

Agenda Item 8

Pendle Replacement Local Plan Consultation:

Several Public Consultations have been underway this last month and after discussion with Cllr. Oliver it was decided that the Council's focus would be concentrated on the Scoping Report, which gave an opportunity to suggest changes to the emphasis and core content of the replacement Local Plan. The Scoping Report contained 14 questions which were overlapping in some cases and so the answers sometimes became repetitive.

Barrowford Parish Council has suggested a rethink on the direction taken as the adopted Core Strategy was over aspirational at all levels of the social fabric of Pendle. This Strategy was not underpinned by detailed specific policies to be included in the Local Plan Part 2. This necessitated the retention of policies from the Local Plan adopted in 2006 but written in the preceding few years to cover what was originally a two-year period. But due to national planning policy and economic changes the Local Plan took six years to write and during the intervening period optimistic growth forecasts used to determine housing and employment needs have shrunk considerably.

Pendle Councillors rejected the Local Plan Part 2 in December 2021 and it decided to restart the whole Local Plan with a one stage Plan containing both the Core Strategy and the specific policies that underpin the Core Strategy element. Work is expected to take around 2 years to get to the new Adopted Local Plan and until then the only local planning policies are the Adopted Core Strategy and the retained policies from the 2006 plan whose policies in some cases were written 20 years ago.

The proposed annual housing number is 142 houses per year of the plan as opposed to the 292 in the Core Strategy, the fact that this document is the only current adopted Local Plan Document means the figure for planning determination is 292 until the new Local Plan is Adopted.

Barrowford Parish Council should be supporting a more pragmatic approach to any New Local Plan by advocating a Levelling Up from the Bottom-Up approach whilst reducing the ability of developers to use the viability argument to develop greenfield sites for executive developments that are not generally needed by the population of Pendle. The main focus of all Councillors and Councils in Pendle over the next 20 years should be renewal and improvement of the worst wards in Pendle to engender a vision of hope and through action positively improve these areas and create a demand for housing and market growth within these wards.

The same old, same old approach used in the last 2 Local Plans has not regenerated these deprived areas, but continually permitting executive development in the greenfields abutting the more affluent areas, in the name of meeting annual housing targets has driven the prices up beyond the means of the local residents. This New Local Plan should be written with a sole aim of beginning the regeneration of these areas by whatever means at Pendle's disposal.

The submitted Response is aimed at trying to convince Officers that aspects of the Core Strategy have been ineffectual in stimulating regeneration of deprived wards whilst disastrous in areas such as Barrowford.

Agenda Item 8

Mr. J. Halton
Principle Planning Officer
Pendle Borough Council
Town Hall
Market Street
Nelson BB9 7LG
5th August 2022

Dear Mr. Halton,

Barrowford Parish Council's response to the Scoping Consultation.

Q1. Do you agree with the range of evidence being prepared in support of the Local Plan? Is there anything which you feel has been overlooked?

A1. No specific response.

Q2. Do you agree with the plan period as proposed? If not, what period should we plan for through the new Local Plan and why?

A2. The proposed Plan Period is fine on paper but may not give the intended 15-year lifespan from adoption Previous editions of the local plan have exceeded the proposed dates by several years. The replacement Local Plan 2001-2016 wasn't adopted until May 2006 and the replacement for that plan was split into two parts, with the Core Strategy being adopted in December 2015 and Part 2 being rejected in December 2021 six years later. There are many factors why both these Local Plans were so far delayed but the fact remains that both were five years behind schedule. Perhaps a couple of years should be added to the final date of the plan to give the desired 15 years.

Q3. What kind of place do you think Pendle should be in 2040?

A3. Currently Pendle is a borough that is defined by small areas of great affluence and large areas of deprivation. The aspirational ethos of the Adopted Core Strategy, although laudable, has failed to re-balance inequality in housing within Pendle. The lack of adoption of a Local Plan Part 2 (containing the defined policies that underpin and give direction to the Core Strategy) within the first few years after the adoption of the Core Strategy has been a disaster. The drafting of Part 2 was materially affected by a wide range of problems which included, amongst others, Government revisions of the NPPF; Government austerity policies reducing funding to Local Authorities; the subsequent reduction in staffing levels resulted in the Local Plan taking a back seat when it came to resources and priority.

