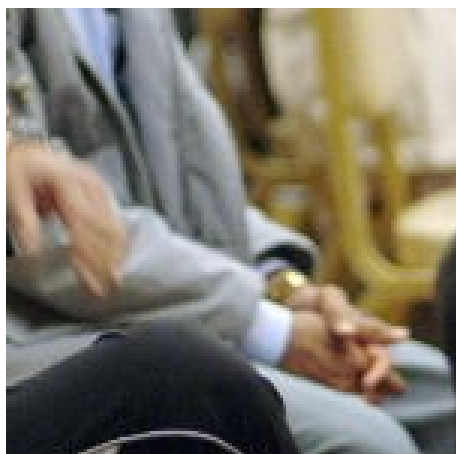
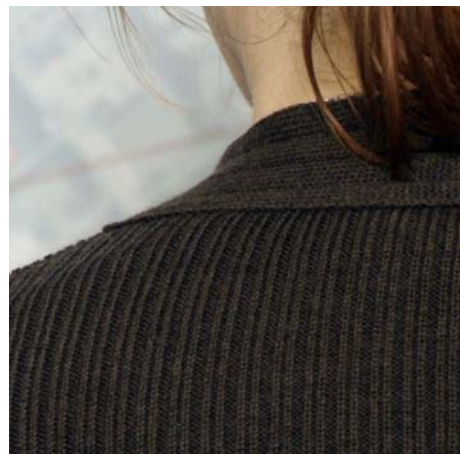
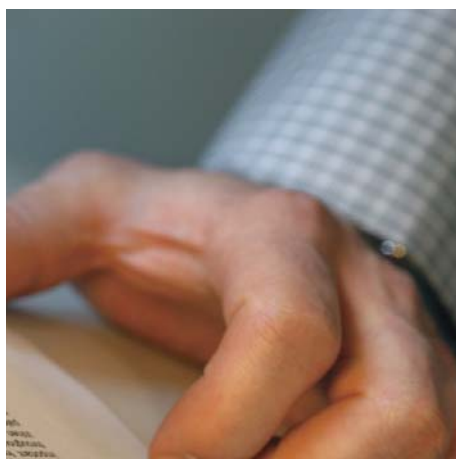
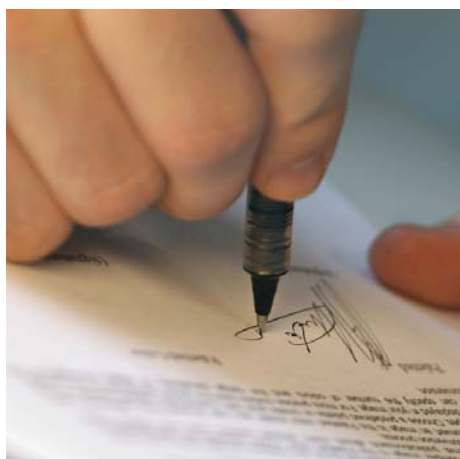


Preparing a Local Plan for Pendle



Core Strategy Publication Report Consultation Statement

August 2012



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Introduction

- 1.1 This statement has been published in support of the *Pendle Core Strategy (Publication Report)*. It has been prepared in accordance Regulation 22(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012,¹ which require the publication of a statement setting out the following:
- (i) Which bodies and persons were invited to make representations under Regulation 18.²
 - (ii) How those bodies and persons were invited to make such representations.
 - (iii) A summary of the main issues raised by those representations.
 - (iv) How these representations have been taken into account.
 - (v) The number of representations made pursuant to Regulation 20 and a summary of the main issues raised in these representations.³
 - (vi) If no representations were made pursuant to Regulation 20, a statement to this effect.
- 1.2 The Regulations do not require such a statement to be prepared prior to submission. As such items (v) and (vi) are not relevant at this time.
- 1.3 On 29th March 2007, Pendle Council adopted its *Statement of Community Involvement (SCI)*. This sets out how members of the local community and partner organisations are to be engaged in the preparation of new planning policy documents. Since its adoption public consultation and engagement associated with the preparation of the Core Strategy and other planning policy documents has been carried out in accordance with the SCI.
- 1.4 As part of this commitment to continuous and meaningful engagement with interested parties, Pendle Council has chosen to publish a *Consultation Statement* to accompany the formal public consultations held at the *Issues and Options* and *Preferred Option* stages (see below), so that consultees could see how their comments have helped to shape successive versions of the Core Strategy.

Engagement and Consultation

- 1.5 The Pendle Core Strategy has been developed over a number of years and has benefited from early and continuous engagement with key stakeholders and members of the public. To date, much of this preparatory work has taken the form of ongoing, informal participation. More structured engagement exercises have taken place as necessary; most often in the form of scheduled meetings with key partners⁴ and formal six-week public consultations where members of the public are also invited to comment (see below).

Availability of Consultation Documents and Publicity Materials

- 1.6 For each formal public consultation, the consultation documents have been made available on the Pendle Council and Feedb@ck websites and at the locations listed in Table 1.

¹ Previously Regulation 28(1) (c) and (d) in the Town and Country Planning (Local Development) (England) Regulations 2004

² Previously Regulation 25 in the Town and Country Planning (Local Development) (England) Regulations 2004

³ Previously Regulation 27 in the Town and Country Planning (Local Development) (England) Regulations 2004

⁴ Recent meetings have taken place under the *Duty to Cooperate*, which was introduced in Section 110 of the Localism Act 2012, and set-out in paragraphs 178-181 of the National Planning Policy Framework .

Table 1: Venues at which consultation documents are available for inspection

• Number One Market Street, Nelson	• Barnoldswick Library
• Nelson Library	• Earby Council Shop
• Brierfield Town Hall	• Earby Library
• Brierfield Library	• Barrowford Library
• Colne Council Shop	• Trawden Library
• Colne Library	• Wheatley Lane Library
• Barnoldswick Council Shop	• Mobile Library

- 1.7 Details of the places and times at which the consultation documents can be inspected is sent to each consultee and advertised online and in the local press. In addition, publicity materials, usually in the form of posters and leaflets, are sent out in advance to a wide range of venues in advance of the consultation for display and collection (Table 2).

Table 2: Spatial summary of deposit and publicity locations

Locations	NEL	BRF	BFD	BLK	CLN	EAR	OTH	PEN
Council Shops / Libraries	2	2	1	2	2	2	3	14
Parish Councils	1	1	1	1	1	1	13	19
Doctors Surgeries / Health Centres	1	1	1	1	2	1	1	8
Leisure Centres	3	0	0	1	3	0	0	7
Business Centres	4	0	0	1	0	0	0	5
Schools and Colleges	13	3	2	5	10	1	12	46
Youth and Community Centres	3	1	1	1	1	1	0	8
Totals	27	8	6	12	19	6	29	107

Key: NEL – Nelson, BRF – Brierfield, BFD – Barrowford, CLN – Colne, BLK – Barnoldswick, EAR – Earby, PEN – Pendle (Total)

- 1.8 Publicity materials for the *Preferred Options Report* were also made available on the newly acquired 'STAN the Van'.⁴ This fully accessible long-wheelbase vehicle (see opposite) was also used to host a series of public exhibitions in remote (rural) destinations.

Current and Previous Consultations

- 1.9 The *Publication Report* represents the fourth public consultation exercise associated with the preparation of the Pendle Core Strategy, and is being conducted in accordance with Regulations 19 and 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The previous stages carried out under Regulation 18 are described on the following pages.



⁴ STAN = Services to a Neighbourhood.

Stage 1: You Choose

- 1.10 A six-week public consultation was carried out between 22nd June and 3rd August 2007 under the banner of *You Choose the Future of Pendle*.
- 1.11 At the close of the consultation period Pendle Council had received written representations from 266 individuals or organisations, and these included a total of 1,323 individual comments. A further 420 comments were raised in workshops and meetings.
- 1.12 This consultation was carried out in conjunction with Pendle Partnership, the Local Strategic Partnership (LSP) for Pendle. The responses helped to identify the key issues to be addressed in both the *Sustainable Community Strategy* (SCS), adopted in May 2008, and the Core Strategy.

Stage 2: Issues and Options

- 1.13 A six-week public consultation to consider the *Issues and Options Report* was carried out between 4th July and 18th August 2008.
- 1.14 At the close of the consultation period Pendle Council had received written representations from 58 individuals or organisations, and these included a total of 1,171 individual comments. A further 1,630 comments were raised by the 71 attendees at five exhibitions/workshops.
- 1.15 A consultation statement was published alongside the Issues and Options Report to:
- Identify those organisations and individuals who were invited to participate in the ‘You Choose’ campaign and describe the programme of engagement leading up to the Issues and Options consultation (Appendix 1).
 - List the key evidence base documents, strategies and government guidance that had influenced the alternative strategy options identified in the Issues and Options Report (Appendix 2).
 - Summarise the representations received in response to the consultation (Appendix 3).
 - Show how Pendle Council had identified the spatial implications to be addressed in the Core Strategy and Land-use Allocations DPD (Appendix 4).
 - Set out the next stages in the consultation process.
- 1.16 As a follow-up to this consultation, Pendle Council published *Issues and Options Consultation: Summary of Responses* in December 2008 to:
- Illustrate the scope of the consultation on the Issues and Options Report.
 - Provide a summary of the responses to the consultation on the Issues and Options Report.
 - Illustrate the level of support for each of the alternative approaches considered as part of the consultation.
 - Provide a summary of the Sustainability Appraisal carried out for each of these alternative approaches.
 - Set out the next stages in the consultation process.

Stage 3: Preferred Options

- 1.17 A six-week public consultation to consider the *Preferred Options Report* was carried out between 28th October 2011 and 12th December 2011.
- 1.18 At the close of the consultation period Pendle Council had received written representations from 246 individuals or organisations, and these raised a total of 1,118 comments.
- 1.19 A consultation statement was published alongside the Preferred Options Report to:
- Provide a summary of the key consultations carried out to date under Regulation 25 (Appendices 1 and 2).
 - Identify the specific consultees contacted at the Issues and Options Stage (Appendix 3).
 - Describe the programme of engagement carried out as part of the Issues and Options consultation (Appendix 4).
 - Summarise the representations received in response to this consultation (Appendix 5).
 - Show how the issues raised have, where applicable, been addressed in the Preferred Options Report (Appendix 5).

Stage 4: Publication

- 1.20 The *Publication Report* represents what is considered to be the final version of the *Pendle Core Strategy*.
- 1.21 Unlike earlier public consultations, which helped to shape the content of the Core Strategy, that carried out under Regulation 19 is concerned only with the 'soundness' of the document (see below).

What is soundness?

The local planning authority (Pendle Council) should only submit a plan for examination, which it considers to be 'sound'; in other words that it is:

- **Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

- 1.22 In accordance with Regulation 19(a) copies of the consultation documents will be made available for a period of six-weeks on the Pendle Council and Feedb@ck websites and at Council Shops and local libraries throughout Pendle. To comply with Regulation 19(b) details of these locations and the times at which the documents will be available for inspection will be publicised on the aforementioned websites and in the local press. In addition all specific and general consultation bodies will be notified directly by letter or email.
- 1.23 To ensure that contact details are as up-to-date as possible a full refresh of the 1,800+ records on the *Planning Policy Database* was carried out by post in early August 2012.

What happens next?

- 1.24 In accordance with Regulation 22, following the close of the consultation period, Pendle Council will submit copies of the Publication Report, all supporting documents and the representations received to the Secretary of State. This represents the start of the Examination process.

Stage 5: Examination

- 1.25 The Secretary of State will appoint an independent inspector to conduct the Examination. The purpose is to consider the soundness of the Core Strategy and whether it complies with the requirements of the Planning and Compensation Act 2004, and associated regulations. The presumption is that the document is sound, unless it can be shown otherwise.
- 1.26 The Inspector will carry out a preliminary assessment of the Core Strategy and other submitted material. If there is any concern about the soundness of the document, the Inspector may call an exploratory meeting. It should be noted that the Examination will not address every individual representation and that written representations will carry exactly the same weight with the Inspector as those pursued by a personal appearance at the examination.
- 1.27 A Pre-hearing Meeting will be held approximately eight weeks after the date of submission, to consider how the examination is to be managed.
- 1.28 The purpose of the Pre-hearing Meeting is to:
- advise those who have asked to be present and heard at the examination, how their representations will be dealt with (i.e. written representations, formal hearings etc.);
 - consider who else might need to be invited to the examination to help the inspector consider of the soundness of the plan;
 - identify the issues that need to be considered at the examination in order to determine the soundness of the plan;
 - consider how those issues relate to one another and the most logical order for their examination;
 - identify the nature of the evidence to be brought to the examination and to set the timetable for the submission of that evidence; and
 - establish the programme for the examination and the timetable for any hearing sessions.

- 1.29 Shortly after the Pre-hearing Meeting, the Inspector will publish a list of Matters for Examination. This will provide a brief description of the issues to be covered, with the names of those who have asked to be heard in person. It will form the basis of the programme for the hearings or round table sessions led by the Inspector, which will be published at the same time.
- 1.30 Hearing session will normally commence 14 weeks after the date of submission. Following the end of any hearing or round table sessions the Inspector will retire to produce a report. This may, or may not, recommend changes to the Core Strategy, based on the evidence presented at the examination.
- 1.31 The Examination formally ends on receipt of the Closure Letter from the Planning Inspectorate, which will accompany the Inspector's Fact Check Report and appendices. Following consideration of the Council's comments on the Fact Check Report, the Inspector will issue a Final Report and appendices approximately 29 weeks after the date of submission.
- 1.32 The Final Report is no longer binding on the Council, but under normal circumstances the Inspectors recommendations will be incorporated into the final version of the Core Strategy which must be adopted by Full Council.

Other Considerations

- 1.33 Whilst public consultation has helped to shape the Core Strategy and provide a local distinctive policy response to the issues we need to address in Pendle, our chosen strategy must also be in general conformity with national planning policy, reflect the strategic priorities of key stakeholders, as embodied in the sustainable community strategy, and be based on a robust and credible evidence base.

Published Plans and Strategies

- 1.34 A review of published plans and strategies is an integral element of the sustainability appraisal process (see below) and an important consideration in drawing up plans and policies.
- 1.35 Helping to deliver the priority objectives set out in *Our Pendle Our Future: Pendle's Sustainable Community Strategy* is the primary objective for the Core Strategy.

Evidence Base

- 1.36 The analysis of published data, the consideration of projections and the production of new empirical research, to address gaps in our knowledge, are all important components of the evidence base behind the Core Strategy.

- 1.37 The key documents, prepared or commissioned by Pendle Council, for the Core Strategy evidence base include:
1. Pendle Strategic Flood Risk Assessment (ENTEC, October 2006)
 2. Pendle Retail Capacity Study (Nathanial Lichfield & Partners, May 2007)
 3. Lancashire Sub-Regional Gypsy & Traveller Accommodation and Related Services Assessment (The Salford Housing and Urban Studies Unit of the University of Salford, May 2007)
 4. Pendle Employment Land Review (Pendle Borough Council, March 2008)
 5. Burnley & Pendle Strategic Housing Market Assessment (Fordham Research, April 2008)
 6. Pendle Open Space Audit (Pendle Borough Council, November 2008)
 7. Pendle Strategic Housing Land Availability Assessment (Pendle Borough Council, May 2008)
 8. Pendle Sustainable Settlements Study (Pendle Borough Council, November 2008)
 9. Burnley & Pendle Affordable Housing Site Viability Study (Fordham Research, July 2009 and Update: July 2010)
 10. Pendle Biodiversity Audit (Pendle Borough Council, September 2010)
 11. South Pennine Renewable & Low Carbon Energy Study (Maslen Environmental, December 2010)
 12. Pendle Infrastructure Study (Pendle Borough Council, September 2011)
 13. Pendle Retail Study (Nathaniel Lichfield & Partners, August 2012)
 14. Burnley and Pendle Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (The Salford Housing and Urban Studies Unit of the University of Salford, August 2012)
- 1.38 All of these documents have been through appropriate levels of public consultation and where appropriate adopted by Pendle Council.

Sustainability Appraisal

- 1.39 Sustainability appraisal is integral to the plan making process. Its purpose is to consider the economic, social and environmental effects of a plan from the outset and performs a key role in providing a sound evidence base for the plan.
- 1.40 Pendle Council determined that, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, that the Core Strategy DPD was likely to have significant environmental effects and that a Strategic Environmental Assessment (SEA) would be required.
- 1.41 ENTEC (now AMEC Environment and Infrastructure UK Ltd.) was appointed by Pendle Council to carry out sustainability appraisal work on the Core Strategy, incorporating the requirements of the European Directive on Strategic Environmental Assessment (SEA) (Directive 2001/42/EC).

- 1.42 Scoping represents the first stage in the process. Through a process of consultation, literature review and data analysis, it establishes:
- the baseline economic, social and environmental issues;
 - the key sustainability issues and objectives; and
 - the methodology for undertaking the sustainability appraisal.
- 1.43 The baseline provides the basis for the prediction and monitoring of significant environmental or other sustainability effects that may arise from the introduction of the Core Strategy and other local development documents.
- 1.44 ENTEC published their Scoping Report on 29th September 2006. On 19th October 2006 the members of Pendle Council's Executive agreed that this report should be placed on the Council's website and sent to the three statutory consultation bodies for comment. In accordance with the published guidance on SEA/SA the consultation ran for a period of five weeks between 30th October and 4th December 2006. The final version of the scoping report comprises the submitted scoping report and consultation responses on the submitted report.
- 1.45 ENTEC published their Sustainability Appraisal Toolkit on 20th April 2007. Detailed sustainability appraisal reports for the Pendle Core Strategy, based on this toolkit, have been prepared to consider the implications of proposals contained in the Issues and Options Report, the Preferred Options Report and the Publication Report.

Habitat Regulations Assessment

- 1.46 In October 2005 a European Court of Justice ruling directed that land use plans are subject to the provisions of Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive).
- 1.47 The purpose of a Habitats Regulation Assessment (HRA) is to assess the potential impacts of a plan or policy against the conservation objectives of a Natura 2000 site and to determine whether it would adversely affect the integrity of that site, either alone or in combination with other plans and projects. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects.
- 1.48 In the UK the network of Natura 2000 Sites are protected by the following:
- The Habitats Directive (EC Directive 92/43/EEC) protects habitats and non-avian species of European importance and applies to Special Areas of Conservation (SACs).
 - The Birds Directive (EC Directive 79/409/EEC) is concerned with the conservation of wild birds and applies to Special Protection Areas (SPAs).
- 1.49 In addition Government guidance⁵ states that globally important wetlands protected under the Ramsar Convention (1971) should be given the same level of protection as SAC and SPA designations.

⁵ Guidance on Habitats Regulations Assessment (Department of Communities and Local Government, August 2006).

- 1.50 The current European Commission guidance details a four-stage process for the production of a HRA, although not all stages are necessarily required, depending on the outcome of each stage in the process:
1. Screening: This identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.
 2. Appropriate Assessment: This stage assesses the likely impacts against the conservation objectives of a European Site, in order to identify whether there may be any adverse effects on the integrity of the site or its features. Where adverse impacts are identified, it also includes an assessment of the potential mitigation for those impacts.
 3. Assessment of alternative solutions: Where significant negative effects are identified at the appropriate assessment stage, alternative solutions should be examined to avoid any potential damaging effects to the integrity of a European Site.
 4. Assessment where adverse impacts remain: An assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed. The Secretary of State for Communities and Local Government will inform the European Commission about the compensatory measures adopted.
- 1.51 For the Pendle Core Strategy, separate HRA reports have been prepared to consider the implications of proposals contained in the Issues and Options Report, the Preferred Options Report and the Publication Report.

Equalities Impact Assessment

- 1.52 In accordance with the Race Relations Act 1976, Race Relations (Amendment) Act 2000, Disability Discrimination Act 1995 and 2005, Equal Pay Act 1970, Sex Discrimination Act 1975 and Equality Act 2010, Pendle Council has a legal requirement to assess the impact of all its existing and proposed plans and policies.
- 1.53 The Equality Act, which came into force from October 2010, introduced a new public sector equality duty effective from 5th April 2011. It states that local authorities have a public duty to have due regard to:
- eliminating unlawful discrimination;
 - promoting equality of opportunity; and
 - promoting good relations between people of different groups.
- 1.54 The equality duties placed on local authorities previously covered gender, disability and race. Under the Equality Act 2010 these have been extended to cover age (younger and older), faith (religion or belief), sexual orientation, gender reassignment and pregnancy/maternity. Local authorities must also exercise their functions in a way that reduces any inequalities that may arise from socio-economic disadvantage.

- 1.55 Pendle Council's Service Impact Assessment was redesigned in April 2011 to meet these new requirements and has been used to assess the implications that the Core Strategy, and individual policies within it, may have on different groups in the local community. The use of this standard template helps the Council to anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group.
- 1.56 For the Pendle Core Strategy an EqlA has been prepared to consider the implications of proposals contained in both the Preferred Options Report and the Publication Report.

Pendle Local Plan Part 2: Site Allocations and Development Policies

- 1.57 Up until the Preferred Options stage, Pendle Council consulted jointly on its Core Strategy and the Land-use Allocations DPD. However, it is not possible to identify, or allocate, sites for development before the strategic direction for future growth in Pendle has been established in the Core Strategy.
- 1.58 As such further public consultations on potential site allocations, will not take place until after the Core Strategy has been through its Examination in early 2013.
- 1.59 Pendle Local Plan Part 2: Site Allocations and Development Policies will set out detailed planning policies used by officers to guide day-to-day decisions on planning applications and identify:
- Sites to be allocated for future development – i.e. for employment, housing etc.
 - Areas to be protected from future development – e.g. SSSI.
 - Areas where development will be restricted – e.g. Green Belt.
 - Areas where development will be required to meet higher standards of design – e.g. Conservation Areas.

Appendix 1

‘You Choose’ Consultation – Summary

Subject of Consultation

- You Choose the Future of Pendle

The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 18 (formerly Regulation 25)

Dates of consultation

- 22nd June to 3rd August 2007

Number of organisations/individuals contacted

- LDF database (specific, general and other consultees) 307
- Pendle Partnership – LSP database 200
- Staff at Pendle Council, Pendle Leisure Trust, Liberata and Housing Pendle 1,150
- Members of Pendle Citizens Panel 1,350
- Schools and Colleges 44
- Invitations to attend LDF Workshops 247
- Invitations to attend SCS Workshops n/a
- **Total** **c. 3,298**

Number of organisations/individuals submitting representations

- Written representations 266
- Attendees at LDF Working Groups 112
- Attendees at SCS Working Groups 77
- **Total** **455**

Number of comments received

- Via written representations 903
- Via LDF Working Groups 285
- Via SCS Working Groups 135
- **Total** **1,323**

Summary of issues raised

- Issues & Options Consultation Statement (Pendle Council, June 2008)

How have the main issues been addressed in the DPD?

- Issues & Options Consultation Statement (Pendle Council, June 2008)

Appendix 2

Issues & Options Consultation – Summary

Subject of Consultation

- Pendle Core Strategy – Issues & Options Report

The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 18 (formerly Regulation 25)

Dates of consultation

- 4th July to 18th August 2008

Number of organisations/individuals contacted

- LDF/LSP databases (specific consultees) 77
- LDF database (general and other consultees) 672
- Businesses on Pendle Council's company, town centres and tourism databases 1,168
- Members of Pendle Citizens Panel 1,153
- People registered with Pendle Council website 805
- Staff at Pendle Council, Pendle Leisure Trust and Liberata 1,020
- Local Councillors 49
- Schools and Colleges 44
- **Total** **4,988**

Number of organisations/individuals submitting representations

- Written representations 58
- Attendance at LDF Workshops 71
- **Total** **129**

Number of comments received

- Via written representations 1,171
- Via LDF workshops 1,630
- **Total** **2,801**

Summary of issues raised

- Issues & Options Consultation Summary of Responses (Pendle Council, December 2008)
- Preferred Options Consultation Statement (Pendle Council, September 2011) – Appendix 5

How have the main issues been addressed in the DPD?

- Preferred Options Consultation Statement (Pendle Council, September 2011) – Appendix 5

Appendix 3

Preferred Options Consultation – Summary

Subject of Consultation

- Core Strategy – Preferred Options Report

The Town and Country Planning (Local Planning) (England) Regulations 2012

- Regulation 18 (formerly Regulation 25)

Dates of consultation

- 28th October to 12th December 2011

Number of organisations/individuals contacted

- Planning Policy database (specific consultees)..... 78
- Planning Policy database (general consultees and individuals) 1,604
- Businesses on Pendle Council's company, town centres and tourism databases 457
- Members of Pendle Citizens Panel and Feedb@ck Online 495
- People registered with Pendle Council website 1,834
- Pendle Council Facebook friends 887
- Pendle Council Twitter followers 1,259
- Staff at Pendle Council, Pendle Leisure Trust and Liberata 784
- Local Councillors 49
- Pendle Partnership – LSP database and Vision Board 175
- Schools and Colleges 44
- **Total 7,666**

Number of organisations/individuals submitting representations

- Written representations 246
- **Total 246**

Number of comments received

- Via written representations 1,118
- **Total 1,118**

Summary of issues raised

- Publication Report Consultation Statement (Pendle Council, August 2012) – Appendix 6

How have the main issues been addressed in the DPD?

- Publication Report Consultation Statement (Pendle Council, August 2012) – Appendix 7

Appendix 4

Preferred Options Consultation – Specific Consultees

Although there will inevitably have been some duplication well over 7,500 notification letters and emails were sent out to organisations and individuals in advance of the six week public consultation on the *Preferred Options Report* (see Appendix 3), at a total cost of £326.04 in postage.

Below is a list of the Specific Consultation Bodies⁶ that were contacted directly by letter or email.

ID	Title	Forename	Surname	Job Title	Organisation
1. Local Planning Authorities					
653024	Mr.	Neil	Rodgers	Head of Planning	Blackburn-with-Darwen Borough Council
327459	Mr.	Andrew	Marshall	Planning and Transport Strategy Manager	Bradford Metropolitan District Council
327469	Mrs.	Margaret	Whewell	Policy & Environment Manager	Burnley Borough Council
-	Mr.	Chris	Wilkinson	Greenspace Projects Manager	Bury Metropolitan Borough Council
327474	Mr.	Philip	Ratcliffe	Planning Policy Manager	Calderdale Metropolitan Borough Council
327531	Ms.	Sian	Watson	Head of Planning and Building Control	Craven District Council
-	Mr.	John	Buddle	Senior Planning Officer	Kirklees Metropolitan Borough Council
653027	Mr.	Simon	Prideaux	Chief Planning & Transportation Manager	Hyndburn Borough Council
328025	Mr.	Carl	Bunnage	Projects and Sustainable Development Team Leader	North Yorkshire County Council
-	Ms.	Georgina	Brownridge	Planning Officer	Oldham Metropolitan Borough Council
327801	Mr.	Colin	Hirst	Forward Planning Manager	Ribble Valley Borough Council
-	Mr.	Andrew	Eadie	Planning and Regulation Service	Rochdale Metropolitan Borough Council
544419	Mr.	Adrian	Smith	Principal Planning Officer	Rossendale Borough Council

Notes:

Bold text: Local planning authorities adjoining Pendle; consulted on all matters relating to local plan preparation.

Italics: Local planning authorities contacted as necessary on cross boundary issues under the 'Duty to Cooperate'.

⁶ At the time of the consultation these were defined in the Town and Country Planning (Local Development) (England) Regulations 2004, as amended [Part 1, Paragraph 2(1)].

ID	Title	Forename	Surname	Job Title	Organisation
2. County Council					
327773	Mr.	Peter	Iles	Specialist Advisor	Lancashire County Council - Environment Directorate (Archaeology)
618757	Ms.	Lynn	MacDonald	Planning and Reorganisation Manager	Lancashire County Council - Environment Directorate (Children and Young People)
-	Mr.	Philip	Megson	Specialist Advisor	Lancashire County Council - Environment Directorate (Economic Development)
-			Post vacant	Specialist Advisor (Ecology)	Lancashire County Council - Environment Directorate (Natural and Historic Environment Service)
461928	Mr.	Steven	Brereton	Specialist Advisor (Landscape)	Lancashire County Council - Environment Directorate (Natural and Historic Environment Service)
327695	Mr.	Don	McKay	Principal Planning Officer	Lancashire County Council - Environment Directorate (Forest of Bowland AONB)
586529	Mr.	Rick	Hayton	Assistant Director Asset and Network Management	Lancashire County Council - Environment Directorate (Highways)
378795	Mr.	Stuart	Wrigley	Transport Co-ordination	Lancashire County Council - Environment Directorate (Transport)
379212	Ms.	Louise	Nurser	Principal Planning Officer	Lancashire County Council - Environment Directorate (Minerals and Waste)
378754	Mr.	Marcus	Hudson	Head of Planning	Lancashire County Council - Environment Directorate (Planning)

3. Parish Councils (Pendle)					
327798	Ms.	Vicky	Thorp	Clerk	Barley-with-Wheatley Booth Parish Council
474591	Mr.	Richard	Nelson	Clerk	Barnoldswick Town Council
327467	Mr.	Iain	Lord	Clerk	Barrowford Parish Council
379210	Mrs.	Hazel G.	Dean	Clerk	Blacko Parish Council
327458	Mr.	John C.	Hoyle	Chairman	Bracewell & Brogden Parish Meeting
327463	Mr.	John	Grice	Clerk	Brierfield Town Council
390111	Ms.	Susan	Graham	Clerk	Colne Town Council
327535	Mrs.	Susan	Graham	Clerk	Earby Parish Council
619590	Ms.	Jane	Kileen	Clerk	Foulridge Parish Council
327987	Mr.	John	Parsons	Clerk	Goldshaw Booth Parish Council

ID	Title	Forename	Surname	Job Title	Organisation
327511	Mrs.	Penny	McBurney	Clerk	Higham-with-West Close Booth Parish Council
327517	Mr.	Paul	Maskell	Chairman	Kelbrook & Sough Parish Council
327388	Mrs.	Laura	McAfee	Chairman	Laneshawbridge Parish Council
328067	Mr.	Martin	Harrison	Town Clerk	Nelson Town Council
327366	Miss	Rebecca	Hay	Clerk	Old Laund Booth Parish Council
327411	Mrs.	Hazel G.	Dean	Clerk	Reedley Hallows Parish Council
327445	Mrs.	Carole	Donahoe	Clerk	Roughlee Parish Council
327449	Ms.	Fiona	Hanson	Clerk	Salterforth Parish Council
327442	Ms.	Adele	Waddington	Clerk	Trawden Forest Parish Council

4. Parish Councils (Adjacent)

327461	Ms.	Lianne	Abram	Clerk	Briercliffe-with-Extwistle Parish Council
327530	Mr.	Andrew	Maillinson	Clerk	Cowling Parish Council
327533	Mrs.	D.	Braithwaite	Clerk	Downham Parish Meeting
327502	Mrs.	M.S.	Rayner	Clerk	Gisburn Parish Council
327508	Mr.	Glyn D.	Broomhead	Clerk	Haworth Cross Roads & Stanbury Parish Council
327515	Mr.	M.	Berry	Clerk	Horton Parish Meeting
327516	Mr.	Roger B.	Frost	Clerk	Ightenhill Parish Council
327394	Mr.	Anthony	Meadows	Clerk	Lothersdale Parish Council
327397	Mr.	D.G.H.	Nelson	Correspondent	Martons Both Parish Meeting
323367	Mrs.	Elaine	Pearson	Clerk	Oxenhope Parish Council
327368	Mrs.	Elizabeth	Bolton	Clerk	Padiham Town Council
327443	Mr.	D.T.	King	Clerk	Rimington & Middop Parish Council
327447	Mrs.	A.M.	Whitwell	Clerk	Sabden Parish Council
327451	Mr.	I.R.	Hirst	Clerk	Simonstone Parish Council
327431	Mrs.	H.	Hundsdoerfer	Clerk	Thornton-in-Craven Parish Council
328086			No contact	Clerk	Twiston Parish Meeting
327424	Mrs.	Linda	Dean	Clerk	Wadsworth Parish Council
327536	Mr.	David	Sharples	Chairman	Worston & Mearley Parish Meeting

5. Other Specific Consultation Bodies

327554	Mr.	Matthew	Saunders	Secretary	Ancient Monuments Society
327478	Mr.	D.	Wright		British Telecom (BT)
327473	Ms.	M.	Goodyer		Cable & Wireless Communications
327456	Miss	Rachael	Bust	Deputy Head of Planning	The Coal Authority
327532	Mr.	Stephen	Marshall-Cam	Division Manager, Rail Regional Policy and Delivery	Department for Transport (DfT) - Rail Regional & Passenger Relations
327543	Mr.	Barry	Connolly	Project Developer	E.On UK Renewables
670126	Mr.	Aidan	Kirkpatrick	Consultant	East Lancashire PCT

ID	Title	Forename	Surname	Job Title	Organisation
327539	Mr.	Philip	Carter	Planning Liaison Officer	Environment Agency
327714	Ms.	Jane	Evans	Head of Planning and Environment	Ericsson Services Ltd. (Vodafone)
327500	Mrs.	Lindsay	Alder	Assistant Network Strategy Manager	Highways Agency - Network Strategy Division NW
327651	Ms.	Judith	Nelson	Regional Planner	Historic Buildings & Monuments Commission for England (English Heritage)
327538	Mrs.	Hazel	Cooper		Homes and Community Agency
327715	Mr.	Marc	Selby	UK Estates Manager	Hutchison 3G UK Ltd.
327520	Mrs.	Barbara	Thornber	Architectural Liaison Officer	Lancashire Constabulary
-	Miss	Victoria	McSherry	Acquisition and Planning	Mono Consultants for the Mobile Operators Association on behalf of Hutchison 3G UK Ltd, O2 (UK) Ltd, Orange PCS Ltd, T-Mobile UK Ltd and Vodafone Ltd
648731	Ms.	Laoise	Magennis	Technical Administrator	National Airport Traffic Service (NATS) (En Route) Ltd.
327492	Mr.	Damien	Holdstock	Consultant Town Planner	National Grid
327370	Mr.	Alan	Hubbard	Land Use Planning Adviser (E Midlands & NW)	National Trust
379458	Mr.	Stephen	Hedley	Planning Advisor	Natural England - Regional Advocacy and Partnerships Team (NW)
-			No contact		Network Rail Infrastructure Ltd.
327430			No contact		Northern Powergrid (YEDL)
-			No contact		Office of Rail Regulation
327566	Mr.	Tom	Higginson	National Town Planning Manager	Strategic Rail Authority
327423	Mr.	David	Sherratt	LDF Assessor	United Utilities Group plc - Asset Protection

In addition, over 1,600 General Consultation Bodies⁷ and individuals (see Appendix 3) were sent either a letter or email between the 26th and 28th October 2012 advising them about the public consultation on the Preferred Options Report.

Details of the General Consultation Bodies and individual members of the public notified about the consultation are held by Pendle Council, but are not reproduced here.

⁷ General Consultation Bodies are defined in the Regulations as: (a) Voluntary bodies (b) A body representing the interests of different racial, ethnic or national groups (c) A body representing the interests of different religious groups (d) A body representing the interests of disabled persons (e) A body representing the interests of businesses.

Appendix 5

Preferred Options Consultation – Consultation Events & Publicity

In addition to contacting the specific and general consultation bodies (Appendix 4), and individuals registered on the Council and LSP databases, an extensive publicity campaign was launched in the local media and on the Council's website to highlight the six week public consultation on the Preferred Options Report.

Figure 1: A selection of publicity materials (Left to right: leaflet, poster, press advertisement)



Much of this publicity centred on a series of public exhibitions held at 14 locations throughout the Borough.⁸ These exhibitions were advertised in the local press and held at various times throughout the day, giving everyone an opportunity to attend an event near to their home at a time that was convenient to them. The 15 exhibitions that went ahead were attended by a total of 129 local residents.⁹

Of the 19 Parish and Town Councils in Pendle, 13 took up the opportunity to receive a presentation from planning officers at one of their scheduled meetings in October, November or December.

Reports were submitted to the Council's Executive, the Pendle Partnership Annual General Meeting and a meeting of the Local Strategic Partnership's business sub-group (Pendle Vision Board).

All consultation documents and publicity materials were available at local libraries and Council shops throughout Pendle, a total of 14 venues. Posters and leaflets were distributed to local leisure centres, doctors surgeries and health centres, schools and colleges, youth and community centres and parish councils, representing a further 93 locations (see Table 2).

⁸ Events were held in 14 of the borough's 21 settlements.

⁹ Planned events in Laneshaw Bridge and Foulridge had to be cancelled due to a broken generator on STAN the Van.

Appendix 6

Preferred Options Consultation – Representations and Officer Responses

This appendix provides a summary of the representations submitted as part of the six week public consultation on the Preferred Options Report, held between 28th October and 12th December 2011. It includes:

1. A copy of the Representation Form
2. A numerical breakdown of the written representations received
3. A summary of the written representations received, together with an officer response indicating how the issues raised have been addressed in the Core Strategy (Publication Report).¹⁰
 - a. Alphabetically by name of organisation
 - b. Alphabetically by surname of individual

A matrix summarising the outcome of the sustainability appraisal is included at Appendix 7 and a summary of the proposed changes to the Preferred Options Report at Appendix 8.

¹⁰ Please note that where a respondent has simply ticked a preference, for an option or choice, the comment is simply noted. Where the respondent has also provided a reasoned justification for their preference, an officer recommendation has been provided, highlighting any changes to be made as a result of this comment.

