please contact us. NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets. Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. NGET's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places.		



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				The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. NGET's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network		



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				-and-assets/working-near-our-assets How to contact NGET If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/ For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com		
Natural England 6.1	All		No Comment	Worsthorne with Hurstwood Neighbourhood Plan - Pre-submission Regulation 14 Consultation Thank you for your consultation on the above dated 08 March 2024. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations,	Noted.	No change.



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				thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan.		
6.2	All		Comment	However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information. Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a	Noted. Refer to 1.3 above.	No change.



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				Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species . Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice. We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most		



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				versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.		
6.3		SEA HRA	Comment	Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.	Noted. Information about the SEA / HRA Screening Assessment processes and reports should be provide on the NDP pages of the PC website prior to submission.	Add SEA / HRA reports to website prior to submission and update if required.
6.4	All		Comment / Advice	Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities Natural environment information sources	Noted. Landscape character is addressed in the NDP policies and Design Guide. Refer to 1.3 above.	Information provided could be used to inform a new Policy on BNG in the Parish. BNG Policy written and included in the WHNPD



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				The Magic1 website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres . Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here². Most of these will be mapped either as Sites of Special	These are all matters that could be used to inform a local NDP policy on BNG and wildlife enhancement in the Parish. PC to discuss.	



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				Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites. National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here³. There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local		



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				planning authority should be able to help you access these if you can't find them online. If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website. General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic4 website and also from the LandIS website⁵, which contains more information about obtaining soil data. Natural environment issues to consider The National Planning Policy Framework⁶ sets out national		



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				planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁷ sets out supporting guidance. Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments. Landscape Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness. If you are proposing development within or close to a protected landscape (National		



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				Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping. Wildlife habitats Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here⁸), such as Sites of Special Scientific Interest or Ancient woodland⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for. Priority and protected species You'll also want to consider whether any proposals might affect priority species (listed here ¹⁰) or protected species.		



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				To help you do this, Natural England has produced advice here¹¹ to help understand the impact of particular developments on protected species. Best and Most Versatile Agricultural Land Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land 12. Improving your natural environment Your plan or order can offer exciting opportunities to enhance your local environment		



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				and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals. Opportunities for environmental enhancement might include: • Restoring a neglected hedgerow. • Creating a new pond as an attractive feature on the site.		



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				Planting trees characteristic to the local area to make a positive contribution to the local landscape. - Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. - Incorporating swift boxes or bat boxes into the design of new buildings. - Think about how lighting can be best managed to reduce impacts on wildlife. - Adding a green roof to new buildings. - Providing a new footpath through the new development to link into existing rights of way. Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on		



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				allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here here. You may also want to consider enhancing your local area in other ways, for example by: • Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community. • Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles		



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				Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance¹³). - Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency). - Planting additional street trees. - Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links. - Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).		



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				Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.		
Lancashire County Council General 7.1	All		Comment	Thank you for your email regarding the above consultation which I have circulated within the relevant departments of the County Council. The relevant departments and individuals have been instructed that should they wish to respond on the neighbourhood plan they should do so on an individual basis. Kind regards	Noted.	No change.
LCC	All		Comment	Dear Sir/Madam	Noted.	No change.



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School Planning Team 8.1				Lancashire County Council's School Planning Team welcome the opportunity to contribute to the Worsthorne with Hurstwood Parish Council Neighbourhood Development Plan First Draft. We recognise the value of engaging with local communities at the earliest stage of their own plans to ensure the future needs of education are highlighted and documented within the Local Plan policies. The value of local knowledge can help to define and shape and future of local communities, ensuring the right level of infrastructure is achieved to meet the growth of housing and employment. Further information about school planning in Lancashire is provided in The School Place Provision Strategy 2022-2025. The School Planning Team has worked closely with colleagues at Burnley Council over a number of years as they develop Local Plans and development		