People in Pendle have as a whole become disillusioned with local planning and the incomplete Local Plan which never had the Defined policy underpinning the Core Strategy in place at any point. The Core Strategy was underpinned by policies from the 2001-2016 Local Plan being carried forward until Part 2 was in place. Many of the retained policies perhaps written several years prior to the adoption in 2006 are now nearly 20 years old and were seen as a short stopgap measure, but after 7 years and no viable Local Plan part 2 are still being used. Britain as a whole has changed significantly in the last 20 years and this is markedly noticeable in Pendle with the needs of the Borough being completely different from 2001.

Inequality in Pendle has continued to widen throughout the last twenty years, due mainly to the fact that the Core Strategy and retained policies have allowed developers to apply for new developments in greenfield areas producing executive housing aimed at the top end of the

Agenda Item 8

market most with no affordable element. The disparity in annual earnings between Pendle and nearby major cities like Manchester and Leeds has attracted commuters to the area purely on the fact that house prices within their areas have spiralled upwards over the last decade. Now you can buy a larger property within the better areas of Pendle for the same price a smaller one in Manchester or Leeds. But the house prices on these new developments far exceed the earning capacities of local residents and further increase the disparity, whilst little or no sizeable housing developments have been built in the areas of greatest deprivation to meet the aspirational needs of local residents.

This is most marked in the M65 Corridor where towns and villages such as Barrowford, and to a lesser extent Colne and Reedley, have seen large increases in house prices, whilst Nelson, and Brierfield to a lesser extent, have been in decline. Nelson contains some of the most deprived wards in the country with large areas of sub-standard terraced houses. The last 30 years have seen Pendle receive sizeable amounts of EEC funding, Elevate funding and others, and yet the time has been spent with local politicians arguing over which town should receive the lion's share of the funding, each taking a parochial view. Several Master Plans have been developed at great expense, and vital years lost. The Elevate funding is a prime example of squandered opportunity as, after several years of in-fighting on how and where to use the funding, it was removed following Austerity measures introduced by the Government. The only area that saw any real progress was Brierfield, where a start was made on regenerating the former Smith and Nephew site and the area below the railway on Clitheroe Road, with Nelson and Colne seeing only limited improvements.

The lack of improvement in Nelson and its steady decline saw a migration of the more affluent people to places like Barrowford, Colne, Reedley, Higham and Fence. This had an impact on housing prices within these areas, with the price for a simple terraced property in Barrowford now being between two and three times that of a similar property in Nelson. The continued rise of property prices in Barrowford, Reedley and parts of Colne has now reached a level where this avenue is closed to most.

The overheating property prices in the larger towns and cities within easy commuting time of Pendle have led to a migration towards the more desirable areas of the borough for a fraction of the cost of a similar property within say Manchester or Leeds. The upwardly spiralling prices in these regenerated larger conurbations have led to additional pressure through more and more speculative development schemes for larger executive housing aimed at commuters.

This has been aided to some extent by both the over-aspirational vision within the Core Strategy and the lack of up-to-date specific Planning Policy which would have been contained in second part of the Local Plan. In the intervening six years since the adoption of the Core Strategy there have been many changes to the country and a downturn in expectations. Trying to marry the already adopted aspirational Core Strategy with its now unrealistic projected housing figures created an impossible situation and was proved to be so when Councillors threw out the Local Plan Part 2 in December 2021.

This lack of defined planning policy has left areas such as Barrowford open to unwanted applications for housing schemes that do not provide the house types and prices that the local inhabitants need, to provide both for young aspiring villagers wishing to purchase their first home and for older residents who wish to downsize into more appropriate housing. The opposite has happened in Nelson, where developers will not build in the areas that need urgent regeneration, owing to a perceived lack of viability and a smaller return on their investment - even if they were gifted the land from the Local Authority.

Agenda Item 8

Barrowford Parish Council would like to see the new Local Plan about turn on the over-aspirational vision presented in the Adopted Core Strategy and adopt a more pragmatic bottom-up levelling-up approach, with improvement to the more deprived areas of Nelson, Brierfield and Colne being at the centre of Local Planning for the next 20 years.