Official use only:

Supporting Documents:

☐

Yes

☐

No

Representation #

REPRESENTATION FORM

L
D
F



Pendle Core Strategy Preferred Options Report

Further copies can be downloaded from the Council's website at www.pendle.gov.uk/corestrategy

Your details

Your agent's details (if applicable)

Name

Organisation

Job title

Address

Postcode

Telephone

Email

Preferred contact:

☐

Letter

☐

Email

☐

Letter

☐

Email

Signature

Date

Data Protection Act 1998

The personal information you provide as part of a representation will only be used by Pendle Council for the purpose of preparing development plan documents and will not appear online. It cannot, however, be treated as confidential, as the Council is obliged to make all representations available for public inspection.

Please return this form to:

Planning Policy
Planning & Building Control
Town Hall
Market Street
Nelson
BB9 7LG

Email: ldf@pendle.gov.uk

Fax: 01282 661720

Don't forget!

We must receive your completed form no later than 5:00pm on Monday 12th December 2011.

Pendle Council cannot accept forms received after this deadline.



For an alternative format of this document phone 01282 661330

Borough of
Pendle

Chapter 4: Our Spatial Vision

Do you agree with the vision for Pendle?

☐ Yes ☐ No

If **No**, please use the response sheet on the back of this form to state why and set out the changes you would like to see.

Chapter 6: Our Spatial Strategy

Do you agree with the spatial strategy for Pendle?

☐ Yes ☐ No

Do you agree with Policy SDP1?

☐ Yes ☐ No

Do you agree with Policy SDP2?

☐ Yes ☐ No

Do you agree with Policy SDP3?

☐ Yes ☐ No

Do you agree with Policy SDP4?

☐ Yes ☐ No

Do you agree with Policy SDP5?

☐ Yes ☐ No

Do you agree with Policy SDP6?

☐ Yes ☐ No

If you have answered **No** to any of the questions above please use the response sheet, on the back of this form, to state why and set out the changes you would like to see.

Chapter 7: Our Foundations for a Sustainable Future

Do you agree with Policy ENV1?

☐ Yes ☐ No

Do you agree with Policy ENV2?

☐ Yes ☐ No

Do you agree with Policy ENV3?

☐ Yes ☐ No

Do you agree with Policy ENV4?

☐ Yes ☐ No

Do you agree with Policy ENV5?

☐ Yes ☐ No

Do you agree with Policy ENV6?

☐ Yes ☐ No

Do you agree with Policy ENV7?

☐ Yes ☐ No

If you have answered **No** to any of the questions above please use the response sheet, on the back of this form, to state why and set out the changes you would like to see.

Chapter 10: Living

Do you agree with Policy LIV1?

☐ Yes ☐ No

Do you agree with Policy LIV2?

☐ Yes ☐ No

Do you agree with Policy LIV3?

☐ Yes ☐ No

Do you agree with Policy LIV4?

☐ Yes ☐ No

If you have answered **No** to any of the questions above please use the response sheet, on the back of this form, to state why and set out the changes you would like to see.

Chapter 11: Working

- Do you agree with Policy WRK1? ☐ Yes ☐ No
- Do you agree with Policy WRK2? ☐ Yes ☐ No
- Do you agree with Policy WRK3? ☐ Yes ☐ No
- Do you agree with Policy WRK4? ☐ Yes ☐ No
- Do you agree with Policy WRK5? ☐ Yes ☐ No

If you have answered **No** to any of the questions above please use the response sheet, on the back of this form, to state why and set out the changes you would like to see.

Chapter 12: Supporting

- Do you agree with Policy SUP1? ☐ Yes ☐ No
- Do you agree with Policy SUP2? ☐ Yes ☐ No
- Do you agree with Policy SUP3? ☐ Yes ☐ No
- Do you agree with Policy SUP4? ☐ Yes ☐ No

If you have answered **No** to any of the questions above please use the response sheet, on the back of this form, to state why and set out the changes you would like to see.

Any Other Comments?

Please set out your comments on the response sheet on the back of this form.

Consultation

How did you find out about this consultation?

- ☐ Letter ☐ Email ☐ Advert / Poster ☐ Local Press / Radio
- ☐ Other (please state) _____

i Further Information

Planning Policy, Planning & Building Control, Town Hall, Market Street, Nelson BB9 7LG

Tel: 01282 661330 Email: ldf@pendle.gov.uk Website: www.pendle.gov.uk/corestrategy

Response Sheet

No.

Please complete a separate response sheet for each of your comments.

Further copies can be downloaded from the Council's website at www.pendle.gov.uk/corestrategy or you can photocopy this response sheet as many times as necessary.

All response sheets should be numbered and securely attached to the representation form.

What does your comment refer to?

Document
(please tick)

☐ Preferred Options Report	☐ Sustainability Appraisal
☐ Consultation Statement	☐ Habitat Regulations Assessment
☐ Equalities Impact Assessment	

Chapter

Page

Policy

Paragraph

Signature

Date

Preferred Options Consultation: Summary of Responses

Section of Preferred Options Report	No Comment	Total Comments	Agree	Disagree
All Written Representations	-	1,118	-	-
Preferred Options Report Document	963	156	-	-
Chapter 1 Introduction ¹¹	1,117	1	-	-
Chapter 2 About the Core Strategy ¹¹	1,115	3	-	-
Chapter 3 Our Spatial Issues ¹²	1,102	16	-	-
Chapter 4 Our Spatial Vision	1,087	31	81%	19%
Chapter 5 Our Strategic Objectives ¹²	1,107	11	-	-
Chapter 6 Our Spatial Strategy	1,089	29	83%	17%
Chapter 7 Our Foundations for a Sustainable Future	1,116	2	-	-
Policy SDP1 Spatial Development Principles	1,090	28	82%	18%
Policy SDP2 Housing Distribution	1,087	31	42%	58%
Policy SDP3 Employment Distribution	1,089	29	79%	21%
Policy SDP4 Retail Distribution	1,093	25	80%	20%
Policy SDP5 Future Infrastructure Requirements	1,092	26	88%	12%
Policy SDP6 Sequential Approach to Development	1,088	30	83%	17%
Chapter 8 The Key Diagram	1,115	3	-	-
Policy ENV1 Protecting and Enhancing Our Natural and Historic Environments	1,079	39	59%	41%
Policy ENV2 Achieving Quality in Design and Conservation	1,092	26	88%	12%
Policy ENV3 Renewable and Low Carbon Energy Generation	1,063	55	33%	67%
Policy ENV4 Promoting Sustainable Travel	1,089	29	69%	31%
Policy ENV5 Pollution and Unstable Land	1,094	24	96%	4%

¹¹ Chapter is concerned with process not policy.

¹² Our Spatial Issues and Strategic Objectives were finalised based on feedback to the Issues and Options consultation.

Section of Preferred Options Report	No Comment	Total Comments	Agree	Disagree
Policy ENV6 Waste Management	1,092	26	100%	0%
Policy ENV7 Water Management	1,095	23	100%	0%
Chapter 9 Place Shaping	1,118	0	-	-
Chapter 10 Living	1,116	2	-	-
Policy LIV1 Housing Provision, Phasing and Delivery	1,089	29	69%	31%
Policy LIV2 Housing Needs	1,091	27	70%	30%
Policy LIV3 Affordable Housing	1,090	28	68%	32%
Policy LIV4 Designing Better Places to Live	1,094	24	83%	17%
Chapter 11 Working	1,118	0	-	-
Policy WRK1 Strengthening the Local Economy	1,094	24	92%	8%
Policy WRK2 Employment Land Supply	1,091	27	78%	22%
Policy WRK3 Retailing and Town Centres	1,093	25	80%	20%
Policy WRK4 Tourism, Leisure and Culture	1,093	25	96%	4%
Policy WRK5 Designing Better Places to Work	1,094	24	96%	4%
Chapter 12 Supporting	1,118	0	-	-
Policy SUP1 Community Facility Provision	1,094	24	96%	4%
Policy SUP2 Health and Well-Being	1,095	23	96%	4%
Policy SUP3 Education and Training	1,095	23	100%	0%
Policy SUP4 Designing Better Public Places	1,094	24	92%	8%
Appendix 1 Affordable Housing & Dynamic Viability	1,118	0	-	-
Appendix 2 Replacement of Local Plan Policies	1,116	2	-	-
Appendix 3 Glossary	1,118	0	-	-
Preferred Options Report Any Other Comments	1,093	25	96%	4%

 Support for policy less than two-thirds of those persons expressing an opinion.

Pendle Core Strategy: Preferred Options Report: Consultation Comments, Officer Responses and Recommendations

