

Action Point	Issue	Inspector's Question	Inspector's request and Council Response	Nature of Work	Proposed Timetable of work
AP1	Whole Local Plan	N/A	HBC to make changes to policy text and policy justification text as agreed in hearing sessions. A tracked changes document and schedule of minor and major modifications will be published.	Redrafting	31/10/2025
AP2	Duty to Cooperate Issue 1.1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004?	1. Has the Council complied with the duty to cooperate during the preparation of the Plan up until the date on which it was submitted for examination?	<u>Issue 1.1 Duty to Cooperate</u> Inspector requested the provision of evidence on liaisons with the following parties: <ul style="list-style-type: none"> • BwD: between March 2024 and the Local Plan submission • Burnley: August 2018 and September 2024 • Rossendale: June 2018 and July 2020 • LCC Highways: Any discussion (or their involvement) before August 2022 • LLFA: Any discussion (or their involvement) before July 2022 • National Highways: evidence of on-going discussion between December 2023 and February 2025 LPA to provide a written response to Historic England email.	New document to provide clarification	17/10/2025
AP3	Habitat Regulations Assessment	8. Has the HRA been undertaken in accordance with the Regulations and is it robust?	Inspector requested the provision of an addendum report to assess the in-combination effects on European sites LPA agreed.	New document to provide clarification	17/10/2025
AP4	Consultation	9. Has the Plan been prepared in accordance with the Council's Statement of Community Involvement (HBC1.003) and statutory consultation requirements? Has all relevant and available evidence been made	Inspector questioned whether in person consultation for Reg. 19 (2) consultation took place. LPA agreed to provide evidence/records for the Reg. 19 (2) consultation	New document to provide clarification	17/10/2025

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		available for consultation, at the various stages of Plan preparation?			
AP5	SP6 & SP25	N/A	LPA to clarify if neighbourhood centres/local parades are defined. They are not shown on the Policies Map. LPA to provide further wording on Hyndburn retail park.	Clarification New document to provide clarification.	24/10/2025
AP7	Principle of Green Belt Release	6. The Local Plan proposes the addition of three new areas of Green Belt totalling 10.5 hectares. Paragraph 139 of the Framework sets out that proposals for new Green Belt should only be established in exceptional circumstances and outlines that they should be set out in strategic policies which should demonstrate five criteria are met. Where in the evidence base is an assessment of the sites against these criteria? Have exceptional circumstances been demonstrated for the establishment of these three new Green Belt sites?	Inspector: what has changed from the 1996 Local Plan making the LPA decide to release those 3 sites (measuring 10.5ha) back to the Green Belt. LPA: LPA would revisit the 1996 Local Plan evidence base to provide further clarification.	New document to provide clarification	17/10/2025
AP8			Inspector: expecting the LPA to provide further assessment on the special circumstances to justify the proposed change to the GB boundary in accordance with paragraph 139 of the NPPF LPA: agree to provide further assessment	New document to provide clarification	17/10/2025
AP9	Principle of Green Belt Release	9. What ways does the plan set out how the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in line with paragraph 142 of the Framework?	LPA to provide a statement to outline potential compensatory measures.	New document / modifications to provide clarification	17/10/2025
AP10	Principle of Green Belt Release	7. Green Belt anomalies and the justification for GB boundary changes. Unclear from the Policies Map.	HBC will provide a catalogue of any minor amendments it wishes to make to the Green Belt Boundary and outline the exceptional circumstances that justify them	New document to provide clarification	24/10/2025
AP11	The Economy and Town Centres	3. What evidence is there that the target of 70ha of employment land over the Plan period is deliverable, bearing in mind past completion rates?	Inspector: How does the HENA model the employment land past completion data?	New document to provide clarification	24/10/2025

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			LPA: LPA will provide further response on this matter to the inspector.		
AP12	General relating to all allocations	1. Are the site allocations for employment soundly based? Are they developable and likely to be delivered as anticipated during the plan period? Could competition from other sites in the Borough or in the East Lancashire area have a negative impact on delivery?	Prepare a note regarding site selection for other employment sites. Look at any rejected sites (if there are any, and rationale for rejection).	New document to provide clarification	24/10/2025
AP13	Delivery	2. The housing supply 2021-2040 is made up of a number of components as set out in Table 7 of HBC8.001. b) What evidence is there to support the figure of 170 new dwellings (10 dwellings per annum), from housing in town centres/permitted development allowance?	Inspector: any data over the last five years to demonstrate number of conversions through Permitted Development rights? LPA: LPA will provide further evidence to clarify.	Clarification	24/10/2025
AP14	Delivery	4. What assumptions have been made to inform the trajectory for the delivery of housing sites, in terms of lead in times for grant of full planning permission, outline and reserved matters, and conditions discharge; site opening up and preparation; dwelling build out rates; phasing; and number of sales outlets?	Inspector: What assumptions have been made to compose a timeframe of two years from the application to completion? LPA: LPA will provide further evidence note (possibly also with external source of evidence together with the Council's own evidence)	New document to provide clarification	24/10/2025
AP15	Five-year housing land supply	8. Is the Council able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the Plan period?	LPA will provide a housing trajectory to demonstrate this can be achieved.	New document to provide clarification	17/10/2025
Matter 11: Protecting and enhancing the environment					
AP16	Implementation and Monitoring	2. Are the proposed indicators and targets appropriate and measurable? Are any others	Inspector:	Modifications proposed in hearing session.	31/10/2025

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		<p>necessary for monitoring to ensure the soundness of the Plan?</p>	<p>Policy SP21 –could be monitored through the number of applications adjacent to the canal to demonstrate the effectiveness of the policy? LPA : agree to review</p> <p>Inspector: SP22 how to monitor the achievement. LPA: will look at the mechanism for monitoring Inspector: could it be monitored through developments within close proximity to a bus stop and/or within sustainable location?</p> <p>HBC agree to think of more creative and SMART ways to monitor the Local Plan</p>		