If in the next 10 years a small area of Nelson such as the already cleared area of Bradley could be regenerated to a standard that improves the quality of life for the residents it could be a catalyst to start regeneration spreading to the adjacent areas. This is not a new idea: Burnley started this over a decade ago in Duke Bar, Stoneyholme, Burnley Wood, and Accrington Road/Cog Lane, using predominantly small semi-detached housing of a modest scale, with small gardens and lower housing density, at a realistic price. The initial success has seen the housing stock of this type of properties increase in value, in each of those areas, giving aspirational hope to those that still remain in substandard terraced properties.

The mind set will have to radically change in any new Local Plan to meet the needs of those areas that require the most regeneration. This change will be set against a greatly reduced housing figure of 142 per year, most of which need to be built within these deprived areas to achieve any measurable improvement. The most realistic way to change the current status quo is to remove the existing aspiration-for-all mentality and replace it with a positive levelling-up agenda starting with most improvement aimed at the areas of most need, with the largest proportion of new builds, up to 80%, being stipulated within a new defined M65 Corridor.

To facilitate this targeting of regeneration within the urban core of Nelson, Brierfield and smaller areas of Colne, a re-think of the current three spatial areas needs to be applied. This would include the removal of the “cherries”, as perceived by speculative developers, from the M65 Corridor and the creation of a fourth spatial area, incorporating the larger villages of Barrowford, Fence, Higham and Reedley with a much lower housing figure consistent with their standing on the Local Planning Hierarchy. The legacy of the inclusion of the Trough Laithe Strategic Housing Site within this area would reduce future housing requirement to a minimum, with the requirement being only housing that meets the immediate future needs of these villages, i.e. small housing sites of 10 or fewer. A similar process could also apply to some areas of Colne, these being attached to Foulridge, Laneshawbridge and Trawden for planning purposes.

This would remove speculative applications and if fought robustly would send out a message that Pendle is not here to be exploited. Pendle could then concentrate on a real levelling-up process, using what planning means, government self-build schemes and Levelling Up funding becomes available to further these ends. Pendle Borough Council should look at not-for-profit schemes and an improved PEARL venture to facilitate this. The Council should take the lead in seeking loans, possibly from the Public Works Loans Board to fund housebuilding in areas such as Bradley and Whitefield which is then sold to first time buyers or families who may be displaced as a result of further demolition through future regeneration. The sole aim should be a small profit margin, possibly through a Council supported mortgage scheme in partnership with perhaps the local Credit Union. Although the net financial gain to the Council will be small whilst the regeneration grows, it has the advantage over other developers of annual receipts through the rates.

The former mill towns of Pendle are made up of predominantly terraced properties, built by mill owners from the 1880's through to the 1920's as workers' houses, to types perceived to be suitable to the workers' employment status within the mill. This has left a legacy of many labouring and weaver status housing interspersed with the odd block of larger proportioned

Agenda Item 8

houses, constructed with better materials and more elaborate frontages designed to express the status of the occupier within the mill.

The idea will not be to remove all terrace properties, as many could be retained. The rejuvenation of lower end mill housing has been tried in Stanley Street in Nelson, with complete refurbishment including two properties made into a larger 4-bedroom house, but it brought only lukewarm success with several properties taking a considerable time to sell. This scheme did not address the high housing density and the lack of spacing between streets through demolition, as originally envisaged, to create a more open aspect with community space outside.

The upside of these conversions was the creation of four to five-bedroom terraced houses renovated to a reasonable standard. The downside was that the cost of these properties was proportionately higher than buying two terraced houses and knocking through; and that by not removing housing blocks to create open space to enjoy outdoor activities the feeling of living cheek by jowl with your neighbours was not dispelled.

Where areas have already been cleared such as around Bankhouse Road, Barkerhouse Road and Regent Street the semi-detached model used in Burnley should be pursued and if successful continued into other areas of Nelson, Colne and Brierfield.

If by 2040 Pendle Borough Council can say:

- we have progressed along the road of regenerating the most deprived areas of Pendle
- improved the quality of life for residents
- increased the value of the initial properties built over that time
- created a viable property market, with local residents in outdated terraces aspiring to live in these new semi-detached houses and progress up the property market

then you will have started to resolve several of the problems that currently divide Pendle.

Q4. Do you agree that the vision should address particular areas within Pendle as well as the borough as a whole?

A4. Due to the massive level of inequality in Pendle, which has increased over the last 20 years, any new Local Plan should be aimed at redressing the balance and prioritising at the needs of residents within the defined areas of most deprivation.