Organisation Order

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
618788	Arrowsmith Associates			Mr Richard Clark	
Policy SDP1	200		Our client, who owns the land outlined in red on the attached plan (which he will be proposing for housing development in the Land Use Allocations DPD) supports the inclusion of Blacko as a rural village as outlined in policy SDP1. However, based on the wording from paragraph 6.20 of the draft Core Strategy preferred options report, which reads 'The villages in the rural area of Pendle perform different functions and can be broadly divided into two groups: i) Rural Service Centres and ii) Rural Villages. The Rural Service Centres are slightly larger in size than the Rural Villages and often have more facilities available to the local population. The Rural Villages are smaller in size both in terms of population and physical areas. They may have only a few services and are dependent on the neighbouring Rural, Local or Key Service Centres to provide for their needs'. Mr Greenwood asks that the Council consider placing Blacko in the list of settlements entitled '3. Rural Service Centres' on the basis of the following services which are available in the village: A public house (plus two others just outside the village), a barber's shop/beauty salon, a place of worship, a primary school and playing fields with children's playground. We believe that the above indicates that Blacko has the amount of facilities required for it to be classed as a rural service centre.	The settlement hierarchy has been developed by looking at two key evidence-based documents: The Pendle Sustainable Settlements Study and the Land Use Consultants report on the role and functions of Key Service Centres in the North West. The Sustainable Settlements Study looked at the location within the borough, the population and physical size, the number of and access to services, and the availability of land for development in each rural settlement. These factors were used to assess the sustainability of each rural settlement and propose the position of each settlement in the hierarchy. Blacko has a limited number of services and received a low sustainability score. Blacko does not meet the criteria to be considered as a Rural Service Centre and is not in a location where it serves other out lying rural villages. The status of rural villages allows for a certain proportion of development to take place to ensure that existing services and facilities are sustained. The expansion of Blacko to Rural Service Centre status is not considered to be an appropriate option for the long term sustainability of the borough. Blacko does not meet the criteria to be defined as a Rural Service Centre. Its status as a Rural Village is considered to be the most appropriate designation taking account of the size, scale and services of the settlement.	No changes to the document are proposed as a result of this representation.
Policy SDP2	205		Our client welcomes this policy and considered it to be a balanced approach to distributing the area's housing requirement across the district.	Agreement noted.	N/A
Policy LIV1	206		Our client recognises the sense in phasing housing allocations and of ensuring that land allocated in the Land Use Allocations DPD can be developed within the relevant timescale of the appropriate phase (he advocates that the land he will be putting forward for inclusion in the Land Use Allocations DPD could be developed within the first phase outlined in policy LIV1) We ask the Council to recognise that not all proposals will be able to contribute to meeting their previously developed land target, this is implicit in the 65% level of the target.	The purpose of the Previously Developed Land (PDL) target is to encourage the most efficient and effective use of land. There are a number of PDL sites in Pendle which are vacant and unused. In the interests of sustainable development the priority for the Council is to bring these sites back into use before using previously undeveloped land resources (greenfield sites). Policy LIV1 recognises that the proposed level of development that is needed in the Borough cannot all be accommodated on PDL and this is reflected in the 65% target. The PDL trajectory indicates the possible delivery of	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				housing on different types of land. It shows that the majority of Greenfield development will occur in the latter phases of the plan when the PDL resource diminishes. Although there is some scope to utilise Greenfield land in the early periods of the plan where necessary to ensure delivery. Policy SDP6 of the Core Strategy sets out the sequential approach to development. At the Land-use Allocations stage consideration will need to be given to this approach and to choosing the most sustainable sites for development. This may include some Greenfield sites.	
618522	Barley-with-Wheatley Booth Parish Council			Mr David Goodger	
Chapter 3: Our Spatial Issues	28		All Barley with Wheatley Booth is in an Area of Outstanding Natural Beauty (CI 3.125) but, I would assume that in the proposed Core Strategy, there is a presumption of building within the present settlement area rather than a presumption not to build in an AONB in a settlement area. We have many visitors here and all, we would hope, appreciate it's small scale and rural nature. In fact, it could be argued that Barley is one of the jewels in Pendle's crown, attracting visitors from all over the county and probably further. It is our belief that part of its charm is its openness, views and small number of houses, some reached by narrow lanes not thought valuable anywhere else. (CI 3.69 & CI 3.71)	Policy 1 of the Replacement Pendle Local Plan includes a presumption in favour of development within a defined settlement boundary. These settlement boundaries will be reviewed during the preparation of the Land-use Allocations DPD in 2012/13. For settlements within the Forest of Bowland AONB, the AONB designation 'washes over' the settlement. As such development within a settlement boundary must also meet the criteria controlling development within the AONB (Policy 2). This ensures that any development is in keeping with the character of the AONB and that is referred to Lancashire County Council's AONB team for comment. At this time there are no proposals to change this policy approach, which was supported by Natural England at the Local Plan Inquiry in 2005. The detail will be set-out in the Development Management Principles DPD rather than Policy ENV1 of the Core Strategy, which contains more strategic guidance.	No changes to the document are proposed as a result of this representation.
Policy SDP2	29		We have already have a row of fairly new terraced houses (The Bullion) in full view of visitors which, few would not argue, are very poorly designed. We also recently have had the Filter Works approved for building which will now be seven new properties. As this was an existing building, there was no real objection to the principle, however, none of the new houses, as far as is known, are being bought and occupied by those in the village. There is now considerable resistance to a housing development application on the filter beds which was the old village green before being compulsory purchased. The main objection is on the grounds of the deterioration of the character of the lane it fronts, not to mention the traffic parking and vehicle congestion on a well used walking route and meeting	Policy SDP2 looks at the distribution of new housing across Pendle. The policy states that in total the rural villages (of which Barley is one) will see 7% of the total housing provision across the borough. The footnote to the policy indicates that this will be spread equally amongst the nine settlements. However, it is accepted that this is not necessarily feasible and does not take account of the individual needs / capacity for the villages to accommodate this additional development. As a consequence it is proposed to amend the policy so that there is more flexibility for some of the rural villages to take more of the housing allocation if there is a need or the circumstances are such that they have the capacity to accommodate further	PROPOSED ACTION: Amend footnotes 103 and 104 - relating to the distribution of new housing in Rural Service Centres and Rural Villages - the new footnotes should indicate that the housing allocation should be distributed according to the individual needs of each settlement and the capacity for each settlement to accommodate the required level of growth.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			place for the village hall. I suspect that similar proposals given recognition and opportunity in your Strategy will evoke similar resistance. We do have great concern for Barley but understand that local needs need to be taken into account. (page 50). It is appreciated that there is little flat land for building left but the Parish Council would hope your planning core aspiration will be toward attempting to move toward Barley being Pendle's 'Downham'.	development. By amending the policy in this way, settlements with limited capacity (e.g. Barley) could provide less development, however, the allocation will need to be met in other locations.	
Policy SDP2	31		In summary, the Parish Council feel that is only right that Barley should be treated on merit with a presumption to protect its character rather than a general presumption for development. Barley Parish Council urge you to treat Barley as a special case and provide a presumption not to build new houses within the settlement area particularly adjacent to listed buildings. (3.73 (Policy SDP2 - 7% new housing and Policy ENV1). Your help is needed to maintain a character which is well known, frequently returned to and loved all over Lancashire	The National Planning Policy Framework (NPPF) (paragraph 14) indicates that the planning system is based on a presumption in favour of sustainable development. It reiterates the basis of the planning system whereby planning applications are judged against the policies in the development plan - where the application meets these requirements planning permission is granted. In some instances there may be material considerations that over rule the policy requirements of the plan. Barley cannot be treated as a special case, however, the location of the village within the AONB offers the village more protection than other rural settlements in the borough (see Policies ENV1 and ENV2 of the Core Strategy). It is noted that there are limited opportunities in Barley for further development - this coupled with the changes proposed to Policy SDP2 (see officer response to comment 29) should ensure that inappropriate development is avoided.	No changes to the document are proposed as a result of this representation.
Policy ENV1	32		In summary, the Parish Council feel that is only right that Barley should be treated on merit with a presumption to protect its character rather than a general presumption for development. Barley Parish Council urge you to treat Barley as a special case and provide a presumption not to build new houses within the settlement area particularly adjacent to listed buildings. (3.73 (Policy SDP 2 - 7% new housing and Policy ENV 1). Your help is needed to to maintain a character which is well known, frequently returned to and loved all over Lancashire.	Barley cannot be treated as a special case; however, the location of the village within the AONB offers the village greater protection (Policies ENV1 and ENV2 of the Core Strategy). It is noted that there are limited opportunities in Barley for further development - this coupled with the changes proposed to Policy SDP2 (see officer response to comment 29) should ensure that inappropriate development is avoided. Development affecting the setting of listed buildings is considered on a case by case basis. It is a requirement of national planning policy that any such development should not affect detrimentally the setting of such buildings.	No changes to the document are proposed as a result of this representation
Policy ENV1	30		Barley is protected under Forest of Bowland AONB SPG 2003, which is, we believe, fully endorsed by Pendle Borough Council. It is paramount that this policy is at least maintained and ideally enhanced to protect the historic character of the village which Pendle Borough Council are so eager to promote.	The SPG is currently a 'saved' document. It will be replaced with a Supplementary Planning Document in the future which will support Policy ENV1's commitment to protecting and enhancing the Forest of Bowland AONB.	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
474591	Barnoldswick Town Council			Mr Richard Nelson	
Policy SDP2	977	No	In relation to Spatial Strategy Policy SDP2 it is the opinion of the council that 16% of new housing allocated to the West Craven towns is far higher than the foreseeable requirement, and even recognising infrastructure restrictions in the early years of the plan, the balance between Barnoldswick's share at 10% to the rest at 6% is an imbalance which will lead to significant over supply of new build accomodation and continued decline of Terraced Housing Market which makes up the core of the town and is part of its intrinsic culture and heritage. Unless building is restricted to Brownfield sites, continued erosion of Green Space within and on the periphery of the town will continue to proliferate to the detriment of the town, its culture, its community spirit and its residents as a whole.	The distribution of 16% of the housing requirement to the West Craven Towns is made up of 10% to Barnoldswick and 6% to Earby. Other settlements (e.g. Kelbrook, Sough, Salterforth) in the West Craven area come under the Rural Service Centre / Rural Village category. The distribution of new housing is based on a number of factors including current and future population and household trends, past completion rates, land availability, and housing need. Policy SDP2 indicates that the majority of new housing will be concentrated in the M65 Corridor (71% of the total provision). This is where the majority of the population live and where future growth is expected to be concentrated. The proposed distribution of 10% to Baroldswick reflects the current population levels, past growth rates and Barnoldswick's status as a Key Service Centre. When looking at the actual amount of new housing (taking the figures from Policy LIV1) the 10% equates to circa 300 dwellings over the next 15 years. To put this into perspective, there has been 195 new dwellings built in Barnoldswick over the last 8 years - so it is of a comparable amount. The level of provision of new housing is not intended to undermine the housing market but to compliment the existing offer. Policy LIV4 requires developers to have regard to the house types that are needed in the area. In a functioning housing market there needs to be a choice of different types of housing - this includes the existing terraced housing stock which can play a key role in the housing ladder. Policy SDP6 requires that developers follow a sequential approach to site selection and that brownfield sites are utilised in the first instance as a priority. The distribution of 10% of the housing allocation to Barnoldswick is a reasonable level to meet the needs and ambitions of the area.	No changes to the document are proposed as a result of this representation.
Policy SDP3	1027	No	In relation to Spatial Strategy Policy SDP3 it is the opinion of the Council that the provision of Employment Land to be provided under this policy is far too high. (Barnoldswick's share being 13% of the borough total, again heavily skewed in the early years because of infrastructure constraints). Recognising that the town has only three Major Employers - Rolls Royce, Silentnight and Hope Technology - the first of these having completed a recent major expansion of facilities in the town, the second having just survived a major bankruptcy scare and the third	Policy SDP1 indicates that Barnoldswick, like Nelson and Colne, is considered to be a Key Service Centre. However, although Barnoldswick exhibits the characteristics of a Key Service Centre, it does so within the context of West Craven. Its role within the borough as a whole is less influential due to its relative isolation and more limited range of services. This is reflected in the proposed distribution of employment land, which at 13% is significantly below that identified for the M65 Corridor as a whole (78.5%). This figure is also in	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			whose business plan projects steady grown not a dynamic expolsion.	line with the percentage of the current population, recent housing and employment land completions and proposed housing distribution in Barnoldswick, which are between 10-11% of the borough total. The proposed figure of 13% acknowledges that there is limited potential for local employment growth, but also recognises that a larger allocation for Barnoldswick is not justified by the available evidence and would not promote a spatial pattern of development that could be considered sustainable in terms of existing infrastructure and service provision. It also seeks to improve the range, quality and choice of sites available, in order to help retain employment locally and attract new investment that will both compliment existing provision and help to diversify the local economic base.	
Policy ENV3	1029	No	In relation to the Foundation for a Sustainable Future, Policy ENV3, which deals with the topic of Renewable and Low Carbon Energy Generation. Whilst in general the Town Council is supportive of efforts to reduce the areas dependence on Carbon Fuels by alternative energy sources and will encourage their use in new developments, the council has serious reservations about the land identified as suitable for Wind Turbine Installations. Under this policy only North East quadrant of the surrounding countryside of Barnoldswick is spared designation as potential for Wind Turbine installation. Three quarters of the town could be enclosed in a ring of trubines by the Pendle startegy whilst the only undesignated sites lie on the Drumlin Field to the North and East which West Craven Borough Council wishes to designate as suitable for similar installations. Our heritage is based on these very geographical features that provide Barnoldswick the best possibilty of optimising the Tourist Trade to the advantage of the town and Pendle Borough as a whole. To destroy this resource before it has been fully developed would seem to be rather short sighted approach to a sustainable future.	7.80 summarises the findings of the evidence base study which includes reference to maps which show the areas of opportunity and constraints to highlight the most suitable areas for wind development. This is based on an analysis of suitable wind speeds and removing areas of most constraint e.g. national landscape and wildlife designations, proximity to settlements, roads and railway etc. However, this is a high level, theoretical analysis and it is not to say thatthis land identified as potentially suitable would be, due to individual site level constraints such as visual and landscape impact, proximity to isolated dwellings etc. Only at an application stage could these more detailed levels of analysis be carried out because they depend on the specifics of a development i.e. the specific heights/sizes and individual siting of the turbines. Thereforethe policy does not go on to allocate these areas for wind development and refers only to them in the 'context' section of the chapter. The policy itself also sets clear criteria that wind farm (and other RLC developments) will only be acceptable where they do not have an detrimental impact on designated areas and also are off an appropriate scale for their setting and do not have an unacceptable impact on the landscape or visual character of an area, the value of any heritage assets or residential amenity. Inevitably there would be some loss of visual or landscape quality in areas developed for wind farms but it is about finding a balance between protecting the most valuable areas and securing a low carbon energy supply for the UK moving forward.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV4	1066	No	In relation to the Foundation for a Sustainable Future, Policy ENV4, dealing with Strategic Transport Schemes, it is noted that Barnoldswick will remain isolated and will remain the largest town in England not to be serviced by Rail, Motorway or Major A Road. Whilst in itself being isolated could have tourist advantages a lack of a major transport infrastructure seriously impedes the attraction of industry or commercial development. This factor seems to have been brushed aside in the growth forecasts for housing and industrial land allocations previously mentioned. Recognising the extended timescale applied to the development plans for Skipton - East Lancs Rail Link and the provision of road link upgrade in the Colne - Skipton transport corridor, no transport infrastructure improvements will benefit Barnoldswick for at least the next 10-15 Years. It is difficult to reconcile this lack of transport development with the growth forecasts projected in the short term planning requirements.	The forecasted amount of development for both housing and employment is set at a level that can be accommodated within the existing settlements. Barnoldswick is receiving less development than Nelson and Colne - this recognises that it is of a different scale to Nelson and Colne and that there are constraints such as accessibility. The proposed level of growth for Barnoldswick is consistent with the approach to future strategic transport provision. It should be noted that Policy ENV4 supports and encourages the improvement of public transport links through contributions from new development.	No changes to the document are proposed as a result of this representation.
619563	Barrowford Parish Council			Mr Eric Jackson	
Chapter 4: Vision	660	No	I have serious concerns that Barrowford Village is being included in the M65 Corridor particularly because it is a rural area more akin to the surrounding villages than the urban areas of Nelson, Brierfield and Colne. Traffic congestion is already a major problem and excessive development with wither housing or employment will cause it to become critical.	Barrowford is part of the urban belt that runs along the M65 Corridor. Although it has links to the rural areas in Pendleside to the north and west, it is a much larger settlement than those within this 'spatial area' and clearly urban in character. This is reflected in the DEFRA urban/rural designations, which classify barrowford as urban. The levels of development proposed in the Core Strategy for Barrowford reflect its status in terms of its size (both area and population), the level of service provision, access to facilities and its function as a local service centre.	No changes to the document are proposed as a result of this representation.
327467	Barrowford Parish Council			Mr Iain Lord	
Chapter 1: Introduction	648		Purpose of the Core Strategy (Preferred Options Report) The core strategy is the broad framework on which local planning decisions are made, the main purpose is to set the direction and vision for Pendle over the next 15 years. That vision is described in paragraph 1.4 of the Preferred Options report stating 'Everything we do is about achieving a better future for Pendle and the people who choose to live, work, learn or visit our community. This means providing: • Good quality affordable homes that meet the needs of our residents; • Educational opportunities that allow our children to reach their full potential; • A diverse range of jobs that enable young people to meet their aspirations locally; • A selection of shops and services	Agreement noted. Comments on the seven key priorities identified by Barrowford Parish Council are addressed at relevant points in the document.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			that cater for our daily needs; • Open space, leisure and cultural facilities that allow us to enjoy rewarding, happy and healthy lifestyles; • All connected by an efficient and sustainable transport system.’ So the purpose of the Core Strategy is to define the spatial expression of this vision by ‘setting a series of strategic objectives and planning policies that will help to deliver this vision’. Barrowford Parish Council fully supports the purposes outlined above and are putting forward seven key Priorities’ as to how to achieve them.		
Chapter 3: Our Spatial Issues	1121		Key priorities for Barrowford Parish Council Following on from (our comments), Barrowford Parish Council is putting forward seven key priorities. It is accepted that some of them will require some rewriting of the current version of the Core Strategy document. The Council is willing to help with the necessary revisions (as far as resources allow) and would welcome the opportunity to be involved in the revision process. Priority 1 That the make-up of the ‘spatial elements’ of the Report (Para 3.10) are changed such that Barrowford is transferred from the M65 Corridor to the Rural Areas. (This priority is developed in much greater detail in the attached Appendix).	See response to Representation 327467/179. Also refer to Comments 1122 (Priorities 2&3), (1123 (Priority 4), 1124 (Priority 5), 1125 (Priority 6) and 1126/1127 (Priority 7).	No changes to the document are proposed as a result of this representation.
Chapter 3: Our Spatial Issues	655		Problems Being Addressed by the Core Strategy Pendle has a number of significant issues that need addressing. These are partly due to the history of the area but are also reflected in the levels of deprivation experienced across the borough and the relative deterioration in deprivation levels of the borough when compared to the rest of England. The Core Strategy is an essential element of the means of addressing these problems. Historical Issues: Colne & Barrowford were the predominant areas of both commerce and population before the coming of the railway in the mid 19th century but, because of the more direct access to the railway; Nelson and Brierfield became the new towns, rapidly expanding in the wake of the cotton industry. Colne grew at a slightly slower pace whilst Barrowford grew little in comparison. The peak years of the cotton industry saw both full employment and prosperity for all the towns, but as cotton went into decline after the Second World War these reasonably well paid semi-skilled jobs started to disappear until by the turn of the 21st century they had all but disappeared. The loss of this major industry and the supporting trades has left a lack of lower to middle income employment opportunities within Pendle.	The spatial portrait sets out the key characteristics of the borough and highlights any issues that need to be addressed. It is the purpose of the strategic planning policies (Chapter 6 onwards) to address these issues. Policy SDP3 addresses any spatial inequalities in employment provision and seeks to provide sufficient employment land to address any imbalances and meet future needs. Policy WRK1 addresses the nature of local employment. It supports the creation of new job opportunities to address the areas identified needs, as set out in three key documents: the Integrated Pennine Lancashire Economic Development Strategy, the Pendle Sustainable Community Strategy and the Pendle Employment Strategy.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 3: Our Spatial Issues	179		Impact of Core Strategy on Barrowford (Key priorities 1 and 2) Paragraph 3.10 of the Preferred Options Report states ‘... three clearly identifiable spatial elements have emerged in Pendle, each with its own distinctive characteristics and unique opportunities (based on the Index of Multiple Deprivation (IMD) groups): 1 The M65 Corridor – Nelson, Colne, Brierfield and Barrowford 2 West Craven Towns – Barnoldswick and Earby 3 Rural areas – sixteen widely dispersed villages and hamlets’ Below is a brief analysis of the statistics summarised from the IMD data and the Pendle Profile data from 2009/10. More detailed data and additional aspects of the characteristics of the areas is contained in the associated Excel Spreadsheet workbook. Average IMD Score Range IMD Rank (1 to 32,482) Average % Rise/Fall in Ranking Between 2004 and 2010 From To Barrowford 13.16 25084 13843 5.0 Rural 9.5 28404 15368 0.1 West Craven 19.19 23988 7928 -1.80 M65 Corridor 40.12 25212 101 -22.5 Excl Reedley 17943 101 Summary of Pendle Profile Details Popul’n %age Ethnicity Social grade White % Other % High% Mid% Low% Barrowford 4,992 5.6 97.45% 2.55% 30.27 39.30 30.43 Rural 11,926 13.4 98.11% 1.89% 35.42 35.43 29.15 West Craven 17,447 19.5 98.13% 1.87% 23.22 40.42 36.35 M65 Corridor 54,947 61.5 76.50% 23.50% 15.76 34.87 49.46 From the 2 sources of data the immediate picture that emerges is that the characteristics of the M65 Corridor area (excluding Barrowford) and the Barrowford area are completely incompatible. In deprivation terms the Barrowford’s IMD score is 13.16 while the average for the M65 Corridor is 40.12 and indication that in statistical terms Barrowford is only one third as deprived as the M65 Corridor towns. Similarly the Ethnicity and Social Grade figures from the Pendle Profile statistics demonstrate the polarising effect of the two areas. In Barrowford Parish Council’s view it is essential that Barrowford is included in the Rural Areas grouping where characteristics are much more similar. The three areas (M65 Corridor, West Craven, Rural) are on a descending scale for both Housing and Employment development needs over the life of the strategy, with the whole ethos centred on concentrating the majority of all development within the M65 Corridor. The aim of this two-fold firstly to improve the quality and choice of housing provision in areas such as Nelson & Brierfield and to bring new employment opportunities to the M65 corridor by providing sites with easy access of the M65. The first section of the report deals with the current status of Pendle as a whole and highlights the difference in life opportunities in the different parts of Pendle and the aspirations of bringing	The representation puts the case for Barrowford being included within the Rural Pendle spatial area rather than the M65 Corridor. The basis for this recommendation is that the three spatial areas identified in the Core Strategy have been defined solely on the basis of the results of the Index of Multiple Deprivation. Whilst the wording in paragraph 3.10, if read in isolation could lead the reader to believe that this is the case, it is clear elsewhere in the spatial portrait (e.g. Para 3.9) and from the evidence base that the spatial areas have not been solely defined by the results of the 2007 IMD. A wide range of factors have been taken into consideration in defining the three spatial areas in Pendle. These are set out in the Sustainable Settlements Study and include: The size of the settlement The role and function of each settlement The relationships each settlement has with adjacent towns and villages The level of service provision Opportunities for future development Constraints to future development Transport and accessibility The study concludes that Barrowford should be defined as a Local Service Centre (Policy SDP1) in recognition of the fact that it offers a range of shops, services and employment opportunities appropriate to this designation and size of settlement. In addition to being used by the local population, a number of these services and facilities are also accessed by a much larger catchment than just the settlements of Rural Pendle. Foremost amongst these are Nelson and Colne College, which remains the only tertiary education facility in the borough, and several specialist high quality retailers and employers. The Rural Pendle spatial area is made up of the Rural Service Centres and Rural Villages defined in Policy SDP1 of the Core Strategy. These are much smaller settlements, in terms of population and level of service provision than Barrowford. The policy focus in Rural Pendle is to protect and enhance the character of the countryside and historic rural settlements. Just as Earby is distinct from Barnoldswick, but forms an integral part of the West Craven Towns spatial area, the level of service provision in Barrowford indicates that although it may be distinct demographically it functions as an integral part of the M65 Corridor spatial area, where the individual settlements collectively provide a range of services for their indigenous population and those people living in the rural settlements in the south of the Borough. The level of development already identified in the vicinity of Barrowford	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			more equality across the borough whilst allowing each defined area to have aspirations of self improvement over the next 15 years. The Core Strategy statistically tries to link different towns and villages together into areas with similar needs and aspirations. The difficulty with this approach is that whilst Barnoldswick and Earby is a good match and the Rural Villages are linked by size and remoteness, some with the added protection of being designated ANOB or SAC or SPA the M65 Corridor is the only one of the three proposed groupings that does not accord with the ethos of similar character, current status and aspirations. No where is this mismatch more clearly shown than in the inclusion of Barrowford within M65 Corridor, Barrowford is currently a thriving village which although in close proximity to the M65 does not share the level of deprivation of its neighbouring larger towns of Nelson, Brierfield and Colne. Barrowford does not share any statistical similarities including economic, housing, social, or deprivation with its larger neighbours but accords with many of the rural villages. This fact is already reflected in the Core Strategy. The level of education and employment potential varies immensely across the borough with the rural areas probably having both the highest take up of further education whilst having the lowest unemployment rates coupled with a much higher percentage employed in either blue collar or white collar professions. This level of affluence is repeated in Barrowford and is in marked contrast to wards of Nelson that abut Barrowford. The lag between Brierfield and Nelson at most levels when compared to the whole of Pendle need to be addressed to allow the borough to prosper as a whole and develop into the sort of place where people wish to live. To achieve this, the Core Strategy should be primarily aimed at meeting the needs of Brierfield, Nelson and to a lesser extent Colne. All three need to reach a par with Barnoldswick and Earby and then Barrowford, Fence and Higham. This can only be accomplished by using whatever funding is available to induce developers and industrialists to want to come to Pendle and build housing developments within these areas of most need or locate their businesses within easy reach of these larger population areas. Barrowford Parish Council believes that this will not be easily achieved if Barrowford is retained in the M65 Corridor for a variety of reasons:	also suggests that its place is within the M65 spatial area. The Sustainable Settlements Study highlights that Barrowford has three potential development sites of over one hectare (Table 3K), the largest number of such sites outside the three Key Service Centres, and that it scores highly in terms of its overall sustainability (Table 3L). The area alongside Junction 13 on the M65, between Nelson and Barrowford, is a key location for future employment growth. This is centred on Nelson and Colne College, which opened its campus at the gateway to the village in 1972. However, it was the arrival of the M65 motorway in the late 1980s, which opened up access to land immediately north of the college. A 23ha area in the open countryside (Area of Special Landscape - Policy E3) to the west of the college campus, around Trough Laithe Farm, was identified in the 1999 Pendle Local Plan, as a site which represents an area of choice for possible future development to meet future long-term requirements (Protected Area - Policy E2A). A specific end-use is not defined within the policy. This designation, in a modified form, was retained by the Inspector at the 2005 Inquiry for the Replacement Pendle Local Plan (Policy 3A). To the south of this site construction work started in 2009 on a 10 hectare site alongside the A6068, close to the motorway junction (J13). Riverside Business Park effectively represents the first phase in the development of the land to the west of the college. The principle of development at this location is therefore well established, the land being identified and designated in the late 1990s and having passed through two Local Plan Inquiries. The Employment Land Review identifies two commercial property markets in Pendle and includes Barrowford within the M65 Corridor. The village of Barrowford is separated from Nelson by Junction 13 on the M65 motorway. It is linear in form with its differing characteristics clearly noticeable as you pass from south to north along the A682. Former textile mills and terraced housing similar to that found in Nelson are typical of the Newbridge area. Towards the centre of the village older cottage properties line the A682, whilst behind the main road 1960s and 1970s housing estates predominate, finally giving way to larger executive homes with substantial gardens in the Higherford area. This built form confirms that whilst Barrowford retains its separate identity, it is clearly an integral part of the gradual transition from the high density urban housing found in the centre of Nelson, and the	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 3: Our Spatial Issues	1116		Housing: Currently areas of Nelson and Brierfield along with parts of Burnley contain some of the most deprived wards in England and have some of the lowest house prices with a large proportion of the housing stock being made up of run down two bedroom former mill worker terraces. These houses are predominantly not large enough to meet the needs of local residents, whilst the very high density of houses per hectare leaves little open or community space for improving the quality of life of residents. Attempts to remodel areas such as Whitefield have seen little success. The heritage lobby has been successful at challenging attempts to regenerate these largely boarded-up areas by forcing public enquiries to take place. This has led to a large proportion of properties abutting the town centre being empty and derelict for almost a decade. The Bradley Action Plan, to regenerate another deprived ward in Pendle, has seen modest success with the building of the Hub at Hilldrop and some external improvements to buildings along Leeds Road which form the gateway into Nelson. Brierfield again has shown some improvements through the Elevate funding but slow progress producing a master plan has ultimately led to the point where a plan is ready but the Elevate Funding has been withdrawn. The demise of Elevate leaves a large hole in the future redevelopment of deprived wards with potential future redevelopment being in a state of uncertainty. A recent publication by Richard Wilkinson and Kate Pickett “The Spirit Level – Why Equality is Better for Everyone” uses detailed analysis across nations to demonstrate that social equality results in improved living conditions for all stratus of society. Barrowford Parish Council believes that to achieve the vision set out in the Core Strategy Report, areas of high deprivation need to be raised to the levels of other parts of the Borough.	adjacent Newbridge area of Barrowford, to the rural areas to the north of the village and the M65 Corridor. Although Barrowford is well placed to serve the needs of nearby rural areas, and provides a service function in that respect, it is clearly urban and physically forms part of the extensive built-up area in the south of the borough. This is reflected in the DEFRA urban/rural classification, which groups Barrowford in with the three other towns in the M65 Corridor; namely Brierfield, Nelson and Colne. The spatial portrait sets out the key characteristics of the borough and highlights any issues that need to be addressed. The Core Strategy sets out how a land-use based planning system can make a positive contribution to the efforts of others to address spatial inequalities in the Borough. It is accepted that there is an imbalance in the local housing market, particularly within the towns along the M65 Corridor where terraced housing predominates. Policies LIV2, 3 and 4 seek to address this imbalance by encouraging new housing that meets our existing and future population needs; is designed to meet lifetime home standards; and more thermally efficient to help reduce our carbon footprint.	No changes to the document are proposed as a result of this representation.
Chapter 3: Our Spatial Issues	656		Pendle has a number of significant issues that need addressing. These are partly due to the history of the area but are also reflected in the levels of deprivation experienced across the	The spatial portrait sets out the key characteristics of the borough and highlights any issues that need to be addressed. The Core Strategy seeks to set out how a land-	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			borough and the relative deterioration in deprivation levels of the borough when compared to the rest of England. The Core Strategy is an essential element of the means of addressing these problems. Deprivation The deprivation experienced across many wards in Pendle is highlighted by the Index of Multiple Deprivation (IMD) figures discussed in section 3.16 to 3.19 of the document. Although paragraph 3.17 states that in 2007 Pendle was the 44th most deprived local authority in England (out of 354) and places Pendle just outside the worst 10% nationally, it does not highlight the huge inequalities in the distribution of deprivation across the borough. Paragraph 3.106 says, 'In Nelson, Colne and Brierfield almost half of all (constituent) areas (16 out of 34) are ranked in the worst 10% nationally and one in the Southfield area of Nelson is in the worst 1%. This means that 29,975 residents (one third of the borough's population) live in areas where significant social issues need to be addressed. Poor living conditions, poor health, and low educational attainment are both causes and the results of declining housing markets...'. The IMD figures below illustrate the level of deprivation and the disparity within the borough: Average IIMD Score Range IMD Rank (1 to 32,482) From To Barrowford 13.16 25084 13843 Rural 9.5 28404 15368 West Craven 19.19 23988 7928 M65 Corrid 40.12 25212 101 (Brierfield, Nelson & Colne) The IMD score is made up of indicators such as income, employment, health, education, housing and crime. The IMD score for Brierfield, Nelson and Colne (the M65 corridor without Barrowford) is greater than four times that of the Rural communities. The ranking of the 32,482 English areas, with the most deprived at number 1 and the least deprived at 32,482 further shows the disparity across the borough. The high 'from' ranking of the M65 Corridor represents the Reedley units. These uncomfortable results are even worse when viewed as changes over a period of time. Between 2004 and 2007 Pendle fell 27 places to 44th position in the English rankings of deprived local authorities, out of 354 authorities. Average % Rise/Fall in Ranking Between 2004 and 2010 Barrowford 5.0 Rural 0.1 West Craven -1.80 M65 Corridor -22.5 (Brierfield, Nelson & Colne) This table illustrates the percentage change in the deprivation rankings of the Pendle areas between 2004 and 2010. Nelson, Colne and Brierfield fell over 22% down the national rankings over the period while Barrowford rose 5% in the deprivation rankings over the same period.	use based planning system can make a positive contribution to the efforts of others to address spatial inequalities in the Borough. The Index of Multiple Deprivation highlights that Barrowford shares many socio-economic characteristics with the rural areas. However, as a Local Service Centre it clearly has a much larger population than the settlements considered to be typical in that spatial area - i.e. the rural service centres and rural villages identified in Policy SDP1. Barrowford is urban in character and physically part of the extensive built-up area in the south of the borough, which collectively serve the needs of more than just the rural areas.	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 6: Our Spatial Strategy	1122		Key priorities for Barrowford Parish Council Following on from (our comments), Barrowford Parish Council is putting forward seven key priorities. It is accepted that some of them will require some rewriting of the current version of the Core Strategy document. The Council is willing to help with the necessary revisions (as far as resources allow) and would welcome the opportunity to be involved in the revision process. Priority 2 That the proposed housing and industrial developments targets suggested for Barrowford are discussed and agreed with Barrowford Parish Council as part of the Core Strategy report review process. (See Appendix for detail) Priority 3 That the agreed increase in the areas for housing and industrial development form part of a discussion on infrastructure planning to go hand-in-hand with the developments. (E.g. additional junior school capacity, consideration of a senior school on the north west side of the borough, significant improvements to the road network to alleviate rush-hour congestion through Barrowford etc.)	See responses to: Priority 1: Comment 1121, Priority 4: Comment 1123, Priority 5: Comment 1124, Priority 6: Comment 1125, Priority 7: Comment 1126 and Comment 1127. With regards to Priority 2 see Comment 179. With regards to Priority 3 - Policy SDP5 sets out how infrastructure will be provided where it is required. Developers will be expected to provide mitigation of any adverse impacts to make the development acceptable in planning terms. At the site allocation stage, proposed sites will be assessed against a range of criteria including whether sufficient infrastructure is available to accommodate the development.	No changes to the document are proposed as a result of this representation.
Policy SDP2	294		Current and Future Development Land Allocation within Barrowford: Barrowford currently has planning permission for a large business park near to junction 13 of the M65, this permission has been renewed with the original permission having been granted on appeal over a decade ago. The first stage is in the process of being built with outline permission for a hotel, pub and nursery complex and further business units being in place covering 10.33ha. The remainder of the site a further 12.96ha has no current planning permission and is highlighted in the LDF Site Search as potentially either employment, housing or mixed. A further 1.88ha is highlighted as housing. The Parish Council, although not against some development of the 12.96ha above the current business park, would like to see a strip of greenbelt introduced along Wheatley Lane Road for the following reasons: • To protect Wheatley Lane Road from vehicle access to the site, as the Road narrows considerably at either end. • To protect Wheatley Lane Road from future ribbon development. • To keep the rural open appearance of the existing landscape. The Parish Council would like to see all access to any extension of the site being from Barrowford Road and would see as acceptable low density housing with open areas and high quality landscaping that helps to preserve the openness and amenity of the existing landscape or smaller B2 business units similarly landscaped or a mixture of the two.	Policy SDP2 deals with the distribution of housing across the borough. The policy indicates that 6% of the Borough's housing allocation should be located in Barrowford in order to meet housing need and growth. The Core Strategy does not allocate land for particular uses. This is done as part of the Land-use Allocations document. This site will be considered as part of that process in the future.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP3	191		Additional Employment Land: The Core Strategy highlights the need to find a further 9 hectares of employment land over the life of the strategy and although Barnoldswick, Earby, the Rural Villages and Colne have a defined amount of additional land required Brierfield, Nelson and Barrowford's allocation is lumped together at 68.5%. This means that any or all the required land can be allocated to one specific site or town. This is quite perturbing given the fact that businesses prefer to develop Greenfield sites and the major concentration falls within Barrowford.	The three employment land surveys carried out in Pendle (2001, 2007 and 2012) and an analysis of inward investment enquiries reveal that many businesses do not distinguish between the three towns accessible from Junctions 12 and 13 off the M65, but simply wish to be located close to one of these motorway junctions. As such it was considered that any breakdown between these three settlements, based on past take-up rates, would in be an artificial construct rather than a reflection of future needs, considering that they have largely co-existent boundaries. In these circumstances a less geographically specific requirement also builds in additional flexibility, which may be needed to help support business growth and meet employment land requirements over the plan period. It also meets the requirements of the National Planning Policy Framework (NPPF) "to address needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances" (Para 21 specifically, but also Paras 14 and 157). Any employment land allocations in the M65 Corridor will not focus on just one settlement, as this is neither desirable nor sustainable. The Employment Land Review (Pendle Council, 2007) identifies a range of sites across the three towns that meet different business needs.	No changes to the document are proposed as a result of this representation.
Policy ENV3	1120	Yes	Environmental Considerations: Paragraph 7.84 admits that Pendle's performance in the area of Renewable and Low Carbon Energy utilisation has been very poor with 'only 0.1 MW of its energy consumption from renewable sources. It is clear therefore, to reach the notional 2020 targets of 15.4MW of electricity and 11.8MW of heat would require a large commitment to renewable energy, which has not been the case in the borough before.' If major housing rebuilding and brownfield industrial site development was undertaken this would provide a valuable opportunity for the planners to insist on the implementation of significant renewable energy technology. This seems essential to us.	The policy requires that all new residential and commercial developments generate 10% of their predicted energy use from renewable or low carbon sources. Where development comes forward it will be required to meet this requirement. However the Core Strategy cannot force development to occur, only facilitate its delivery.	No changes to the document are proposed as a result of this representation.
Policy ENV4	1125		Key priorities for Barrowford Parish Council Following on from (our comments), Barrowford Parish Council is putting forward seven key priorities. It is accepted that some of them will require some rewriting of the current version of the Core Strategy document. The Council is willing to help with the necessary revisions (as far as resources allow) and would welcome the opportunity to be involved in the revision process. Priority 6 That the proposed M65 extension to by-pass Colne, and the A56	Policy ENV4 supports the provision of strategic transport infrastructure including both the A56 Villages Bypass and the re-instatement of the Colne to Skipton railway. These are seen as long term schemes due to the availability of funding to deliver these projects. However, the policy could be strengthened to include a statement about the Council working with partners to lobby for funding to deliver these projects.	PROPOSED ACTION: Include a statement in the policy / supporting text outlining that the Council will work with partners to lobby for improvements to the strategic transport network.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			villages to the Yorkshire border beyond Earby should be actively pursued with Lancashire County Council and central government to ensure the road (and possibly rail) links are prioritised for construction as soon as possible. (See also: Priority 1: Comment 1121, Priority 2&3: Comment 1122, Priority 4: Comment 1123, Priority 5: Comment 1124, Priority 6: Comment 1125, Priority 7: Comment 1126 & Comment 1127).		
Policy LIV1	1123		Key priorities for Barrowford Parish Council Following on from (our comments), Barrowford Parish Council is putting forward seven key priorities. It is accepted that some of them will require some rewriting of the current version of the Core Strategy document. The Council is willing to help with the necessary revisions (as far as resources allow) and would welcome the opportunity to be involved in the revision process. Priority 4 That the focus for housing policy, specifically in the M65 Corridor, becomes the two step approach of (1) demolishing much of the existing terraced housing and (2) building and managing significant numbers of Social Housing for rent through not-for-profit Housing Associations and eliminating the low-quality private rental sector as far as possible. See also: Priority 1 = C1121 Priority 2&3 = C1122 Priority 4 = C1123 Priority 5 = C1124 Priority 6 = C1125 Priority 7 = C1126 & C1127	The Government's approach to housing regeneration has changed and is more focused on bringing empty properties back into use and making better use of the existing housing stock. The regeneration schemes where demolition has taken place or is scheduled to take place will be completed using the remaining funding from the Housing Market Renewal initiative. The Core Strategy aims to create a balanced housing market through new build housing and the regeneration of the existing housing stock. The provision of more affordable housing is a key issue for the borough and the SHMA indicates that the majority of new affordable housing should be of a social rented tenure. However, the provision of new social housing can only be achieved by additional funding obtained by Housing Associations (such as Housing Pendle) or through contributions from developers of new build market housing. Policy LIV3 deals with the provision of new affordable housing setting targets for the proportion of new build housing that should be affordable where this is viable.	No changes to the document are proposed as a result of this representation.
Policy LIV1	1117	Yes	Radical Reassessment of Housing Policy In our opinion there are two* series of changes required to address the housing problem in Pendle. As discussed above, housing is a significant aspect of the dreadful deprivation 'performance' in parts of the Borough. (Firstly,) the situation can only be improved in the long term by innovative housing schemes with demolition and redevelopment of many of the dilapidated terraces particularly within Bradley and Brierfield. This could be further enhanced by the practical reuse of old employment sites situated away from the M65 such as the former mill sited at the top of Brunswick Street . This could be accomplished either by demolition or redesign of the existing fabric. The major need is for larger higher quality homes with more open community space within Brierfield and Nelson. The recent decision for the former Riverside Mills at Crawford Street and Reedyford Mill situated off Scotland Road to be allocated for housing should be reassessed in the light of recent government planning changes and removal of housing	The Government's approach towards regeneration has shifted in recent years and is now more focused on bringing empty homes back into use rather than large scale demolition and redevelopment schemes. Projects that the Council has started such as those in Brierfield and Bradley will be progressed and funding will be used to allow the redevelopment of these sites to take place. There is now very little funding available to continue regeneration in this way. Alternative approaches will need to be progressed. The Core Strategy aims to promote private investment and partnership working to help the regeneration of deprived areas. With specific regard to the use of old employment sites away from the M65 - the Core Strategy includes a sequential approach which directs development to Brownfield sites in the first instance. This would include the reuse of old employment sites where the employment use is no longer viable or appropriate in the specific location. The	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			regeneration funding. Future use of these two sites and others abutting Nelson centre could if developed sensibly for employment help provide the additional footfall and customers to reinvigorate the retail sector within Nelson centre. *(also see comment 1118 under LIV 3)	protection of employment areas for employment uses will only be used for the most prominent employment sites. Sites like Brunswick Street are unlikely to be afforded protection - giving the flexibility for the reuse of the site for an alternative use should the employment use cease. The Core Strategy does not allocate sites for housing or employment. The Riverside Mills site has been allocated in the Bradley Area Action Plan primarily for housing but also to include some employment space where this will help to deliver the housing element of the site. This plan was prepared following extensive consultation with the local community and was approved by an independent inspector at examination. The redevelopment of this site for housing is being progressed privately and without Council funding. It is seen as the key development site in Bradley that will help to regenerate the area. Although the site was formerly protected for employment use in the Replacement Local Plan it was never taken up for employment and had remained vacant for over 10 years. With regards to the Reedyford Mill site - this site is not allocated for housing. It has a residential planning permission but an employment use on the site would still be acceptable if a suitable use came forward. Policy LIV1 aims to create a balanced housing market that allows for housing growth while also securing housing and neighbourhood regeneration. The Land-use Allocations Development Plan Document will allocate the sites to delivery this aim.	
Policy LIV2	1128		Barrowford Housing Needs: Barrowford suffers from the opposite problem of the M65 towns, in that high property values and a shortage of affordable social enterprise family homes and smaller properties, at an affordable cost make Barrowford a difficult location to establish a home for many people wishing to remain or relocate into Pendle. Barrowford Parish Council would support the provision of an extra 6% of the housing requirement until 2026 highlighted in the Core Strategy, if a large proportion of these houses were smaller social enterprise homes to meet the needs of younger people living within Barrowford who cannot afford to remain living independently of their parents. To this end the Parish Council has highlighted sites primarily owned by the Borough to be allocated for these types of development within the Housing Land Availability Strategy. The problem is emphasised by the disproportionate sale value of identical properties within the M65 corridor compared to Barrowford, with terraced house	The SHMA indicates that Barrowford Ward has a lower proportion of social rented accommodation compared to other tenures. This is also an issue in the wards of Whitefield and Walverden - both of these wards are also in the M65 Corridor. In terms of property prices Barrowford Ward does have higher prices than the majority of wards in the M65 Corridor. However, the wards of Reedley, Marsden and Vivary Bridge also have relatively high prices compared to other wards in the M65 Corridor. So high prices are not solely an issue in Barrowford. Policies SDP2 and LIV1 deal with the distribution and amounts of new housing respectively. Following an analysis of a number of factors (past trends, population projections, land availability etc) it is considered that 6% of the housing requirement should be located in Barrowford. The NPPF indicates that Local Planning Authorities should plan for a mix of housing based on current and future demographic and market trends	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			prices being on average 60% higher in Barrowford than Nelson and Brierfield. This makes the village more attractive to developers and led to the creation of several large housing estates within the last 30-40 years. Barrowford is at the point where saturation level has almost been reached for more expensive properties, with the need over the next 15 years being for affordable housing and smaller starter/single occupier homes. These are not the type of work most developers wish to invest in as profit margins are low. The creation of an adequate number of these homes as part of a section agreement on a large estate would not be feasible within Barrowford and perhaps Community Right to Build Schemes or Neighbourhood Development Plans are the only realistic option to achieve this.	and the needs of different groups of people in the community. The evidence (SHMA) indicates that in Barrowford the need is for smaller market dwellings and larger affordable dwellings. In terms of the overall housing need the SHMA indicates that there is nearly an equal need for market and affordable housing. Barrowford is ranked in the middle section of the wards within the Housing Market Area in terms of whether there is a greater need for market or affordable housing (see SHMA Table 12.2). The overarching aim of Policy LIV2 is to identify the different types of housing need in the borough (in terms of the needs of different groups of people - including families). The provision of affordable housing is dealt with under Policy LIV3. Information from the SHLAA will be used to inform the preparation of the Land-use Allocations DPD - to help decide which sites are suitable for allocation. However, should the Parish Council wish to pursue a Neighbourhood Plan or Community Right to Build order then they may be able to include additional affordable housing provision as they see fit.	
Policy LIV3	1118		Radical Reassessment of Housing Policy In our opinion there are two* series of changes required to address the housing problem in Pendle. As discussed above, housing is a significant aspect of the dreadful deprivation 'performance' in parts of the Borough. (Secondly), there is a need to review the rented stock of housing in Pendle. Paragraph 3.34 of the document says, 'The profile of the rented stock differs markedly from the national profile with private rented housing (18%) significantly higher than the national average (11%) and the overall proportion of social rented housing significantly lower at 11% compared to 18%.... Older homes, which dominate the private rented sector, tend to have a lower energy efficiency rating, a major factor in contributing to fuel poverty.' This points to the need to encourage Social Housing Associations to build modern, efficient housing for long term secure renting and to encourage the current residents of private renting to move to the purpose built schemes. The clearance of existing terraced areas and the rebuilding of Social Housing schemes would make a significant contribution to the reduction in deprivation. *(also see comment 1117 under LIV 1)	Policy LIV3 requires developers to provide a proportion of new dwellings as affordable units in new housing schemes. The policy requires that 80% of this provision should be of a social rented tenure. Social housing providers (RSLs/HAs) are required to meet certain standards for energy efficiency when providing new units. The demolition of the existing terraced stock to provide new housing is underway in some of the Borough's regeneration areas (e.g. Bradley in Nelson, the canal corridor in Brierfield and Churchfields in Colne). However, this approach is no longer the favoured method for regenerating deprived areas. The renovation of the existing terraced housing stock is considered to be a better use of resources. Where these are acquired and renovated for social / affordable housing they must meet the decent homes standards. Policy LIV4 encourages the use of the BREEM for Refurbishment scheme - which includes improving the energy efficiency of such properties. There needs to be a balance between different tenures including private rented properties as these still have a role to play in the housing market / housing ladder. The requirements of Policies LIV3 and LIV4 aim to increase the provision of energy efficient, social housing (as far as possible through the planning system).	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK2	1124		Key priorities for Barrowford Parish Council Following on from (our comments), Barrowford Parish Council is putting forward seven key priorities. It is accepted that some of them will require some rewriting of the current version of the Core Strategy document. The Council is willing to help with the necessary revisions (as far as resources allow) and would welcome the opportunity to be involved in the revision process. Priority 5 Those areas of land suitable for industrial/commercial use, particularly in the M65 Corridor, are retained for industrial/commercial use and not disposed of for private housing development.	The supporting text notes that the loss of employment land will only be considered where business uses may no longer be the most appropriate long-term use for that site (Paragraph 11.43). Both the supporting text (Paragraphs 11.44 and 11.43) and the policy itself highlight the intention to retain employment sites and that those given 'protected' status will be sequentially preferable. The protection of these sites will be secured through the Land-use Allocations DPD and thier extent identified on the accompanying Proposals Map. Also refer to comments C1121,C1122, C1123, C1124, C1125, C1126 & C1127.	No changes to the document are proposed as a result of this representation.
Policy WRK2	1119	No	Local Employment Schemes: Our view is that industrial land within the urban core should be retained for industrial use both to improve employment prospects for local people and to encourage workers to utilise local facilities. During the construction of the M65 and when it reached Pendle there was a presumption that most employment sites would be situated within easy reach of a junction which led planners to earmark larger sites within a narrow corridor along the M65 irrespective of their current designation but preferably Greenfield. This led to the squandering of less sensitive locations such as the industrial sites along the North Valley at Colne, which have been diverted from industrial use into supermarkets, restaurant chains and other retail outlets. This not only reduced the vibrancy of the main shopping centres of Colne and Nelson but removed these prime sites for industry. This short sighted approach of using existing suitable brownfield sights (sic) for retail or housing has led to an increase in pressure to provide alternative sites and the only easily available sites lie within either the Green Belt or Open Space and are mostly within or adjacent to Barrowford. Our opinion is that the potential shortfall of additional employment land of 9 hectares could be met by the re-use of two large former employment sites situated near to the M65 within the Nelson urban core, Riverside Mills and Reedyford Mill. These two former mill sites could provide employment opportunities in the areas where they are needed and within the life of the Core Strategy, as both are currently empty and available. The use of these sites would also have the added benefit of easy access to both foot traffic and bicycle access from large areas of Nelson and are already sited on main public transport routes whilst within 1km of the M65. Unfortunately these sites are now not solely earmarked as employment land.	The Council acknowledges that industrial land should be retained within the urban core, where this continues to meet the needs of modern business. Policy WRK2 seeks to protect a hierarchy of sites (Brownfield and/or Greenfield) that are best in terms of both quality and location to meet the Borough's future employment needs. The policy restricts non-business uses within the Protected Employment Areas; nine of which are currently designated in the Replacement Pendle Local Plan (2001-2016). The continued validity of these designations and possible additions will be reviewed during the preparation of the Land-use Allocations DPD. In the North Valley topographical constraints (i.e. steep valley slopes, the culverted North Valley Stream and proximity of residential properties) limited the potential for redevelopment for traditional industrial uses. A mixed-use scheme comprising smaller-scale retail and employment uses was seen as the best solution for the area. Other locations, with more immediate access to the motorway were seen as offering a more attractive and viable proposition for facilitating the expansion of local businesses and attracting inward investment. The demand for large, attractive and accessible employment sites in the M65 Corridor remains largely unfulfilled in Pendle, and this has been highlighted in responses to the 2007 and 2012 employment land surveys. The representation states that undue pressure is being placed on Greenfield development in, or adjacent to, Barrowford, as a result of employment sites in Nelson, which are well located in relation to the motorway have been allowed to go for housing. Policy WRK2 seeks to protect a hierarchy of sites (Brownfield and/or Greenfield) that are best in terms of both quality and location to meet the Borough's future employment needs. The identification of these sites will be carried out in the	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				preparation of the Land-use Allocations DPD that follows on from the Core Strategy. What the Core Strategy establishes in Policy SDP3 is that the overwhelming need for employment land is in the M65 Corridor, which has the greatest levels of demand and regeneration need. This largely unfulfilled requirement for large, attractive and accessible employment sites in the M65 Corridor is backed up by the findings of the 2007 and 2012 Employment Land Surveys. The two sites mentioned by name in the representation (Riverside Mills and Reedyford Mill) are both situated within the Nelson Housing Market Renewal area, where regeneration of the housing offer is seen as a priority. The two sites in question are seen as catalysts for the future revitalisation of the local housing market. In the case of Riverside Mills, its re-allocation for housing has been a long process. Protected Employment Area status was removed from the site in the Replacement Pendle Local Plan, which was adopted in May 2007. The allocation of the site for housing was subsequently taken forward in the Bradley Area Action Plan DPD, which was adopted in July 2011. This process from start to finish has taken nine years (i.e. 2002-2011). During this time there has been ample opportunity to submit representations and debate the loss of employment land. The Reedyford Mill site has not previously been identified as a Protected Employment Area. Access constraints from the A682 (Scotland Road) and via Pendle Street (weight restriction on the bridge over the canal) make the redevelopment of the site for employment generating uses somewhat problematic. The absence of a specific planning policy designation does not preclude its future re-use for employment, but opens up the potential for the site to be redeveloped for a range and mix of uses that could make a valuable contribution to the regeneration of the area.	
Policy WRK2	311		Barrowford's Future Employment Aspirations: The Barrowford Parish Plan and Barrowford Parish Council sees future employment potential developing either in the B2 sector for which the Riverside Business Park is designated with the higher quality of design which accords with the ethos of the village. The Parish Council sees this type of employment being supplemented by servicing the emerging tourist and visitor needs. These aspirations will come under pressure because most of the Greenfield sites available along the M65 Corridor fall within or adjacent to Barrowford with little available Greenfield sites on the Nelson side of the M65. The potential shortfall of	The representation refers to future employment potential being "in the B2 sector for which the Riverside Business Park is designated." The Riverside Business Park is allocated for B1 uses (light industrial, research & development and office uses) in the Replacement Pendle Local Plan (2001-2016). The reference to 'higher quality design' which follows implies that the consultee intended to refer to B1 and that the reference to B2 is likely to be a typographical error. This was confirmed by email on 6 th February 2012. It is on this basis that the following comments are made. The representation states that undue pressure is being placed on Greenfield	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			additional employment land of 9 hectares could be met within Barrowford by use of Greenfield sites or by the reuse of two large former employment sites situated near to the M65 within the Nelson urban core. These two former mill sites within Nelson close to the M65 could fulfil the employment requirement in the M65 Corridor excluding Colne for the life of the Strategy. The use of these sites would also help meet the lower carbon emissions requirements by the easy access for both foot traffic and bicycle from large areas of Nelson with Reedyford Mill being sited on a bus route. Use of these former employment sites would allow these Greenfield sites to be retained as a land bank for potential longer term future needs.	development in, or adjacent to, Barrowford, as a result of employment sites in Nelson, which are well located in relation to the motorway have been allowed to go for housing. Policy WRK2 seeks to protect a hierarchy of sites (Brownfield and/or Greenfield) that are best in terms of both quality and location to meet the Borough's future employment needs. The identification of these sites will be carried out in the preparation of the Land-use Allocations DPD that follows on from the Core Strategy. What the Core Strategy establishes in Policy SDP3 is that the overwhelming need for employment land is in the M65 Corridor, which has the greatest levels of demand and regeneration need. This largely unfulfilled requirement for large, attractive and accessible employment sites in the M65 Corridor is backed up by the findings of the 2007 and 2012 Employment Land Surveys. The two sites mentioned by name in the representation (Riverside Mills and Reedyford Mill) are both situated within the Nelson Housing Market Renewal area, where regeneration of the housing offer is seen as a priority. The two sites in question are seen as catalysts for the future revitalisation of the local housing market. In the case of Riverside Mills, its re-allocation for housing has been an extremely long process. Protected Employment Area status was removed from the site in the Replacement Pendle Local Plan, which was adopted in May 2007. The allocation of the site for housing was subsequently taken forward in Policy AAP1 of the Bradley Area Action Plan DPD, which was adopted in July 2011. From the start of work on preparing policies for the Replacement Pendle Local Plan (2002) to the adoption of the Bradley Area Action Plan (2011) has taken approximately nine years to complete. During this time there have been a number of opportunities to submit representations on the proposals and debate the loss of employment land. The Reedyford Mill site has not previously been identified as a Protected Employment Area. In 2012 the mill was under-utilised, but remained in active employment use. Access constraints from the A682 (Scotland Road) and via Pendle Street (weight restriction on the bridge over the canal) make the redevelopment of the site for employment generating uses somewhat problematic. The absence of a specific planning policy designation does not preclude its future re-use for employment, but opens up the potential for the site to be redeveloped for a range and mix of uses that could make a	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK3	1126		Key priorities for Barrowford Parish Council Following on from (our comments), Barrowford Parish Council is putting forward seven key priorities. It is accepted that some of them will require some rewriting of the current version of the Core Strategy document. The Council is willing to help with the necessary revisions (as far as resources allow) and would welcome the opportunity to be involved in the revision process. Priority 7 That tourism (see also comment 1127) and retail facilities are recognised as essential components of the borough's future planning and will be supported and encouraged to contribute to the quality of Pendle life.	valuable contribution to the regeneration of the area. Also refers to C1121, C1122, C1123, C1124, C1125, C1126 & C1127. This response only relates to the retail elements of the comment relevant to Policy WRK3. The importance of the retail function in Barrowford is recognised by its inclusion within the second tier of the retail hierarchy for Pendle (Policy SDP5), and its designation as a local shopping centre. As such Barrowford is regarded as one of six key locations in the borough where retail developments should be located.	No changes to the document are proposed as a result of this presentation.
Policy WRK4	1127		Key priorities for Barrowford Parish Council Following on from (our comments), Barrowford Parish Council is putting forward seven key priorities. It is accepted that some of them will require some rewriting of the current version of the Core Strategy document. The Council is willing to help with the necessary revisions (as far as resources allow) and would welcome the opportunity to be involved in the revision process. Priority 7 That tourism and retail (see also comment 1126) facilities are recognised as essential components of the borough's future planning and will be supported and encouraged to contribute to the quality of Pendle life.	Also refer to comments C1121, C1122, C1123, C1124, C1125, C1126 & C1127 The importance of existing tourist facilities in Barrowford is clearly recognised. However, opportunities for further development are likely to be restricted to commercial premises within the town centre. Policy WRK3 and policies in the subsequent Land-use Allocations and Development Principles DPD seek to achieve a balance between town centre uses that will support rather than undermine the retail function of the local shopping centre, and vice versa.	No changes to the document are proposed as a result of this representation.
648853 Colne and District Committee					
Policy ENV3	1130		1) Policy ENV3 be amended to read "the potential generating estimate from wind turbines contained within the Core Strategy is 15.3 megawatts, this should be reduced with a stronger commitment to solar, hydro, biomass and geothermal alternatives. 2) The principle of community energy schemes should be extended to mean the whole of the Borough of Pendle. 3) If, in future, community wind turbine companies are considered necessary in Pendle, they contribute towards the Council's services to mitigate against the negative impact on our countryside. 4) It is the view of this Committee that non of the sites which have been identified on the map in the Draft Core Strategy, which are either located in the Colne and District area or seen from the Colne and District area, should be allocated as being suitable for wind turbines in the Core Strategy. 5) When the Government targets for low carbon electrical generation are achieved, further wind turbine erection should be discouraged. 6) Policy ENV3 is incompatible with the aims of Policy LIV1	The 'target' of 15.4 MW is not purely a wind energy requirement. It is intended to be achieved through a mix of technologies, although it is accepted that with the current types of technology available the largest contributor is likely to be wind power. It is accepted that community energy schemes may be suitable outside of urban areas and therefore any distinction between areas will be removed in the revised policy. Community wind turbines as a specific delivery mechanism are not an element of this policy. Any proposed wind development would be considered on a case by case basis against relevant policies. There are no specific sites allocated as suitable for wind energy in the core strategy. The maps are contained in The South Pennines Renewable and Low Carbon Energy Study (Maslen Environmental, 2010). Any applications for wind turbines would be considered on a case by case basis. The policy makes clear in protected areas such as AONB's that wind	PROPOSED ACTION: To remove restriction on community energy schemes.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			(Protection of Landscape) and Policy WRK4 (Enhancing Landscape for Improved Tourism).	farms will not be permitted where they conflict with the purposes of the designation. The 'targets' in the policy are not government targets but locally set targets which are in place to ensure that Pendle contributes its fair share of the nations RLC energy needs, as stated in the policy. They are set to encourage renewable and low carbon energy schemes but are not intended to be a ceiling or indeed a minimum. It is a positive aim for the plan to achieve. Policy ENV3 is not incompatible with other policies in the core strategy. It makes clear that in those landscape that are protected for their value, development which would be detrimental to this would not be allowed.	
619994	Colne Golf Club			A Lonsdale	
Policy ENV3	997		I wish to make comment in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind tourbine over other reneable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be of outstanding natural beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy. - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives. I hope that my comments will be placed before elected members and I look forward to your response to these points in due course.	This representation was submitted and received following the publicised closing date for the public consultation, on Monday 12th December 2011. It is for Members of the Council's Executive to decide whether to accept this representation. 1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
618903	Craven District Council			Mr Stephen Brown	
Policy ENV4	315	Yes	Craven District Council supports the preferred approach to protect the route of the former Colne-Skipton railway for future transport use. The preferred approach of supporting the A56 Villages Bypass and reinstatement of the Colne-Skipton railway line as long term strategic transport options is also supported.	Support for the approach to strategic transport provision noted.	N/A
Policy LIV1	310		Paragraph 10.25 is noted which states the following: "In the north of the borough there may also be some impact on Skipton's housing market. Barnoldswick and Earby provide potential alternatives for people seeking to live in the Craven area. However, the potential impacts are likely to be minor as the level of planned new house building in West Craven is relatively low (see Policy SDP2) and the links are not as strong as	It is acknowledged that the improvement of transport infrastructure between Pendle and Craven could potentially have an impact on the housing market in both areas. For example people may choose to live in Pendle and commute to Skipton for employment or visa versa. The major transport projects (the A56 Villages Bypass and the reinstatement of the Colne to Skipton Railway) are not	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			those between the settlements in the south of the Borough and neighbouring Burnley.” The enhancement of transport infrastructure connecting Pendle with Craven District would be anticipated to have an impact on this housing market relationship.	currently identified in the transport planning process (Local Transport Plan (LTP3)) as current priorities. However, they are important projects for Pendle but are dependent on funding coming forward for them to be delivered. The potential impacts on the housing market from these improved transport links will need to be considered in future plans.	
618755	Emery Planning Partnership Ltd			Mr John Coxon	
Policy SDP2	177		We consider that the Core Strategy does not allocate enough housing development to Barnoldswick. Allocating only 10% of new development to Barnoldswick does not reflect its role and function as a key service centre alongside Nelson and Colne. It is also insufficient to meet current and future housing need in the settlement. It should also be noted that Barnoldswick is a ‘stronger’ housing market than other settlements and could deliver a higher level of housing development in the next 5 years, when the council anticipates that deliverability issues will constrain housing development in other parts of the borough. We therefore consider that at least 20% of new housing development should be distributed to Barnoldswick. We represent a client who has interests in Barnoldswick. As this consultation relates to the Core Strategy and not site specific issues, we will forward details of our client’s site to the council in a separate submission.	The distribution of new housing is based on an assessment of a number of factors - including the current population trends, past completions, housing need (overcrowding etc) and land capacity. Although Barnoldswick is identified as a Key Service Centre in the settlement hierarchy - this is in relation to its location in the borough - i.e. it is the main settlement in the West Carven Area. Its designation as a Key Service Centre is on a different scale to that of Nelson (including Brierfield) and Colne. Barnoldswick only has 11% of the borough's population and if the current population spread continues then the level of housing provision proposed in the Core Strategy for this part of the borough is appropriate. The actual amounts of new housing are considered in Policy LIV1 - it should be noted that the figures outlined in that policy are minimum figures, so although SDP2 indicates that only 10% of the total housing provision will be distributed to Barnoldswick this is a minimum provision level.	No changes to the document are proposed as a result of this representation.
Policy ENV1	184		Policy ENV1 states that “Existing open spaces will be protected from development. The Council will encourage and support the improvements to the routeways between open spaces along with the creation of new sites as part of a wider programme of green infrastructure provision.” A footnote clarifies that existing open spaces relate to those defined on the proposals map and identified within the Open Space Audit. We consider that the policy requires additional detail to clarify that existing designations in the Local Plan will be reviewed in accordance with the findings of the Open Space Audit and to reflect recent planning permissions.	It is agreed that clarification regarding the updating of the Open Space Audit and its relationship with the policy is required.	PROPOSED ACTION: Amend the footnote to explain that the Open Space Audit will be reviewed periodically to reflect changes in amounts, levels and types of provision.
Policy LIV1	181		In order to be legally compliant, the level of housing provision and phasing must conform to the RSS if the Core Strategy is to be submitted to the Secretary of State and adopted before the RSS is revoked. However, we understand that the RSS is likely to	There are a number of evidence base documents that have been used to formulate the housing requirement figure. The figure in the SHMA is based on an assessment of the needs and potential demand for housing, and the existing supply of	PROPOSED ACTION: The policy will be clarified to explain that the overall housing target is a minimum and that where evidence of further need and demand exists

