



APPENDIX 3.3 KELBROOK AND SOUGH SITE ASSESSMENT RESULTS

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SECTION 1 BACKGROUND AND INTRODUCTION

Kelbrook and Sough Parish Council have decided to produce a Neighbourhood Development Plan to achieve various objectives including maintaining the Parish's predominantly rural character. The emerging Local Plan for Pendle has identified a need for housing in the Borough including in rural areas. In the approved Local Plan Strategy, the total housing need for Pendle was identified as 298 per year for the borough.

The January 2021 draft of the Part 2 of the Local Plan identified a site in Kelbrook and Sough in order to meet the needs of rural Pendle as the Parish was identified in the Core Strategy 2015 as a Rural Service Centre due to the parish having an industrial estate. While the Parish Council accepts the need to identify land to meet housing need in Rural Pendle, it is concerned about both the total amount that is needed within Rural Pendle and the extent to which that need should be met within Kelbrook and Sough Parish. Indeed, the concern about the total amount of housing needed for Pendle is shared by the Pendle Council which, on 25th March 2021, voted to accept a lower Housing Need figure of 146 dwellings per year for the Borough. This is a significantly lower number that should be reflected in the housing requirement for Kelbrook and Sough Parish.

It was decided that the best approach was to write a policy that identified the best site to accommodate development, should evidence based need arise but which would protect the site from development until such times as this specific evidence-based need for housing arose and outlining the criteria that any such development on that site would be required to meet. This approach is known as safeguarding land. Specifically, this evidence-based need would be that which the adopted Local Plan, LP2 would have later identified as a need for housing at that scale in the Parish. A policy safeguarding the site at the corner of Barnoldswick Road and Colne Road for 64 houses was included in the Neighbourhood Plan, along with 2 smaller sites, that went to Regulation 14 Consultation in September 2021.

Consultation on the pre-submission draft Neighbourhood Plan in Autumn 2021 showed broad support for this approach.

However, since the Consultation, further uncertainty has been created with regard to the Pendle Local Plan when the Full Pendle Council decided on 9 December 2021:

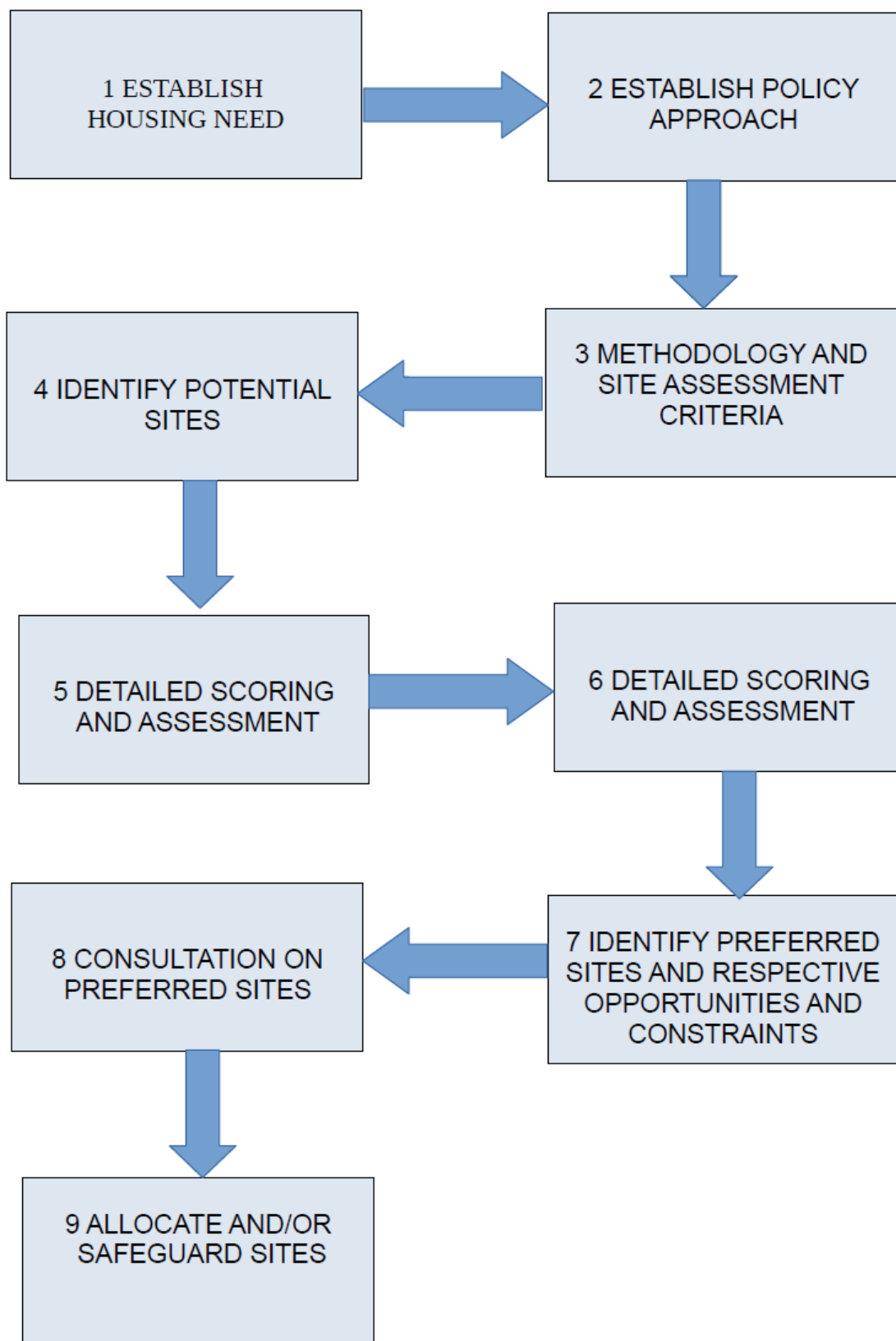
- (1) That a housing number of 142 be agreed for the Pendle Local Plan Part 2.*
- (2) That officers re-visit the Core Strategy and Pendle Local Plan Part 2 and its supporting policies in order to protect greenfield sites.*