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				plans to ensure the infrastructure requirements are included within the policies to support the successful delivery of sustainable housing development, including the allocation of land for new school provision. LCC produce pupil projections that can assist local planning authorities, both in terms of long-term planning and securing education contributions from developers. We will continue to work with, and advise, the local planning authority of the pupil projections taking into account planned housing development. This data is applied to the Pupil Forecast Methodology which enables LCC to forecast the 5 years position, for further detail of this process please refer to the methodology. link below. https://www.lancashire.gov.uk/media/919265/pupil-forecast-methodology.pdf		



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				With regards to the Worsthorne with Hurstwood Neighbourhood Development Plan (2024-2032) we have a number of comments to make on the Regulation 14 Plan First Draft.		
8.2	2.1		Comment	Within paragraph 2.1 key issues for the neighbourhood plan are identified. With respect to housing the School Planning Team would comment individually on any updates to housing allocations via the normal Local Plan planning process.	Noted. It is assumed that BBC would consult LCC on planning applications as part of the development management process.	No change.
8.3	2.6		Comment	At paragraph 2.6 we would like a comment surrounding sustainability, covering the mitigation of community infrastructure including the impacts on education	Accepted. Amend Objective 7	Amend NDP. Amend Objective 7: To protect and enhance key community assets and services <u>including educational provision and infrastructure</u> and to ensure the area is safe for all.
8.4	4.9		Comment	Paragraph 4.9 requires further clarity on the definition of "small scale". What does small scale mean? Depending on the size of a residential development it could have an impact on education mitigation. The School Planning	Noted. This paragraph refers to an extract from Burnley Local Plan. There is no definition of small scale in the Local Plan, but the	Following advice from BBC insert additional text in justification: <u>'Small scale' housing development is not defined in the Local Plan but paras 4.4.11 – 4.4.14 set out the background to the development boundaries, the identification of the villages and the type of development</u>



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				Team assesses all residential developments providing a net increase of 10 or more dwellings, however the current Education Contribution Methodology (July 2023) states that if a development includes a number of planning applications that are less than 10 dwellings then these applications may be assessed in order to mitigate the overall impact of the development. Similarly, applications that are part of a wider development or additional to an existing permission will require an education contribution assessment.	NPPF defines major development. Refer to Planning Policy Team at BBC for clarity on 'small scale'.	<u>that the Local Plan strategy envisages in the villages.'</u>
8.5		Policy WHNDP4, Housing Need and Mix	Comment	Policy WHNDP4, Housing Need and Mix, does not mention any mitigation measures for any development towards education or sustainable communities. Paragraph 5.35 states that "The WHHNA concludes that for the neighbourhood area the suggested mix of development during the plan period should focus on 1-bedroom and 2-bedroom dwellings. Therefore,	Noted. These are matters for BBC working with LCC as part of the development management process.	No change.



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				WHNDP4 seeks to ensure that development proposals include smaller houses and house types that can meet the needs of first-time buyers and other residents who may be looking to downsize". Although 1-bedroom dwellings do not generate any yield towards school places, the School Planning Team assesses all residential developments providing a net increase of 10 or more dwellings. The current Education Contribution Methodology (July 2023) states that if a development includes a number of planning applications that are less than 10 dwellings then these applications may be assessed in order to mitigate the overall impact of the development. Similarly, applications that are part of a wider development or additional to an existing permission will require an education contribution assessment.		



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8.6		Policy WHNDP7, Community Facilities	Comment	Policy WHNDP7, Community Facilities, states that there will be a presumption in favour of the protection of existing community facilities and includes education facilities as a facility that is afforded protection. The policy does not make reference to the mitigation required toward education regarding the impact of new housing development(s).	Accepted. This Policy could be amended to refer to mitigation for educational provision.	Amend Policy as suggested. Amend Policy WHNDP7, Community Facilities. Add further text: <u>'Proposals for residential development will be required to support suitable mitigation towards education in accordance with Lancashire County Council's Education Contribution Methodology (July 2023) or later policy.'</u>
8.7	P53		Comment	Within the Neighbourhood Plan Review (May 2023) section on page 53 of the document it provides draft objectives which are now assumed agreed key objectives. The final objective listed states "To protect and enhance community assets and services and to ensure the area is safe for all". This section makes no direct reference to the mitigation of the impact of key developments towards school places.	Noted. This section refers to earlier consultation processes in relation to the preparation of the Draft Plan.	No change.