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			be revoked before the Core Strategy is adopted. We therefore consider that the level of housing provision needs to be justified by the evidence base in accordance with PPS3 and the emerging NPPF. We consider that the proposed requirement of 200 per annum is too low. The evidence base suggests that a higher housing requirement than that proposed within the Preferred Options document is needed. The household projections indicate a need for an additional 313 dwellings per annum to 2026, whilst the SHMA indicates a need for an additional 275 dwellings per annum. Taking into account the number of empty homes in Pendle and the potential to reduce these, we consider that the SHMA projection of 275 net additional dwellings per annum should be utilised as the housing requirement for the borough. Furthermore, the Core Strategy fails to take into account the deficit in housing provision accumulated against the previous RSS housing requirement. This unmet need does not cease to exist simply because a new plan is to be adopted. It must therefore be added to the housing requirement within the Core Strategy. In terms of phasing, we consider that the proposed housing requirement in the first 5 years should not be reduced. Whilst we acknowledge that current market conditions are difficult, the emphasis should be on approving housing development in order to kick start the economic recovery. This is emphasised by the Planning for Growth agenda, the draft NPPF and also PPS3 which emphasises the need to maintain a 5 year housing supply. Planning for less growth in the short to medium term (and thus allocating fewer sites) on the basis of the current economic downturn is in our view contrary to the Government's clearly stated objectives, and is unlikely to facilitate the economic recovery required.	housing. The SHMA target is drawn out of the Balancing Housing Markets (BHM) Model which produces a policy relevant figure that can then be subject to wider policy debate. i.e. the model generates a figure based on certain assumptions and data. The final target can then be adjusted to take account of different factors e.g. the impact an increased level of housing may have on the housing market / regeneration areas etc. The housing requirement of 3,000 dwellings over the plan period is considered to be a realistic target that takes account of a broad range of factors. It should be noted that this is a minimum requirement and there is scope within the policy to provide additional dwellings where there is a need or the demand to do so. This element of the policy will be clarified in the publication version. The latest monitoring of housing land in Pendle indicates that there is currently a shortfall of 221 dwellings against the RSS provision figure. This equates to just over one years worth of provision. It is acknowledged that this shortfall will need to be accounted for in the Core Strategy's housing requirement and therefore it is recommended that the deficit is added to the overall housing requirement. The phasing table in Policy LIV1 clearly states that the phased delivery for each period is a minimum expected delivery and not a maximum. The phasing approach is designed to be realistic in terms of actual deliverability but sufficiently flexible to allow additional dwellings to come forward should the economic recovery accelerate. The phasing approach is not designed to restrict sites coming forward but is instead intended to provide realistic deliverable targets for different points in the plan period - to be used in conjunction with the housing trajectory.	additional housing will be provided. PROPOSED ACTION: The policy will be revised to clarify that the phasing approach is a minimum expected delivery approach and not a restrictive mechanism. PROPOSED ACTION: Increase the overall housing requirement figure to take account of the current levels of under delivery.
327651	English Heritage			Ms. Judith Nelson	
Document	9		Thank you for your letter dated 1st November 2011 consulting on the preferred options stage of your Core Strategy. Clearly a number of changes have already and will be taking place in planning legislation and policy with the Localism Act and the draft National Planning Policy Framework which you will have to consider in relation to the content of the final document. English Heritage is currently considering its advice on neighbourhood planning and we suggest that you review our website www.helm.org.uk for our latest guidance from time to time. The report identifies the importance of Pendle's historic	The National Planning Policy Framework (NPPF) was published on 27th March 2012. The version of the Pendle Core Strategy to be published and subsequently submitted to the Secretary of State has been revised to make it compliant with the NPPF and ensure that it addresses any implications of the Localism Act. Policy ENV1 sets out the Council's approach to the protection and enhancement of the historic environment. Whilst research documents such as the Lancashire Mills Survey are useful to help inform specific detailed issues, they can quickly become out	PROPOSED ACTION: Revise the Core Strategy to take account of the implications of the Localism Act and the National Planning Policy Framework (NPPF). PROPOSED ACTION: Add further reference into the Spatial Portrait to emphasise the importance of Pendle's Mill heritage.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			environment and heritage assests and both PPS5 and the draft NPPF call for local planning authorities to set out a strategy for the conservation and enjoyment of the historic environment including heritage at risk (NPPF178). Pendle has 2 entries in the current Heritage at Risk Register, Brierfield Mills and Whitefield conservation area. English Heritage is currently commissioning Phase II of the Lancashire Mills Survey with information on buildings at risk due in summer 2012; this will be followed by more detailed assessments. The CS should include means of accommodating this additional information when it becomes available.	of date and have limited value in preparing a strategic document such as the Core Strategy. It is however accepted that there reference could be made to the importance of mills to the built heritage of Pendle's in the Spatial Portrait. Positive actions are underway with regard to the two local entries in the Heritage at Risk Register. In the case of Brierfield Mills, Pendle Council has taken a pro-active approach to its future preservation and re-use. Having recently acquired the site through its joint venture company PEARL2, with the help of funding from the Homes and Communities Agency (HCA), a development brief looking at its future re-use is to be prepared in conjunction with key partners. In the Whitefield area of Nelson, English Heritage has been widely consulted, and been an active participant in the Council's efforts to regenerate the Conservation Area. In particular it has offered advice on initiatives funded through the Partnership Scheme in Conservation Areas (PSICA) and been involved in the development of key projects part-financed by the Townscape Heritage Initiative (THI).	
Chapter 4: Vision	10		Whist the Report makes a number of references to protecting, safeguarding and enhancing the Borough's heritage; this is not specifically reflected in the Vision apart from the reference to enhancing the setting of heritage assets. It is suggested that the Vision include a statement which secures the positive and proactive conservation of Pendle's historic environment and heritage assets. This would then provide the framework for the agreed strategic objectives which are supported.	It is important to note that the purpose of the vision is to emphasise the key strategic objectives of the Core Strategy. It cannot, and does not, seek to address each policy objective in detail. The current reference to heritage in the vision, which references enhancement of the setting of heritage assets, relates only to the M65 corridor. the reason for this is that extensive regeneration activity in this area is seen as providing a major opportunity to achieve this goal during the plan period. Policy ENV1 clearly demonstrates the importance placed on protecting both the natural and historic environment throughout Pendle. This objective is also reflected in specific design policies such as LIV4, WRK5 and SUP4. However, the opportunity to provide additional references to the importance of the historic environment in the overall vision for Pendle will be investigated.	PROPOSED ACTION: Amend paragraph 4.11 to include a reference to the importance of protecting and enhancing Pendle's historic environment.
Policy SDP6	11		English Heritage supports the sequential approach to development set out in SDP6. As PPS5 Policy HE1 observes "Keeping heritage assets in use avoids the consumption of building materials and energy and the generation of waste from the construction of replacement buildings." PPS5 Policy HE3.1(iv) also supports the reuse of existing fabric.	Support for the policy is noted. Linked to this policy is Policy ENV2 which advocates the reuse of historic buildings. Policy SDP6 could be strengthend by amending the first bullet point of the policy to emphasise the reuse of existing buildings and previously developed land as the first priority.	PROPOSED ACTION: Amend the first bullet point to read "reuse of vacant buildings and previously developed land within a defined settlement boundary".

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV1	12		English Heritage supports the integrated policy approach set out in paragraphy 7.10 for the protection and enhancement of the natural and historic environment and the strategy for the historic environment and built heritage at paragraph 7.44. This paragraph could also make reference to new and emerging information about the historic environment such as the Mill Study. Policy ENV1 is supported however it is suggested that it could take a more proactive approach to the enhancement of historic places and managing heritage at risk.	Reference to specific documents whilst of use for specific issues is not considered of the strategic level required for such a policy. Such documents will also unnecessarily date the strategy as they are updated or become of less relevance. It is considered that together policies ENV1 and ENV2 take an appropriate approach to the conservation and enhancement of historic places and managing heritage at risk.	No changes to the document are proposed as a result of this representation
Policy ENV2	13		We welcome and support the approach set out to achieving quality in design and conservation in the report and support policy ENV2.	Support noted	N/A
Policy ENV3	14		The report highlights for Pendle a major issue relating to energy usage in its existing building stock. I suggest that the document include a link to the website: Climate Change and your Home, see: http://www.climatechangeandyourhome.org.uk/live/saving_ergy_in_buildings_intro.aspx Here you can find information on saving energy in buildings looking at ways of minimising carbon emissions by reducing energy consumption through insulating and draught proofing thereby reducing the heat lost from walls, windows, floors and roofs. The site also reports on new research from English Heritage on the retention of original sash windows counteracting some of the misconceptions about the energy efficiency of original timber sash windoes, a unique feature of England's built heritage which is fast disappearing. See: http://www.climatechangeandyourhome.org.uk/live/research_generic.aspx We support the references to impact on heritage assets in ENV3.	Support noted. It is also agreed that reference to the energy efficiency of the existing building stock and how it can be sympathetically improved should be mentioned. However it is not appropriate to directly reference webpages but reference to advice being available from English Heritage will be made.	PROPOSED ACTION: Make the following addition to the context section: "Pendle has a large stock of traditionally constructed stone buildings. There are many ways that the energy efficiency of these buildings can be improved sympathetically (e.g. loft insulation, or the improvement of traditional windows) and English Heritage offer further guidance on these issues.
Policy WRK4	15		The role of heritage led tourism is recognised in the report and policy WRK4 is supported.	Agreement noted.	N/A
Policy SUP4	16		The report refers to the document World Class Places and includes a policy on Designing Better Public Places SUP 4, the government's strategy identifies as one of the four elements of quality of place, "the treatment of historic buildings and places" (see 2.1 and 2.5), this should be incorporated as a bullet into the policy wording.	It is acknowledged that the policy could be strengthened by recognising the contribution that the historic built environment can bring to quality of place.	PROPOSED ACTION: Include additional wording to the Supporting text after paragraph 12.55: The factors that shape quality of place can be organised under four broad headings. - The range and mix of homes, services and amenities. - Design and upkeep of buildings and spaces. - Provision of green space and green infrastructure. - Treatment of historic buildings and places. PROPOSED ACTION: Include additional

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					wording in the Policy text under 'Public Buildings': - Re-using historic buildings, where appropriate, or by incorporating design elements in new developments that respond sympathetically to the built heritage, public spaces and key infrastructure elements, within the historic environment in which they are located. PROPOSED ACTION: Include additional wording in the Policy text under 'Public Realm': - Enhancing the setting of any historic buildings or infrastructure in the immediate vicinity.
379229	Environment Agency			Ms. Gemma Jackson	
Policy SDP2	26	Yes	The policy identifies areas within the borough which have capacity issues at the Waste Water Treatment Works and state potential restrictions on future development until necessary improvements are made to infrastructure. We support this approach as it incorporates a stance of sustainable development. We are also pleased to see the inclusion of brownfield development where there is sufficient infrastructure capacity for settlements such as Earby and Kelbrook.	The general support for the policy is noted. The National Planning Policy Framework (NPPF) (paragraph 162) requires Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. Policy SDP2 aims to direct new housing to the most sustainable locations at levels where the infrastructure capacity can cope with additional development or where the required infrastructure can be provided. The policy recognises that there may be circumstances where there needs to be restrictions to development until the appropriate infrastructure can be provided.	No changes to the document are proposed as a result of this representation.
Policy SDP3	27	Yes	The policy identifies areas within the borough which have capacity issues at the Waste Water Treatment Works and states potential restrictions on future development until necessary improvements are made to infrastructure. We support this approach as it incorporates a stance of sustainable development. We are also pleased to see the inclusion of brownfield development where there is sufficient infrastructure capacity for settlements such as Earby and Kelbrook.	Agreement noted.	N/A
Policy SDP6	38	Yes	We are pleased to see that the outlined sequential approach to development will steer development to brownfield sites in the first instance. This will promote sustainable development and the remediation of contaminated land.	Support for the policy is noted. The supporting text will be amended to make reference the positive contribution the sequential approach can have to remediating contaminated land.	PROPOSED ACTION: Amend the supporting text to include a reference to the remediation of contaminated land.

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Policy ENV1	39		In paragraph 7.17 woodlands are not the only habitat useful for carbon storing. The Core Strategy makes little reference to the borough's overall biodiversity value, and is largely restricted to a few habitats. However, Pendle has far more ecological and biodiversity assets as identified in Pendle's Biodiversity Audit and Lancashire Biodiversity Action Plan. Biodiversity is integral and important element in the borough (http://www.lancspartners.org/lbap/lancashire.asp), as well as having significant numbers of Biological Heritage Sites and priority habitats i.e., rivers, upland habitats and woodlands. It is recommended a key element of the core strategy is to better align with the new England Biodiversity strategy (http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/framework.aspx), and provide functional ecological networks and work on a landscape scale approach to protect and enhance these key priority habitats in the borough. It is also recommended, where practicable, that biodiversity opportunities are integrated in new development proposals particularly when it can have wider benefits such as reducing flood risk, e.g. by creating new retention ponds and/or flood storage, removing culverts, de-canalising rivers that have had a legacy of poor or inappropriate development. PPS9 sets out the key principles that will help to ensure the impacts of potential development on biodiversity features are fully considered as part of the planning process. It also encourages the provision of new nature conservation features beyond the requirements for mitigation or compensation. Such improvements can provide valuable enhancement to the living and working environment of the Borough. Portions of the borough are located along river valley corridors within the River Ribble and Calder catchments. Some rivers have suffered from a legacy of poor and inappropriate development which has left many sections of river corridor in a highly degraded state. With an emphasis on redeveloping along some of these river valley corridors, there may be significant opportunity to rehabilitate and enhance these river corridors with integrated new riparian development that can have a multitude of benefits in respect to landscape, amenity, biodiversity and flood risk. This restoration of heavily modified watercourses also has the ability meet new objectives for relevant waterbodies in the new statutory River Basin Management Plan. It can also help with meeting the requirements of the Water Framework Directive. There are opportunities within many development proposals to create, manage and enhance wildlife habitat and the natural landscape.	It is agreed that more of the habitats within the borough should be included in the policy and also where they relate to specific examples which would give the policy greater depth for instance carbon storage as mentioned. Policy ENV1 already requires development to consider its impact on the natural environment and biodiversity as part of its overarching concept. With regard to biodiversity opportunities being integrated into development proposals, paragraph three of the policy already gives provision for this requirement; however the strategy section (7.35) could be expanded to make better links to how they can also help with flood storage and attenuation measures with links to policy ENV7. The issues raised relating to development along rivers is too detailed for the Core Strategy but policy ENV2 would require any new development, including that alongside rivers, to deliver the highest possible standards of design. Development affecting rivers is also covered by policy ENV7 of the Core Strategy. This policy supports the restoration of modified watercourses by supporting de-culverting. The supporting text explains that this can be important to restoring a more natural river environment. It is accepted that there could be greater links between policies ENV1 and ENV7 to show how water management can benefit biodiversity. ENV1 does specifically look to create opportunities for and enhance biodiversity in the borough. However it is not possible to have a policy which actively seeks the removal of buildings. The issue of landscaping schemes is too detailed for the core strategy and such issues will be picked up in the Development Management Policies. The programmes and projects mentioned are too detailed for the Core Strategy but the general direction of the policies ENV1 and ENV7 are supportive of such objectives. It is accepted that the definition of Green Infrastructure could be expanded to better reflect how people can interact with it as well as linking the policy to Policy SUP2 (Health and Wellbeing). This policy recognises the importance of Open Space and Green Infrastructure in promoting healthy lifestyles. It is accepted the strategy section to this policy could be broadened to acknowledge the additional benefits regarding access to the countryside. Policy ENV1 amended to link to this policy strategy. It is agreed that river corridors should be included as an example of Green Infrastructure. It is agreed that reference to climate change adaptation for	PROPOSED ACTION: At the beginning of paragraph 7.15 insert " In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including: Grassland; Boundary; heathland; woodland; inland rock; wetland and; freshwater". PROPOSED ACTION: Insert at end of paragraph 7.35 "The incorporation of features such as balancing ponds, or the removal of culverts can also have much wider benefits such as the reduction of flood risk. Policy ENV7 considers wider water management issues" PROPOSED ACTION: Insert at beginning of paragraph 7.17 " Of concern to all biodiversity assets is the impact of climate change. There is significant evidence [1] that climate change adversely affects biodiversity, indeed it is likely to become one of the most significant drivers of biodiversity loss by the end of the century. Climate change is already forcing biodiversity to adapt either through shifting habitat, changing life cycles, or the development of new physical traits. Conversely biodiversity can help to reduce the negative effects of climate change At the end of the paragraph add "Other habitats are also important in this respect. Upland peat bogs play a significant role in carbon capture and storage. Their conservation and restoration through the re-wetting of upland and lowland peat soils helps to create suitable conditions for a layer of living plants which absorb CO 2 from the atmosphere." PROPOSED ACTION: After 'adaption to climate change.' Insert "It is acknowledged that other habitats are also important in such respects, for instance peat bogs play a significant role in carbon capture and storage whilst the re-wetting of upland and lowland peat soils helps to reduce levels of CO 2 through the creation of suitable conditions for a layer of living

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Any planning applications that capitalise on these opportunities should be encouraged. The creation and enhancement of habitats adjacent to existing wildlife sites, where the new habitat can complement and provide a buffer for existing habitat, should be promoted. Habitat creation and enhancement towards the achievement of targets within the Lancashire Biodiversity Action Plans or new River Basin Management Plan should also be encouraged through the planning process. With regards to future development, we would suggest this has the potential to provide valuable new assets for future Pendle residents and wildlife alike, plus having possible flood risk, amenity access, water quality benefits i.e. :- Create continuous and much enlarged public open space areas adjacent to the rivers. We would seek where the opportunity arises the removal of existing buildings that currently encroach right up to bank top of watercourses, which detract from the river corridor, prevent access, and reduce habitat value. Integrate flood storage and attenuation requirements of PPS25 with biodiversity and landscape enhancement measures, rather than dealing with these on a separate basis i.e., incorporation of above ground sustainable urban drainage techniques such as retention ponds, swales, etc., where feasible. Have integrated landscaping schemes, preferably based on native species, to improve the biodiversity value of a site, and sourcing of local plant stock. Opening up of culverted "skylighting" watercourses with its biodiversity, flood risk reduction and improved maintenance benefits. De-canalisation and restoration of open sections of channelised river, Invasive weed eradication programmes, Incorporating long term conservation management/monitoring of the landscape and biodiversity value within the site and/or adjoining areas. Creation of a new fish passes at the existing large weir's, creating new and interesting features for amenity as well as biodiversity value. 7.25 Open Space and Green Infrastructure In respect to the countryside and the environment, it is recommended as part of the core strategy that there is a promotion of the natural environment and in encouraging people's engagement with it, providing a key element in people's quality of life, and improved physical and mental health and well being. The Natural England report provides further evidence and guidance in incorporating such issues. (http://naturalengland.communisis.com/naturalenglandshop/docs/HEV1.pdf). The Environment Agency also has its north west recreational strategy out for public consultation at the present	biodiversity/habitats within the borough should be made and that green networks enabling facilitation of movement are key to increasing the ability of species to adapt to climate change. The issues around watercourses are covered by policy ENV7 as this is considered to be the most appropriate location to consider these specific issues whilst linking between the two policies to acknowledge the overlaps between the natural environment and water management.	plants which absorb CO₂ from the atmosphere." PROPOSED ACTION: After the 5 purposes of green infrastructure state: "Examples of Green Infrastructure can include, amongst others; parks, open spaces, woodlands, rivers, ponds, swales and wetlands." PROPOSED ACTION: Delete the two key reasons for Green Infrastructure in paragraph 7.42 and replace with Natural England's six social, environmental and economic benefits of Green Infrastructure as follows " Green Infrastructure can provide many social, economic and environmental benefits including: Places for outdoor recreation and play; Space and habitat for wildlife with access to nature; Climate change adaptation; Environmental education; Local food production; Improved health and wellbeing" http://naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx PROPOSED ACTION: At the end of paragraph 7.27 add "Policy SUP2 Health and Wellbeing acknowledges links between access to open spaces and health". PROPOSED ACTION: In paragraph 7.32 "It is important to ensure that there are connections between the core biodiversity sites and habitats, to allow species to move freely between them in order to feed, disperse, migrate or reproduce. This is seen as a key in providing future resilience to the potential impacts of climate change" PROPOSED ACTION: Amend policy SUP2, paragraph 12.32 to broaden the scope to reference the benefits to health and well being of the natural environment.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			moment 'Strategy for Water Related Recreation'. With a growing demand for outdoor pursuits we all need to consider how best we can widen access to the region's waters, whilst protecting the environment and wildlife that live within them. The new strategy will influence the way planning authorities and organisations work when providing new opportunities for water based recreation. The consultation can be found on the University of Brighton's website: http://www.brighton.ac.uk/waterrecreation/north_west_consultation_details.htm, and it is recommended this is referred to as part of the core strategy. The draft plan will be on the site until 13th January 2011. Policy ENV 1 Protecting and Enhancing Our Natural and Historic Environments In general we support the inclusion of a protecting and enhancing environments policy within the Core Strategy. We would recommend that this could be made stronger by including the following aspects: • Reference to climate change adaptation for biodiversity/habitats within the borough • Managing and enhancing river corridors under green infrastructure and future development • Watercourses (and groundwater flows) are protected from encroachment and adverse impacts, and that water quality is maintained or improved in line with the Water Framework Directive (WFD). • A commitment within the policy that where appropriate the Council will seek the enhancement and restoration of modified watercourses.		
Policy ENV3	64		It is recommended that the Core Strategy is better aligned with anticipated future building regulation CO2 reductions targets. This target level could then be raised as the strategy progresses and new environmental building standards are introduced, with the ultimate aim of ensuring all new homes are carbon neutral by 2026. This would set a stronger message to all prospective developers, the council's desire to drive the sustainable development in the borough, and make a major step in tackling the urgent need to address climate change and be carbon neutral by 2026. In respect to housing and sustainable design, the Agency would expect that the guiding principles set out in planning policy i.e., PPS1 supplement and 'UK sustainable development strategy', is at the heart of any new housing strategy in Pendle, including: Ensure positive urban design to create and enhance urban greening which contributes to climate change adaption, and helps minimise risk to the economy and communities by promoting and/or enhancing natural management measures. In respect to the possible delivery of hydropower schemes within the borough, there is need for any	For Pendle the issue with energy generation is not simply one of reducing emissions but also of increasing RLC generation to improve energy security and reduce fuel poverty, especially in off-grid rural areas. Therefore it was decided to address the issue in terms of energy generation not emission reduction. With regards to sustainable design, policies ENV2, LIV4, WRK5 & SUP4 cover this in more detail.	PROPOSED ACTION: Expand the wording of this policy to make clearer the type of assessments that would be expected to accompany a renewable energy planning application, including environmental assessments.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			applicant to consult the Environment Agency at as early a stage as possible, for guidance and advice on any such schemes. Whilst the Agency welcomes the possibility of creating new renewable energy generation within the borough, any scheme should make sure there is adequate environmental assessment as part of the application to ensure the most environmentally sensitive option is pursued without degrading existing biodiversity or amenity assets, or are in contradiction with River Basin Management Plan objectives.		
Policy ENV5 and Policy ENV6	65		The second bullet point states: "ensure that water quality is not compromised and, where appropriate, secure improvements to water quality" However, there are no indicators proposed to assess the success of this policy. We feel that greater attention should be paid to the requirements of the European Water Framework Directive and associated River Basin Management Plans as this could provide a key policy hook to secure reductions in pollution. The sixth bullet point states that the Council will: "require the use of sustainable waste management processes that seek to reduce the generation of waste and prepare waste for reuse, recycling or other forms of recovery, only requiring disposal as a last resort". Whilst this ambition is laudable, further details should be provided to explain how this will be achieved. Perhaps a simpler and more readily quantifiable approach would be to require a reduction in waste sent for disposal. Implicit in this would be a driver for greater waste recycling, but the emphasis would be on the reduction of waste. In conjunction with the above, the related target on page 99 should be amended to read "reduction in waste sent to landfill" rather than "increase in recycling rates". Increasing the recycling rate does not necessarily promote waste reduction which should be the key driver for the policy in line with the key principle of the waste hierarchy.	ENV5 2nd bullet point - the policy notes that reference must also be made to Policy ENV7, which addresses water quality in more detail and the indicators proposed to assess the success of the policy objectives. It is accepted that Policy ENV7 would benefit from the inclusion of specific references to the European Water Framework Directive and the River Basin Management Plan for the Ribble. ENV6 6th bullet point - Rather than replace the target to 'increase recycling rates', it is proposed to add a fourth target that will seek to 'reduce waste sent to landfill'.	PROPOSED ACTION: Include the following additional text within Policy ENV7: Developers should ensure that water quality is not compromised and ... seek improvements to the aquatic environment in order to help achieve the objectives set out in the European Water Framework Directive and the River Basin Management Plan for the Ribble. PROPOSED ACTION: Include the following targets: Reduce the amount of waste sent to landfill.
Policy ENV7	68		Whilst we are pleased to see the draft refer to WFD and RBMPs, we feel that there should be greater integration of WFD targets into the strategy. At present the text lacks any conviction that the Council is actively seeking enhancements to water quality. This may raise questions as to the effectiveness of the strategy and to combat this, the section should be reworded to show the Council's commitment to enhancing water quality and complying with the WFD. In terms of paragraph 7.169 the figures are based on GQA which is out of date. We would therefore recommend that the paragraph is amended to as follows: In terms of water quality, there are 16 waterbodies	The representation addresses several specific issues, which are dealt with individually below: (1) The greater integration of targets from the Water Framework Directive would add conviction that the Council is actively seeking enhancements to water quality. (2) Para 7.169 - The figures quoted from the General Quality Assessment (GQA) are out of date: (3) Para 7.179 - Clarification should be provided as to what 'infiltration systems' to mitigate against pollution risk entail by replacing infiltration systems with "install oil interceptors and other necessary mitigation measures." - The reference to oil interceptors is considered to be too prescriptive. It is	PROPOSED ACTION: Reword the Supporting Text (paragraph 7.169): (2) In terms of water quality, there are 16 water bodies in Pendle, which fall under the European Water Framework Directive (WFD). Of these half are at less than good status. Water bodies need to reach good status by 2015, or in some cases 2027. Three of these failing water bodies have been prioritised as high priority water bodies, namely: 1. Colne Water, which is failing for: phosphate