Although this is not an adopted, agreed housing number, it has led to the withdrawal of the Pendle Local Plan, LP2 leaving a position where the only adopted number is 298 dwellings per annum. It is unknown, at the time of submission, whether the Strategic Plan, LP1 will be revisited and a single Future Plan produced or the Development Plan, LP2 will be revisited and the final housing requirement amended from 298 dwellings per annum across Pendle.

The Parish itself is largely washed over by Open Countryside with the 2 settlements of Kelbrook and Sough and an industrial area made up of 4 estates which separate the 2 settlements.

SECTION 2 SITE ASSESSMENT PROCESS

The flowchart below shows the stages of the Site Assessment Process.



2.3 METHODOLOGY AND SITE ASSESSMENT CRITERIA

Given the uncertainty over housing numbers and the policy approach as outlined above, potential sites will be identified on the edges of existing development in the village. An initial sift will be undertaken whereby any sites that are not available (i.e. the owner is not interested in selling) or are so constrained as to be clearly unviable or otherwise unachievable in some way, will be sifted out. Remaining sites will be assessed on Availability, Achievability and Suitability using an appropriate scoring system.

'Available' means that the owner would be prepared to allow the site to be developed and this can be classed according to whether that would be immediately (this year or next year), over the next 2-5 years, in 6-10 years, 11-15 years time. Anything over 15 years would have been sifted out on the grounds of not being available.

'Achievable' effectively means viable i.e. whether the site could, given various restrictions such as any requirement for an element of affordable housing, be developed.

'Suitable' effectively means the extent to which the development of a site would be in line with national, local or neighbourhood planning policy.