Q5. What key priorities (local and borough wide) should be addressed within the vision for the Local Plan?

A5. Pendle has lagged behind other nearby Local Authorities in many key priorities, through indecision at both local, county level

- **Housing inequality and regeneration: (Comments included in Q3.)**
- **Employment: The future employment opportunities within the area have been dropping consistently since the 1970's with the total decline of textiles and associated service providers. Heavy engineering is also in decline with the future of Rolls Royce at Barnoldswick always seeming to be at risk. There are few innovative new businesses setting up within Pendle with most business/industrial parks providing low skilled, low paid industrial or retail work.**
- **Transport and connectivity to the wider area: Pendle is currently at the end of a transport cul-de-sac, with reasonable access only along the railway and the M65 towards Blackburn**

Agenda Item 8

and Preston. The arterial roads into West and North Yorkshire are A roads through villages and towns and are mainly unsuitable for the level of goods traffic needed to invigorate local businesses. The only Motorway route involves heading towards Manchester to join the M62 at Simister Interchange. The rail link is currently non-existent unless you go to Rosegrove and change trains or take another form of transport to Manchester Road Station at Burnley. This lack of easy connectivity and lack of key transport routes for business has led to Pendle being ignored in preference to sites nearer to junction 9.

Q6. Is there any issue, relevant to the Local Plan, which you feel has been overlooked and should be included as a strategic objective and why?

A6. Effects of Global Warming:

1. **Carbon Reduction and Green Energies: The Renewable and Low Carbon Energy Study Final Report adopted December 2010 showing progress within the Burnley, Pendle, Rossendale, Calderdale and Kirklees Borough/Metropolitan Council showed that Pendle was the furthest from meeting the UK Target of 15% renewables local energy production. In 2010 Pendle produced the least renewable energy of the 5 Authorities involved. Has Pendle achieved that goal?**
 - **With the effects of Global Warming being felt more strongly, what policies will be included in the Local Plan to reduce carbon emissions in order to mitigate climate change through either passive means in house design, insulation and orientation or renewable energy generation through ground source or air source heat pumps, solar panels or other means.**
 - **What larger renewable energy sources will be allowed, for example wind turbine, water turbine, biomass, or deep drilled larger ground source applications?**
 - **Are policies to deal with mitigating excessive heat episodes through new building design being considered?**
2. **Flooding and Surface Water Mitigation:**
 - **Flooding: Will polices be included to help mitigate both localised flooding and periodic flooding through surface water run-off caused by increased rainfall through climate change?**
 - **On all subsequent developments are the current SUDS, which maintain existing surface water run-off and account for a 1 in a 100 year event, being adjusted to take in expected increases in these 1 in a 100 year events?**
 - **Is it possible to include polices to introduce mitigation on smaller developments and extensions which increase the potential for surface water run-off?**

Q7. Do you agree with the scope and extent of listed strategic policies for the new Local Plan?

A7. This is dependent on the type of Local Plan Pendle wishes to deliver

Q8. Do you think there are any strategic issues, relevant to planning, which are not covered within the list above? If so what are these?

A8. The Levelling Up Bill, when fully enacted through Parliament, could possibly provide a funding stream to enable some of the most urgent strands of regeneration to begin. In the past too much time has been wasted on party politics and inter town petty rivalry. These distractions need resolving in the short to medium term to allow urgent regeneration to proceed. The current round of levelling up funding is again being allocated on a predominantly parochial basis, and some of the projects coming forward improve the lot of the haves with

Agenda Item 8

improved theatres and facilities but do little to address the problems of residents of the most deprived areas who are unable to afford these facilities.

Q9. Do you support proposals to revise the spatial strategy so that the focus is on the three key service centres and their immediate sphere of influence?

If not, would you prefer to keep the spatial-areas as they are in the Core Strategy, or is there an alternative approach that you think the Council should consider?