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8.8	All		Comment	Although there is not a direct reference to educational impacts within the report we ask that it is recognised that school place provision is a key element of delivering sustainable communities. The DfE guidance 'Securing Developer Contributions for Education' advises that housing development should mitigate its impact on school provision. In relation to the Free Schools Programme the DfE expects the developer to make an appropriate contribution to the cost of the project, allowing the DfE to secure the school site on a peppercorn basis and make use of developer contributions towards construction. LCC's Education Contribution Methodology provides details of how developer contributions are sought	Noted. The NDP could be amended to refer to this information in the supporting text of Policy WHNDP7 Community Facilities.	Amend Plan. Insert additional supporting text to support Policy WHNDP7: <u>'During the Regulation 14 consultation process, LCC submitted various comments in relation to school provision and mitigation for residential development. The comments included that school place provision is a key element of delivering sustainable communities. The DfE guidance 'Securing Developer Contributions for Education' advises that housing development should mitigate its impact on school provision. In relation to the Free Schools Programme the DfE expects the developer to make an appropriate contribution to the cost of the project, allowing the DfE to secure the school site on a peppercorn basis and make use of developer contributions towards construction. LCC's Education Contribution Methodology provides details of how developer contributions are sought. Further information can be viewed at https://www.lancashire.gov.uk/council/performance-inspections-reviews/children-education-and-families/school-organisation-reviews/</u>



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8.9	All		Comment	The School Planning Team work with local planning authorities to identify where development will result in a shortfall of school places and to secure contributions to mitigate the impact of development. Further information about future demand for school places and plans to address projected shortfalls can be viewed at: https://www.lancashire.gov.uk/council/performance-inspections-reviews/children-education-and-families/school-organisation-reviews/ Lancashire County Council's School Planning Team wish to thank Worsthorne with Hurstwood Parish Council for the opportunity to engage in this process and we look forward to further engagement in the future. If you have any queries, please do not hesitate to contact me. Yours faithfully	Noted.	No change.



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LCC Lead Local Flood Authority 9.1	All		Comment	Dear Worsthorne with Hurstwood Parish Council, Thank you for inviting the Lead Local Flood Authority to comment on the below consultation. WORSTHORNE WITH HURSTWOOD PARISH COUNCIL DRAFT NEIGHBOURHOOD PLAN Neighbourhood Development Plan 2024-2032 Regulation 14 Plan First Draft Lancashire County Council is the Lead Local Flood Authority for the County Council's administrative area. The Flood and Water Management Act sets out the requirement for the Lead Local Flood Authority to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within its area. In the planning process, the Lead Local Flood Authority is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning	Noted.	No change.



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				(Development Management Procedure) (England) Order 2015. Comments provided in this representation are advisory and it is the decision of the Parish Council whether any such recommendations are acted upon. The comments given have been composed based on the extent of the knowledge of the Lead Local Flood Authority and information provided at the time of this response.		
9.2	All		No comment	The Lead Local Flood Authority has reviewed the consultation details and has no comments to make regarding the Neighbourhood Plan, as the plan contains no policies relating to surface water flood risk or surface water drainage that fall within our remit.	Noted.	No change.
9.3	All		Comment	It is assumed that Policy CC4 (Development and Flood Risk) and Policy CC5 (Surface Water Management and Sustainable Drainage Systems) of the adopted Burnley Local Plan have been deemed appropriate	Noted. NDPs should not replicate Local Plan policies and it is accepted that that the relevant policies on flooding and water management in the Burnley	No change.



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				for the neighbourhood by the Parish Council. You may wish to consider opportunities to enhance these Local Plan policies at the Neighbourhood level, for example, by taking opportunities presented by new development in the neighbourhood and improvements in green and other infrastructure to reduce the causes and impacts of flooding, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management, in line with Paragraph 167 of the National Planning Policy Framework. I trust that you find these comments valuable. Should you wish for further information or clarification on the contents of this letter please contact us at the email address provided.	Local Plan address these matters sufficiently in relation to development proposals in the parish.	