2.4 POTENTIAL SITES AND INITIAL SIFT

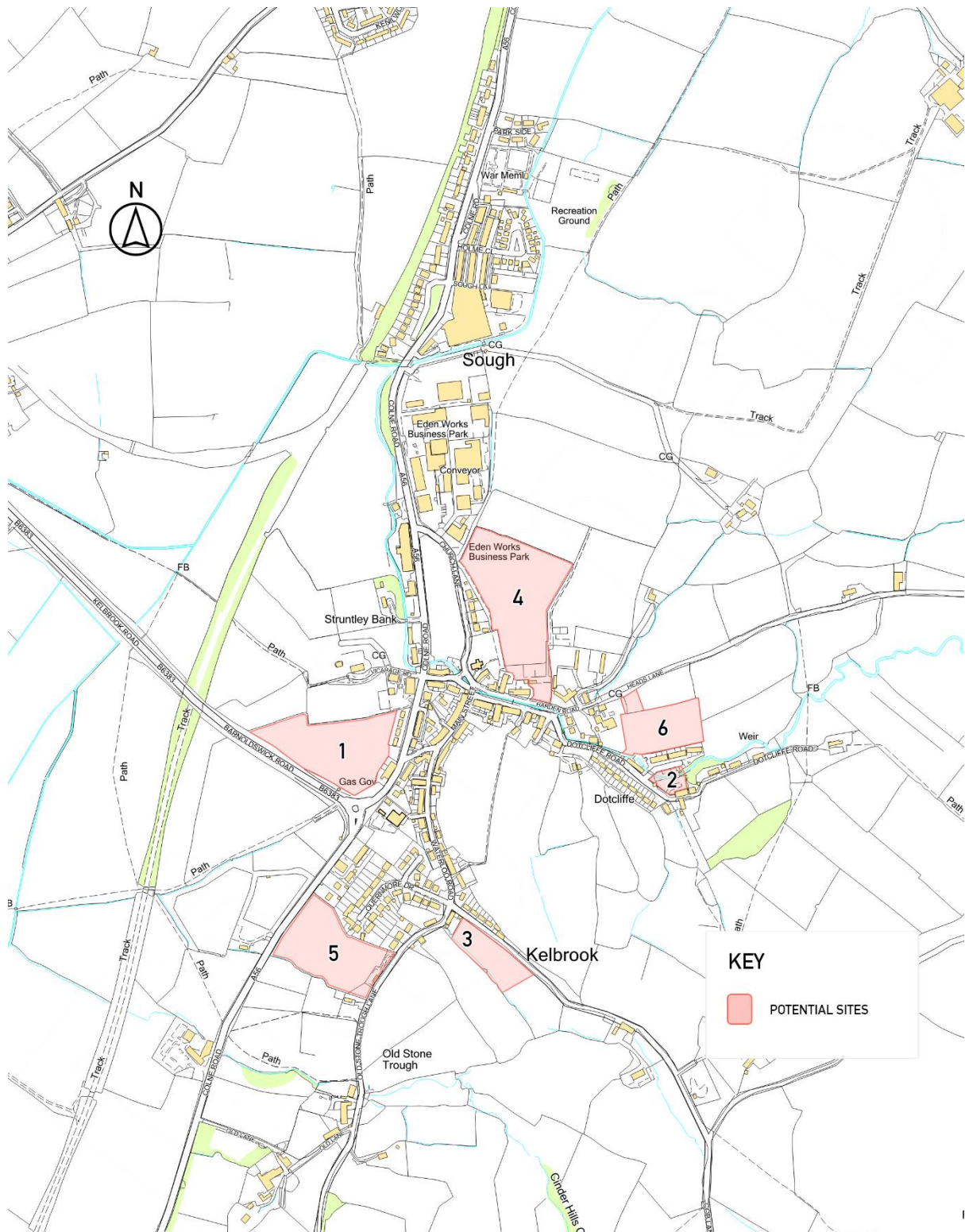
Potential sites will be identified that are adjacent to existing developed areas in the settlement. Sites that have a road or fields between them and the settlement will not be regarded as potential sites. This is in line with the Objectives of the Neighbourhood Plan in particular Objectives 1-3.

	Ref	Location	Site area (hectares)	Current Land Use	Site conditions	House no	Comments
1	P068	Land at Barnoldswick Road/Colne Road, Barnoldswick Road, Kelbrook	2	Sheep grazing and hay making	Greenfield	64	Access from Barnoldswick Road already available
2	P183	Dotcliffe Yard, Dotcliffe Road, Kelbrook	0.23	Caravan storage	Brownfield	4-7	Site suitable for regeneration
3	P243	Land at Cob Lane, Kelbrook	1.02	Sheep grazing and haymaking	Greenfield	10	Access through village and impact on flooding
4	N/A P282	Land to rear of Church Lane/Brook Farm, Kelbrook	2.65	Sheep grazing and hay making	Greenfield	83	THIS LAND HAS BEEN WITHDRAWN IN SEPT 2021
5	P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	2	Horse grazing	Greenfield	60	Access could be created off A56

6	N/A	Land at Heads Lane	0.5	Sheep grazing and haymaking	Greenfield	15-20	Access off Heads Lane (private road)
Unsuitable sites							
7	P273	Land north of Barnoldswick Road	1.42	Sheep grazing and hay making	Greenfield	35	This is an isolated site that would not be suitable
8	P297	The Stables, Old Stone Trough Lane, Kelbrook	1	Horse grazing	Greenfield	40	This is an isolated site that would not be suitable
9	P298	Land to rear of Craven Heifer	1.5	Sheep grazing and hay making	Greenfield	51	This is an isolated site that would not be suitable and the size of this area would increase the housing in Kelbrook by 20%

Three of the sites, P273, P297 and P298 were on the original list and were deemed to be unsuitable based on the methodology criteria that all sites need to back on to existing housing.