A9. Spatial Strategy:

- **Barrowford Parish Council was opposed to the village's inclusion in the M65 corridor in the Core Strategy. The planning department chose to ignore the fact that Barrowford is on a lower tier of the Local Planning Hierarchy than the towns within the corridor and overruled this objection in order to meet the housing quota by any means possible. This has led to a disproportionate level of interest from developers wishing to build executive homes in the village for perceived aspiring people. Unfortunately, these developments do not predominantly target existing Pendle residents but rather aspiring commuters from more affluent areas. The overall effect has been large increases in house prices putting local houses out of the reach of first-time buyers. This goes far beyond Barrowford's Local Service Area planning category requiring provision only for the village's immediate housing needs. The Local Plan Part 2 which was supposed to underpin planning policy and the Local Planning Hierarchy did not materialise in an acceptable form, leaving Barrowford covered by an over-aspirational out-of-date Core Strategy and a handful of retained 15–20-year old out-of-date planning policies.**
- **Barrowford would like to see the M65 Corridor re-worked with the creation of a 4th spatial area for the following reasons:**
 1. **As the M65 Corridor is the area highlighted to provide the largest percentage of housing requirement and has the highest level of deprivation Barrowford and potentially certain areas of Colne should be removed from the M65 Corridor and relocated in spatial areas with a lower expectation of housing requirement in this way speculative larger developments that do not meet the aspirations of the Local Plan can be more effectively dealt with.**
 2. **The creation of a 4th Spatial Area was put forward by Barrowford Parish Council prior to the adoption of the Core Strategy:**
 - **Barrowford Parish Council, suggests that a new spatial area following the A6068 including Barrowford, Higham, Fence (and arguably Reedley and Blacko) be created. These are some of the larger villages and more evenly matched in both social and economic standing. This new spatial area would be expected to contribute fewer new dwellings as a percentage than the M65 Corridor but more than the rural villages and could better provide for its own local need whilst protecting its status within the Local Planning Hierarchy.**
 - **Some areas of Colne which are also vulnerable to speculative planning applications could also be piggybacked onto other larger villages. This would allow the new Local Plan, with its reduced housing numbers, to best use that reduced number for the improvement of the areas of the borough with most need.**
 - **Events over the last 6 years, in particular the ignoring of Barrowford's status on the Planning Hierarchy in favour of M65 Corridor status, and the way that the 500 houses within the Strategic Housing Site have been offset against other towns' housing requirements whilst still leaving Barrowford expected to provide additional housing sites have galvanised village opposition to being in the M65 Corridor.**

Agenda Item 8

Q10. Do you support the Council's proposal to continue to focus growth on settlements in the M65 corridor?

A10. As long as alterations to the Spatial Areas are followed through and a bottom-up levelling-up approach is taken, with a mindset to address housing inequality in the urban cores, Barrowford Parish Council would support the focus of growth on the areas of the M65 Corridor which need them most.

Q11. Do you agree with the proposed changes to the Policies Map? If not why?

A11. The proposed changes to designations could raise concerns particularly

- **Settlement Boundaries and Open Countryside:** A clear and definitive line is useful, but some of the recently considered additions, which were included in the Local Plan Part 2 could be; some houses built beyond the existing settlement boundary could be retained as housing in the open countryside.
- **Town Centres:** The town centres should still be delineated on the map but changes to the Business Use Classes on the 1st September 2020 revoked all Classes within Class A and replaced them with a newly defined Class E. Have all previous planning approvals been classed as the A Class equivalent in the new E Class, or can existing businesses do what they want within the E Class? Some clarity is needed in this regard as the role of the Primary Shopping Area policy is to keep these protected areas predominantly retail. Any blurring of the planning definitions would render that policy unworkable. If the Primary and Secondary Frontages policy is to be retained, current businesses will need to be advised of their current Business Use category and all future Change of Use applications would need to be monitored to continue the defined percentages. Many business owners are ignorant of the fact that the granting of a liquor licence does not include Change of Use and this should possibly be an advisory on the Licence Application.
- **Local Shopping Frontages:** All of Pendle's larger settlements, including Barrowford, created pockets of shops aimed at essential goods as they expanded during the 1860's to 1930's. Most contained a butcher, grocer, baker and a newsagent. Previous Local Plans have tried to address the decline of the larger shopping areas within Pendle by categorising these sites as outside the defined shopping centres, making both planning applications and grant applications problematic. Maybe in this era of a low carbon future, the retention of these local shopping areas, should be defined within the Policies Map. Whilst possibly restricting use to day-to-day shopping needs, such a policy would encourage less car use.
- **Proposed Housing, Employment, Retail and Community Facility site allocations:** These should possibly be redefined as proposed development land, since the current designation for either housing or business use is not flexible enough to allow the planning changes needed as the situation in Pendle evolves through time and need. A prime example is the former Riverside Mill in Nelson, which has long been designated for housing but due to its close proximity to Junction 13 could have been an acceptable business park if accessed via Charles Street.
- **Protected Car Parks:** Owing to severe lack of on road parking within all urban cores of Pendle all existing urban car parks should have some form of protection, with a defined policy to improve parking availability within the main retail town centres.
- **Sites of Settlement Character (re-designation):** Does this Policy include Conservation Areas, Listed Buildings, AONB's and others? Will the Policies Map include Character Areas included in adopted Neighbourhood Plans?