Appendix 4

Worsthorne with Hurstwood Regulation 14 Consultation – Responses from residents

Ref. No.	Page No. Para No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
1.1	3.0		Comment	Dear Parish Council, Further to our meeting in Hurstwood Chapel last week I would like to make further comments which I did not have time to address. Firstly, I feel that although we are classed as Worsthorne with Hurstwood we are nothing like Worsthorne. This hamlet is a unique historical gem due to Edmund Spenser a poet in the reign of Elizabeth the first who stayed here and should remain so at all costs. This Hamlet as hardly changed unlike Worsthorne which is nothing like it was when it was a proper village. I am aware the turnout for the meeting was	Noted. The NDP could include more detail about Hurstwood eg in Section 3 and other sections to identify it as a distinct and separate settlement in the parish.	Amend Plan. <u>Include brief description of each of the settlements in Section 3.0 as part of the parish profile / portrait.</u>



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				small but that does not mean the residents here don't care what happens here. There are two working farms here, which I might add are run to a high standard as is the maintenance of the land. These farms should be high on your priority as is the conservation of our wildlife. We have a large range of wildlife which many people are not aware of and this must be protected. Since Covid we have had a lot of damage and disruption done to the village by people coming here.		
1.2	All		Comment	As you are aware they have no regard for the village Green thinking they can do what they want on it, granted you did put some posts in place, but it is still being trashed. After the first	Noted. The NDP is a planning policy document and will be used to help determine planning applications. It is	TBC Consider adding further Appendix setting out Community Aspirations / Parish Council Actions. This could replace 5.39 etc



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				meeting you had I wrote to you after consulting several people in the village, to suggest a Hawthorne Bush all-round the Green up to the Bailiff's House would deter anyone trying to park on it and it would be highly beneficial to all wildlife especially the owls and Bats that go round there at night to feed.	not an action plan for the PC. Para 5.39 includes 'Supporting Parish Council Actions' The PC could consider adding an Appendix to the NDP setting out 'community aspirations / parish council actions' to add value to the NDP policies. These would cover non planning matters such as traffic, parking, litter etc and note how the PC could take action on important matters to residents, working with partners and stakeholders. Examiners prefer to see these set out in an Appendix as they do not form part of the NDP.	
1.3	N/A		Comment	The situation with people coming here and not keeping their dogs on leads is becoming out of control.	Noted. Refer to 1.2 above.	No change.



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				Within the last few weeks two sheep have been savagely attacked and killed. Within the last two years two deer have been attacked, one killed, and one had to be put to sleep. These people have no idea what the Country Code is.		
1.4	5.39		Comment	Mention was made of more signs for parking. We don't want or need more signs. What is needed is for the nice sign which we already have but as been obscured by the Notice Board to be moved to the other side of the Notice Board where it is visible. The payment machine on the car park should be removed too. Also, it would look for more in keeping with our village if the hideous Plastic Grit 8ox was replaced with a metal one. If you have a problem with this I am sure my husband could help you.	Noted. Refer to 1.2 above.	No change.
1.5	N/A		Comment	Now for litter. Even in winter I am collecting rubbish every day, plastic	Noted. Refer to 1.2 above.	No change.



Ref. No.	Page No. Para No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council's Consideration	Amendments to NDP
				bags, cups. Wine bottles, cans and other disgusting things which I won't mention. Now summer is soon upon on the situation will be far worse. We are on constant alert to make sure nobody lights a fire or a barbeque. I can't tell you how many times I had to get the Fire Brigade out this last couple of years. If a fire got out of control especially in warm weather not only could it have devastating consequences for the wildlife but for the farmers too.		
1.6	5.39		Comment	Now speeding. Why as nothing been done to address the speed limit from Salterford Lane to Hurstwood and from Worsthorne to Hurstwood. This should be down to 20MPH. Again, two working farms here and people riding out on horses from one of them. Someone is going to be killed. When the speed limit	Noted. Refer to 1.2 above.	No change.