One site that met the initial criteria was not available for development and was not assessed. The other site, P282, was withdrawn from development in September 2021. The information is included since, until this date, it was a suitable site.



Map showing the position of the different sites in Kelbrook and Sough

2.5 & 2.6 DETAILED SCORING AND ASSESSMENT

The details scoring and assessment was done using the same matrix that Pendle Council used for the Local Plan with an initial sift done using a traffic light system with those getting a red light being sifted out and then, for those sites that remain, scores given for each criteria (covering Availability, Achievability and Suitability) and totalled up at the end to give an indicative score. The system Pendle used is outlined in Appendix 1 of their Local Plan Part 2: Scoping Report and Methodology October 2016, (Revised July 2017).

https://www.pendle.gov.uk/downloads/file/10542/scoping_report_and_methodology_revised

Information including photographs will be gathered for each of these sites through desk top research and site visits in accordance with the assessment criteria.

The Neighbourhood Plan Steering Group spent several sessions assessing each site against the criteria in the Pendle Methodology. Once the initial assessment had been done and after consultation with Pendle Planning, the process was repeated for each site to ensure that, as far as possible, the group were objective in their assessment of each criteria. Three Kelbrook and Sough specific criteria were added following the analysis of the Residents' Survey and these were added to the scores.



Ref	SITE	Size (hectares)	No of houses	BASELINE INFORMATION				AVAILABILITY											
				0.1	0.2	0.3	0.4	Viability				Natural Environment				Other Environmental Constraints			
					CONTEXT ONLY			1.1	1.2	1.3	1.4		1.5	1.6	1.7	1.8		1.9	1.10
P068	Land at Barnoldswick Road/Colne Road	2	60	5		3	1	5	5	5	4		4	1	3	0		5	1
P183	Dotcliffe Yard		10	5		3	5	1	1	1	3		4	1	3	0		5	5
P243	Land at Cob Lane, Kelbrook	1.02	10	5		3	1	5	3	1	2		4	5	3	0		5	1
P282	Land to rear of Church Lane/Brook Farm, Kelbrook	2.65	83	5		3	1	5	5	1	3		4	3	3	0		5	1
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	2	60	5		3	1	5	1	1	3		4	3	3	0		5	1

Ref	SITE	Size (hectares)	No of houses	ACHIEVABILITY					
				Viability		Market Conditions/Perception and Demand			
				2.1	2.2	2.3	2.4	2.5	2.6
P068	Land at Barnoldswick Road/Colne Road	2	60	0	1	1	1	5	2
P183	Dotcliffe Yard		10	0	1	1	1	1	2



P243	Land at Cob Lane, Kelbrook	1.02	10	0	1	1	1	1	4
P282	Land to rear of Church Lane/Brook Farm, Kelbrook	2.65	83	0	1	1	1	5	2
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	2	60	0	1	1	3	3	2

Ref	SITE	Size (hectares)	No of houses	SUITABILITY																	
				Infrastructure Constraints						Natural Environment											
				3.1	3.2	3.3	3.4	3.5	3.6		3.7	3.8	3.9	3.10	3.11	3.12	3.13	3.14	3.15	3.16	
																				CONT EXT ONLY	
P068	Land at Barnoldswick Road/Colne Road	2	60	5	5	5	2	5	4		3	3	5	5	3	5	5	5	0	3	
P183	Dotcliffe Yard		10	5	5	5	3	5	5		5	5	5	5	5	5	5	5	0	5	
P243	Land at Cob Lane, Kelbrook	1.02	10	5	2	2	2	4	4		3	3	5	5	2	5	5	5	0	3	
P282	Land to rear of Church Lane/Brook Farm, Kelbrook	2.65	83	5	4	2	2	4	4		5	5	5	5	2	5	3	5	0	3	
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	2	60	5	2	1	2	5	3		3	3	4	5	2	5	5	5	0	3	