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			which fall under the Water Framework Directive. 50% of these are at less than good status. Waterbodies need to reach good status by 2015 or 2027 in some cases. Three of the failing waterbodies have been prioritised as high priority waterbodies, these are: 1. Colne Water which is failing for: Phosphate (continuous sewage discharge and intermittent sewage discharge), Ammonia (Annex 8, Phys-Chem), Hydrology, and Phytobenthos. 2. Wycoller Beck, reasons for failure: Copper (this is expected to improve by 2015) 3. Stock Beck reasons for failure : Fish, Invertebrates, Phosphate (diffuse source and point source). We have been looking at the possible causes of water quality failure on the River Colne and we are in the process of putting in water quality sondes to upload live data onto websites to get a real time look at what the water quality is doing in the catchment and understand where pollution is coming from. We need to consider the impact of development on sewerage infrastructure and ensure early discussion with United Utilities, use water cycle studies to inform water management particularly in areas where there is pressure on sewerage infrastructure and/or water supply, look for ways to deliver improvements to bathing waters e.g. supporting work to resolve misconnections and promote water efficiency. 7.179 The paragraph refers to "infiltration systems" to mitigate against pollution risk from development. Clarification should be given as to what this entails. Would "install oil interceptors and other necessary mitigation measures" be more appropriate? Flood Risk It should be noted that for future formal site allocations the sequential and exception test will need to be undertaken for sites within Flood Zones 2 and 3 as stipulated by Annex D of PPS25. This should be undertaken as part of your Level 2 SFRA. In terms of policy ENV7 and flood risk, we wish to make the following comments: • The list of things new developments must consider could be expanded more with regards to surface water run off. We would recommend that a commitment to surface water run off rates is incorporated into the policy. E.g. 30% reduction for brownfield sites and Greenfield run off rates. • Change of Use applications in designated flood zones to residential use, or uses which pose risk to life, will not be permitted. We would recommend that this is expanded to clarify which flood zones this policy refers to. Would it be both Zones 2 & 3 or just 3? Indicators At present there is no indicator for ENV7 that relates to water quality. Perhaps including WFD status of watercourses would allow the implementation of the policy to be measured. Water Management, Water Quality and	however, acknowledged that the sentence could be improved by the addition of a reference to mitigation measures other than infiltration systems, in order to cover all eventualities. (4) Policy Text - The list of things new developments must address with regard to surface water run off could be expanded. It could also be improved by incorporating details of run-off rates. (5) Policy Text - Need to clarify whether restrictions on change of use to residential applies to Flood Zone 2 and 3, or just Zone 3. (6) Indicators - There is no indicator relating to water quality. Suggest WFD status of watercourses is used.	(continuous sewage discharge and intermittent sewage discharge), ammonia (Annex 8, phys-chem), hydrology, and phytobenthos. 2. Wycoller Beck, which is failing for: copper (expected to improve by 2015). 3. Stock Beck, which is failing for: fish, invertebrates, phosphate (diffuse source and point source). (3) PROPOSED ACTION: Include additional wording in the Supporting Text (paragraph 7.179): In the final sentence, after "and a requirement to install infiltration systems ..." insert "and other necessary mitigation measures." See response to Comment 215. (4) PROPOSED ACTION: Amend the Policy Text: Replace "within designated flood zones" to read "within Flood Zone 3." (5) PROPOSED ACTION: Include additional wording in the Policy Text: Within Flood Zone 2 proposals should have regard to the sequential and exception tests in PPS25. (1 & 6) PROPOSED ACTION: Include additional indicators: Include indicator(s) that align with the Environment Agency monitoring strategy to aid consistency in monitoring the WFD status of watercourses in Pendle.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Resources Monitoring In respect to monitoring indicators for 'water quality and resources' it is recommended environmental data for the new strategy, that it be aligned with the new monitoring strategy the Agency is adopting as part Water Framework Directive and River Basin Management Planning rather than the old General Quality Assessment (GQA), please refer to the following link for further information http://www.environment-agency.gov.uk/research/planning/33260.aspx & http://www.environment-agency.gov.uk/research/planning/33262.aspx		
619590	Foulridge Parish Council			Ms Jane Killeen	
Chapter 4: Vision	719	Yes	M65 Corridor. Foulridge Parish Council in consultation with village residents, on the whole, agrees with the vision but would like to suggest that the greener urban environment is achieved by development along the M65 route but not yet beyond. The council is open to consideration of a bypass or a rail link to connect with West Craven towns.	General support noted. The Spatial Vision indicates that the M65 Corridor will be the focus for new development whilst the Rural Areas, which include the village of Foulridge, will see more limited levels of development targeted at meeting local needs. Improved connectivity, via broadband, rail or road links will help to support existing businesses. They could also facilitate sustainable levels of growth in the areas north of Colne, as sites in the area would be more accessible and better placed to meet the needs of the borough as a whole.	No changes to the document are proposed as a result of this representation.
Chapter 6: Our Spatial Strategy	721	Yes		Agreement noted.	N/A
Policy SDP1	722	Yes		Agreement noted.	N/A
Policy SDP2	723	Yes		Agreement noted.	N/A
Policy SDP3	724	Yes		Agreement noted.	N/A
Policy SDP4	725	Yes		Agreement noted.	N/A
Policy SDP5	726	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP6	727	Yes		Agreement noted.	N/A
Policy ENV1	728	Yes		Agreement noted.	N/A
Policy ENV2	729	Yes		Agreement noted.	N/A
Policy ENV3	730	No	Policy ENV3 Our foundations for Sustainable Future. Foulridge Parish Council in consultation with village residents does not agree that this option explores the use of ALL renewable energy sources but relies too heavily upon wind. The un-coordinated establishment of wind turbines will compromise Policy ENV1 and WRK4, protection and enchantment of our natural environment also improving tourism. The use of increased solar energy and the possibility of using hydro energy must be taken into consideration to make this a viable plan. In addition the development of wind farms must be driven by Pendle Borough Council in partnership with a commercial business. The Borough must benefit from the profits. the target of 15mw is a very substantial one. Foulridge Parish Council has concerns though, and the renewables option appears to be concentrated almost exclusively on wind power. 15mw at 0.5mw per turbine means 30 units. If the efficiency of the turbines is taken into account, approximately (25%-30%), the number of turbines to reach the target exceeds 100. Once the protected areas of Pendle, Boulsworth and Weets are quite rightly ruled out. Wind turbines are likely to be concentrated in a small area on the high land to the northeast of Pendle district the unsightly nature will be detrimental to encouraging tourists and this is against the core strategy policy of encouraging tourist activity. There are many well publicised shortcomings of wind turbines. They will not work when there is no wind (or high wind) and when this occurs it is not at predictable or convenient times. The turbine units are imported, they are erected by travelling crews, bring no work into the area and contribute no revenue (except to the individual land owners). In contrast other renewables have more benefits: . Solar insulation of existing properties have a more projectable yield. . They can be installed using local labour. . solar will bring income into individual homes and insulation boosts savings, and engages families in the energy debate. In conclusion, Foulridge Parish Council considers that the policy gives a much too high emphasis on wind energy almost the	The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of all technologies as appropriate. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			exclusion of other renewables.	to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. Some of the areas of constraint identified on the wind speed maps are related to protecting designated landscape and wildlife areas. This is to ensure that the best quality landscapes and habitats are protected and the impact on wildlife etc minimised. Inevitably there would be some loss of visual or landscape quality in areas developed for wind farms but it is about finding a balance between protecting the most valuable areas and securing a low carbon energy supply for the UK moving forward. It is possible to secure environmental improvements as part of a wind farm development, for example the large wind farm at Scout Moor on the Rossendale/Rochdale borders, has included projects financed by the wind farm developer to the tune of £500,000 to improve the quality and biodiversity of up to 500 hectares of land. Schemes can also improve access to the open countryside with improved footpaths and bridleways etc. There is no significant evidence that tourists are put off returning to an area because of the presence of a wind farm. Some wind farms have actually proved themselves as tourist attractions. The UK's first commercial wind farm at Delabole in Cornwall received 350,000 visitor in its first eight years. Your comment regarding a wind farm partnership between Pendle Borough Council and a wind farm developer is noted and will be passed to the Council's Climate Change Group for consideration.	
Policy ENV4	732	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	733	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	735	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV1	736	Yes		Agreement noted.	N/A
Policy LIV2	737	Yes		Agreement noted.	N/A
Policy LIV3	738	Yes		Agreement noted.	N/A
Policy LIV4	739	Yes		Agreement noted.	N/A
Policy WRK1	740	Yes		Agreement noted.	N/A
Policy WRK2	741	No	If the spatial vision is to be achieved it will be difficult to find 50ha of employment land in the Borough.	Whilst the indicative requirement identified in Policy WRK2 is for 50.58 hectares of employment land between 2011 and 2026, the existing employment land supply was 41.22 hectares (see Table 2.4 of the Employment Technical Paper). As such the projected shortfall in employment land over the plan period is just 9.36 hectares. Whilst Para 11.31 explains how the shortfall in employment land was calculated in the Employment Land Review, it is acknowledged that the calculation of the employment land figure for the Core Strategy should be set out more clearly in the supporting text for the policy. It is also accepted that finding just over 9 hectares of new employment land in Pendle will not be a straightforward task. The identification of those sites considered to be best suited to meeting the quantitative and qualitative needs of future employment growth in the Borough will be addressed during the preparation of the Land-use Allocations DPD, which follow the adoption of the Core Strategy.	PROPOSED ACTION: Include an additional paragraph after Para 11.31 briefly setting out how the employment land requirement in Policy WRK2 has been calculated, based on the methodology set out in Table 2.4 of the Employment Technical Paper.
Policy WRK3	742	Yes	Reasonable consideration must be given to parking for shopping etc, in town and local shopping centre's.	Policy ENV4 (Paragraph 7.120) acknowledges the need for car parking in town (and local shopping) centres to "help boost trade and the local economy." Revised car parking standards will be set out in the Development Management Principles DPD, and this is acknowledged in both the supporting text (Paragraph 7.134) and the final line of the Policy text. Until these new standards are adopted, the maximum car parking standards in Policy 31 of the Replacement Pendle Local Plan (2001-2016) will be retained, as noted in the final line of the policy and Appendix B.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK4	743	Yes		Agreement noted.	N/A
Policy WRK5	744	Yes		Agreement noted.	N/A
Policy SUP1	745	Yes		Agreement noted.	N/A
Policy SUP2	746	Yes		Agreement noted.	N/A
Policy SUP3	747	Yes		Agreement noted.	N/A
Policy SUP4	748	Yes	N/A	Agreement noted.	N/A
618932	Friends of Greenfield LNR			Mr David Penney	
Chapter 4: Vision	364	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	366	Yes		Agreement noted.	N/A
Policy SDP1	368	Yes		Agreement noted.	N/A
Policy SDP2	370	Yes		Agreement noted.	N/A
Policy SDP3	372	Yes		Agreement noted.	N/A
Policy SDP4	374	Yes		Agreement noted.	N/A
Policy SDP5	376	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP6	378	Yes		Agreement noted.	N/A
Policy ENV1	380	No	Protecting and enhancing our Natural Environment – Biodiversity, geodiversity, landscapes and green open spaces – is essential to combat climate change. It is good that there is a commitment to increase biodiversity through the provision of new sites and not just enhance what we already have. It is also good to know that Policy ENV 1 will protect existing open spaces from development. I hope this Policy extends to protecting all other Greenfield sites from housing or industrial development. While this comment is also referring to Policies in Chapter 10: “Living”, it is closely linked to Policies in Chapter 7: “Our Foundations for a Sustainable Future” – Improving the Environment we live in. As this is a spatial strategy, social, economic and environmental policies are interlinked and impact on each other. So, I will repeat these comments on Chapter 10 on a separate Form. So, with this approach, the Council should insist on a Policy of only allowing development on Brownfield sites and resist pressure from developers and guidance in the National Planning Policy Framework which would allow developments on Greenfield sites while ignoring Brownfield sites. (e.g. Lldgett/Bents Triangle, Colne; Greenfield Open space on proposed Greenfield Road Housing Development). As there a lot of Brownfield sites in Pendle, there should be a focus on bringing these back into use for housing or industrial use. Further, with the demise of the Housing Market Renewal Programme and its damaging legacy, under Elevate Pathfinder, the Council should give priority to renovating existing empty properties and restoring houses where they have been demolished so that we can build sustainable communities rather than granting planning permission for new developments on virgin green land and open spaces. There is an obvious housing need for affordable homes to rent and purchase with the growing numbers on Housing Pendle’s waiting list and Pendle’s low wage economy. The cost of renovation would be far less than building new homes from scratch.	The core strategy sets out elsewhere that the use of brownfield sites and existing buildings is preferable to the use of greenfield sites, however there will be instances where the use of such previously developed sites will not be possible and it is necessary for the strategy to take account of this. The Core Strategy's sequential approach to development is detailed in policy SDP6. In respect of the reuse of existing properties the Living Chapter of the Core Strategy covers this.	No changes to the document are proposed as a result of this representation
Policy ENV2	382	Yes		Agreement noted.	N/A
Policy ENV3	385	No	It is encouraging that Renewable and Low Carbon (RLC) developments will be based on the UK Renewable Energy Strategy targets in order to achieve 10% generation of energy	It is proposed to amend the policy to clarify which types of ‘new development’ this requirement will apply. It is proposed that the requirement will apply to all development	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			use from renewable low carbon sources at the local level. Starting from a very low level of renewable energy in Pendle, it is going to be difficult to achieve this minimum target, as a contribution towards reducing CO2 emissions. The Council will have to do more than “encourage” the development of such renewable and low carbon energy. As there seems to be a resistance to wind farms in Pendle, the Council should consider strengthening its Policy from “encourage” to “positively promoting and delivering” renewable and low carbon energy. Furthermore, the Policy of using renewable sources of energy should not just be applied to new residential and commercial developments but also extended to include the renewal/regeneration/restoration of existing properties, as they already do in Germany. In addition, planning policies should ensure it is easier to gain permission for the development of renewable sources of energy, such as wind farms. It would also increase the generation of RLC energy, if the Council promoted other sources of renewable energy, as recommended in the South Pennines R & LC Energy Study Report 2010, such as solar panels, which are now cheaper and more efficient, as well as ground source heating. While it is not highlighted in the Report, I would suggest that hydro-power schemes could make a valuable contribution to local sources of renewable energy, as Pendle has relatively high levels of rainfall and the terrain (hills and valleys) to store water in reservoirs and release energy through dams.	except non-residential changes of use or extensions under 1000m2 floorspace, or householder applications, so as to not place an undue technical or financial burden on these smaller developments. This will include the conversion of building where this requires planning permission. The future Development Management DPD may consider alternative requirements to improve the energy efficiency and carbon emissions of existing buildings subject to applications for extensions. Forrenovation/restoration projects that do not require planning permission, the raising of energy and emissions standards in building regulations should bring about improvements in energy efficiency and may involve the need to include RLC technologies to meet the increasing standards. The Core Strategy supports all forms of renewable energy generation, including Solar and Hydro power. The requirement in the policy for new developments to provide 10% of their energy requirement from onsite RLC technologies should encourage the uptake of micro technologies such as solar panels. However, local evidence base reports, including the Forest of Bowland AONB (LCC) led Hydro power study, (available at http://www.forestofbowland.com/climatechange#hydro) suggest that there is limited potential for Hydro power of any significant scale in the Borough. However where such schemes are appropriate Hydro proposals will be supported as they can contribute towards the overall renewable and low carbon mix in the borough.	
Policy ENV4	388	No		Objection noted, however no comments provided in relation to the objection.	N/A
Policy ENV5 and Policy ENV6	391	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	395	Yes		Agreement noted.	N/A
Policy LIV1	397	No	My general comments cover all 4 Living Policies: - LIV 1: Housing Provision, Sharing and Delivery - LIV 2: Housing Needs - LIV 3: Affordable Housing - LIV 4: Designing Better Places to Live Linked to Policy ENV 1, it is good to know that existing open spaces will be protected from development. I hope this Policy extends to	The National Planning Policy Framework (NPPF) at paragraph 17 (Core Planning Principles) encourages the effective use of land by reusing land that has been previously developed (Brownfield land). It also indicates that allocations of land for development should prefer land of	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			protecting all other Greenfield sites from housing or industrial development. As this is a spatial strategy, social, economic and environmental policies are interlinked and impact on each other. So, with this approach, the Council should insist on a Policy of only allowing development on Brownfield sites and resist pressure from developers and guidance in the National Planning Policy Framework which would allow developments on Greenfield sites while ignoring Brownfield sites (e.g. Ldgett/Bents Triangle, Colne; Greenfield Open space on proposed Greenfield Road Housing Development). As there a lot of Brownfield sites in Pendle, there should be a focus on bringing these back into use for housing or industrial use. Further, with the demise of the Housing Market Renewal Programme and its damaging legacy, under Elevate Pathfinder, the Council should give priority to renovating existing empty properties and restoring houses where they have been demolished so that we can build sustainable communities rather than granting planning permission for new developments on green land and open spaces. There is an obvious housing need for affordable homes to rent and purchase with the growing numbers on Housing Pendle's waiting list and Pendle's low wage economy. The cost of renovation would be far less than building new homes from scratch.	lesser environmental value. However, the NPPF does not prohibit the use of Greenfield sites. Policy SDP6 provides a sequential approach to development and requires developers to consider the reuse of previously developed land as a first priority. Greenfield development cannot be wholly ruled out as there needs to be a balance between sustainable development on the right types of land and not unduly restricting development that may bring employment and housing opportunities to the borough. The level of development proposed in the Core Strategy is such that some Greenfield development will be needed. Furthermore the current economic conditions mean that many previously developed sites are not viable to redevelop. In order for new development to be delivered some of the Greenfield sites may need to come forward in the earlier stages of the plan period. The reuse of empty properties is a key Council priority in the Sustainable Community Strategy and also within the Core Strategy. The level of new house building takes account of the need to reoccupy empty homes. However, there is only so much the planning system can do to aid this process. Other Council initiatives are underway to try and bring empty homes back into use - these include: working with the Council's Joint Venture Partner, contacting absentee landlords, bidding for funding to renovate empty properties. Funding has recently been secured for a number of empty home schemes across Pennine Lancashire. Policy LIV3 of the Core Strategy looks at how empty properties could be used for affordable housing, however, this relies on new build housing coming forward to provide the funding for this. Furthermore one of the key housing issues in Pendle is about supplying the right mix, types and choice of housing to meet the different needs of the population. Innovative approaches may be required when looking at the reuse of empty homes in order to meet these needs.	
Policy LIV2	399	No	My general comments cover all 4 Living Policies: - LIV 1: Housing Provision, Sharing and Delivery - LIV 2: Housing Needs - LIV 3: Affordable Housing - LIV 4: Designing Better Places to Live Linked to Policy ENV 1, it is good to know that existing open spaces will be protected from development. I hope this Policy extends to protecting all other Greenfield sites from housing or industrial development. As this is a spatial strategy, social, economic and environmental policies are interlinked and impact on each other. So, with this approach, the Council should insist on a Policy of only allowing development on Brownfield sites and resist	These comments do not directly relate to Policy LIV2. Housing needs, in terms of affordable housing are considered under Policy LIV3. These comments are dealt with under the following policies / comments: Policy LIV1 - Comment 397, Policy LIV3 - Comment 401, Policy LIV4 - Comment 403.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			pressure from developers and guidance in the National Planning Policy Framework which would allow developments on Greenfield sites while ignoring Brownfield sites (e.g. Lidgett/Bents Triangle, Colne; Greenfield Open space on proposed Greenfield Road Housing Development). As there a lot of Brownfield sites in Pendle, there should be a focus on bringing these back into use for housing or industrial use. Further, with the demise of the Housing Market Renewal Programme and its damaging legacy, under Elevate Pathfinder, the Council should give priority to renovating existing empty properties and restoring houses where they have been demolished so that we can build sustainable communities rather than granting planning permission for new developments on green land and open spaces. There is an obvious housing need for affordable homes to rent and purchase with the growing numbers on Housing Pendle's waiting list and Pendle's low wage economy. The cost of renovation would be far less than building new homes from scratch.		
Policy LIV3	401	No	My general comments cover all 4 Living Policies: - LIV 1: Housing Provision, Sharing and Delivery - LIV 2: Housing Needs - LIV 3: Affordable Housing - LIV 4: Designing Better Places to Live Linked to Policy ENV 1, it is good to know that existing open spaces will be protected from development. I hope this Policy extends to protecting all other Greenfield sites from housing or industrial development. As this is a spatial strategy, social, economic and environmental policies are interlinked and impact on each other. So, with this approach, the Council should insist on a Policy of only allowing development on Brownfield sites and resist pressure from developers and guidance in the National Planning Policy Framework which would allow developments on Greenfield sites while ignoring Brownfield sites (e.g. Lidgett/Bents Triangle, Colne; Greenfield Open space on proposed Greenfield Road Housing Development). As there a lot of Brownfield sites in Pendle, there should be a focus on bringing these back into use for housing or industrial use. Further, with the demise of the Housing Market Renewal Programme and its damaging legacy, under Elevate Pathfinder, the Council should give priority to renovating existing empty properties and restoring houses where they have been demolished so that we can build sustainable communities rather than granting planning permission for new developments on green land and open spaces. There is an obvious housing need for affordable homes to rent and purchase with the growing numbers on Housing Pendle's waiting list and Pendle's low wage	These comments are dealt with under the following policies / comments: Policy LIV1 - Comment 397, Policy LIV2 - Comment 399, Policy LIV4 - Comment 403. The main mechanism for securing affordable housing through the planning system is by requiring developers to provide a proportion of the dwellings in a scheme as affordable units - this will often involve transferring the ownership of these properties to a RSL/HA such as Housing Pendle. In the first instance (in line with the National Planning Policy Framework (NPPF)) this requirement should be on-site - in the interests of creating inclusive, mixed communities. However, it is recognised that this may not always be possible. In such circumstances, where robustly justified, developers can make a contribution to fund the renovation of empty properties in order to utilise them as affordable homes. There needs to be a balance between building new homes and renovating existing properties - as there is limited funding available for renovating existing empty properties - obtaining a contribution from the developers of new homes is one way to help bring empty properties back into use and also helping to increase the provision of affordable housing.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			economy. The cost of renovation would be far less than building new homes from scratch.		
Policy LIV4	403	No	My general comments cover all 4 Living Policies: - LIV 1: Housing Provision, Sharing and Delivery - LIV 2: Housing Needs - LIV 3: Affordable Housing - LIV 4: Designing Better Places to Live Linked to Policy ENV 1, it is good to know that existing open spaces will be protected from development. I hope this Policy extends to protecting all other Greenfield sites from housing or industrial development. As this is a spatial strategy, social, economic and environmental policies are interlinked and impact on each other. So, with this approach, the Council should insist on a Policy of only allowing development on Brownfield sites and resist pressure from developers and guidance in the National Planning Policy Framework which would allow developments on Greenfield sites while ignoring Brownfield sites (e.g. Lidgett/Bents Triangle, Colne; Greenfield Open space on proposed Greenfield Road Housing Development). As there are a lot of Brownfield sites in Pendle, there should be a focus on bringing these back into use for housing or industrial use. Further, with the demise of the Housing Market Renewal Programme and its damaging legacy, under Elevate Pathfinder, the Council should give priority to renovating existing empty properties and restoring houses where they have been demolished so that we can build sustainable communities rather than granting planning permission for new developments on green land and open spaces. There is an obvious housing need for affordable homes to rent and purchase with the growing numbers on Housing Pendle's waiting list and Pendle's low wage economy. The cost of renovation would be far less than building new homes from scratch.	The Government has changed its emphasis on how regeneration should be undertaken and is now more focused on bringing empty dwellings back into use. The Council is supportive of this approach and this is reflected in a number of the policies in the Living Chapter. The Government has not changed the requirement for Local Planning Authorities to plan for additional housing. Both the reuse of existing dwellings and the provision of new dwellings are required to ensure that the housing needs of the Borough are met over the plan period. One of the key housing issues in Pendle is about supplying the right mix, types and choices of housing to meet the different needs of the population. Innovative approaches may need to be taken when looking at the reuse of empty homes in order to meet these needs. Policy LIV4 supports the refurbishment of existing properties and encourages developers to use the BREEAM for Domestic Refurbishments scheme in order to further improve the sustainability of such dwellings.	No changes to the document are proposed as a result of this representation.
Policy WRK1	405	Yes		Agreement noted.	N/A
Policy WRK2	407	Yes		Agreement noted.	N/A
Policy WRK3	409	Yes		Agreement noted.	N/A
Policy WRK4	411	Yes		Agreement noted.	N/A
Policy WRK5	413	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SUP1	415	Yes		Agreement noted.	N/A
Policy SUP2	417	Yes		Agreement noted.	N/A
Policy SUP3	419	Yes		Agreement noted.	N/A
Policy SUP4	421	Yes		Agreement noted.	N/A
619588	Friends of the Earth			Ms Jane Wood	
Chapter 6: Our Spatial Strategy	41	Yes		Agreement noted.	N/A
Policy SDP1	42	Yes		Agreement noted.	N/A
Policy SDP2	43	Yes		Agreement noted.	N/A
Policy SDP3	44	No	Very difficult to start new businesses. Would they be attracted to Barnoldswick or Pendle as a whole due to present road network and no rail link between Skipton and Colne.	Policy SDP3 is concerned with the proposed distribution of land to accommodate future employment development and growth, whilst infrastructure provision is addressed in Policy SDP5. One of the many factors (Para 6.31) taken into consideration in determining this proposed distribution is current infrastructure provision. Column 3 of the table in Policy SDP5 indicates that there are no known constraints in terms of transport infrastructure that are critical to delivery of the plan objectives. The table also indicates that the plan will support for future projects to improve both the road (construction of the A56 bypass) and rail (reinstatement of the Colne-Skipton railway line) networks, which should help to improve the attractiveness of the area for inward investment.	No changes to the document are proposed as result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP4	50	No	I am very concerned about Policy SDP4 stating that there should be major retail development in Barnoldswick. We are already 'ringed' by superstores which have had a negative impact on both Colne and Nelson. Our town centre is vibrant with small independent shops because we do not have a superstore in the town.	Policy SDP1 indicates that Barnoldswick, like Nelson and Colne, is considered to be a Key Service Centre. However, although Barnoldswick exhibits the characteristics of a Key Service Centre, it does so within the context of West Craven. Its role within the borough as a whole is less influential due to its relative isolation and more limited range of services. Policy SDP4 establishes a retail hierarchy, but must be read in conjunction with Policy WRK3, which clearly states that all retail applications that are intended to serve a borough-wide catchment should be located in Nelson or Colne (Paragraph 3 of the Policy). In planning terms a retail scheme serving local needs may be considered to be a 'major' application, as this terminology applies to all applications occupying a site of one hectare or more, or in excess of 1,000 square metres. In combination Policy SDP4 and Policy WRK3 seek to ensure that any application in West Craven, which exceeds this threshold, are located in Barnoldswick, and that its scale is consistent with the towns function as a shopping centre so that it does not undermine the vitality and viability of the town centre or create unsustainable shopping patterns within the Borough.	PROPOSED ACTION: Include a reference within Policy SDP4 stating that it must be read in conjunction with Policy WRK3
Policy SDP5	53	Yes		Agreement noted.	N/A
Policy SDP6	56	Yes		Agreement noted.	N/A
Policy ENV1	58	Yes		Agreement noted.	N/A
Policy ENV2	60	Yes		Agreement noted.	N/A
Policy ENV3	61	Yes		Agreement noted.	N/A
Policy ENV4	62	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	63	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV7	67	Yes		Agreement noted.	N/A
Policy LIV1	69	Yes		Support noted	N/A
Policy LIV2	70	Yes		Agreement noted.	N/A
Policy LIV3	71	Yes		Agreement noted.	N/A
Policy LIV4	73	Yes		Agreement noted.	N/A
Policy WRK1	74	Yes		Agreement noted.	N/A
Policy WRK2	77	Yes		Agreement noted.	N/A
Policy WRK3	78	Yes		Agreement noted.	N/A
Policy WRK4	84	Yes		Agreement noted.	N/A
Policy WRK5	93	Yes		Agreement noted.	N/A
Policy SUP1	94	Yes		Agreement noted.	N/A
Policy SUP2	95	Yes		Agreement noted.	N/A
Policy SUP3	98	Yes		Agreement noted.	N/A
Policy SUP4	100	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
611376	GL Hearn			GL Hearn	
Chapter 3: Our Spatial Issues	313		Nelson's challenges 1.9 Nelson is a town centre facing significant challenges. The Core Strategy highlights Pendle's IMD ranking as the 44th most deprived local authority in England (Para 3.17) and that "deprivation is most acute in the centre of Nelson." (Para 3.19). 1.10 Other problems for Nelson include a declining population in the central areas (Para 3.108), high levels of worklessness (Para3.37), high concentrations of low income people (Para 3.52). 1.12 We also note and agree with the statements in the Preferred Options that "retailing is a major source of employment" (Para 3.65) and that Nelson remains the primary shopping centre for the Borough "although it has a relatively weak retail offer" (Para 3.87).	Agreement noted.	N/A
Chapter 4: Vision	222	Yes	1.4 We note that at paragraph 4.11 the "vision" for Pendle, includes "increased shopping activity in a revitalised Nelson town centre"	Agreement and comment noted.	No changes to the document are proposed as a result of this representation.
Chapter 5: Our Strategic Objectives	305		We support the draft strategic objectives of the Core Strategy set out at paragraph 5.2. In particular: Strategic Objective 1 which seeks to "establish a hierarchy of settlements to assist regeneration by promoting the re-use of existing buildings and Brownfield sites and directing growth the most sustainable locations"Strategic Objective 7 which seeks to "Increase the choice, variety and quality of the retail offer and promote uses that contribute to the creation of a well-balanced, safe and socially inclusive night time economy in our town centres."	Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	224	Yes	1.6 We also agree with the Spatial Strategy at paragraph 6.5 which directs the majority of development to the M65 Corridor and in particular Nelson, which as noted above is identified as the primary settlement in Pendle and one of three 'Key Service Centres' (Policy SDP1).	Agreement and comment noted.	No changes to the document are proposed as a result of this representation.
Policy SDP1	227	Yes		Agreement noted.	N/A
Policy SDP2	230	Yes		Agreement noted.	N/A
Policy SDP3	233	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP4	235	Yes	We support Policy SDP4 which states that major retail developments should be in Nelson, Colne and Barnoldswick. This reflect the Core Strategy which states that "retail hierarchy aims to promote sustainable development by location retail and service provision in the areas that are most accessible to the largest proportion of the population. Ensuring that people do not have to travel further than they need in order to access everyday goods is a driving principle behind the retail heirarchy."	Agreement noted.	N/A
Policy SDP5	237	Yes		Agreement noted.	N/A
Policy SDP6	239	Yes	1.8 Policy SDP6's sequential approach to development prioritising "previously developed land and vacant buildings within settlement boundaries" is, in opinion, a justified approach both in a policy context but also in pursuit of regeneration the key town centres such as Nelson.	Support for the sequential approach noted. Reference to the regeneration benefits of redeveloping brownfield sites will be included in the strategy section (paragraph 6.59).	PROPOSED ACTION: Include a reference in paragraph 6.59 to the regeneration benefits of redeveloping Brownfield sites.
Policy WRK3	241	No	1.1 We provide the following representations with rgard to the Core Strategy Preferred Options Report Decemner 2011 on behalf of our clients Edinburgh House. 1.2 Our client's interests primarily concern the regeneration of Nelson town centre, which as set out in paragraph 3.87 of the Draft Core Strategy..."remains the primary shopping centre for the borough". 1.3 Whilst focusing on the town centre regeneration of nelson and in particular retail led regeneration, our clients wish to reserve their right to comment further in due course on other aspects of the plans as it emerges. 1.11 We also note that at paragraph 11.65, the Preferred Options report states that..."Today Nelson town centre primarily serves a local catchment. Our foremost concern is to arrest the decline of the town centre and enhance its role as a shopping destination of choice. Its reduced role has resulted in high vacancy levels and a decline in environmental quality, so securing investment tht directly, or indirectly, helps to improve the retail offer in terms of both quantity and quality will be a priority". 1.13 At paragraph 11.76 the Preferred Options report states. "A sequential approach will underpin our retail strategy. The three town centre's - Nelson, Colne and Barnoldswick - will be the primary focus for retail activity, each providing a mix of comparison and convenience shopping". 1.14 At paragraph states that..."The provision of additional retail floor space will be guided by the Pendle Retail Capacity Study and subsequent updates in the annual Retail and Leisure Land Monitoring Report, together with the retail hierarchy defined in Policy SDP4 of this Core Strategy.	1.16 - States that requiring applicants for developments within the town centre to address the sequential test is not in accordance with national planning policy as set out in PPS4 (Para EC14.3). PPS4 has now been replaced by the Natonal Planning Policy Framework, which retains a requirement for local planning authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan (paragraph 24). Although this was not the intention, it is acknowledged that the existing wording in Policy WRK3 implies that retail applications within a town or local shopping centre are required to address the sequential test. As such it is proposed to re-word the policy text, along the lines suggested by the consultee, to help improve clarity and ensure compliance with the NPPF. 1.19 - Notes that the Policy WRK3 (Para 7) states that there is "no identified requirement to provide additional floorspace for convenience retail during the plan period" and that "any new convenience retail development should re-use existing sites within a Town Centre or Local Shopping Centre." It then goes on to question whether this proposed approach is: (a) Justified, considering that the evidence base (Retail Capacity Study) uses data from 2005. 1.24 - considers that the policy is not based on a credible evidence base. It is accepted that elements of the Pendle Retail Capacity Study (PRCS) are out of date and that its projections do not go up to the end of	PROPOSED ACTION: Amend Policy text at paragraph 3: "Applications for retail or other town centre uses, not located within a defined town or local shopping centre, should address the sequential test and be located in the following order of priority:" PROPOSED ACTION: Amend Policy text at paragraph 7: There is no identified requirement in quantitative terms to provide additional floorspace for convenience retail during the plan period. However, there may be a qualitative need to deliver greater consumer choice and enhance the vitality and viability of existing centres. Where possible, any new convenience retail development should re-use existing sites within a Town Centre or Local Shopping Centre.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			But promoting the vitality and viability of the Borough's Shopping centre's requires a combination of factors: - Improving the range and quality of existing retail facilities; - Directing the type and scale of development to the most appropriate location; and - Reducing vacancy levels. 1.15 The main thrust of our Representation concerns Policy WRK3. We concur with the overall "town centres first" thrust of the policy which necessarily mirrors that set out in PPS4, but make the following representations. 1.16 The policy states..."To support the spatial development strategy (Policies SDP1 and SDP4), all retail applications that are intended to serve a borough-wide catchment should be located in Nelson or Colne. These and all other applications (the consultee has highlighted the beginning of this sentence in bold) for retail, and other town centre uses, should also address the sequential test". 1.17 This appears not to accord with PPS4, which states that proposals within a centre or up to date development plan are not required to address the "gateway" sequential test. As such we consider the apparent addition of requiring in centre applications to address the sequential test is not in accord with national policy and would be an unwelcome, counter productive and unsound policy. 1.18 In this regard we note that until such time as a new DPD will identify a Primary Shopping Area for the town centres of Nelson and Colne, the local plan designation remains. 1.19 Second, the policy starts that there is "no identified requirement to provide additional floor space for convenience retail during the plan period. Any new convenience retail development should re-use existing sites within a Town Centre or Local Shopping Centre"1.20 We note the additional convenience space can be provided if existing town centre sites are re-used, but consider that the first part of this policy provides a context against which appears to effectively be a presumption against future food store or convenience retail floor space for the foreseeable future. 1.21 It follows, therefore, that we also take issue references within the ryder to Policy WRK3 namely Paragraph 11.70 which reinforces this presumption against additional convenience floor space and specifically a food store based on capacities drawn from the Retail Capacity Study (2007). 1.22 We consider this is not justified (it is based on an out of date evidence base, namely a 2007 study based itself on 2005 survey material); would be ineffective in implementing the Plan's strategic objectives for town centre regeneration; and is inconsistent with parts of national policy (namely a need to balance quantitative and qualitative need). We consider these issues in more detail	the plan period (i.e. 2026). N.B. A partial update of the PRCS will help to inform any revisions to Policy WRK3 ahead of its publication and submission to the Secretary of State. 1.26 - Notes that the Policy WRK3 appears to advance a presumption against the development of new convenience floorspace in Nelson town centre and that this contradicts emerging policy, which seeks to promote development in sustainable locations and to enhance vitality and viability. It is certainly not the intention of Policy WRK3 to unduly restrict convenience retail development in Nelson town centre. However, development of convenience retail is significantly ahead of the projected requirements for the borough, as set out in Table 13.1 of the Pendle Retail Capacity Study (PRCS). In addition, the identified deficiency "to the north of the borough" (Para 13.6) has yet to be adequately addressed, although the PRCS recognised that the absence of suitable sites may require this additional provision to be accommodated in Nelson or Colne, where development could serve the Borough as a whole. Since the PRCS was adopted in May 2007, 4,140 square metres (net) new convenience retail floorspace has been granted planning permission and 3,136 square metres (net) has been completed. . The majority of this provision is accounted for by the new Sainsbury's store in Colne, which in the absence of a suitable site in Barnoldswick was expected, in part, to help meet the need for a new food store "to the north of the borough". As noted in the representation (Para 1.26), none of these completions or consents are within Nelson town centre. Taking into account projected leakage of 30% convenience retail spend and the loss of convenience retail provision since the adoption of the PRCS, it is accepted that new convenience floorspace provision is desirable in Nelson town centre. To this extent Policy WRK3 promotes the re-occupation of existing premises and redevelopment of vacant sites in town centre locations (Para 4). This is in order to maintain the level of provision recorded in the PRCS and to allow for modest growth to increase the limited range and choice of convenience retailers, referenced in Para 13.7 of the PRCS. What Policy WRK3 seeks to limit is the provision of additional floorspace in Nelson that would take provision significantly above and beyond the level recorded in the PRCS, as the study does not identify a need for such provision, other than to increase the range and choice of convenience retailers (Para 13.7) and combat leakage (Para	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			below. Justified? 1.23 The Core Strategy draws upon a Retail Capacity Study (RCS) prepared by NLP consultants and adopted by the Council in May 2007. This Study forecasts capacity for convenience retail within Pendle Borough over the 2006-2021 periods. The RCS forecasts are in our opinion out of date. The RCS was published in 2007 but the data collected dates in fact back to 2005. 1.24 In this regard we conclude that retail policy is not based on a credible evidence base, especially given the economic changes that have taken place and specifically in the context of the declining vitality and viability of Nelson, and the site specific opportunities Nelson has to bring about retail led regeneration. In this regard we are aware of at least one available site and market demand that would attract new retail expenditure into the centre of Nelson, clawing back trade lost to out of centre locations. 1.25 We note that the evidence from the RCS is updated by annual monitoring undertaken by the Council, the latest of which is the Retail and Leisure Land Monitoring Report 2010-11. The annual monitoring considers development completions and consents and concludes that there has been a commitment of convenience retail floor space of 8,775sq m since 2007 which exceeds the 2021 trajectory of the RCS. It is this evidence is carried through to the Draft Core Strategy (paragraph 11.70) 1.26 However, it is important to note that none of these completions or consents is in Nelson town centre itself which is the primary town centre for the Borough. In other words the town centre has not benefited from the consents granted and as such it is perverse to apparently advance a policy which proposes a presumption against new convenience development within a centre where national, adopted local plan and the emerging Core Strategy wishes to achieve more sustainable development and enhance vitality and viability. 1.27 We also note that the Retail Study (2007) identifies a projected 30% convenience leakage from the Borough and that this is set to continue. This is not simply a case of convenience retail leakage as linked trips will result in wider retail expenditure which is also in effect leaking from the Borough. Additional convenience floor space located centrally in Nelson would, in our opinion, greatly enhance the vitality of the town centre and provide additional choice and quality in the convenience retail offer resulting in at least a partial reverse of retail leakage experienced. Effective? 1.28 Policy WRK3 makes it clear that town centres in the M65 corridor should be the focus for new retail development. The context for this is highlighted in Para 11.55 which states that "new retail development is an	9.20). N.B. A partial update of the PRCS will help to inform any revisions to Policy WRK3 ahead of its publication and submission to the Secretary of State. (b) Effective in implementing town centre regeneration. 1.29 - States that Policy WRK3 appears to be inflexible in the context of convenience retail, setting a presumption against its development. This is not the intention of the policy. It is acknowledged that the policy erroneously states in paragraph 7 that there is "no identified requirement to provide additional floorspace for convenience retail". Whilst this may be true up to 2021, there could be additional need beyond this date. As noted above and in the representation (Para 1.20) Policy WRK3 states that new convenience retail provision is permissible where existing town centre sites and premises are to be re-used. This is in order to maintain the level of provision recorded in the PRCS and to allow for modest growth to increase the limited range and choice of convenience retailers, referenced in Para 13.7 of the PRCS. What Policy WRK3 seeks to limit is the provision of additional floorspace that would take local provision significantly above and beyond the levels recorded for each town centre in the PRCS, so as not to adversely affect their vitality and viability. N.B. A partial update of the PRCS will help to inform any revisions to Policy WRK3 ahead of its publication and submission to the Secretary of State. (c) Consistent with national policy. 1.31 - Argues that Policy WRK3 is not compliant with PPS4 in terms of balancing qualitative and quantitative need. Although PPS4 has been replaced, the NPPF requires local planning authorities to use its evidence base to assess "the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development." As noted above, taking into account projected leakage of 30% convenience retail spend and the loss of convenience retail provision since the adoption of the PRCS, it is accepted that new convenience floorspace provision is desirable in town and local shopping centres throughout Pendle, and in particular Nelson. Policy WRK3 seeks to promote the re-occupation of existing premises and redevelopment of vacant sites in town centre locations (Para 4) in order to maintain the level of provision recorded in the PRCS and to allow for modest growth to increase the limited range and choice of convenience	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			important part of any economic growth strategy" and the "need for viable and vibrant town centres with decent shops". 1.29 We therefore find it contradictory that Policy WRK3 appears inflexible in the context of convenience retail setting a presumption against its development (even on central highly accessible sites) when such development would enhance the local economy, improve viability and vibrancy of the town centre and improve quality and choice for consumers. 1.30 Moreover, given continuing difficult market conditions for most forms of retail development, we note food retail is one of the few viable forms of development that has a reasonable prospect of being delivered in Nelson. As such we consider the Preferred Options draft needs to adopt a more flexible policy to in town convenience development as another test set out at PPS12 is whether there is a realistic prospect of implementation. In this regard we consider a new food store in Nelson would be one of the best prospects of kick starting regeneration with the town centre. Consistent? 1.31 We consider that Policy WRK3 is inconsistent with the realisation of wider strategic objectives of the Core Strategy, in particular: Strategic Objective 1 (i.e. it potentially limits the ability to reuse brownfield sites in sustainable locations); Strategic Objective 7 (i.e. increasing the choice, variety and quality of the retail offer); and Policies SDP1 and SDP4 which seek to strengthen Nelson as a Key Service Centre and primary retail centre in the Borough. 1.32 Further for reasons set out at earlier in this Representation, we consider that the draft Core Strategy is also inconsistent with PPS4. 1.33 In addition PPS4, Paragraph EC1.4, requires local planning authorities to "take account of both the quantitative and qualitative need for additional floor space for different types of retail and leisure uses, local planning authorities: i) Assess whether there is provision and distribution of shopping, leisure and local services, which allow genuine choice to meet the needs of the whole community, particularly those living in deprived areas, in light of the objective to promote the vitality and viability of town centres and the application of the sequential approach. ii) Take into account the degree to which shops may be overtrading and whether there is a need to increase competition and the retail mix. Lack of Choice for Consumers 1.34 Presently there are two food stores located within Nelson, namely Lidl, at Rigby Street, to the West of the town centre and Morrison, at Pendle Street, to the north of the town centre. A Tesco store on Leeds Road ceased trading in autumn 2010 and remains vacant. 1.35 The Lidl Store is	retailers, referenced in Para 13.7 of the PRCS.	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			relatively small and caters for a particular 'discount retail' sector of the market. 1.36 The Morrison store is situated to the northern edge of the town centre. The Retail Capacity Study (2007) states that the Morrison store is significantly overtrading at £19.36m above the benchmark turnover of £25.06m. 1.37 A new food store in Nelson town centre would therefore clawback expenditure being lost to out of centre locations and therefore improve consumer choice in an area of deprivation, whilst improving the vitality of the town centre. 1.38 In this context, additional convenience floor space (i.e. food store) would accord with PPS4 requirements for qualitative need' and the Core Strategy Strategic Objective 7 which "seeks to increase the choice, variety and quality of the retail offer" as referenced at Paragraph 11.55 of the Draft Core Strategy. 1.39 Paragraph 11.65 further refers to the decline of Nelson Town Centre and the aim to "enhance its role as a shopping destination of choice". It further states that "additional footfall needs to be converted into sales and an improvement in the quality of the retail offer will be essential, if this is to happen. Ability to deliver regeneration 1.40 We have referred, in paragraphs 1.9 to 1.12 of this Representation, to the acute deprivation issues face by Nelson and the importance of improving the retail offer. 1.41 The ability of retail development to contribute to "the vitality, viability, diversity and character of our existing centres" and to help "support urban and economic regeneration" is referenced in Paragraph 11.58 of the Policy. Thus, the Council clearly recognises the importance of retail use in this context. 1.42 Development viability is undoubtedly an issue in the current market and Nelson has been significantly affected by the recession witnessing vacant properties and failed development proposals. Food store retail, however, continues to maintain competitive land values, which in turn allow such development to contribute to wider regeneration objectives, creating jobs and enhancing the vitality of town centres. 1.43 In this context, and in PPS4 planning policy terms, the case for convenience retail should also take account of qualitative need in the context of a limited quality and choice of offer currently being provided for in Nelson and significant job creation, town centre footfall and brownfield site redevelopment benefits which would result from such a scheme. Conclusion 1.44 We support the Preferred Options overall strategy and parts of the retail policy set out at Policy WRK3 including the general adoption of the "town centre first" approach and proper application of PPS4 tests. 1.45 However,		