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				was put in place on these roads you hardly ever so a car. Does nobody have any sense. This matter has been going on to long and someone should take responsibility and do something about it.		
1.7	N/A		Comment	Finally, what about the drug dealers using this village at night. This is still happening and again nothing has been done. I am quite sure all the people who live here will agree with all my comments. some Feedback from you would be appreciated as I never received a response to my last letter.	Noted. Refer to 1.2 above. All comments received are reported in the Consultation Statement and the PC website will be updated to refer to this document once completed. Refer comments about Drug Dealing to the Police.	No change.
2.1	All		Comment	Hurstwood neighbourhood plan meeting We were unable to attend the recent neighbourhood plan consultation due to being out of the country but wish to show our support for the	Noted.	No change.



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				issues submitted to you from X		
2.2	5.39		Comment	We live on Hurstwood Lane and are constantly inundated with traffic parked outside. Cars vans etc....park half on the pavement and half on the road obstructing wheelchairs, prams and forcing them onto the roadway Alternately if the vehicles parked on the lane it would not be possible for traffic to pass!!!t The car park is now free a much safer place to park but still motorists continue to park along the lane	Noted. Refer to 1.2 above.	No change.
2.3	5.39		Comment	Speeding is an issue from all manner of transport even though 20mile limit is clearly displayed. One stretch of the lane has no pavement ,horses are regularly on the lane.	Noted. Refer to 1.2 above.	No change.



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				An accident is waiting to happen		
2.4	5.39			Local farmers work very hard looking after their land and animals. The unthoughtful visitors who walk their dogs without a lead cause danger and occasionally death to sheep, horses and the natural environment. Dog excrement can be regularly found on pavements fields and often poo bags are left hanging from the trees. Could I suggest more bins for those who do pick up their animal droppings The amount of litter left is unbelievable and unsightly. Local residents often walk around at night collecting bottles paper plastic and personal items which are a danger to the sheep, horses, deer and natural habitat.	Noted. Refer to 1.2 above.	No change.



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2.5	5.39			DRUG DEALING IS STILL AN ISSUE AT NIGHT AND THE POLICE ARE AWARE !!!! Sadly Hurstwood. the lovely historical area of beauty is being ruined by irresponsible Visitors. People of Hurstwood pay a premium to live here but struggle to receive support or Services.	Noted. Refer to 1.2 above. Refer comments about Drug Dealing to the Police.	No change.
3.1	12 3.4		Comment	urban fringe areas of Pike Hill and Brownside	Noted.	Amend 3.1 to refer to this?
3.2	12 3.6		Comment	St John's and its contribution in Worsthorne should be included here. on Sundays a tearoom	Noted.	Amend 3.6 to refer to this?
3.3	22 5.2	Policy 1	Support	Agreed.	Noted.	No change.
3.4	27 5.12	Policy WHNDP1B – Worsthorne and Hurstwood		h)....not alien or unsympathetic...	Not understood – this comment repeats policy wording.	No change.



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		Conservation Areas				
3.5	30 5.17		Comment	An updated Conservation Area Appraisal for Hurstwood needs to be produced	Agreed. The PC could work with BBC to progress this. PC to discuss.	No change.
3.6	31 5.20		Support	This is an admirable objective, conspicuously ignored in some recent developments.	Noted. This refers to the NPPF.	No change.
3.7	33 5.24	WHNDP3 – Separation	Support	This policy is probably the most important objective in the development plan.	Noted.	No change.
3.8	36 5.32		Comment	... development in Burnley...	No understood	No change.
3.9	38 5.37		Comment	Consideration also needs to be given to the reduction of the traffic impact caused by the considerable number of car driving short term visitors to Hurstwood - traffic calming measures on Hurstwood Lane, 20mph limit at gateway, adequate and regulated parking provision.	Noted. Refer to 1.2 above.	No change.
3.10	40 5.40	WHNDP6 – Renewable and Low	Comment	Consideration might be given to the possibility of floating solar (floatovoltaic!)	Noted.	No change.