Ref	SITE	Size (hectares)	No of houses	ACHIEVABILITY									
				Natural Environment	Historic and Built Environment		Other Environmental Constraints						
					3.17	3.18	3.19	3.20	3.21	3.22	3.23	3.24	3.25
P068	Land at Barnoldswick Road/Colne Road	2	60	1	5	2	5	3	5	5	4	5	
P183	Dotcliffe Yard		10	5	5	5	2	5	5	4	4	5	
P243	Land at Cob Lane, Kelbrook	1.02	10	1	5	5	5	5	5	3	2	5	
P282	Land to rear of Church Lane/Brook Farm, Kelbrook	2.65	83	1	4	5	5	5	5	4	4	5	
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	2	60	2	5	5	5	3	5	4	2	5	

Ref	SITE	Size (hectares)	No of houses	SUITABILITY															
				Quality of the Wider Environment			Accessibility												
				3.26	3.27	3.28	3.2	3.30	3.31	3.32	3.33	3.34	3.35	3.36	3.37	3.38	3.39	3.40	3.41
P068	Land at Barnoldswick Road/Colne Road	2	60	3	5	3	1	4	4	2	2	1	5	4	3	2	2	1	3
P183	Dotcliffe Yard		10	5	5	3	1	2	4	1	1	1	3	3	1	1	1	1	1
P243	Land at Cob Lane, Kelbrook	1.02	10	3	5	3	1	1	3	1	1	1	2	3	1	1	1	1	2



P282	Land to rear of Church Lane/Brook Farm, Kelbrook	2.65	83	3	5	3		1	2	4	1	1	1	2	3	1	2	2	1	2
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	2	60	3	5	1		1	1	1	1	2	1	3	4	2	2	2	1	2

Ref	SITE	Size (hectares)	No of houses	Social and Regeneration Policy							TOTAL										
				3.42	3.43	3.44	3.45	3.46	4.1	4.2											
P068	Land at Barnoldswick Road/Colne Road	2	64	1	2	5			5	5	5										218
P183	Dotcliffe Yard		10	1	3	5			5	3	1										208
P243	Land at Cob Lane, Kelbrook	1.02	10	1	5	5			5	1	1										185
P282	Land to rear of Church Lane/Brook Farm, Kelbrook	2.65	83	1	5	5			5	5	3										204
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	2	60	1	2	5			5	1	3										183



Final Scores for Sites

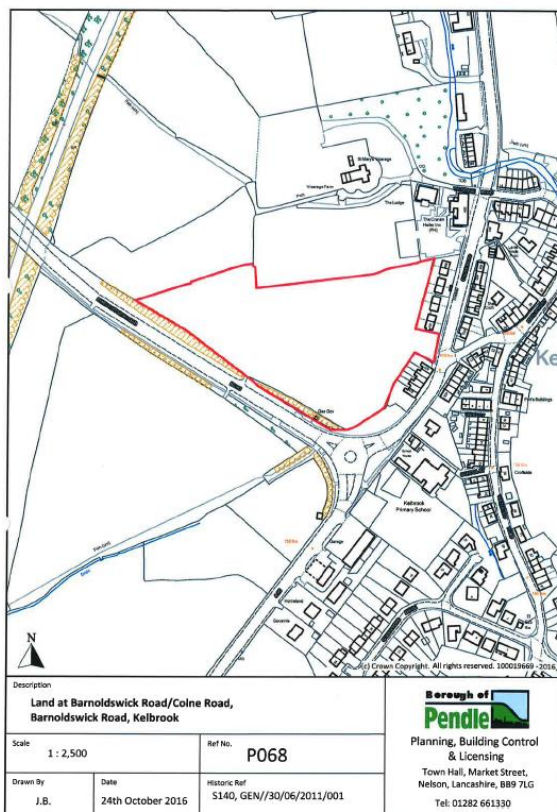
Site Reference	Description	Total Score
P068	Land at Barnoldswick Road/Colne Road	218
P183	Dotcliffe Yard	208
P243	Land at Cob Lane, Kelbrook	185
P282	Land to rear of Church Lane/Brook Farm, Kelbrook	204
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	183

1. Land at Barnoldswick Road/Colne Road, Barnoldswick Road, Kelbrook

This is a field used for sheep grazing and for a number of years has held a weekly car boot sale. It can be seen from the A56 when approaching the roundabout on the south side of Kelbrook. The site slopes slightly from the corner to the point of the field. There is currently access to the site from an entry point on Barnoldswick Road with good visibility in both directions.



The site is bounded on the east by a row of terraced houses and bungalows and south by the road, the other two boundaries are onto fields.