Q12. From your experience of using the current Policies Map, what changes could be made to improve the functionality of this resource and aid the ease of its use?

Agenda Item 8

A12. When you first open up the Policies Map all the policy designations are already illustrated. Perhaps the map should be blank of policies on opening, showing only the Town and Village boundaries, with the overlay of policies being left to the user.

Q.13. Do you agree with monitoring proposals for the new Local Plan? Can you identify anything which has been omitted?

A13. The monitoring proposals are fine but consideration should be given to the difficulty involved in regenerating areas that have seen neglect for decades. Reversal of policy allowing changes to the Spatial Areas should be resisted to allow time for regeneration to take hold.

Q.14. Do you agree with the three scenarios identified above, which would warrant an early review of the Local Plan? If not, do you believe this list should be expanded, reduced, or removed and why?

A14. Although monitoring is essential, the obsession with housing numbers has been the be-all and end-all of any plan in the past and has dictated policy that meets this perceived need for new homes at any cost, even if the new homes do not match the shortcomings of the existing housing stock. This mind set is slowly turning certain areas into a commuter belt whilst not addressing the low quality, low value housing stock within the more deprived areas of the borough. This train of thought has seen areas of Pendle become unaffordable to local people while the many who live in the more deprived wards have seen a steady decline in both the quality and value of their homes, with these areas sliding into terminal decline. Perhaps new housing should be monitored and assessed in terms of the plan's ability to redress this imbalance and concentrate on a housing market model that meets these needs.

Looking at Section 7.9 where it is proposed to include a mechanism within the new Local Plan requiring its early review:

Part 1 states *"The number of new homes delivered in the borough falls to less than 75% of the required total over a rolling 3-year period as indicated through the Housing Delivery Test or similar."* The road to redevelopment of the deprived areas will be slow initially but, if it can be started early within the life of the plan and the new housing is both affordable and meets the needs of the local population, regeneration will move on at an ever-increasing rate. This process is now beginning to be illustrated in Brierfield, starting with the former Smith & Nephew factory and bringing improvements in the Canal Corridor and as a consequence an upturn in both the housing and town centre business occupancy. A combined three-year assessment may in the early years be a little premature in assessing large scale regeneration in these areas, though a level of progress will need to be shown.

Part 2 is currently subject to ever changing Government Policy and should show the most flexibility. Policies should be written to reflect imminent changes to Government Policy necessitated by Carbon Reduction and Green Energy Generation.

Part 3 states: *"Monitoring shows that development delivered in the borough has significantly deviated from the planned strategy in terms of its spatial distribution resulting in lasting unplanned harm to the local environment or communities of Pendle."*

The current adopted and retained policies suffer from the inclusion of more sought-after development locations within the M65 Corridor which have diminished the drive to develop in the areas that need it most. If the Council's primary reason for the new Local Plan is to be a levelling-up ethos throughout the life of the new plan, and if changes to the Plan's Spatial Areas reduce the scope of larger developments outside the M65 Corridor, then the Council could legitimately use this clause to further redress the balance.

7.10 states: *"Such changes may result in the need for a radically different planning strategy to the one adopted, with the adopted strategy acting as a barrier to resolve the situation. A mechanism facilitating an early review of the Plan is required to ensure that local policy is sufficiently adaptive and flexible to unforeseen changes which might occur in the years following its adoption, ensuring*

Agenda Item 8

that the matters are efficiently dealt with in a manner which is relevant to Pendle and reflects the will of the local community.”

This would be superfluous, as arguments relating to larger developments outside the M65 Corridor would be contrary to the Levelling-Up aspirations of the Local Plan. The immediate yearly housing figures are subjective; in the end it is the total over the life of the plan that matters.