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		Carbon Energy Projects		panels on Cant Cough reservoir, perhaps with a turbine generator on the outflow. Proximity to the windfarm might facilitate distribution. Advantages: Reduction in evaporation and algae growth. Some output could be used to circulate/aerate stored water. More efficient and less intrusive on the landscape than land-based arrays.	The PC would be interested to hear about any proposals for community energy schemes.	
3.11	All		Comment	With the wealth of information provided, I found it difficult to identify the parts of the printed document to which a response is invited (and impossible with the online version!). Others may well have the same problem.	Noted.	No change.
Lancashire County Councillor 4.1		Objective 1: Landscape	Support Comment	Largely in support with the proviso that 'nothing stays the same' and there needs to be an understanding that the landscape is a working area.	Noted. Consider adding detail about historic landscape character. Could be addressed in landscape / biodiversity study.	Amend NDP. References to historic landscape character assessment could be added to the NDP for example if included in a commissioned landscape and biodiversity assessment.



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				Also, no account has been taken to recognise Worsthorne's landscape is entirely manmade from the creation of the hushings as an early industrial undertaking for the extraction of lime to the shooting moors, kept through the mid to late 1800s to the creation of the reservoirs and the bleak moorland of today. Historic features – protection of the historic industrial landscape is much overlooked. From stonewalls to lime kilns to bench marks on the remains of stone gate posts to the stone walls themselves, it would be helpful for the Parish to recognise these distinctive features and seek to restore them rather than plant over them. Hedges – hedges are wonderful things ... in		Amend 5.6 to include local detail about industrial and agricultural heritage. Review NCA descriptions and only include those that are relevant to the NDP area. Reviewed and amended



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				moderation and not at the expense of drystone walls. Hedges tend to be havens of uninteresting monoculture, hawthorne, in this case. If necessary it would be better to support projects of mixed planting with holly, hazel, blackthorn, even dogrose, and a regime of laying them at the appropriate age and time rather than flailing. Many of the policies mentioned in the WHNDP, such as the NCA are not applicable to Worsthorne and I feel they have been included as an unresearched filler rather than with any understanding of what they mean or how useful, or supportive, they can/could be.		
4.2	5.7		Comment	5.7 Opportunities for recreational activities are present (although the	Noted.	Amend NDP



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				Pennine Way does not run through the parish). More multi-user paths should be encouraged to ensure engagement by a more diverse number of the community. Better use of the reservoirs should be discussed. At present they are underutilised and the arguments put forward for not making use of them remain unsubstantiated other than hearsay and habit.		The supporting text could be amended to include references to improving existing facilities e.g. through multi use paths and reservoirs.
4.2	5.10		Comment	5.10 Failure to mention bridleways – again shows a shortfall in real research into the area for the needs of the plan. Public Rights of Way encompass all forms of non-motorised access and should be the term used.	Noted.	Amend NDP Refer to PROW rather than footpaths.
4.3	P26		Comment	Pg. 26 Interested to read productive agricultural activity with lush, improved pastures utilised for dairy	Noted.	Amend NDP Edit extracts from NCAs to include only those points relevant to the NDP area.



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				farming – Dairy farming died out in the 80s due to it not being a particularly good area for dairy? Small land holdings and poor land, easily poached and over grazed.		
4.4		Policy WHNDP1B – Conservation Area	Comment	Policy WHNDP1B – Conservation Area Worsthorne's conservation area has not been particularly well protected. Hopefully the Neighbourhood plan will be able to preserve what is left, enable sympathetic infill and prevent destruction of the square.	Noted. The NDP policies supported by the design guide should help to ensure changes are sympathetic to local character and heritage.	No change.
4.5		Obj 2	Support	WHNDP OBJECTIVE 2 – Fully support and suggest collaboration with Civic Trust over future planning applications.	Noted.	No change.
4.6		Obj 3	Comment	WHNDP OBJECTIVE 3 – MAINTAIN THE IDENTITY & DISTICT PHYSICAL SEPARTION OF EACH OF THE NEIGHBOURHOOD AREAS.	Noted. The design guide sets out detailed design codes for development in the area.	Amend NDP Amend Policy WHNDP1A – Landscape to include a criterion to protect the area's dark skies and avoid unnecessary light pollution.