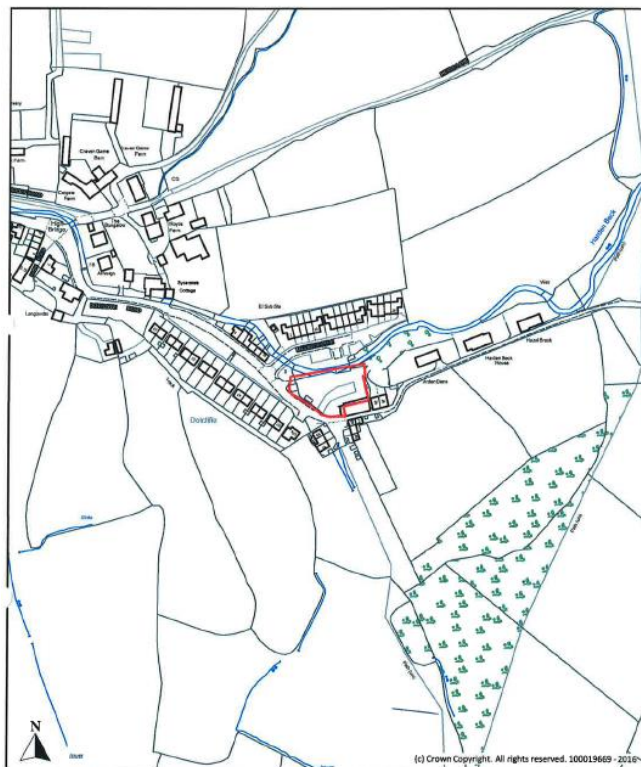
Potential access point




2. Dotcliffe Yard, Dotcliffe Road, Kelbrook

This site is the only one within the Kelbrook Settlement Boundary. It is currently used to store caravans however it would make a suitable site for redevelopment into residential housing.

The land is flat however, being a brownfield site, some site preparation would be required



Description Dotcliffe Yard, Dotcliffe Road, Kelbrook			 Planning, Building Control & Licensing Town Hall, Market Street, Nelson, Lancashire, BB9 7LG Tel: 01282 661330	
Scale	1 : 2,500	Ref No.		P183
Drawn By	J.B.	Date		24th October 2016
		Historic Ref		1060

3. Land off Cob Lane

A planning application was submitted for the entire site in 2016. This was refused on appeal and a further application, 17/0691/OUT was submitted in 2017. This application was to build 10 houses on the field to the north east of the stream. The field to the south is part of the environment in which the listed houses Stoops Farm and Yellow Hall sit and therefore cannot be developed. On appeal, APP/E2340/W/18/3200240, planning permission for access was given as long as a number of conditions are satisfied. In August 2021, approval was obtained for a Permission in Principle to build up to 9 houses.

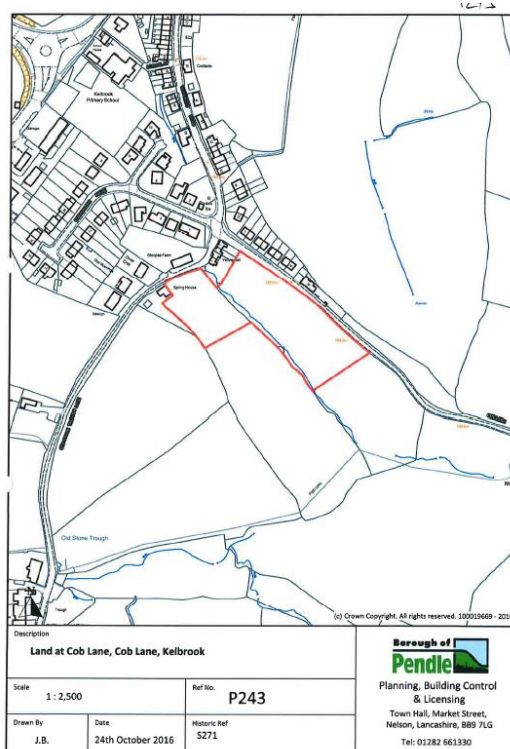
On the basis that planning permission has been obtained, the site was scored alongside all the other sites and this makes it one of the more suitable sites for development.

The access point for the site would be off Cob Lane which is a narrow road where there is no off street parking.