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			for the reasons set out above we find other parts of the policy, particularly the apparent requirement for all forms of retail development (even those in the town centre) to be subject of the sequential test and for there apparently to be a presumption against food retail development with town centres. We find these aspects of the plan not to be justified, effective or consistent with national policy and as such unsound. 1.46 We consider that there is a need in planning policy terms to allow for greater flexibility in policy WRK3, particularly in the context of 'qualitative need' to allow for positive consideration of additional convenience retail floor space within the town centre and / or improve choice and quality of retail offer for local people. 1.47 In this regard we respectfully request that Policy WRK3 be reworded accordingly. We would propose the following wording for addition to the main policy text (proposed wording emphasis): "To support the spatial development strategy (Policies SDP1 and SDP4), all retail applications that are intended to serve a borough-wide catchment should be located in Nelson or Colne. (Delete "These and all other"). Applications for retail and other town centre uses outside of designated centres or not within an up to date development plan should (Delete "also") address the sequential test and be located in the following order of priority" "There is no identified quantitative requirement to provide additional floor space for convenience retail during the plan period; however, there may be qualitative need to deliver greater consumer choice and enhance the vitality and viability of existing sites within a Town Centre or Local Shopping Centre."		
619568	Goldshaw Booth Parish Council			Mr Bill Mayor	
Chapter 4: Vision	663	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	664	Yes		Agreement noted.	N/A
Policy SDP1	666	Yes		Agreement noted.	N/A
Policy SDP2	667	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP3	669	Yes		Agreement noted.	N/A
Policy SDP4	671	Yes		Agreement noted.	N/A
Policy SDP5	672	Yes		Agreement noted.	N/A
Policy SDP6	674	Yes		Agreement noted.	N/A
Policy ENV1	675	Yes	Change 'support' to 'ensure'.	The objector suggests changing the word 'support' to 'ensure' in the policy. It is not clear which wording of support it is suggested to change but in either case it would change the meaning of the policy in a way in which is not appropriate. The Council cannot force development that is otherwise acceptable to incorporate biodiversity or green infrastructure route ways as part of the scheme.	No changes to the document are proposed as a result of this representation
Policy ENV2	677	Yes	Delete 'neutral'.	The representation requests the deletion of the word 'neutral' from the policy. This would change the thrust of the policy significantly and result in an over restrictive requirement for development in the Council's view. The wording "positive or at least neutral" in this respect is promoted by the Town and Country Planning Association as part of their advice to local authorities intended to ensure that strong and comprehensive Core Strategy and Development Plan Document (DPD) policies are developed.	No changes to the document are proposed as a result of this representation
Policy ENV3	682	Yes		Agreement noted.	N/A
Policy ENV4	683	Yes	Delete all ref to railway - a pointless and unsustainable idea.	The re-instatement of the railway is a long-term strategic project which would provide better rail links to Yorkshire and beyond. There is significant support for this project within the community. It is recognised that it may not come to fruition during the lifetime of the plan, but it is important to identify it as a future option and protect the former route for transport use. The County Council's Local Transport Plan recognises that both the railway re-instatement and/or the provision of a bypass are potential future transport options. The Core Strategy supports this approach and hence	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				identifies these strategic transport schemes within Policy ENV4.	
Policy ENV5 and Policy ENV6	684	Yes	All rural developments should be judged on pollution potential.	Agreement noted (Policies ENV5 & ENV6), particularly in relation to sites in rural areas.	N/A
Policy ENV7	685	Yes		Agreement noted.	N/A
Policy LIV1	686	No	Speed up development to drive local economy.	Policy LIV1 will not restrict development. The policy puts in place certain checks to try to ensure that the delivery of new housing actually happens. However, the planning system is only one element of the construction industry. In the current economic conditions many sites within the borough are either not viable or only marginally viable to develop and this is inevitably impacting on the delivery of new housing.	No changes to the document are proposed as a result of this representation.
Policy LIV2	687	Yes		Agreement noted.	N/A
Policy LIV3	689	No	Too general - housing needs in rural areas not similar to urban - needs differentiation.	Policy LIV3 explains that there is a difference in terms of the reasons behind the affordability issues in the rural areas and the urban areas of the borough (see paragraphs 10.70 and 10.71). The Policy also sets different targets and requirements for affordable housing in the rural areas - including the use of local occupancy conditions and rural exception sites. The policy already differentiates between different affordable housing needs and requirements in the different parts of the borough.	PROPOSED ACTION: In the interests of clarity - the layout of the policy should be amended to make clearer the distinction between rural and urban affordable housing provision.
Policy LIV4	691	Yes	Current policy appears to favour terraces and 'townhouse' development, this is inappropriate in many rural contexts.	The policy requires that developers have consideration to the types and sizes of dwellings that are needed in the borough. The policy sets out a borough wide guide for developers to use, but this is only a guide and can be varied depending on the location of the development. For each of the three spatial areas further general guidance is provided. In the rural areas the policy states that "a range of types and sizes will be required, however, there is a need for some larger affordable dwellings (3+ bedrooms) and smaller market dwellings (2 or fewer bedrooms)." The policy does not stipulate the specific type of dwellings that these should be. It should be noted that in some rural areas the provision of terraced properties would be appropriate to those	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				locations. The policy also indicates that in the M65 Corridor and West Craven Towns the provision of new terraced properties should be kept to a minimum as there is already a sufficient provision of this type of dwelling. Overall the policy is aiming to strike a balance between the needs and demands (in terms of the type and sizes) of new dwellings and the location of the development - the flexibility of the policy should allow for the most appropriate properties to be developed in the area they are to be located.	
Policy WRK1	696	Yes		Agreement noted.	N/A
Policy WRK2	698	Yes		Agreement noted.	N/A
Policy WRK3	700	Yes		Agreement noted.	N/A
Policy WRK4	702	Yes		Agreement noted.	N/A
Policy WRK5	703	Yes		Agreement noted.	N/A
Policy SUP1	704	Yes		Agreement noted.	N/A
Policy SUP2	705	Yes	'direct.....deprivation' Yes, but ensure equality. Rural areas often deprived of facilities and unequally funded.	The policy states that priority will be given to "directing health, leisure and social care facilities to areas with high levels of deprivation or, an identified need or deficiency in provision". This would include rural areas where there is often a deficiency in provision of such facilities. It is the responsibility of the NHS to identify where there are health care needs and look at the most efficient way of addressing these issues. The policy in the Core Strategy aims to support the improvement of health care facilities inline with the NHS service delivery plans. By providing new services and access to them this should help to reduce inequalities.	No changes to the document are proposed as a result of this representation.
Policy SUP3	707	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SUP4	710	No	Too many bland 'Barnfield' buildings allowed; these are characterless and incompatible with surrounding structures.	Comment noted. Policy ENV2 seeks to secure good quality designs for new build, refurbishment and conservation projects. In addition Policies LIV4 (Housing), LIV5 (Employment) and SUP4 (Public Places) address specific design requirements relating to these specific building types.	No changes to the document are proposed as a result of this representation.
378925	Hargreaves Brown & Benson			Ms. Nikki Antemes	
Document	40		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
479036	Higherford Residents Action Group			Mr Ray Hudson	
Policy SDP2	751	No	The Higherford Residents Action Group are against the building of more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Junction 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
618770	Indigo Planning			Ms Charlotte Blinkhorn	
Chapter 6: Our Spatial Strategy	190		The Spatial Strategy for the borough should list Spenbrook village under 'Rural Pendle' alongside Trawden, Foulridge, Fence and Kelbrook as one of the villages capable of supporting additional services and housing provision. Spenbrook village has previously developed land and buildings within the settlement boundary suitable to accommodate housing and small scale employment and support services as proposed in the current application. Its appropriateness for development is confirmed in the Council's SHLAA which identifies the Spenbrook Mill site as suitable for a mixed use proposal which has potential to improve the sustainability of the village.	The villages of Trawden, Fence, Foulridge and Kelbrook have been identified as Rural Service Centres. This reflects their position in the Settlement Hierarchy as villages of a certain size (both in terms of physical area and population number) that can provide a certain level of services to their residents and the surrounding rural areas. Spen Brook is a small village (circa 3ha) with a population together with Newchurch-in-Pendle and surrounding farmsteads (i.e. wider than just the core of the village) of circa. 265 people. It does not have the services and facilities, and is not of a sufficient size to be classed as a Rural Service Centre. The Pendle Sustainable Settlement Study sets out the criteria for the different settlement category types. The designation of Spen Brook as a Rural Village is more appropriate. Development in Rural Villages is set at a level that aims to meet the needs of the residents of that type of settlement. The provision of additional housing, employment and services in Spen Brook would be inline the with the strategy as proposed, provided it was of an appropriate scale.	No changes to the document are proposed as a result of this representation.
Policy SDP1	194		We support the identification of Spenbrook under Rural Villages in Policy SDP1 as suitable for development relative to the role and function of the settlement. We suggest that the policy makes provision for minor settlement boundary changes where justified to be agreed in the Site Allocation DPD. This is to enable a minor extension to the settlement boundary in Spenbrook village to incorporate all land within the curtilage of Spenbrook Mill inside the settlement boundary. The curtilage boundary provides a strong edge to the settlement via a stone boundary wall making it an appropriate amendment with the land within	The Core Strategy does not consider the allocation of sites or the alterations of boundaries - this will be carried out as part of the Land-use Allocations process. Changes to the settlement boundaries can be put forward during the consultation on that document. It is proposed that a footnote is added to the policy text to explain that settlement boundaries may be subject to change through the Land-use Allocations process. Policy SDP1 clearly states that other policies within the Core Strategy and other DPDs set out the exceptions for developing outside of the	PROPOSED ACTION: Insert a footnote to explain that the settlement boundaries defined on the Proposals Map may be changed during a review of the plan. PROPOSED ACTION: Amend the Policy to provide additional details regarding the types of development that can be allowed outside of the settlement boundaries.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			part of the Mill's functional curtilage. The revision to the settlement would increase flexibility in the delivery of development in Spenbrook. The current application proposes land within the curtilage but outside of the settlement boundary as public open space and a revision to the boundary would provide increased flexibility in policy terms to enable this. Alternatively, the policy could increase the scope of exceptions under which development in the open countryside is acceptable. This could include to enable regeneration and the provision of community facilities.	settlement boundaries. However, in the interests of clarity the Policy will be amended to set out the uses to be allowed outside of the Settlement Boundaries.	
Policy SDP2	207		The settlement hierarchy set under Policy SDP2 allocates 7% of housing provision to Rural Villages. The allocation should ensure that it provides sufficient capacity to enable new housing to be delivered at the Spenbrook Mill site.	As drafted Policy SDP2 requires the housing allocation in the Rural Villages to be divided equally between those settlements. However, this is unlikely to be practical and some villages may have greater capacity to accommodate additional dwellings than others do. It is proposed that Policy SDP2 is revised to provide a more flexible approach to the distribution of new dwellings in the Rural Villages. This would allow some Rural Villages to have additional development where they have the capacity. This would allow for sites such as Spen Brook Mill to come forward.	PROPOSED ACTION: Amend footnotes 103 and 104 - relating to the distribution of new housing in Rural Service Centres and Rural Villages- the new footnotes should indicate that the housing allocation should be distributed according to the individual needs of each settlement and the capacity for each settlement to accommodate the required level of growth.
Policy SDP5	248		The Draft Infrastructure Study should identify Spenbrook village Waste Water Treatment Works (WWTW) as a facility for upgrades and extended capacity. It should be identified by the Council to United Utilities for funding in the 2015-2020 period. The redevelopment proposals for Spenbrook Mill may require increased capacity at the Spenbrook WWTW. It is imperative that a solution is found in order to the site to be fully developed. It has been vacant for over years and is falling further into a state of disrepair the longer it remains vacant. In this state it is causing an eyesore to the local community and wider AONB. The Council should therefore identify the Spenbrook WWTW as a priority for upgrades in the plan period.	Development at this location is not dependant on the Core Strategy, but could come forward under current planing policy. However, it is agreed that the lack of capacity at Spen Brook WWTW for the proposed development at Spen Brook Mill, which has come to light since both the Infrastructure Study and Core Strategy (Preferred Options Report) were prepared, should be reflected in both documents.	PROPOSED ACTION: Amend the Pendle Infrastructure Study by identifying capacity issues at Spen Brook WWTW in relation to additional housing provision and increased capacity requirements identified for the 2015-20 period. PROPOSED ACTION: Policy SDP5: Identify capacity issues at Spen Brook WWTW in relation to additional housing provision and increased capacity requirements identified for the 2015-20 period, under Energy and Utilities in the Table on Page 55. PROPOSED ACTION: Policy SDP2: Identify Spen Brook in the second footnote to the policy as a village where the capacity of the WWTW may alter the proposed distribution in the first five years of the plan period.
Policy LIV1	213		Policy LIV1 sets the housing target for the borough and we support that the requirement is referred to as a minimum. The policy sets a phased approach to delivery of housing over the plan period with delivery restricted to 800 units in the first five years of the plan. We object to any phased approach to housing	Policy LIV1 was written in the context of PPS3 and the RSS for the North West. The RSS specifically required Local Authorities to introduce phasing policies to secure the orderly and managed release of housing. It is acknowledged that both the national and regional planning policy position	PROPOSED ACTION: The policy will be revised to remove the term phasing and to clarify that the phasing approach is a minimum expected delivery approach and not a restrictive mechanism. It will be linked

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			delivery set in the Core Strategy. Such phasing of housing delivery could restrict sustainable development coming forward and will restrict certainty and developer confidence. This does not accord with the Government's drive for housing growth set out through the draft National Planning Policy Framework and recent Ministerial Statements. The market will naturally deliver in a phased approach given the size of sites and infrastructure requirements and therefore a phasing policy is unnecessary. If the Council are to proceed with housing phasing policy, the policy should make provision for sites to come forward in special circumstances which should include regeneration benefits. In the case of Spenbrook Mill site, there is an overriding need for the site to be developed to regenerate the site which has been vacant for over five years. The site has deteriorated and has been subject to theft and vandalism and is in urgent need of redevelopment. As such provisions need to be made for sites to come forward regardless of supply and phasing.	is changing and Policy LIV1 needs to reconsider the inclusion of a phasing mechanism. The NPPF requires Local Authorities to: illustrate the expected rate of housing delivery through a housing trajectory, set out a housing implementation strategy for the full range of housing, and describe how they will maintain delivery of a five-year supply of housing land. As the context section of Policy LIV1 explains, the purpose of phasing policies is to secure the orderly and managed release of housing land, to help ensure a five year supply of land is maintained and delivered, and to take account of factors that may inhibit the supply / delivery of housing land e.g. infrastructure capacity. The phasing approach should be revised to tie it back to the housing trajectory - in terms of expected delivery levels for different periods of the plan. The Policy should be revised to make clear that the phasing approach is linked to the delivery of sites and that it is not a restriction to the supply. The Policy should also be revised to explain how the requirements for granting planning permission.	to the housing trajectory and five year supply requirement. The policy will also be revised to explain the requirements for granting planning permission.
618699	Indigo Planning			Mr Robert Crolla	
Chapter 6: Our Spatial Strategy	166	Yes	This overriding strategy for Pendle identifies Barnoldswick as one of the "West Craven Towns". These are the towns located in the north of the Borough. Stirling Investments support the identification of the West Craven Towns, which include Barnoldswick, as a location for growth (both residential and employment) to support and diversify the existing economic base. Stirling Investments supports the objective of seeking to diversify the local economy by reducing the reliance on a single "high value advanced engineering business". However, it is important that a balance is struck between the diversification of the economic base, through new development or redevelopment of existing employment sites, and the provision of appropriate levels of new residential development to meet the needs of this diversifying workforce, and the existing population. It is noted that the spatial strategy accepts that a limited amount of new housing will help to support the projected population growth in the town. However, clarity is required in the spatial strategy policy on this issue. At present it reads that this housing will be limited and that it will only be delivered through the redevelopment potential of existing employment sites. This strategy approach is flawed given that: a) The diversification of the economy (if successful) will lead to	The support for the identification of the West Craven Towns is noted. The strategy aims to be a succinct overview of how the key issues will be addressed. In Barnoldswick the main issues relate to the current employment base. The strategy in relation to the redevelopment of existing employment sites is not limited to new housing. Existing employment sites may be utilised for many different uses including retail, housing or new employment. Other land is available within the existing settlement area of Barnoldswick and this could also be used for a variety of uses. A limited amount of new housing is proposed as this is inline with the proposed amount of employment growth. For clarity the final sentence of the second paragraph under the strategy for the West Craven Towns will be amended.	PROPOSED ACTION: Reword the final sentence of the second paragraph under the strategy for the West Craven Towns to read: "Existing employment sites may offer redevelopment potential for a variety of uses. A limited amount of new housing will be provided to support the growth in population."

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			demand for more than a limited amount of new housing; b) The diversification of the economy will lead to the redevelopment of existing employment sites for employment purposes, which are best suited to such uses, given their current and previous use; and c) The scale of housing provision envisaged to meet the demands of this diversifying economy, being driven by the redevelopment and re-use of existing employment land, will lead to the requirement to release new areas of land for residential development. The spatial strategy in relation to Barnoldswick should be reworded to read as follows: "Existing employment sites offer redevelopment potential to support this economic diversification. New housing development elsewhere will help to support the anticipated population growth in the town resulting from this strategy."		
Policy SDP1	167	Yes	Policy SDP1 relates to Spatial Development Principles and identifies the settlement hierarchy in Pendle. Indigo Planning made representations on Issue 1A of the Core Spatial Strategy Issues and Options DPD in August 2008. Clearly, Barnoldswick performs a wider role than solely meeting local needs, which is recognised in the Core Strategy. The CSIO stated that Barnoldswick is relatively well served by roads and public transport and already has a significant function in providing employment, retail and other services for a wide geographical area. The Pendle Settlement and Sustainable Rural Settlement DPD (May 2008) stated that the settlement of Nelson, Colne and Barnoldswick have been previously identified in the adopted RSS, Joint Structure Plan and emerging RSS as Key Service Centres. The document stated that they are clearly the main towns within Pendle and on this basis it was considered that they should remain designated as Key Service Centres. The Spatial Strategy now reflects this position. Barnoldswick is identified as a Key Service Centre. Key Service Centres (KSC) are at the top of the settlement hierarchy in Pendle (others are Nelson (including Brierfield) and Colne). Stirling Investment Properties LLP supports the identification of Barnoldswick as a KSC within Policy SDP1, as a centre which will provide a level of service which is appropriate to the size of the settlement and local population. Paragraph 6.18 indicates that "the accessibility of these towns and the current level of services provide a good base for future development" However, although this hierarchy is utilised to control the distribution of development through policies SDP2-SDP4, it is important to reiterate the fact that the Spatial Strategy sets the context for SDP1. This context for Barnoldswick is to seek to diversify the economic base of the	Pendle is made up of a number of different areas. At a broad level the Spatial Strategy identifies three key areas: the M65 Corridor, the West Craven Towns, and the Rural Areas. In each of these areas there are settlements which play a leading role in the provision of services etc, but this is relative to the size of the population they serve. Barnoldswick, like Nelson and Colne is identified as a Key Service Centre in Policy SDP1. However, although Barnoldswick meets the criteria for a Key Service Centre, it does so in the context of West Craven. Its role within the borough as a whole is less influential due to its relative isolation and more limited range of services. The Spatial Strategy states that Barnoldswick will accommodate a limited amount of new housing to support the projected population growth. It is not envisaged that the level of growth in Barnoldswick or Pendle as a whole will lead to the vast expansion of the Key Service Centre towns. The majority of growth is expected to take place within the existing settlement limits, in a sustainable way that is appropriate to the scale and function of each settlement. The predicted level of growth in Barnoldswick is reflected in Policies SDP2-SDP4. The percentage distributions set out in these policies reflect the opportunities and development that is needed in each area. Barnoldswick represents one element of a wider growth strategy for Pendle - the majority of which is to be located in the M65 Corridor. This is made clear from the Spatial Strategy and the distribution policies of SDP2-SDP4.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			settlement and to accommodate growth in the residential population. Consequently, Policy SDP1 is supported in terms of the approach to development where "proposals for development will be supported in the settlement listed below provided they are of a nature and scale that is proportionate to the role and function of that settlement." However, the Spatial Strategy suggests that although the role and function of Barnoldswick will not change (i.e. it will stay as a Key Service Centre), its characteristics will change in terms of the types and scale of employment and residential development that can be anticipated to come forward over the plan period. This context needs to be reflected in other policies in the DPD; such as SDP2 and SDP3.		
Policy SDP2	169	No	Indigo Planning made representations on Issue 2B of the Core Spatial Strategy Issues and Options DPD in August 2008, relating to the distribution of housing. Stirling supported Option 2 at this time which stated that new housing development should be located in Key Service Centres, Local Service Centres and Rural Service Centres. Whilst new housing development should be permitted within all three locations, Key Service Centres should be the first priority followed secondly by Local Service Centre and finally Rural Service Centre. The amount of development permitted within these locations should be proportionate to the scale of the centres. PPS3 (paragraph 36) states that houses should be provided in suitable locations and in order to achieve the Government's objectives, policies should ensure that housing is located in close proximity to a range of community facilities with good access to jobs, key services and infrastructure. Key Service Centres provide a wide range of services and facilities and by focussing new housing development in these areas will help to reinforce the existing level of service provision and help to reduce the need for people to travel. Consequently, this will again assist in meeting Central Government's Sustainability objectives. Policy SDP2 relates to housing distribution and suggests that 10% of all new housing across Pendle be provided in Barnoldswick. This is considered to be low compared to the anticipated provision in the other Key Service Centres. The other key service centres benefit from a much higher allowance (Nelson - 30%; Colne - 25%; Brierfield - 10%). The allowance allocated to Barnoldswick should be reflective of its position within the settlement hierarchy, and the content of the Spatial Strategy and Policy SDP1. This policy should be amended to justify greater levels of residential development in Barnoldswick. Justification for the 10%	Policy SDP2 sets out the proposed distribution of new housing in Pendle. This distribution is based on an assessment of a number of factors; quantitative and qualitative. The National Planning Policy Framework (NPPF) indicates that Local Planning Authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing (paragraph 47). It also requires Local Planning Authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50). The Housing Technical Paper was written to bring together a number of sources of information in order to provide the trend and analysis data in which to inform and formulate policy. Policy SDP2 has used this information to identify broadly where new housing should be located while Policy LIV1 has used this information to set the level of new housing to be developed. With regards to the limited number of factors that have been used to determine the distribution - it was considered that these factors helped to provide a broad framework of quantitative information to show: i) where housing had previously been located (past trends data) ii) where the population currently resides (the current population distribution) iii) where land is available for new housing (SHLAA data). The Housing Technical Paper includes data from the SHMA with regard to housing need. Some of which has been used in the assessment of where to distribute new housing - specifically where there are issues of overcrowding. However, it is acknowledged that the housing technical paper should include further information and analysis in the Housing Distribution section on the need	PROPOSED ACTION: Amend the Housing Technical Paper to include additional factors in order to provide a more extensive assessment of the distribution of new housing. Where the findings of this new assessment significantly change the existing proposed distribution consider amending Policy SDP2 to reflect this. PROPOSED ACTION: Amend Policy SDP2 to provide clarity in terms of the flexibility of the policy - the percentages are targets for the plan period but are considered as a flexible guide rather than rigid, restrictive figures. These changes will bring it in line with Policy LIV1 in terms of the flexibility applied to the housing requirement figures.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			allowance is set out in the Housing Technical Paper (Winter 2010). Table 4e sets out the three key factors influencing this allowance: a) past completions; b) current population spread and c) SHLAA land availability. there are a number of flaws associated with this approach: a) The use of only three factors in the determination of distribution is overly simplistic and not robust; b) All have these factors have been given the same weighting. There is no assessment of the relative weight of these factors; c) The use of simplistic averaging of the three percentage total suggests a reinforcement of the weighting characteristics. d) All three factors are supply based factors and are a function of existing policy or development supply; e) Past completions are a function of previous policy - policy going forward is not reflected in this assessment; f) Population spread is a direct function of historical trends and previous planning policy; g) No other factors have been taken into account such as - housing demand for example, or the application of a different policy approach going forward; and h) A number of the percentages have been rounded up or rounded down. For example in Barnoldswick the population spread is 11.45% but in table 4e it is rounded down to 11% (a loss of 0.45% on that factor). Most importantly, it is not evident how this distribution of 10% (based on these three factors) reflects the policy approach contained in the Spatial Strategy and Policy SDP1. The attached representations on the Spatial Strategy and SDP1 indicate the anticipated diversification of employment and growth in the residential population; a demand based policy. Consequently the distribution of only 10% of the Authorities housing requirement to Barnoldswick (a Key Service Centre) compared to the other KSC's is inappropriate. The adoption of a growth strategy for Barnoldswick should merit a greater allowance for residential development to a) meet existing demand for properties generated by its role as a Key Service Centre and b) meet the demand to be generated from the policy approach in Policy SDP1. Therefore Stirling Investments object to the proposed policy approach and suggest that Issue 1b - Option 1 which focuses new housing development in the Key Service Centres, is most appropriate on this basis.	and demand for housing in Pendle. Other data from the SHMA on issues of households in unsuitable housing and new household formation rates can also help to show where there is likely to be housing need in the borough. Initial analysis of this data shows that it follows a similar pattern to that already described with a greater need in the M65 Corridor, followed by the West Craven Towns and then Rural Pendle. In terms of housing demand consideration will be given to the housing market trends in terms of the number of properties sold and available on the market. In terms of the use of weighting in the analysis - it was considered that the use of weightings can be subjective and because the different figures that were being used were all of a similar importance, weighting was deemed unnecessary. Furthermore these factors show broad trends which are then used to provide an initial framework for the levels of distribution. They are adjusted taking more qualitative factors into account. It is not a rigid formula based process as there are many variables which can affect the proposal. Using a simple averaging technique allows for a more transparent process. Where figures have been rounded this does not have a significant impact on the outcome of the analysis as the quantitative factors provide a broad framework on which to determine the distribution - it is not a precise formula or calculation, rather it provides an overview of possible scenarios. Barnoldswick is the Key Service Centre for the West Craven area of the borough - i.e. it is the main town in that part of the borough and provides services and facilities for Barnoldswick's population and rural hinterland. The towns and villages in the West Craven area are of a different scale to those in the M65 Corridor, as a result the proposed amounts of growth are set at a level that reflects these different scales. The policies in the Core Strategy are designed to be flexible in order to respond effectively to change over the plan period. Policy LIV1 sets out the proposed level of new housing to be built in the borough. The policy sets out a minimum provision figure and suggests that further dwellings may be provided over and above this figure should there be evidence of need and demand. Policy SDP2 indicates that 10% of this total requirement will be located in Barnoldswick, however, the actual number of dwellings may increase where there is a need. In the interests of clarity Policy SDP2 should be amended to reflect the flexibility of other policies within the	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Core Strategy. In terms of how Policy SDP2 fits with the Spatial Strategy - the strategy is clear that it will require a limited amount of new housing to support the population growth. The provision of 10% of the housing allocation to Barnoldswick is considered to be of a sufficient scale as to support the growth in that area. The strategy is not looking at significant expansion in Barnoldswick, rather it is encouraging moderate, sustainable growth within the current settlement area.	
Policy SDP3	175	No	Policy SDP3 relates to employment distribution and recognises the over dependence of the local economy on the existing Rolls-Royce facility in Barnoldswick. In accordance with the Spatial Strategy and SDP1, the policy requires that the local economic base be diversified. Paragraph 6.34 suggests that the M65 Corridor is the general focus for future settlement growth. This is not reflective of the content of the Spatial Strategy, SDP1 or SDP2 which also identify the West Craven towns, and Barnoldswick in particular as a Key Service Centre, as the foci for settlement growth. In this context, the intention to concentrate new employment opportunities in the M65 Corridor does not adequately reflect the growth strategy for Barnoldswick. The policy suggests that 13% of the employment land requirement for Pendle to 2026 should be provided in Barnoldswick. The justification for this figure is provided in the Core Strategy Employment Technical Paper (Winter 2010) and detailed in Table 3.2 of that document. This demonstrates that 25.9% of available employment land is located in Barnoldswick. However, the proposed distribution suggests only 13% in Barnoldswick. This is not reflective of the identification of Barnoldswick as a Key Service Centre or the strategy to diversify the local economy.	Policy SDP1 indicates that Barnoldswick, like Nelson and Colne, is considered to be a Key Service Centre. However, although Barnoldswick exhibits the characteristics of a Key Service Centre, it does so within the context of West Craven. Its role within the borough as a whole is less influential due to its relative isolation and more limited range of services. The current population, recent housing and employment land completions and proposed housing distribution are all approximately 10% to 11% of the borough total. As such the proposed figure of 13% for employment land provision acknowledges that there is limited potential for local employment growth, but also recognises that a larger allocation for Barnoldswick is not justified by the available evidence and would not promote a spatial pattern of development that could be considered sustainable in terms of existing or projected infrastructure and service provision. The availability of employment land is just one of several criteria used to establish the proposed employment land distribution (see Employment Land Technical Paper). But, as noted in the representation past take-up (10.7%) has not been unduly constrained by the availability of employment land. The purpose of the aspirational figure (13%) is to help improve the range, quality and choice of sites available, in order to help retain employment locally and attract new investment that will both compliment existing provision and help to diversify the local economic base. The relatively large amount of employment land currently available in Barnoldswick reflects the decline of traditional industries, the less intensive use of land by modern businesses and the loss of some businesses to more attractive and accessible locations in the M65 Corridor.	No changes to the document are proposed as a result of this representation.
Policy SDP6	176	No	Policy SDP6 proposes a sequential approach to development suggesting (in order of priority): a) brownfield land and vacant buildings within settlement boundaries b) other land within	The published National Planning Policy Framework (NPPF) includes 12 core land-use planning principles that underpin plan-making (paragraph 17). They include encouraging the	PROPOSED ACTION: Replace third bullet point and final paragraph with the following wording: Land outside of a defined