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				This is at odds with PC practice that has, to date, objected to developments whether they are in or out of the Local Plan (see. Heckenhurst). Suggest NP is more robust in getting involved with how a development looks, its layout and legacy with the addition of practical conditions on materials and open space. Conditions to perhaps cover: dark skies – prevent further light pollution: this does not prevent low level lighting. Controlled patio/fake grass.	The design guide and NDP do not include guidance on lighting and protecting dark skies but a criterion could be added to the landscape policy. Plastic grass and patios are permitted development and do not require planning consent.	
4.7		Obj 4	Comment	WHNDP OBJECTIVE 4 – ENSURE FUTURE HOUSING DEVELOPMENT MEETS NEEDS OF LOCAL AREA. Please define what is meant as 'affordable housing'; social housing – which would not go down well with the neighbours -	Accepted.	Amend NDP. Insert NPPF definition of affordable housing in Appendix or refer to it in supporting text



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				or is this statement suggesting a manipulation of the market to create a buy to let. Please clarify.		
4.8		Obj 5	Support	WHNDP OBJECTIVE 5 – IMPROVE LOCAL CONNECTIONS Largely agree – the car remains king and, practically, always will, but that should not prevent the creation / enhancement and upgrade of the PRow network to enable multiuse by cyclists and horseriders to and from neighbouring settlements, the urban centre or the national network.	Noted.	No change.
4.9		Obj 5	Support	Traffic calming: this is subject to national highway strategies and policies but should be one of the list of conditions submitted when commenting on future developments.	Noted.	No change.
4.10	5.36		Support	5.36 Agree with provisos.	Noted.	No change.



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				WOONERF is not new nor a model that works in the UK but could be applied, with discretion, to new development.		
4.11	5.39		Comment	5.39 Endorse collaboration with the repair, maintenance and creation of walls/banks/PRoW. Again, only footpath mentioned – please amend to cover all Public Rights of Way. Add 'equestrian' between pedestrian & cyclist whether it is in Policy IC1 or not. There is a lack of recognition that equestrian sports contribute a substantial amount to the Borough economy and Worsthorne riders are, in effect, urban riders. They must be recognised in the Neighbourhood Plan and be considered in highway	Noted.	Amend Plan Insert references to PROW and horse riders.



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				matters bearing in mind limited access to safe off road bridleway, multiuser provision.		
4.12		Obj 6	Support	WHNDP OBJECTIVE 6 – DEVELOPMENT OF SMALL SCALE RENEWABLE/COMMUNITY ENERGY PROJECTS Support : Parish to lobby MP/Councillors for support with regard to this item? That PC encourage private individuals to develop or incorporate renewable energy when extending/developing their properties and discuss possible support through LALC, the LGA. Request Borough perhaps add some form of RE be a condition of planning.	Noted.	No change.
4.13		Obj 7	Support / Comment	WHNDP OBJECTIVE 7 – COMMUNITY FACILITIES Agree – with note: 1. that future business opportunities are	Noted.	No change.



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				in the right place for the right activity. A notable example being small lanes, without pavements, and party venues next to residential settlements and livestock vulnerable to unnecessary stress and possible danger from rubbish and drunken misadventure?		
4.14	All		Comment	Final Note: This has been an interesting exercise, and I applaud the Parish for undertaking it. However, there are a few points to be raised. 1. There is a lot of generic information pulled off the internet and not properly researched / annotated in the document – was it worth the cost? 2. Difficulty submitting response, or submission to find it has not been logged has meant, for myself, this is the third submission.	Noted.	NPSG Sub – Committee set up to review all information and correct generic references where necessary. System was updated to allow easier response.



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				3. The working group lacked diversity, hence no one picked up on the generic nature of the report that added nothing but bulk.		Re-write completed to simplify the document and make it less bulky, more relevant and readable.