Potential access point



View from access point indicated on the left



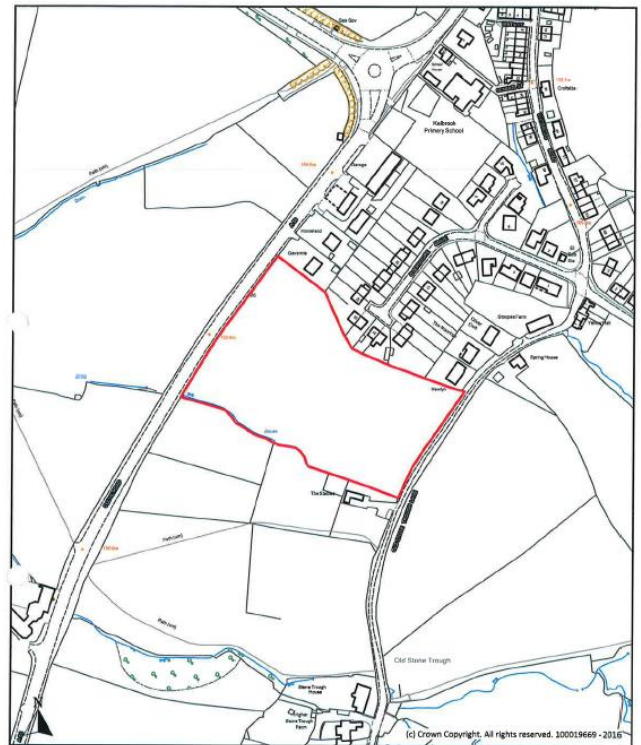
7. Land at Quernmore Drive


This is a greenfield site outside the settlement boundary. It is currently used for horse grazing and has a stable. The fields rises steeply from the A56. There is currently a gate on Old Stone Trough Lane, however this is a narrow road and would significantly increase the traffic through the village.

Potential access point on Old Stone Trough Lane



Views from access point



Description Land at Quernmore Drive, Old Stone Trough Lane, Kelbrook			 Planning, Building Control & Licensing Town Hall, Market Street, Nelson, Lancashire, BB9 7LG Tel: 01282 661330
Scale 1 : 2,500		Ref No. P004	
Drawn By J.B.	Date 24th October 2016	Historic Ref S009	
<small>(c) Crown Copyright. All rights reserved. 100019669 - 2016</small>			

2.7 PREFERRED SITES AND RESPECTIVE OPPORTUNITIES AND CONSTRAINTS

The first choice site is Dotcliffe Yard, P183, which is a brownfield site within Kelbrook village and would benefit from being redeveloped. This site would allow the development of 4-7 dwellings if built in a terraced style and would be a site for affordable housing.

The second choice is the land at Cob Lane, P243, because, although it scored a lower total and all the other sites, it has approved planning permission for up to 9 houses. This is subject to detailed planning that is still under consideration at the time of completing the Neighbourhood Plan

2.8 CONSULTATION ON PREFERRED SITES

These sites were subject to the Pre-submission Consultation that began in September 2021 and ran for 6 weeks.

The consultation showed support for the sites allocated although there was a comment from Pendle Council stating that the Dotcliffe Yard site would need to undergo a Sequential Test due to part of the site being identified as Flood Zones 2 and 3.

2.9 CHANGES TO HOUSING REQUIREMENT

Since the Regulation 14 Consultation, the Full Pendle Council decided (9th December 2021),:

- (1) That a housing number of 142 be agreed for the Pendle Local Plan Part 2.*
- (2) That officers re-visit the Core Strategy and Pendle Local Plan Part 2 and its supporting policies in order to protect greenfield sites.*

Pendle had been expected to issue its final draft (Publication Report) later in 2021 or early 2022, however it following the Council decision it was withdrawn. A revised Plan will be published at a later date that has not been provided. As such the Kelbrook and Sough Neighbourhood Plan is no longer going to include a Safeguarded Land policy.

Given this significant reduction in housing requirement, the Neighbourhood Planning Group have reviewed the allocation of sites and decided that there is no need to include the safeguarded site at Barnoldswick Road/Colne Road that had been included in order to accommodate a potentially much higher level of housing requirement that had been anticipated. Given that Land at Cob Lane is much smaller and already has outline planning permission it was decided to keep this site allocated in the Plan and similarly for the land at Dotcliffe Yard notwithstanding the need for it to pass a sequential test.