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			settlement boundaries; and c) land outside settlement boundaries, where there is a proven need. The draft NPPF makes no reference to the requirement to adopt this sequential approach. The policy does not provide clear guidance in relation to the term "need". First, it suggests that this need will be detailed in Local Authority documents. These have yet to be confirmed as constituting a robust evidence base on which to base policy decisions. There is no indication as to the protocol for updating this documentation. A more appropriate approach would be for each case to be considered on its own merits, and for evidence on how each development proposal meets a need to be presented by the applicant, rather than the starting point for the application being the two documents identified above. There is no indication of the process by which each application will be assessed and the criteria to be used to show that any need has been proven. The need relates only to two land uses: residential and employment development. Other land uses (such as leisure; infrastructure; office; commercial; retail) are not considered in the Strategic Housing Market Assessment or the Employment Land Review. In this context the policy does not provide a robust basis on which to base planning decisions.	effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. Policy SDP6 aims to direct new development to the most sustainable locations and promote the reuse of previously developed land in the first instance. It is acknowledged that the third bullet point and final paragraph of the policy need to be amended to clarify when development outside of settlement boundaries will be permitted.	settlement boundary for appropriate rural uses.
Policy LIV1	178	No	Policy LIV1 sets out policy on the provision, phasing and delivery of housing targets. Pendle suggest a minimum total housing requirement of 3,000 (2011-2026), which equates to 200 dwellings per annum. This figure is slightly higher than the current RSS target of 190 dwellings. Over the next five years the Council is required to deliver 1,000 dwellings. The Council's latest Annual Monitoring Report (AMR) (reflected in the Core Strategy) states that there is provision for 1,113 dwellings over the next 5 years. This equates to a 5.56 year supply. However, figure LIVa (Housing Trajectory) suggests that this target of 200 dwellings per annum will not be achieved; with a potential shortfall of 64 dwellings by the end of 2012/13. To address this Policy LIV1 suggests a phased approach to delivery which suggests a reduced annual allowance of 160 dwellings per annum to 2016, and an increased requirement of 220 dwellings per annum from 2016 to 2026. Given this shortfall, Stirling Investment Properties maintain that the target of 200 dwellings per annum should be increased to better reflect the findings of the SHMA (Issue 5a - option 2) and the latest Housing Land Availability Assessment. It is welcomed that the policy indicates that the phased delivery target is the minimum provision required. However, this is not reflected elsewhere in the policy; for example in the per annum requirement rates. The phasing	The housing trajectory indicates that there are projected completions of over 1000 dwellings in the first 5 years of the plan. It is the timing of when these sites will come forward that is the issue relating to meeting a delivery rate of 200 dwellings per annum. The phasing approach merely reflects the likely delivery in the first 5 year period taking account of the current economic circumstances, infrastructure capacity etc. It should be noted that the phasing figures are minimum expected figures and are not designed to restrict the housing supply. This will be clarified in the revised policy. With regards to the phasing approach and the impact new housing will have on regeneration - the building of new housing near areas of regeneration could reduce the demand for the existing housing stock or new build houses that are part of regeneration schemes - especially in the short term. There are a number of regeneration projects in Pendle, the success of which could be harmed if additional housing was provided that outstripped demand. The Pennine Lancashire Housing Strategy explains the potential negative effects new housing can have on low demand areas. Policy LIV1 requires applicants / developers to assess the potential impact of new housing on these regeneration projects. The intention of the phasing approach is to act as a	PROPOSED ACTION: The policy will be revised to clarify that the phasing approach is a minimum expected delivery approach and not a restrictive mechanism. PROPOSED ACTION: The policy will be amended to clarify the requirements of applicants.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			approach should also be revised to act as a stimulus to the delivery of residential development in the short term given the existing anticipated shortfall in supply - the current suggested figure of 800 dwellings between 2011 and 2016, is less than that anticipated in the five year periods 2016-21 and 2021-26 (1,100 dwellings). The adoption of this approach to reduce negative impacts on regeneration areas is incorrect. It is the housing completions coming forward which will actually deliver the regeneration. By suppressing the housing targets this will have a negative impact on regeneration initiatives. The adoption of a low target to reflect the current economic climate is also ill-founded. The target should be such that - a target - and by adopting a lower target this is in effect a self-fulfilling policy. Reference to the adoption a sequential approach to site selection is made in Policy LIV1; and reflects the content of Policy SDP6 (separate representations have been made on this policy) which has consequences for the drafting of LIV1. In this context the policy does not provide a robust basis on which to base planning decisions.	guide to provide an indication as to the likely levels of housing that will be delivered in each period. It is not a mechanism for restricting the supply of new housing. The Core Strategy is aiming to achieve a balance between the sufficient provision of new housing whilst also ensuring the use of the existing housing stock is not undermined. The phasing approach takes into account the current and short term economic conditions as it would be unrealistic to set overly optimistic delivery figures. Comments on Policy SDP6: A Sequential Approach to Development are dealt with separately under the response to Comment 176.	
328062	JWPC Ltd			Mr Andrew John Walker	
Policy LIV1	531		1. This policy is within the chapter of the Strategy entitled "Creating a Vibrant Housing Market". This aims to create a balanced housing market across the Borough. The following comments are based on a consideration of the Preferred Options Report and the Housing Technical Paper. Our starting point is the belief that housing development will be one of the key drivers for economic recovery and growth in Pendle. The Strategy should encourage and facilitate new development and should not attempt to micro-manage the provision of housing or restrict development by adopting rigid annual requirements. The experience of restraint policies operated under the adopted local plan was generally negative and exacerbated the effects of the economic downturn. 2. The Policy, correctly, looks at the level of provision over the plan period and the adoption of relatively higher levels is welcome with the caveats that the overall requirement should be regarded as a minimum rather than maximum figure and that the figures should be net to allow for future clearance. However, the Policy states that the provision will be managed in accordance with a phasing approach outlined in Table LIV 1a. 3. The Table LIV 1a suggests that the first five year of the plan period (2011 – 2016) would have a reduced annual requirement of 160 dwellings. The five	1. The policy will not restrict the provision of new housing. The overall and annual targets are minimum figures based on a realistic assessment of what is needed and could come forward. It should be noted that a substantial number of permissions were granted prior to the moratorium coming into place which did not get built out. The restraint policy was a direct response to the requirements of higher level planning policy (i.e. the Joint Lancashire Structure Plan (JLSP) and RPG13) which previously set the housing requirement figures for Pendle. This level of planning policy has now been replaced and the policy of housing restraint was lifted in 2009. It should also be noted that until 2008/09 the delivery of new housing was ahead of schedule. The economic downturn that occurred in 2008 was the primary reason that the delivery rate fell, rather than limitations placed on the granting of planning permissions. 2. The proposed overall housing figure is based on an assessment of need/demand together with additional factors such as the need to reoccupy empty homes. The policy already indicates that the figure is a minimum. 3. It is acknowledged that the policy needs to be clarified to explain that the phasing mechanism is a minimum expected delivery rate. 4. It is not	PROPOSED ACTION: Remove the term phasing from the policy and explain that it is a minimum expected delivery rate which is linked to the housing trajectory and five year supply requirement. PROPOSED ACTION: Include the word "net" in front of the overall housing figure within the first sentence of the policy. PROPOSED ACTION: Change the dates of the minimum expected delivery approach and plan period.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			year phased delivery figure of 800 dwellings is under a column which is headed “minimum provision” but this qualification does not appear to be explained in the text to the policy, nor is any indication given as to how this will be operated. 4. The reason for the reduced provision over the early period of the plan is explained by reference to building industry capacity issues and the economic downturn. However, paragraph 3.6 of the Housing Technical Paper also refers to the need to allow the housing regeneration sites to come forward and get established. This raises the concern that the real reason for adopting a reduced requirement figure in the early years is an attempt to extend the negative housing restraint policy of the past few years. In other words the phasing is being used as an artificial constraint rather than an encouragement to new development. 5. A further consideration relates to the fact that year one of the plan period has past and the provision to be adopted will, in effect, lag one of two years behind the phasing programme. It is therefore suggested that the phasing in Table LIV 1a should be simplified to show three equal five year minimum figures of 1000. This should have the effect of removing any artificial management of the annual supply requirement whilst retaining the overall provision figure for the plan period. 6. A similar consideration applies to the release of sites during the first plan period. If the release of sites following Policy SPD 6 principles fails to deliver sufficient land to meet the requirement then the release of green field sites should be considered. In many cases, previously developed land suffers from constraints which prevent it being brought forward on time. Other sites within the settlement boundary may not be of the quality to achieve a balanced housing stock or to achieve the distribution requirements of Policy SPD 2. In these circumstances the delivery of housing development should not be constrained if land outside of settlement boundaries is available to meet a proven need in the early plan period. 7. The Policy also seeks to introduce new requirements on developers to demonstrate “deliverability”, This is explained as availability, suitability, and achievability. Larger schemes must also demonstrate viability. It is not clear or explained why these additional tests are necessary particularly for sites within the SHLAA where these issues will already have been assessed. This process will, undoubtedly, further complicate and delay the determination of planning applications and act as a further deterrent to housing development.	the intention to restrict the delivery of housing through the phasing mechanism - it is merely a guide as to the expected minimum levels that are seen to be achievable in the first 5 years given the current economic conditions. There is a difference between the delivery of new housing and the granting of planning permission for new housing. It is acknowledged that more planning permissions will need to be granted to ensure delivery but these should only be granted if there is evidence that they will be delivered. 5. The requirement figure will in-effect start once the Core Strategy is adopted, as will the lower requirement figure for the first 5 years. 6. The intention of the sequential approach is to direct development to PDL sites in the first instance. This is because these sites need regenerating and are more likely to be in sustainable locations compared to Greenfield sites outside of the settlement boundary. The NPPF encourages the efficient use of land by reusing land that has been previously developed (Brownfield). It is however acknowledged that there may be instances where Greenfield sites will need to be released due to the low viability of Brownfield sites. Policy LIV1 acknowledges the need for some Greenfield development in its PDL trajectory. Furthermore the allocation of land in the Land-use Allocations plan will ensure that there is sufficient land available to meet the housing requirement. 7. Proposals for new housing development are already required to demonstrate their deliverability - this has been a requirement since the Interim Housing Policy was adopted by the Council in 2009. This approach is necessary to ensure the delivery of sites and to stop land-banking, which does not help delivery. If sites have already been assessed as part of the SHLAA process it will be easy for applicants / developers to demonstrate the deliverability of a site.	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Appendices	527		Appendix B Local Plan Policies Replaced by the Core Strategy 1. Paragraph 2.13 of the Preferred Options Report indicates that certain policies of the existing Replacement Pendle Local Plan will not be replaced by the Core Strategy. Details of the policies to be replaced are given at Appendix B to the Options Report. However, a number of the local plan policies which will not be replaced are not up to date and their replacement is necessary. These policies are listed below together with comments on how they should be dealt with as part of the Core Strategy. 2. Local Plan Policy 1. The main pre-ambble to this policy is that new development should be incorporated within settlements except in certain circumstances. This general statement could be incorporated into Core Strategy policy ENV 1. Policy 1 also has a number of sub-paragraphs as follows: 1. This is referenced to local plan policies 24 and/or 40. Both of these policies are replaced in the Core Strategy. 2. This is cross-referenced to local plan policy 24 which is replaced. 3. A general reference in ENV 1 and to PPS 7 would replace this. 4. This is referenced to local plan Policy 17 which is replaced. 5. This refers to Policy 17 which is replaced. The general point relating to conversions should be incorporated into ENV 1 retaining the reference to PPS 7. 6. The intention of this is covered by ENV 1. Reference is made to local plan policies 2 and 3 both of which are replaced. The generality of the 25% rule can be covered in ENV 1 although the use of the precise figure is un-necessary and discredited (see appeal decision APP/E2340/D/11/2157321). 7. This is cross-referenced to local plan policies 4A, 4B, 4C, 24 and 40. All of which are replaced by policy ENV 1 and the WRK policies. 8. Again this general reference is covered by ENV 1. 1.2 This refers to policies which are replaced. In conclusion Policy 1 cannot be retained as, in the main, it refers to other policies of the local plan which are replaced. This emphasises the point that the policy is out of date. Without exception the matters covered by the policy are covered in the new ENV policies, or could be with minor textual amendments. 3 Local Plan Policy 3A. This is clearly a policy which is outdated in that it refers to the proposals map which is now well over 10 years old, will be replaced in detail by the Land Allocations Plan and is dealt with in the Core Strategy by SPD 6, LIV 1 and LIV2. Its retention is un-necessary and confusing. 4. Local Plan Policy 12. The general intent of this policy is incorporated into ENV 1 and ENV 2. Any site specific allocations should be incorporated into the Land Allocations plan. To retain this policy in isolation from the new development plan prevents the reason for the designation being tested against up to date	There are a number of policies in the Adopted Replacement Local Plan that will not be replaced by policies in the Core Strategy. The policies that are not replaced will remain part of the development plan as part of the Local Plan until they are replaced by other documents. Regulation 8 of The Town and Country (Local Planning) (England) Regulation 2012 states in paragraph 5 that where a policy is intended to supersede an adopted policy this should be identified. This is the purpose of the appendix. However it is accepted that the wording in paragraphs 2.12 and 2.13 could be made clearer to reflect this in that where policies are not replaced they are also not repealed and will be reviewed as part of a later process. Policy 1 of the Adopted Replacement Local Plan sets criteria for permitting development in the open countryside. Such criteria is too detailed for the strategic level of the Core Strategy and as such any replacement policy will be included as part of the Local Plan Part II. Notwithstanding this Core Strategy policy SDP1 indicates that development should be within a settlement boundary and Local Plan Part II policies will set out in which circumstances exceptions to this may be appropriate. Notwithstanding this it is agreed that that reference to agricultural workers dwellings should be made in the core strategy. Where cross referencing occurs the policy which supercedes it will apply. Policy 3A of the Replacement Local Plan still applies. The policy and allocations linked to it will be reviewed as part of the Land Use Allocations DPD. The NPPF sets out in paragraph 55 what is acceptable. More detail will be provided in Local Plan Part II. Local Plan Policy 12 similarly will remain part of the development plan until reviewed by the Land Use Allocations DPD. The policy is too detailed to be included in the Core Strategy. Local Plan Policy 16 is not a spatial strategy. It specifically relates to landscaping in new development. This is too detailed for the Core Strategy and is not included in policy ENV1 but will be considered as part of a later stage in the review process. Local Plan Policy 18 - where policies, such as this, are clearly out of date, they will not be replaced. This will be made clearer in the appendix. Local Plan Policies 22, 26 and 27 remain part of the development plan until reviewed as part of the Land Use Allocations DPD. The NPPF supports the approach taken in these policies. The policies in the Core Strategy will not be out of date as that is the very purpose of a plan review, to review and update policies. Overall, the general principles of	PROPOSED ACTION: Include at the end of second the bullet point in paragraph 2.12: - such as a detailed in the Pendle Local Plan Part 2: Site Allocations and Development Policies. PROPOSED ACTION: At the end of paragraph 2.13 include: Some of the more detailed policies will be included in the Pendle Local Plan Part 2: Site Allocations and Development Policies as mentioned above. PROPOSED ACTION: In appendix B indicate which policies will be included in the Pendle Local Plan Part 2: Site Allocations and Development Policies. Add a column to the appendix showing where Local Plan Part 2 policies will be relevant. PROPOSED ACTION: Make reference to agricultural workers dwellings in LIV2.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			requirements and modern national planning policy. 5 Local Plan Policy 16. This is a very general policy which is completely dealt with in the new policies ENV 1 and ENV 2. 6 Local Plan Policy 18 This policy is now completely out of date and is cross-referenced to other policies most of which are replaced. Any residual issues can be, and probably are, covered in the new LIV policies. 7. Local Plan Policy 22 Again this is outdated and un-necessarily detailed. The new WRK policies should deal with the generality of the policy and the Land Allocations plan with site specific allocations. 8. Local Plan Policies 26 and 27. As recent appeals have shown Policy 26 is in urgent need of up-dating. Site specific policies should be incorporated into the Land Allocations plan. CONCLUSIONS There is a real danger that the retention of Local Plan policies will cause confusion and prevent a review of the issues they cover under the new Development Plan System. The Core Strategy should provide the strategic context for all development matters in the future and should not leave residual policies which are outdated and out of context. It is accepted that some of the Core Strategy policies will need to be fleshed out by site specific allocations or more detailed development management policies. Where this is the case it should be explicitly stated, for example, in the way that paragraph 10.28 makes reference to the Land-use Allocations Development Plan. As things stand the new development plan will be burdened by a series of out dated retained policies most of which are un-useable because they are cross-referenced to other policies which have been replaced.	policies in the local plan which it is considered appropriate to carry forward are covered by the core strategy but further detail in Part II of the local plan will be required. This will be made clearer in the table.	
327517	Kelbrook & Sough Parish Council			Mr. Paul Maskell	
Policy SDP1	462		We note the additional housing and employment areas that the strategy states are required and that these will be spread across the region. We note that in West Craven there are still many dissused/brown field sites that desperately need redevelopment and trust that these will be given the highest priority for housing and/or employment, especially for low cost affordable housing. We would ask that settlement boundaries are not compromised, or if development is needed outside the boundary, this is done in rationalising boundaries to allow controlled, small developments as that will have significantly less impact on a parish than a single estate type scale development.	Policy SDP6 provides a request for developers to use a sequential approach to site selection and prioritise the use of Brownfield sites in the first instance - this applies across the borough. Policy SDP1 clearly states that new development should be located within a settlement boundary. It indicates that there may be certain exceptions to this requirement but they must be in line with other policies in the Core Strategy. This should offer sufficient protection to the Open Countryside. Where development is proposed outside of a Settlement Boundary it will need to be justified and be at an appropriate scale. Policy SDP1 will be amended to clarify the exceptions allowed and criteria developments will need to meet. The Land-use Allocations DPD will review the Settlement Boundaries to ensure that	PROPOSED ACTION: Amend Policy SDP1 to clarify the exceptions allowed outside the Settlement Boundary.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV3	465		We note the renewable energy requirements in the strategy and the suggested use of moorland above the parishes for wind turbines. Given the lack of detail on where, how many, what size, the PC would make the following observations: Firstly there is a problem of access to the suggested areas with regard to the transportation of the size of turbines that a commercial wind farm would require. There is a precedent in other areas for restricted access for these large transporters to be prohibitive of development. Secondly, much of the suggested land has recently been designated Access Land under the Countryside and Rights of Way Act, increasing the tourism potential for this area. The development of wind farms would render this progress worthless as users of this land would not be encouraged by the presence of huge wind turbines. Thirdly, the effect of such a development on the visual amenity of a very large area of both rural and urban environment would be disastrous. Lastly, we would want to ensure that any renewables policy adopted by PBC fully considers all the available evidence regarding the comparative value of various solutions. There is much evidence to suggest that, for the damage these installations cause to the countryside, the actual contribution that windfarms make to the energy market is negligible	they are appropriate to the future development needs of the borough. The Core Strategy does not designate or 'suggest' any land for wind turbines. The evidence base report on RLC (Maslen Environmental 2010) does identify the areas of most potential. This is based on an analysis of suitable wind speeds and removing areas of most constraint e.g. national landscape and wildlife designations, proximity to settlements, roads and railway etc. However, this is a high level, theoretical analysis and it is not to say that all this land would be suitable, due to individual site level constraints such as access, visual and landscape impact, proximity to isolated dwellings etc. Only at an application stage could these more detailed levels of analysis be carried out because they depend on the specifics of a development i.e. the specific heights/sizes and individual siting of the turbines. With specific regard to countryside access, wind farm developments can also be used to improve and increase access to the countryside through improved or extended footpath networks etc secured from the developer to mitigate potential impacts to recreation and tourism. And there are examples where wind farms have become visitor attractions, increasing visitor numbers to an area. All these issues could be legitimately considered at the time of a planning application. The Core Strategy equally supports the use of all RLC technologies. It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board.	PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board.
Policy WRK1	468		We note the need for "connection" in the strategy and the part that high speed broadband is expected to play in meeting high tech employers needs for global communication. We were concerned this seemed to be aimed at the major urban areas in West Craven. We would point out that we have need of such service levels to be delivered within the rural parishes for high tech companies within the villages as well as for the many home workers who currently have a very limited service due the the distance from their premises back to the telephone exchange. We trust that these needs will also be addressed.	The need for access to good quality broadband within the 'rural parishes' is identified in the supporting text for Policy SDP5 - see Energy & Utilities in the table on page 55. It is also acknowledged in the supporting text for Policy WRK1 (Para 11.22), which states that "widespread access to high speed broadband throughout our rural areas" will be a key element in the transformation of our rural economy. The policy text for Policy WRK1 encourages new development that will promote sustainable working practices. It specifically acknowledges that projects which will help to grow, diversify and strengthen the rural economy, including proposals for home-working, will be supported. However, it is acknowledged that support for improvements to broadband connectivity and speeds could be better	PROPOSED ACTION: Include a bullet point within the policy indicating support for projects that will help to deliver better connectivity for businesses, in particular improvements to broadband within the rural areas.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				reflected within the policy text. Whilst planning will not be the primary vehicle for delivering improvements in broadband, the policy should actively support developments that seek to deliver improved levels of connectivity, particularly in our rural areas.	
327658	Lancashire County Council			Mrs Kate Grimshaw	
Chapter 4: Vision	97	No	No comments provided relating to this section of the document.	Disagreement noted. However, the consultee has not provided any specific comments indicating why the Spatial Vision is not supported, or how it could be improved.	No changes to the document are proposed as a result of this representation.
Policy SDP1	173		YPS (Young People Services) is moving towards a key centre/satellite centre provision. This is due to the budgetary restraints that have been placed on us which in turn has led to the reduction in staffing. YPS has already come up with a model of key centres and satellites for Pendle. Nelson is to be the key centre and Colne (with Trawden as outreach provision), Brierfield and Barnoldswick (with Earby as outreach provision) are to be satellite centres. YPS' plans more or less fit with the boundaries of this policy.	The provision of YPS (Young People Services) at the identified locations will fit with the Settlement Hierarchy approach. The level of service provision is appropriate to the position the settlements hold in the hierarchy. This will ensure that such services can be accessed by those most in need and ensure the long term sustainability of such services.	No changes to the document are proposed as a result of this representation.
Policy SDP2	174		Any new development has the potential to impact on the existing Young People's Centres as potentially it could increase the demand on services for young people within that area. However, YPS look at each large scale planning application that is submitted to Pendle to assess whether the new development hits our pre-identified priority areas. YPS has a brand new facility within Nelson which has been funded by Myplace and because of this we now have no identified need for a new building within Pendle. However, depending upon the number of planning applications and new dwellings, YPS would always look at either improving or extending existing provision to meet the increased demand.	Policy SDP2 sets out the proportion of new housing to be developed in each settlement in Pendle. This together with the figures outlined in Policy LIV1 provides the amount and location of housing that is expected to be delivered during the plan period. On this basis LCC YPS may need to either improve existing facilities or provide additional facilities to meet demand.	No changes to the document are proposed as a result of this representation.
Policy SUP1	99	No	In 'resisting the loss of community facilities' in the manner provided on page 181, the borough council is proposing to make the disposal of surplus public sector property more difficult; as it is implied in the policy that the majority of such premises will be identified as being 'community facilities'. The measures promoted in the policy are significantly more onerous than those recently enacted in the Localism Act (the so-called 'community right to bid' proposals) and as such will potentially have the following effect:- i) the ability of local authorities to return redundant premises to productive use (by their disposal	The purpose of Policy SUP1 is to try to avoid the loss of essential community facilities. It is acknowledged that over the plan period services and facilities may be delivered in different ways and this may result in a community building becoming redundant for the particular community use. The policy already includes a number of exceptions which will allow the loss of these facilities and for the buildings / sites to be used for other uses. In particular the second sub-bullet point of the second bullet point under the General Principles section indicates that when evidence is presented that the	PROPOSED ACTION: Amend the third sub-bullet point of the second bullet point under the General Principles section of Policy SUP1 to read: "it can be proven the property has been vacant and actively marketed for a community use for over one year".

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			in the open market) will be reduced, as structural deterioration is an inevitable consequence of the lengthy periods of disuse pending community use assessments. ii) the holding costs imposed by an inability to achieve early sales represent a substantial waste of money – public money in the case of large public organisations such as the county council. iii) the ability of public bodies to promote the regeneration of their areas via the use of their surplus property stock, either directly or via the proceeds of sale, could be compromised by an inability to achieve early disposals of key public sector assets. The county council has consulted public sector partners on the creation of a pan-Lancashire property-based regeneration initiative; 'The Lancashire Regeneration Property Partnership'. The formal OJEU procurement of private sector partners for this initiative is due to commence in January. iv) in view of the variance between planning authorities in Lancashire in policies focused on the retention of community facilities, there is a risk that those authorities with onerous restrictions on the property sale process will suffer reduced market and hence regenerative activity relative to those adopting a more 'business friendly' approach.	facility is no longer required or viable and cannot be used for an alternative community use then the loss of the facility will be acceptable. This is considered to be a flexible approach and it is likely that if the County Council are trying to dispose of a site it will be because the facility is no longer required - may be because the service is being delivered in a different way or at an alternative location. The third sub-bullet point also allows facilities to be lost where they have been remained vacant and have been actively marketed for over one year. The one year timescale is an appropriate length of time to ensure that proper consultation is carried out and that all possible alternative options are explored. It is acknowledged that the policy needs to clarify that the property / site has been actively marketed for community use. The National Planning Policy Framework (NPPF) (paragraph 28) indicates that specifically in rural areas local plans should promote the retention and development of local services and community facilities. The sustainability of towns and villages is dependent on the provision of, and good access to, community services and facilities. It is therefore appropriate for Policy SUP1 to encourage the retention of such services and facilities to ensure the continuation of viable and vibrant communities.	
378754	Lancashire County Council			Mr Marcus Hudson	
Chapter 4: Vision	145		Pendle is currently characterised by a relatively self contained localised labour market. The strongest commuting links exist to Burnley and to a lesser extent Blackburn with only limited interaction with the neighbouring Yorkshire districts to the east. The document focuses on future linkages with the Manchester City region and North Yorkshire. It would provide a more balanced picture of the Borough's characteristics and linkages to place a greater emphasis on the role of Pendle within the Lancashire sub region and linkages west into Lancashire. The major employment site at Barnoldswick should be seen as part of a network of sites across Lancashire which collectively forms an advanced manufacturing growth sector. This sector is critical to diversifying the County's economic base.	The Spatial Vision looks forward 15 years to provide an indication of what Pendle will be like if the Core Strategy is successfully implemented. It represents a transformational agenda for the borough, highlighting the need to improve linkages with the city regions of Manchester and Leeds. Such improvements will not only benefit Pendle, but will also have a wider benefits for Pennine Lancashire and the county as a whole. In comparison Pendle's existing linkages with the rest of Lancashire are comparatively good and do not feature prominently in the Spatial Vision. This does not mean that improving linkages with the rest of the county is regarded as unimportant. Whilst the M65 and A59 may provide adequate east-west road links rail services could be improved. The Spatial Strategy acknowledges Pendle's place within Pennine Lancashire and how links to the city regions (including Preston) can benefit the potential for economic growth in Pendle and Pennine Lancashire. Similarly Policy WRK1 acknowledges that the areas	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				specialism in advanced manufacturing (notably aerospace) has cross boundary implications and is a key component in a large network of establishments across Lancashire. It is not therefore considered necessary to change the Spatial Vision in response to this comment.	
Policy SDP5	149		The document would in my view benefit from a greater emphasis being placed on broadband connectivity and ensuring that broadband infrastructure is considered proactively in future development.	The table within the supporting text highlights the need to expand broadband coverage, particularly into the rural areas. Elsewhere the policy offers broadsupport for infrastructure improvements that are considerednecessary to support future development and growth in Pendle. The support for improved broadband provision is echoed in the Spatial Vision for Pendle (Page 36, Para 4.14) and throughout Policy WRK1.	No changes to the document are proposed as a result of this representation.
Policy ENV4	154		I also note reference throughout the document to Lancashire's Local Transport Plan as LTP2. As of March this year LTP3 was adopted by Lancashire County Council. I suggest the text within the document is updated to account for this. In addition to this, the supporting implementation plan for LTP3 was adopted in October of this year. Again I suggest the text is updated to account for this and to also take into account the transport schemes and initiatives that are listed within this document for Pendle and surrounding districts.	Policy ENV4 and its supporting text will be updated to reflect the adoption of LTP3 (Local Transport Plan 3) and the implementation plan. Where appropriate the policy will be amended to take account of the transport schemes and initiatives proposed in the implementation plan.	PROPOSED ACTION: Amend Policy ENV4 and the supporting text to take account of the adoption of LTP3 and its implementation plan.
Policy ENV4	148		The focus on links eastward is evident in the strategic transport issues highlighted; these being the A56 villages bypass and the re-opening of the Colne to Skipton railway line. The merits of these proposed schemes will need to be subject to rigorous assessment to determine their benefits. Given that future housing and employment distribution is to be focused around the M65 corridor then the document could usefully give greater focus to the potential infrastructure needs arising from this pattern of development, which may well offer the prospect for new infrastructure and enhanced connections eastwards across the borough.	Policy ENV4 supports the long term proposals of the A56 Villages Bypass and the re-instatement of the Colne to Skipton railway line. However, paragraph 7.122 notes that the delivery of these schemes is subject to detailed planning, costing and funding. Studies have been undertaken in the past to highlight the potential benefits of both these schemes. The County Council will need to consider whether it is necessary to re-evaluate / revise these studies in order for these schemes to be progressed. Local Transport Plan 3 (LTP3) sets out the County Council's priorities for transport improvements. For Pendle it includes a commitment to undertake a M65 to Yorkshire Corridor Study to obtain a better understanding of potential solutions. The policy acknowledges that where there is likely to be an adverse impact on the highway that these issues should be addressed and mitigated against before the development is allowed to proceed. The policy already requires contributions to be made to improve the highway where necessary and to help improve public transport systems. The policy could be improved to give more of a focus of the	PROPOSED ACTION: Include additional wording in the supporting text to make clear that by focusing new development in the M65 Corridor this may require additional transport infrastructure to be put in place and that this could be useful for improving links eastwards across the borough.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 8: Key Diagram	158		In Chapter 8, the purpose of the key diagram is to illustrate proposals. Transport corridors are shown, but transport interventions that the County Council has recognised (e.g. A56 villages bypass and the re-opening of the Colne to Skipton railway line) are not shown. I suggest that the key diagram is amended to take this into account.	transport infrastructure needs required in different areas of the borough. It is agreed that the transport interventions such as the road (A56 Bypass) and railway should be shown on the key diagram. As there is no specific detailed route yet available the general broad location of the routes will be shown by additional arrows on the Key Diagram.	PROPOSED ACTION: Add an additional arrow to show the broad route of the A56 bypass and the Colne-Skipton railway.
327773 Document	Lancashire County Council 1114		The County Council's Archaeology and Ecology Services (which now form part of the Development Management Group) have been consulted on the preferred options paper for your authority's Core Strategy. Your authority specifically opted out of the previous service level agreement with the County Council for the supply of advice on policy and development proposals; primarily for bugetary reasons and which I understand and have some sympathy. However, in the absence of such an agreement or other arrnagements that would reimburse the County Council for providing such advice, we are not in a position to make any comments on your strategy at this stage. You will be aware that Planning Policy Statement 5 Planning for the Historic Environment (PPS5) and its associated practice guide has now been in use since March 2010, and whilst the latter is still under review, it seems to have settled into use reasonably well. The PPS confirms the need for local planning authoirites to have access to a Historic Environment Record and its dedicated staff, and the need to obtain expert advice when making planning decisions that affect heritage sites. Equally the recent White Paper 'The Natural Choice: securing the value of nature' (DEFRA, June 2011) re-states the government's commitment to a healthy, properly functioning natural environment and to its proection and improvement as a core objective of the planning system (paragraph 2.33-7). They acknowledge this as a necessary foundation of sustained economic growth, prospering communities and personal wellbeing. We are currently discussing the opportunity of redrafting the service level agreements with the other local authorities in Lancashire, with the view to providing a service that is both cost-effective and meets their specific needs, allowing them to meet their legal requirements with regard to the natural and historic environment. We have received a positive response to date, and there appears to be a general desire to maintain the service, but	Mr Peter Iles This representation was submitted and received following the publicised closing date for the public consultation, on Monday 12th December 2011. It is for Members of the Council's Executive to decide whether to accept this representation. The comments relating to general advice, containedwithin the representation are noted. But Pendle Council wishes to record its disappointment that a statutory consultee has chosen not to respond to the public consultation, having been given the opportunity to do so. Pendle Council accepts that it no longer has a service level agreement with Lancashire County Council (LCC) for the supply of advice relating to archaeology and ecology. As an alternative the Council has agreed for specialist advice to be made available on a case by case basis from LCC thus meeting the requirement to have access to a a historic environment record as required by the National Planning Policy Framework (paragraph 169).	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			perhaps with revisions to the terms of the former agreements. If you feel there would be some merit in discussing the opportunity for the County Council to provide such a service again to your authority, we would be happy to discuss this with you at your offices at a time that is convenient to you. Such a meeting could include discussion on: - What consultations should be included in a standard service. - Whether a service is required over and above a standard service. - The cost structure associated with such and how charges are calculated. - The need to tailor agreements to individual authority needs. We are also discussing with other authorities the opportunity to extend any agreement to include landscape advice, and whether given the current climate we are facing whether there is opportunity to provide any other extended shared specialised services. In the absence of such an agreement, in whatever form may be considered acceptable, there is no certainty that the County Council would be in a position to provide advice on a case by case basis on request, at the expense of those that have entered into such an agreement. The Development Management Group sees this as an opportunity to provide a service to your authority which would meet your particular needs, and with regard to the budgetary constraints we are all experiencing. We hope you will find this an acceptable and transparent approach to trying to meet your requirements. If you feel there would be some merit in at least discussing this without any obligation of course, we would be happy to meet with you.		
618757	Lancashire County Council			Lynn MacDonald	
Policy SDP5	180		Section 6 on Page 7 of your document should be revised as follows: · Primary Little spare capacity within Colne Primary schools. A shortfall of primary places has already been identified in Nelson, Barnoldswick and Brierfield areas and consultation is currently underway on the provision of additional places in these areas. The growth in the birth rate in most areas of Pendle means that we are reviewing the area annually to establish whether there is a further need for additional places. · Secondary Whilst there is currently some surplus in the secondary schools, this is expected to reduce in the next few years, in line with the rising pupil numbers in the primary sector. BSF has now been discontinued by the government before the rebuild of all Pendle's secondary schools could be completed. · Existing Further education provision has capacity. · No Higher Education Provision in boroughbut priority of Pennine	As Lancashire County Council (Education) are the source of this information, the new wording provided by the consultee for inclusion in the table on Page 57 (Policy SDP5) will be reflected in the Publication version of the Core Strategy.	PROPOSED ACTION: Amend the entry for education, in Column 2 of the table in the supporting text (Page 57), to accord with the revised wording in the representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Lancashire Economic Strategy to improve HE provision in the sub-region. Delivery -As the number of surplus places reduces, there will be an increasing call on capital funding for the provision of education places with a drastically reduced capital allocation from central government. With the discontinuance of the Primary Capital Programme and Building Schools for the Future, Lancashire's Strategy for the Provision of School Places and Schools' Capital Investment' (available on the Lancashire.gov.uk website) lays out Lancashire's priorities, with demographic context.		
Policy SUP3	182		The comments attached refer to the education references on p189 of your document Paragraph 12.47 is currently being revised by our 14-19 Education team and will forward you their comments on this section separately. 12.44 Pendle has a number of Children's Centres throughout the borough, including a children's centre in the centre of Colne, Colne Children's Centre. We will work closely with partners to ensure that Children's Centre services continue to meet the needs of the communities across Pendle. 12.45 The Primary Capital Programme has now been discontinued, together with the Building Schools for the Future Programme (relating to secondary schools). Whilst the Building Schools for the Future programme helped to transform the secondary educational experience in Pendle, via the building of 2 new schools, there are still secondary schools in Pendle which will not now have the opportunity to benefit from the programme. Policy SUP03 will support developments where they bring about improved educational facilities which will help to raise educational attainment levels in the borough. 12.46 Planning the provision of school places is undertaken by Lancashire County Council. When planning places, information on the birth rate, housing developments, inward and outward migration and population changes are taken into account. An increase in Pendle's birth rate over the last few years has led to the county council increasing the capacity of an infant and junior school in Nelson. However, a further increase sees a need for additional places in Brierfield, Nelson and Barnoldswick. (At the time of writing, consultation was underway on the provision of these additional places). The reduction in the capital funding being made available to the county council means that seeking contributions from housing developers where the development is expected to impact upon school places may increase. An additional issue for the county council is the lack of sites available for the provision of additional places. Therefore, we will work closely with the	The representation proposes changes to the wording of the Strategy to reflect recent changes in the education sector, particularly in terms of funding.	PROPOSED ACTION: Re-word the Supporting text: 12.38 There are a number of Children's Centres in Pendle, the latest being a purpose built facility in Colne town centre. 12.44 Pendle Council will work closely with public and private sector organisations to ensure that service provision for children and young people continues to meet the needs of communities across the Borough. Where appropriate this will include the provision of new facilities to meet an identified need set out in the Pendle Infrastructure Study, or partners' plans. 12.45 The Primary Capital Programme and Building Schools for the Future Programme (Secondary Schools) have both been discontinued. Whilst the latter helped to transform secondary education in Pendle, via the building of two new schools, several secondary schools did not benefit from the programme. Policy SUP3 will support further developments where these bring about improved educational facilities, to help raise educational attainment levels in the borough. 12.46 Lancashire County Council (LCC) is responsible for planning the provision of school places. In doing so they take account of information on the birth rate, new and proposed housing developments, inward and outward migration and population changes. An increase in Pendle's birth rate over the last few years has seen LCC increase capacity at

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			county council to identify suitable sites through the Land Use Allocations Process. Whilst the growth in pupils is currently impacting on the primary school sector, this growth will move into the secondary sector by approximately 2017. Further information on the planning of school places in Pendle can be found within Lancashire's annual 'Strategy for the Provision of School Places and Schools' Capital Investment ' which can be found on the Lancashire.gov.uk website. 12.47 Further education (FE) has been centralised with the relocation of Nelson and Colne College to a single site on the Nelson - Barrowford boundary. As such there is currently no further requirement for FE provision in the borough. Pendle Council will support proposals which propose to introduce specialist provision, particularly that which builds on local business specialisms, or provides HE provision not currently available in the Borough. 12.48 Schools can play a part in providing wider community benefits through making use of their facilities for wider community use. Such uses and wider co-location initiatives will be supported where they do not impact upon the school's ability to provide places for pupils of statutory school age in that area.		infant and junior schools in Nelson. Further projected increases have indicated a need for additional places in Brierfield, Nelson and Barnoldswick. At the time of writing (2012), consultation is underway on the provision of these additional places. The reduction in capital funding being made available to LCC means that the need to seek contributions from housing developers, where the development is expected to impact upon school places, may increase. An additional issue for LCC is the lack of suitable sites available for the provision of additional school places. Pendle Council will work closely with LCC to identify suitable sites through the Land-use Allocations process. Whilst the growth in pupils is currently impacting on the primary school sector, this growth will move into the secondary sector around 2017. Further information on the planning of school places in Pendle can be found in Lancashire's annual 'Strategy for the Provision of School Places and School's Capital Investment'. 12.47 Further education (FE) has been centralised with the relocation of Nelson and Colne College to a single site on the Nelson -Barrowford boundary. As such there is currently no immediate requirement for FE provision in the borough. Pendle Council will support proposals which propose to introduce specialist provision, particularly that which builds on local business specialisms, or provides HE provision not currently available in the Borough. 12.48 Schools can play a part in providing wider community benefits by making their facilities available for wider community use. Such uses and wider co-location initiatives will be supported where they do not impact upon a school's ability to provide places for pupils of statutory school age in that area. PROPOSED ACTION: Make the following

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
					addition to the Key Linkages box: Strategy for the Provision of School Places and School's Capital Investment.
618527	Laneshawbridge Parish Council			Ms Laura McAfee	
Chapter 4: Vision	33	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	34	Yes		Agreement noted.	N/A
Policy SDP1	35	No	This Council believes that with its current work in developing a rural services and community hub alongside sustaining two freehold public houses, a hotel, holiday cottages, a bed and breakfast, a fishery, several home-based businesses, a feed merchants as well as its vision in promoting itself as a tourism hub as the 'Gateway to Lancashire,' that Laneshaw Bridge should be considered as a Rural Service Centre rather than a Rural Village. Through sustaining these aspects this has enabled many opportunities for employment which also supports the identity of a Rural Service Centre. Alongside this is the factor of the oversubscribed village primary school which demonstrates an influx of people into the village.	The settlement hierarchy has been developed by looking at two key evidence-based documents: The Pendle Sustainable Settlements Study and the Land Use Consultants report on the role and functions of Key Service Centres in the North West. The Sustainable Settlements Study looked at the location within the borough, the population and physical size, the number of and access to services, and the availability of land for development in each rural settlement. These factors were used to assess the sustainability of each rural settlement and propose the position of each settlement in the hierarchy. Laneshaw Bridge was considered to be a rural village due to its sustainability score. It has a limited number of convenience services and did not meet the criteria set out in the study to be a Rural Service Centre. The status of rural villages allows for a certain proportion of development to take place to meet the needs of the local population and ensure that existing services are sustained. The designation of Laneshaw Bridge as a Rural Village will not stop the development of services and the community hub, however the scale of these developments will need to be appropriate to the size and function of the village.	No changes to the document are proposed as a result of this representation.
Policy SDP2	36	Yes		Agreement noted.	N/A
Policy SDP3	37	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP4	45	Yes		Agreement noted.	N/A
Policy SDP5	46	Yes		Agreement noted.	N/A
Policy SDP6	47	No	This Council disagrees with the concept of developing the fringes of settlements, particularly where this may see the conjoining of two settlements. This policy is particularly worrying for this Council as we believe that an oversubscribed village school on one side (Laneshaw Bridge) and an area for jobs (Colne) combined with a major road (A6068) may provide extraordinary circumstances. It is essential that this policy does not lead to the village of Laneshaw Bridge losing its identity.	The purpose of this policy is to direct new development to the most sustainable sites and promote the reuse of previously developed land in the first instance. It is acknowledged that the policy could be strengthened by revising the third bullet point to explain that development outside of settlement boundaries will only be permitted for appropriate rural uses. This should help to protect the identity of settlements and provide a check on unnecessary expansion.	PROPOSED ACTION: Revise bullet point 3 to explain that development outside of settlement boundaries will only be permitted for appropriate rural uses. Where necessary provide links to other policies / documents to set out what constitutes appropriate rural uses.
Policy ENV1	49	Yes		Agreement noted	N/A
Policy ENV2	51	Yes		Agreement noted.	N/A
Policy ENV3	52	No	This Council broadly agrees with policy ENV3, however in relation particularly to wind power, this village is one surrounded by hills and its amenity could be severely damaged by them. This Council suggests that Pendle Borough Council seeks to work with an electricity company to provide one site where several large capacity turbines could be erected in partnership, both to contain and prohibit mass developments, to ensure that revenue from them is kept within the Borough and also to meet the targets set.	This could be considered as part of the Land Use Allocations DPD process. Both current and emerging national planning policy includes provisions for allocating sites or areas of search. It should be noted however, that this is unlikely to mean that the planning authority could refuse further wind farms simply for being outside of this area, as this would likely be against national policy.	No changes to the document are proposed as a result of this representation.
Policy ENV4	54	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	55	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	57	Yes		Agreement noted.	N/A
Policy LIV1	75	Yes		Support noted	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV2	76	No	This Council does not agree with the provision of allocated pitches for the Gypsy and Traveller community as it feels this would attract settlers to the area unnecessarily. In addition this Council feels that allocation of land in The Land Use Allocation Development Document would negatively impact the value of property surrounding that allocation, even if the property remained unoccupied.	The Government's new Planning Policy for traveller sites sets out the requirements of Local Authorities for the provision of sites for the Gypsy and Traveller community. The policy requires Local Authorities to: 1) set pitch targets for gypsies and travellers and plot targets for travelling show people. 2) set criteria for allocating sites and/or determining applications. To do this Local Planning Authorities should assess the likely permanent and transit site accommodation needs of travellers in their area. Addressing the needs of the Gypsy and Traveller community through the planning system aims to reduce the likelihood of illegal encampments. If used effectively the planning system can help to locate the Gypsy and Traveller community in places where they can access services alongside the settled community and in a way that is not detrimental to either community. The overall intention of the Planning Policy for Traveller Sites is that Local Authorities still need to assess the accommodation needs of travellers (this is a legal requirement under the Housing Act 2004) and plan accordingly to provide for this need. Therefore Policy LIV2 needs to make provision for the Gypsy and Traveller community. The intention of the policy is to only meet the true needs of the traveller community who want to live in Pendle.	No changes to the document are proposed as a result of this representation.
Policy LIV3	79	Yes		Agreement noted.	N/A
Policy LIV4	80	Yes		Agreement noted.	N/A
Policy WRK1	82	Yes		Agreement noted.	N/A
Policy WRK2	83	Yes		Agreement noted.	N/A
Policy WRK3	85	Yes		Agreement noted.	N/A
Policy WRK4	86	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK5	87	Yes		Agreement noted.	N/A
Policy SUP1	88	Yes		Agreement noted.	N/A
Policy SUP2	89	Yes		Agreement noted.	N/A
Policy SUP3	90	Yes		Agreement noted.	N/A
Policy SUP4	91	Yes		Agreement noted.	N/A
327580	Lidgett & Beyond Group			Mr. Owen G. Oliver	
Document	183		There is much that is sensible and encouraging in the Report and we see this as evidence that the Council aims to do its best for the wider Pendle region within the constraints imposed on it from National Government.	Comment noted.	No changes to the document are proposed as a result of this representation.
Policy SDP6	185	No	We do have concerns about paragraphs 6.58, 6.59, 7.44, 10.90 and paragraphs two and nine within Policy ENV1. We view these paragraphs as potential convenient “get out clauses” for developers. Once these exceptions are deployed, then precedents will be set that could well encourage a snowball effect. Please remember that what is built cannot be unbuilt! We would therefore appreciate a rewrite of these paragraphs using more discouraging terms. Taking paragraph 6.58 as an example: “However, the use of Brownfield land can often be expensive and therefore lead to circumstances where development is not viable, for example where a site requires expensive land remediation measures or in times of economic recession.” This paragraph affords developers not one, but two “get out clauses”. It essentially says that if, taking Colne as an example, well known derelict former factory and mill sites are found to be costly to remediate (as they undoubtedly will be), they can be passed over in favour of virgin ground on the outskirts and rural fringes of town. Such actions will lead to an increase in the doughnut effect. Furthermore, potential developers will additionally be able to simply claim “we are in recession” (which we are thereabouts) thus generating another tick in the box of paragraph 6.58. When we emerge from this	The National Planning Policy Framework (NPPF) encourages “the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value” (paragraph 17, bullet point 8). Policy SDP6 directs new development to the most sustainable sites and promotes the reuse of previously developed land in the first instance. However, to achieve the levels of growth identified in the Core Strategy will require some greenfield sites to be developed in the future. The NPPF also states that “allocations of land for development should prefer land of lesser environmental value” (paragraph 17, bullet point 7). Policy SDP6 and the strategy will be revised to include details of the relationship between the sequential approach and the allocation of land. It is proposed to delete paragraph 6.58 and address issues relating to the viability and delivery of both brownfield and greenfield sites within the strategy section at paragraph 6.59. Paragraph 6.59 sets out the strategy for Policy SDP6 in terms of the priority given to the development of different types of land. It is proposed to reword this paragraph to set out in more detail how the development of brownfield and greenfield land is prioritised, and how the viability of sites	PROPOSED ACTION: Delete paragraph 6.58. PROPOSED ACTION: Reword paragraph 6.59 to read: “New development will be expected to re-use vacant buildings and previously developed land within a defined settlement boundary as the first priority, in order to help recycle land and make a positive contribution to regeneration in the borough. The second priority for development will be other land (Greenfield) within a settlement boundary. However, in order to not unduly restrict development, and ensure that the levels of growth proposed in the Core Strategy are achieved, it is recognised that the release of some of these greenfield sites may be necessary in advance of development on previously developed land. This flexible approach will only be supported where such sites are shown to be economically viable and in a sustainable location. It is important to achieve a balance between the sustainable