2.10 SEQUENTIAL TEST AND EXCEPTIONS TEST

Sequential Test

Due to the Environment Agency's identification of part of the Dotcliffe Yard site as being in Flood Zones 2 and 3, a sequential test was undertaken whereby the site was compared with

other sites in Flood Zone 1 that passed the initial sift to determine whether the site could be alternatively located in a site wholly located in Flood Zone 1. This has been done by comparing the site with alternative sites to see whether they would meet the Neighbourhood Plan Objectives.

The Neighbourhood Plan group consider that the Objective

OBJ 5: To provide homes that will meet the local need for housing

will have been effectively met by a much smaller allocation of housing than had been envisaged, as explained above.

Site Reference	Description	Number of dwellings	Flood Risk Zone	Does the site meet NP objectives
P068	Land at Barnoldswick Road/Colne Road	64	1	<p>No. The allocation of this site would be contrary to the following Objectives:</p> <p>OBJ 1: To retain the historical look of Kelbrook village, maintain and enhance the physical character of the parish,</p> <p>OBJ 2: To minimise the impact of new development on the settlement areas and within the wider landscape that comprises the Parish.</p> <p>OBJ 3: To protect local open and green spaces, in particular historic and valuable views, biodiversity, wildlife and cultural heritage and the natural environment, both habitats and landscapes.</p> <p>OBJ 8: To enhance the natural environment, landscape, green infrastructure and biodiversity of the Parish</p>
P282	Land to rear of Church Lane/Brook Farm, Kelbrook	83	1	<p>No. This site is no longer available (since Sept 2021). However it was assessed and so considered for the test. The allocation of this site would be contrary to the following Objectives:</p> <p>OBJ 1: To retain the historical look of Kelbrook village, maintain and</p>

				<p>enhance the physical character of the parish,</p> <p>OBJ 2: To minimise the impact of new development on the settlement areas and within the wider landscape that comprises the Parish.</p> <p>OBJ 3: To protect local open and green spaces, in particular historic and valuable views, biodiversity, wildlife and cultural heritage and the natural environment, both habitats and landscapes.</p> <p>OBJ 8: To enhance the natural environment, landscape, green infrastructure and biodiversity of the Parish</p>
P004	Land South of Quernmore Drive - access via Old Stone Trough Lane	59	1	<p>No. The allocation of this site would be contrary to the following Objectives:</p> <p>OBJ 1: To retain the historical look of Kelbrook village, maintain and enhance the physical character of the parish,</p> <p>OBJ 2: To minimise the impact of new development on the settlement areas and within the wider landscape that comprises the Parish.</p> <p>OBJ 3: To protect local open and green spaces, in particular historic and valuable views, biodiversity, wildlife and cultural heritage and the natural environment, both habitats and landscapes.</p> <p>OBJ 8: To enhance the natural environment, landscape, green infrastructure and biodiversity of the Parish</p>

As such the sequential test demonstrates that there are no sites that can be considered to meet the objectives of the Neighbourhood Plan as well as the Dotcliffe Yard site.

Exceptions Test

In accordance with the National Planning Policy Framework, paragraphs 163 -165, the “Exceptions Test” must be applied to the site.

Paragraph 164 states that

“To pass the exception test it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.”

The Dotcliffe Yard site would pass the sustainability elements of the Exception Test on the basis of its contribution to meeting the following NP objectives:

OBJ 1: To retain the historical look of Kelbrook village, maintain and enhance the physical character of the parish
OBJ 2: To minimise the impact of new development on the settlement areas and within the wider landscape that comprises the Parish
OBJ 3: To protect local open and green spaces, in particular historic and valuable views, biodiversity, wildlife and cultural heritage and the natural environment, both habitats and landscapes.
OBJ 5: To provide homes that will meet the local need for housing.
OBJ 8: To enhance the natural environment, landscape, green infrastructure and biodiversity of the Parish

and by delivering the following significant positive sustainability benefits:.

- Providing homes for people to live in
- Protecting and enhancing the character of the area
- Protect soil resources and make the most efficient use of land (the site is brownfield)

To ensure that the development will be “safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall” the site can be allocated subject to a policy requirement that any proposal must be able to demonstrate that it can achieve this by virtue of employing a flood resilient design that promotes mitigation which is supported by a site specific FRA using current Environment Agency climate change guidance to be approved through the planning application process.

The site can therefore be regarded as passing the Exceptions Test and can be allocated by policy in the Neighbourhood Plan provided that the policy requires a site specific FRA to



demonstrate that the design of the proposal is safe, does not increase flood risk and if possible reduces flood risk in accordance with the Framework.