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			recession, there could well be widespread national regret that beautiful, yet desirable, areas like Lidgett & Beyond were sacrificed for short term gain.	can affect delivery. In order to comply with the NPPF the policy must provide a flexible response to achieving sustainable development. This may require the development of greenfield sites in advance of previously developed land. The paragraph will also include details relating to development outside of settlement boundaries.	development of sites whilst not compromising development that may bring employment and housing opportunities to the borough. The development of land outside a defined settlement boundary will be limited to appropriate rural uses. Qualifying uses are identified in the NPPF (paragraphs 28 and 55) and other policies in the Core Strategy. They may also be defined in subsequent local plan documents. PROPOSED ACTION: Include an additional paragraph in the strategy after paragraph 6.59 which reads: "In line with the NPPF the allocation of sites should prefer land of lesser environmental value and should follow the sequential approach". PROPOSED ACTION: Revise the third bullet point and final paragraph of the policy to read: "Land outside of a defined settlement boundary for appropriate rural uses ¹ " Footnote to read: " ¹ Appropriate rural uses are defined in the National Planning Policy Framework (NPPF) and other policies in the Core Strategy. The Pendle Local Plan Part 2: Site Allocations and Development Policies will provide further, specific details of appropriate rural uses." PROPOSED ACTION: Include a final paragraph at the end of the policy which reads: "The allocation of land for development in Local Plan Part 2: Site Allocations and Development Policies should follow the sequential approach and prefer land of lesser environmental value."
Policy ENV1	186	No	We do have concerns about paragraphs 6.58, 6.59, 7.44, 10.90 and paragraphs two and nine within Policy ENV1. We view these paragraphs as potential convenient "get out clauses" for developers. Once these exceptions are deployed, then precedents will be set that could well encourage a snowball effect. Please remember that what is built cannot be unbuilt! We would therefore appreciate a rewrite of these paragraphs using more discouraging terms.	It is not clear what the objector does not consider appropriate about paragraph 7.44 as this sets out the strategy for protecting and enhancing the historic environment and is not related to criteria for development of sites.	No changes to the document are proposed as a result of this representation
Policy ENV1	189	No	No mention whatsoever is made of two Protected Areas (PAs) and the Site of Settlement Character (SOSC), designations that	The respondent is correct that designations including Protected Areas and Sites of Settlement Character are not	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			protects an appreciable chunk of Lidgett & Beyond's area. If these designations are now defunct, as may be clarified by the projected Land-use Allocations in 2012, we would urge the Council, in the strongest terms possible, to move the SOSC outside the Settlement Boundary and redesignate it with the PAs as Green Belt and reject any planning applications in this area of unquestionably exceptional natural beauty. Addressing this is imperative as we understand that such designations are hard to amend once set - we look to you as the experts not to leave any stone unturned with the Pendle documentation to ensure that these areas do not become sacrificed in the short term and leave us, our children and visitors to the area regretting the changes made by hungry/greedy developers. The Lidgett & Beyond Group is composed of residents from the Lidgett, Skipton Old Road, Bents, Hill Lane, Favordale, Keighley Road and Castle Road area, which is a beautiful, largely unspoilt slice of Lancashire's upland countryside. A magnet to walkers and hikers, as reflected by the "Walkers Welcome" status, it is part of Colne's Green Lung, a view endorsed by Andrew Stevenson MP, Councillor Mike Calvert and Councillor Paul White. Members of the Lidgett & Beyond Group aim to preserve the wildlife, the vibrancy and the character of this special place. We'd like to work with the Council's Delivery Bodies to help meet the Report's targets on: - Increasing open space - Increasing designated land - Resisting loss of heritage assets - Creating a coherent design approach for Lidgett & Beyond The dice now seem to be loaded in favour of the developers and away from residents and community groups such as ours. Here's what the Council for the Protection of Rural England has to say: "The (current) reforms represent the biggest shake-up of planning for over 50 years. They will place the countryside under increasing threat and leave local communities and planning authorities largely powerless in the face of developer pressure."	part of the strategic approach of the plan. The need for any such designations will be considered as part of the Site Allocations DPD process. There is no strategic review of the Green Belt planned and the National Planning Policy Framework states that once designated Green Belt boundaries should only be altered in exceptional circumstances. The strategic level of development proposed in the Core Strategy does not require a strategic review. Detailed boundary changes will again be considered as part of the Site Allocations DPD. Policy ENV1 has been developed to protect open countryside and the Greenbelt. The purpose of the Core Strategy is to set general levels of development rather than site specific allocations. The planning system is based on a general presumption in favour of sustainable development - planning applications are judged against the policies in the development plan - where the application meets these requirements planning permission is granted. In some instances there may be material considerations that over rule the policy requirements of the plan. (The National Planning Policy Framework expands on this presumption - in the form of the presumption in favour of sustainable development). The Government's Localism Agenda puts in place the possibility of individual communities creating 'Neighbourhood Plans' which allows groups to shape the planning of their area. This will give communities some scope to set planning policies specific to their area.	
Policy ENV3	276		I confess to being one of those rare individuals who has no problem with the appearance of large turbines in the landscape, a reasonable admission in these and many other parts! However there are no plausible or realistic arguments against the sort of views expressed by Barry and Eileen Birtwistle of Skipton Old Road Colne and Joanne Atkinson of Coniston Grove BB8 7DE. To these I would add an horrendous well demonstrated negative footprint left by thier manufacture and a clear and unacceptable structural, mechanical, electrical and metriological vulnerability clearly demonstrated last week when windspeeds in Scotland were significantly higher than normal	It is not for this document to debate the technical or financial pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which can contribute towards UK targets and the Government supports the development of wind farms in the UK in national planning and energy policy. As such, the role of the Core Strategy is to best manage such potential developments in Pendle through the Planning system by ensuring that we can achieve suitable developments where achievable, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. With	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			and one of these windmills fell down and another one burst into flames. The very long term forecast for this sort of weather is that we are going to get a lot more of it. Under these circumstances we would in effect be guinea pigs in a dodgy experiment using tax payer's money with low probability of success. This approach should therefore be robustly resisted in the name of common sense. I hope these points can be considered and I look forward to your response in due course.	regards to the safety and vulnerability of the technology, there are over 35,000 wind turbines worldwide and there is not one reported incident where a member of the public has been injured by wind turbines. In extreme weather events, all forms of development have the possibility of failure, for example the loss of roofs from buildings etc. Wind farm developers already have to consider distances to buildings, roads and footpaths etc to protect the public should a wind turbine fall over, sometimes referred to as 'topple distance'. This aspect would continue to be considered as part of any planning application.	
Policy LIV3	187	No	We do have concerns about paragraphs 6.58, 6.59, 7.44, 10.90 and paragraphs two and nine within Policy ENV1. We view these paragraphs as potential convenient "get out clauses" for developers. Once these exceptions are deployed, then precedents will be set that could well encourage a snowball effect. Please remember that what is built cannot be unbuilt! We would therefore appreciate a rewrite of these paragraphs using more discouraging terms.	Paragraph 10.90 explains that there may be some instances in rural settlements where there are not sites available to provide the affordable housing that is needed in that area. In these instances sites outside of the defined settlement boundary may be considered to provide for this need. The policy cannot be used to justify the development of sites outside of the settlement boundaries of the main towns. The policy specifically relates to rural settlements. The National Planning Policy Framework (NPPF) indicates that in rural areas Local Planning Authorities should plan housing development to reflect local needs, particularly for affordable housing, including through rural exceptions sites where appropriate. It also indicates that Local Planning Authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The policy will need to be amended to ensure compliance with the NPPF.	PROPOSED ACTION: Amend the Policy and Justification Text to ensure compliance with the National Planning Policy Framework (NPPF). The justification text should explain why rural exception sites may be needed and when market housing on such a site could be acceptable to deliver the affordable housing.
378401			LSP Member	Councillor Asjad Mahmood	
Policy SDP5	557		Issues I feel should be considered in the LDF: Telecommunications (broadband) in areas where it is still not available.	Policy SDP5 supports improvements in broadband provision (see Energy and Utilities in the table on Pages 55 and 56) and this is echoed in the Spatial Vision for Pendle (Page 36, Para 4.14) and throughout Policy WRK1.	No changes to the document are proposed as a result of this representation.
Policy ENV1	555		Issues I feel should be considered in the LDF: protection of open space trees & trees on development sites	The wider strategic issues surrounding open space and trees are considered as part of policy ENV1. Detailed policy issues for sites will be developed in future as part of the Development Management policies process.	No changes to the document are proposed as a result of this representation
Policy ENV3	553	Yes	Issues I feel should be considered in the LDF: renewable energy - wind & biomass (heating & energy networks).	Policy ENV3 looks at the provision of renewable energy in Pendle and includes specific references to the different	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV4	552		Issues I feel should be considered in the LDF: A59 bypass Improve rail links	types of renewable technologies. Policy ENV4 supports the provision of both the A56 Villages Bypass and the re-instatement of the Colne to Skipton railway line. However, these are likely to be long term projects as further work on need, impact and funding needs to be carried out. In terms of improving rail links the supporting text could be revised to include a reference to the partnership working which is taking place to improve the existing railway provision.	PROPOSED ACTION: At the beginning of paragraph 7.109 include the following wording: "Lancashire County Council is involved in working with various stakeholders to improve the local railway environment, and sustainability of the railways lines in Lancashire."
Policy ENV7	554		Issues I feel should be considered in the LDF: water conservation and water protection sustainable drainage systems, as we have drains collapsed esp. on back streets of terraced housing	The issues raised in this representation are considered to be adequately addressed by Policies ENV5 and ENV7.	No changes to the document are proposed as a result of this representation.
Chapter 10: Living	548		Issues I feel should be considered in the LDF: 1) Addressing affordable housing needs 2) Building (housing) on brownfield sites and better use of empty housing 3) High end housing 4) Regeneration (esp. housing)	The issues raised by the consultee are covered in a number of the policies in Chapter 10: Living. 1) Addressing affordable housing needs - Policy LIV2: Housing Needs and Policy LIV3: Affordable Housing aim to help meet the housing needs of the population. Policy LIV2 looks specifically at the different types of housing needs and would support applications coming forward to deliver this type of housing. Policy LIV3 provides a mechanism for delivering affordable housing as it requires a percentage of new housing to be of an affordable tenure. 2) Building housing on brownfield sites - Policy SDP6 provides a sequential approach to all new development which requires the developer to consider the use of previously developed land as a first priority. However, the level of house building proposed may require the use of some greenfield sites in the future. 2) Better use of empty housing - The proposed housing requirement in Policy LIV1 takes account of the large number of empty homes in the borough and supports bringing those homes back into use. Policy LIV3 also provides a mechanism for bringing some of these homes back into use by refurbishing them and converting them into affordable housing. 3) High end housing - Policy LIV1 will be amended to make reference to housing demand and the provision of aspirational housing. 4) Regeneration (especially housing) - the Core Strategy aims to support the regeneration activities of the Council. Policy LIV1 requires that any new housing does not jeopardise the success of regeneration projects.	PROPOSED ACTION: Include additional wording in Policy LIV1 relating housing demand and providing for aspirational housing.
Policy LIV2	546		Issues I feel should be considered in the LDF: reduce inequalities, (social exclusion and disparities within the borough). (Comment also made against Policy SUP1 - Comment 544 and Policy WRK1 -	Policy LIV2 looks specifically at housing needs and how the Core Strategy (planning) can help address the different housing needs of everyone in Pendle. By addressing housing	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Comment 547)	need - this will help to reduce inequalities, social exclusion and disparities within the borough.	
Policy WRK1	550		Issues I feel should be considered in the LDF: retaining high skilled workforce.	Policy WRK1 supports investment by "businesses in the priority (growth) sectors" identified in the Integrated Economic Strategy for Pennine Lancashire. This document identifies advanced manufacturing as one of two the priority sectors in Pendle.	No changes to the document are proposed as a result of this representation.
Policy WRK1	547		Issues I feel should be considered in the LDF: reduce inequalities, (social exclusion and disparities within the borough)	Policy WRK1 supports investment by "businesses in the priority (growth) sectors" identified in the Integrated Economic Strategy for Pennine Lancashire [the priority sectors in Pendle are identified as advanced manufacturing and tourism (see Policy WRK4)]. The objective is to strengthen the local economy and increase prosperity. In combination with WRK2 the policy focuses the provision of new infrastructure for employment growth in the M65 Corridor. This is the area of greatest demand from businesses, because the motorway network and a large and skilled workforce are readily accessible. It is also the area of greatest regeneration need in Pendle. This spatial emphasis on the towns of Brierfield, Nelson and Colne will help to address social exclusion and disparities in the Borough, by helping to reduce worklessness and increasing household income. Also refer to comments 544 (SUP1) and 546 (LIV2).	No changes to the document are proposed as a result of this representation.
Policy WRK3	551		Issues I feel should be considered in the LDF: poor quality of shopping environment improve and make a vibrant nightlife in the town centres	Policy WRK3 seeks to create viable and vibrant town centres (Para 11.55), by establishing an environment in which high quality retail outlets flourish alongside complimentary town centre uses (e.g. offices, leisure and tourism) (Para 11.58). The retail hierarchy (Policy SDP4) ensures that the scale and type of development is appropriate to the character of each town or local shopping centre. Support for this retail hierarchy is provided in the supporting text for Policy WRK3 (Para 11.76). This paragraph also addresses the need for applications for 'town centre uses' outside a defined town or local shopping centre boundary, to carry out a sequential test to help reinforce the "town centre first" approach advocated in paragraph 24 of the National Planning Policy Framework (NPPF). The supporting text for Policy WRK3 (paragraph 11.75) also indicates that further policies in the Land-use Allocations DPD will seek to encourage a vibrant mix of activities by restricting the number of non-shopping uses within particular areas or frontages within a town or local shopping centre. The importance of the night time	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				economy is set out in paragraph 11.84 of the supporting text for Policy WRK3 and emphasised within the Policy text under the M65 Corridor spatial area, noting that proposals should not compromise the safety and enjoyment of others. In support of these objectives policies WRK5 and SUP4 aim to ensure that public buildings and spaces are of a high quality design, accessible to all members of our community in order to promote social interaction that is so vital in creating a safe and vibrant atmosphere.	
Policy WRK4	556		Issues I feel should be considered in the LDF: better use of waterways/canal hotel development (as no major hotel in Pendle)	The representation suggests that better use should be made of our canals and waterways and that support be offered for additional hotel provision. The opening paragraph of the policy supports development that will provide new or improved visitor accommodation (including hotels). The policy then seeks to direct such developments to the most sustainable locations within the borough, and priorities four locations. One of these priority locations is alongside the Leeds & Liverpool Canal, which is regarded as one of the major catalysts for regeneration in both our urban and rural environments.	No changes to the document are proposed as a result of this representation.
Policy SUP1	544		Issues I feel should be considered in the LDF: reduce inequalities, (social exclusion and disparities within the borough) (Comment also made against Policy LIV2: Comment: 546 and Policy WRK1: Comment: 547).	Policy SUP1 looks to promote joint working with partners to ensure that improved community services and facilities are provided in areas of deprivation or need. One of the aims behind this is to reduce levels of social deprivation and improve social inclusion. This will help to reduce inequalities across the borough by ensuring everyone has access to the services they need.	No changes to the document are proposed as a result of this representation.
Policy SUP3	549		Issues I feel should be considered in the LDF: skills & qualifications and low educational attainment	The representation asks that the Core Strategy address skills, qualifications and low levels of educational attainment. This is the central theme running through Policy SUP3, which addresses the way in which the planning system can help to support improvements from pre-school through to post-16 education.	No changes to the document are proposed as a result of this representation.
606619 National Federation of Gypsy Liaison Groups				Mr Peter Mercer MBE	
Policy LIV2	2	No	Whilst the Lancashire Sub-Regional Gypsy and Traveller Accommodation and Related Service Assessment (GTAA) showed that 2 pitches were needed in Pendle by 2016, the North West Plan Partial Review draft Panel report instead suggested a redistributive approach to accommodation provision for Gypsies, Travellers and Travelling Showpeople and	Pendle made representations to the RSS Partial Review consultations objecting to the proposed Gypsy and Traveller pitch provision allocations. The redistributive approach that was put forward failed to take into consideration the location of the needs of the Gypsy and Traveller community. By adopting a balancing approach to the distribution of sites	PROPOSED ACTION: Revise Policy LIV2 to include criteria for the selection of sites for the Gypsy and Traveller community. Amend the policy to explain that where evidence of a need arises pitches will be provided to meet that need.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			allocated 15 pitches to Pendle. This was based on evidence that was rigorously tested and scrutinised at the Examination in Public. The authorities in the sub-region which had a reduced allocation were Hyndburn, Blackpool and Blackburn with Darwen. I note that all three of these authorities have used the redistributive approach in the latest versions of their Core Strategies (Hyndburn Submission Core Strategy 2011, Blackpool Core Strategy Preferred Option 2010, Blackburn with Darwen Adopted Core Strategy 2011). If Pendle fails to follow the redistributive approach then clearly there will be a gap in the provision needed across the area, and evidenced need will fail to be met. There is now a duty to cooperate in plan making and the proposed approach as set out would appear to fail to meet this duty. Additionally, there are no criteria against which allocations or applications for planning permission can be assessed. This is contrary to the provisions of both current and emerging government policy (Circular 01/2006 and draft Planning for Traveller Sites). Policy LIV2 needs to be amended to include a minimum figure of 15 pitches for Gypsies and Travellers and include policy criteria to guide site location.	this ineffect reduces provision in the areas where the Gypsy and Traveller community want to be i.e. it does not help to meet the needs in the desired locations. This approach was not applied to the provision of new housing for the settled community - it is considered to be an inconsistent and illogical way of assigning the number of sites/pitches for the Traveller community. Furthermore it should be noted that although the Partial Review went through an Examination in Public process, the findings were never adopted and the document has no weight as part of the Statutory Development Plan. It is acknowledged that Hyndburn Borough Council has carried forward this approach in their Core Strategy (which is now adopted). However, it should be noted that Rossendale has also had their Core Strategy found sound (and now adopted) using figures from an updated GTAA rather than using the figures in the RSS partial review. An inconsistent approach has been taken across Pennine Lancashire. The introduction of the duty to co-operate raises some important issues between authorities that adopted Core Strategies prior to the duty coming into effect and those where Core Strategies are still to be adopted. In line with the Government's Planning Policy for Traveller Sites, Policy LIV2 will be revised to include criteria for site selection. The Burnley and Pendle GTAA (2012) provides an update to the Lancashire GTAA (2006). This new study indicates that there is no identified need for pitches for the Gypsy and Traveller community in Pendle. As a result the policy will not include a specific minimum pitch requirement. However, the policy will be amended to explain that where evidence of a need arises pitches will be provided to meet that need.	
327370			National Trust	Mr Alan Hubbard	
Chapter 4: Vision	249	No	The Trust welcomes reference to carbon reduction, to protection and enhancement of high quality landscapes and to tourism and leisure. However, the Vision could be much stronger in respect of its important and valued heritage and the natural environment attributes, and the benefits they bring to the Borough's residents and businesses. Specifically, the Vision should be improved by reference to: • Adapting to the impacts of climate change as well carbon reduction. • Restoring degraded landscapes as well as protecting high quality ones • The importance of biodiversity and the natural environment	The Spatial Vision looks forward 15 years to provide an indication of what Pendle will be like if the Core Strategy is successfully implemented. This and other comments have indicated that the Spatial Vision could be amended to make better reference to the natural environment and in particular biodiversity and on reflection this viewpoint is accepted. The current reference to heritage assets, which only applies to the M65 corridor could be revised to cover the whole of Pendle. However, the Spatial Vision needs to be succinct and only identify the key changes /	PROPOSED ACTION: Amend the Spatial Vision to include more general reference to the importance of the natural and historic environments in Pendle.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			within the Borough • The importance of protecting and enhancing the Borough's heritage assets and their settings. • The potential role of heritage-led regeneration. • The importance of the multifunctional role of green infrastructure networks in bringing together these aspects with potential benefits for leisure, health, wellbeing, sustainable travel, biodiversity, climate change mitigation, landscape and the local economy. It should be noted that the natural environment, heritage, landscape, tourism and leisure are important across the Borough, in urban as well as rural areas.	improvements that need to occur in Pendle. Alternatively, further detail could be added to the Spatial Strategy and/or specific policies where appropriate.	
Chapter 5: Our Strategic Objectives	251		Objective 9 Suggested wording "...valuable contribution they make to biodiversity, sustainable transport, landscape, the local economy and adapting to climate change." Objective 10 Suggested wording "Ensure new development protects, and wherever possible enhances, both our built heritage, including the wider setting of designated features; and open spaces, including the countryside, areas which are valued for their contribution to landscape character, and sites of nature conservation value."	(1) The strategic objectives for the Core Strategy were finalised after careful consideration at the Issues and Options stage. It is however accepted that, as the representation suggests, additional wording in SO9 would help to emphasise the multiple benefits of our natural environment. The additional wording is accepted with the caveat that the references to 'sustainable transport' and 'adaptation to climate change' are combined in a single reference to 'carbon reduction'. (2) The proposed re-wording of SO10 is not considered to add to the purpose of the objective, or improve its clarity. Also refer to Spatial Portrait (Comment 20)	PROPOSED ACTION: (1) Amend SO9 - After biodiversity add 'landscape, the local economy and carbon reduction.' (2) No changes to the document are proposed as a result of this element of the representation
Chapter 6: Our Spatial Strategy	252	No	The Trust welcomes reference to the importance of the built and natural heritage and sustainable tourism in rural areas. Limiting growth and restrictions on development in the open countryside, especially in Green Belt and AONB, will also be important in retaining the Borough's character. However, it is disappointing that the importance of heritage assets and their settings, the historical environment generally, and biodiversity and ecological networks within urban areas is not recognised. The spatial strategy needs to recognise: • The importance of the heritage and natural assets both the urban and rural areas, including the wider built heritage of urban areas and its potential to play a role in regeneration. • The importance of the landscape as a setting for the built up areas, with tightly defined townscapes surrounded by hilly open countryside. • The importance of a strategic network of green spaces, linking urban and rural areas and providing for health, leisure, sustainable transport, biodiversity, addressing climate change and boosting the local economy.	The purpose of the Spatial Strategy is to focus on the actions to be taken to help resolve the key issues in each area of Pendle. The natural and built heritage are important assets in the Rural Areas of Pendle and these need protection. However, in response to this and a number of other comments made to the document as part of the consultation process it is accepted that a stronger commitment needs to be made to the borough's natural (including biodiversity) and historic environments in both the rural and urban areas. An additional paragraph will be included at the beginning of the Spatial Strategy which will set out how the natural and historic environment can contribute to the success of the Core Strategy.	PROPOSED ACTION: Include the following paragraph after the first paragraph of the Spatial Strategy: "Pendle's natural and historic assets make a significant contribution to the overall attractiveness of the area and help to promote local distinctiveness. Identifying additional assets and securing their protection and enhancement, will allow biodiversity to thrive, help to foster civic pride, facilitate tourism and encourage investment."
Policy ENV1	255	No	The Trust generally welcomes this policy. However, it would be improved by inclusion of the following: 1. Reference to the	The representation requested that the policy make reference to the setting of heritage assets. The National	PROPOSED ACTION: Make reference in the policy to the setting of heritage assets.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			setting of heritage assets is needed. Guidance on this is provided by paras133-124 of the PPS5 good practice guide . Para 118 states Change, including development, can sustain, enhance or better reveal the significance of an asset as well as detract from it or leave it unaltered. For the purposes of spatial planning, any development or change capable of affecting the significance of a heritage asset or people's experience of it can be considered as falling within its setting. Where the significance and appreciation of an asset have been compromised by inappropriate changes within its setting in the past it may be possible to enhance the setting by reversing those changes. An example of particular importance is the setting of Gawthorpe Hall, a key heritage asset within East Lancashire. Although the Hall itself is located in Padiham, it is adjacent to the border with Pendle Borough and key views from the Hall and its grounds take in an open, largely undeveloped, rural landscape within Pendle. This is important, for example in considering any allocations / extensions to the south and west of Fence, which is proposed as a key service centre. 2. In the green infrastructure section, reference to the potential multifunctional benefits of the green infrastructure network (linking urban and rural areas and providing for health, leisure, sustainable transport, biodiversity, addressing climate change and boosting the local economy) and promotion of developments which support these benefits. PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide, March 2010	Planning Policy Framework states the importance the setting can make to the significance of a heritage asset and the policy should be amended to reflect this. The wider benefits of green infrastructure are accepted and the policy will be amended to reference these. With reference to biodiversity opportunities being integrated into new development where practicable, it is considered that the third paragraph of the policy allows for this possibility.	PROPOSED ACTION: Make the following changes to the section on Green Infrastructure: The two key reasons for Green Infrastructure in paragraph 7.42 will be deleted and replaced with Natural England's six social, environmental and economic benefits of Green Infrastructure as follows: "Green Infrastructure can provide many social, economic and environmental benefits including: Places for outdoor recreation and play Space and habitat for wildlife with access to nature for people Climate change adaption Environmental education Local food production Improved health and wellbeing" http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx
Policy ENV2	256	No	The Trust welcomes this policy with its strong approach to the importance of good design to the historic and natural environment, and to climate change mitigation and adaptation. In light of comments on ENV1 however, bullet 3 could be amended to state "...of heritage assets and their settings is not..."	The representation requested the addition of setting to the consideration of the significance of heritage assets. The National Planning Policy Framework makes it clear that the setting of heritage assets is an important consideration in development proposals and it is considered appropriate to reflect that here.	PROPOSED ACTION: Amend bullet point 3 of the policy text to read: "Proposals should ensure the significance of heritage assets and their settings is not harmed or lost"
Chapter 8: Key Diagram	260		This should show the AONB designated areas of the Borough.	It is agreed that the AONB designation should be shown on the Key Diagram. On the same basis it is considered also necessary to show the extent of the South Pennine Moors SSSI as well.	PROPOSED ACTION: Add the AONB and SSSI designations to the Key Diagram.
Policy WRK2	257	No	The Trust welcomes the approach to the economy in rural areas. However, it could be enhanced by reference to promotion of rural business based on heritage, landscape and natural assets, where it contributes to conserving and enhancing those assets.	The descriptions of employment to be supported in Rural Pendle was not intended to highlight specific types of development. However, it is acknowledged that the protection and enhancement of our natural and built heritage is one of the three key pillars of sustainable development and that this should be recognised within the	PROPOSED ACTION: Include a bullet point within the policy, under Rural Pendle, indicating support for projects that "make a positive contribution to the protection, enhancement, conservation or interpretation of the landscape, natural

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				policy.	assets, biodiversity and built heritage."
Policy WRK4	258	Yes	The Trust supports this policy and welcomes the support for sustainable tourism.	Agreement noted.	N/A
Policy SUP4	259	No	The Trust generally supports this policy although it would be enhanced by reference to the role of the historic built environment in contributing to quality of place, public buildings and the public realm.	It is acknowledged that the policy could be strengthened by recognising the contribution that the historic built environment can bring to quality of place.	PROPOSED ACTION: Include additional wording in the Policy text under 'Public Buildings': Re-using historic buildings, where appropriate, or by incorporating design elements in new developments that respond sympathetically to the built heritage, public spaces and key infrastructure elements, within the historic environment in which they are located.. PROPOSED ACTION: Include additional wording in the Policy text under 'Public Realm': Enhancing the setting of any historic buildings or infrastructure in the immediate vicinity.

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Document	193	We do not have any additional comments to make on the Preferred Options Report beyond are original comments made at the issues and options report stage, but would like to take the opportunity to reiterate (a) key point(s) referenced as 317529/925 in your preferred options report – consultation statement. 31759/925 Green Infrastructure We have previously made comments on the importance of Green Infrastructure (GI) and reiterate these comments in relation to the preferred options report. The Core Strategy should provide a clear focus in relation to GI provision and where possible such provision should be incorporated into new development with assistance from developer contributions. As the evidence base suggests that there are requirements for both physical and social infrastructure in the borough and the Council should seek to address this issue in the Core Strategy. The Natural Environment White Paper highlights the importance of GI in planning; 'We need urban green infrastructure to complete the links in our national ecological network. Urban green space allows species to move around within, and between, towns and the countryside. Even small patches of habitat can benefit movement. Urban green infrastructure is also recognised as one of the most effective tools available to us in managing			Kate Wheeler Policy ENV1 sets out the Council's approach to protecting and enhancing the natural environment, which includes issues relating to open space and other types of green infrastructure. The protection and creation of green spaces is also reflected in other policies within the Core Strategy. Policy LIV4 requires the provision of new open space or green infrastructure as part of new housing developments, whilst Policy SUP2 recognises positive contribution they make to the health and well-being of the local community. This multi-policy approach seeks to ensure that the requirement to provide new open space and green infrastructure in a development is fully understood and clearly justified. It is, however, acknowledged that clearer and stronger links could be made by referencing the widely accepted benefits of people having access to green spaces and direct contact with the natural environment in Policies ENV1 and SUP2. PROPOSED ACTION: Amend Policy ENV1 and Policy SUP2 to include reference to the benefits of being in contact with the natural environment and identify how access to the natural environment can be improved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			environmental risks such as flooding and heatwaves. It is part of the answer to the challenges posed by a changing climate.’ (para 2.78, White Paper), ‘We want urban green spaces to be recognised as an essential asset and factored into the development of all our communities. They will be managed to provide diverse functions for the benefit of people and wildlife. They will cool urban areas and reduce flood risk, helping communities to adapt to a changing climate. They will continue to play a key role in regeneration projects throughout England, supporting local economic growth. Greener neighbourhoods and improved access to nature will improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks’ (Para 2.80, White Paper) Natural England has developed a GI signposting document, which may be of assistance, it includes detail in relation to GI provision and provides some best practice example of LDF policies relating to GI. http://www.naturalengland.org.uk/Images/GI-signposting_tcm6-11961.pdf		
Chapter 2: About the Core Strategy	195		Sustainability Appraisal We do not have any additional points to make regarding the accompanying Sustainability Appraisal (non technical summary). Natural England considers that all the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633), which incorporates the European SEA Directive (Directive 2001/42/EC), have been met. Habitats Regulations Assessment As our previous letter (dated 23 February 2011 Ref: NW 10/11 16482), Natural England agrees with the approach taken in relation to the Habitats Regulations Assessment (HRA). Should any significant changes occur between the current draft and the publication stage, the plan should be rescreened with respect to The Conservation of Habitats and Species Regulations 2010. Natural England should be consulted on any amendments that may lead to a likely significant effect(s) on any European Site.	Natural England's view that the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633), which incorporates the European SEA Directive (Directive 2001/42/EC), and the Habitat Regulations Assessment have been met is noted.	N/A
Chapter 3: Our Spatial Issues	192		We do not have any additional comments to make on the Preferred Options Report beyond are original comments made at the issues and options report stage, but would like to take the opportunity to reiterate (a) key point referenced as 327529/918 in your preferred options report – consultation statement. 327529/918 Spatial Portrait Natural England has previously raised concern in relation to the detail included in the Spatial	The representation recommends a number of additions to the environment section of the spatial portrait.	See officer recommendation to Comment 323 (Chapter 3).

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Portrait section of the Core Strategy. As outlined in a last response we considered that the Environment section did not fully reflect the natural environment in Pendle. We note that some changes have been made, however there are still areas that could be expanded upon. e.g.: While the text mentions that one-third of Pendle is protected by international, national or local designations it goes on only to mention the internationally designated wildlife sites and does not mention their main interest features. It would have been helpful to mention these, and then list the Sites of Special Scientific Interest, which are of course of national importance, within the borough. There is reference to the Forest of Bowland Area of Outstanding Natural Beauty, which we welcome, but a reference to the landscape character of this and other parts of the district would be helpful. The document refers to woodlands, which are important, but does not mention other national or Lancashire Biodiversity Habitats. A brief text is also needed on species. The Spatial Portrait provides an excellent opportunity to set the natural environment context to ensure planners, applicants and members of the public fully understand the natural assets that are present in Pendle. Therefore Natural England considers that this section should include all Pendle's environmental assets to guarantee a complete portrait is provided in the Core Strategy, this can then flow down to lower tier development plan documents.		
Policy SDP5	196		Infrastructure Study Having reviewed the Infrastructure Study we welcome in particular the detailed references to green infrastructure and suggest that the Preferred Options Report provides links to this study.	The supporting text for Policy SDP5 (paragraph 6.47) erroneously makes reference to the Pendle Infrastructure Plan (sic), rather than Study. Additional references to the study are not considered necessary within Policy SDP5, but it is recognised that an additional reference within Policy ENV1 would be useful.	PROPOSED ACTION: Include references in the key linkages to: Pendle Biodiversity Audit (Policy SDP5), Pendle Infrastructure Study (Policy ENV1).
618916	North Yorkshire County Council			Mr Malcolm Spittle	
Document	348		I can confirm that the County Council has no strategic planning policy comments on the proposals.	Comment noted.	No changes to the document are proposed as a result of this representation.
327366	Old Laund Booth Parish Council			Miss Rebecca Hay	
Policy WRK2	92		The council is particularly concerned about page 151 which states that 50 hectares of employment land is needed over the planned period. The council understands that approximately 41 hectares are currently available and that 9 hectares of extra land	The representation makes reference to "a number of subjective measures which inflate the (employment land) figure unnecessarily." The employment land calculation is based on the methodology employed for the North West of	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			is needed. The council understands that the method used to establish the 50 hectares used a number of subjective measures which inflate the figure unnecessarily in the council's view. It also notes that there are large parcels of land around the borough which are identified as employment land, but have lain idle for many years. The council is thoroughly supportive of the need for employment in the borough, but does not believe there is a proven need to destroy any more green land.	England Plan: Regional Spatial Strategy to 2021 (RSS). This has been accepted as a robust and credible approach at a number of examinations for Core Strategies that have subsequently been adopted across North West England. Whilst the methodology remains the same, updated figures for annual average take-up, employment land supply and GVA growth have been used in the calculations underpinning the Pendle Core Strategy. The derivation of these figures is detailed in the accompanying Employment Technical Paper and set-out briefly below: Past take-up rate: The annual average take-up of employment land in Pendle has been updated to take account of figures for the years since the RSS was prepared. Employment land supply: The figures from the most up-to-date Employment Land Monitoring Report (2009/10) were used to update the supply position. GVA growth: The 2.18% growth rate represents an average of the three most widely recognised economic forecasting models (Oxford, Cambridge and Experian). This methodology was to be used in the preparation of the Regional Strategy (RS2010) before this work was abandoned. This growth rate is substantially lower than the 4.25% figure used in the RSS, which although adopted in September 2008 was based on projections calculated before the onset of the recent economic recession. It is considered that the above methodology is both robust and credible, and as the calculations are based on up-to-date information they do not artificially "inflate the figure unnecessarily."	
327956	P & H Castings			Mr Jeff Pedder	
Chapter 5: Our Strategic Objectives	652		I support the strategic objectives outlined in the Core Strategy, of which our ideas could support: 1 Assist Regeneration; 4 Respond to the causes of climate change; 5 Deliver sufficient quality housing; 6 Strengthen the economy; 10 Ensure that new development respects our man made heritage	Agreement noted.	N/A
Policy ENV2	650		Issue 6b option other - comment 328010/1308 The Officer's Recommendations in the Consultation Statement are very helpful if I interpret them correctly. I operate in an 1840's grade 2 listed power loom foundry accessed by a steep external ramp. The early victorian structure is massive and much larger than the firm now requires and the timber roof structure poses a continual fire concern in a building for metal melting furnaces.	Whilst the policy supports a number of measures to design for climate change mitigation and adaption, this does not remove the need for any changes to heritage assets to be considered in terms of any harm to their significance. These issues would be considered in the appropriate manner i.e. an application for Listed Building Consent where issues around particular buildings and their significance can be	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Premises with level access, better insulation and services to reduce the carbon footprint would improve working conditions and reduce overhead costs. Change of use to allow the historic premises to be economically converted for more sustainable uses will be essential to allow the business to move to suitable, safer premises. The review of existing planning use designations proposed through the sustainability appraisals could allow appropriate conversion to uses that would better conserve the historic structures for future generations.	considered.	
Policy WRK2	651		Consultation Statement [Issue 6b, Option - Other, Comment 328010/1308] The Officer's Recommendations in the Consultation Statement are very helpful if I interpret them correctly. I operate in an 1840's grade 2 listed power loom foundry accessed by a steep external ramp. The early victorian structure is massive and much larger than the firm now requires and the timber roof structure poses a continual fire concern in a building for metal melting furnaces. Premises with level access, better insulation and services to reduce the carbon footprint would improve working conditions and reduce overhead costs. Change of use to allow the historic premises to be economically converted for more sustainable uses will be essential to allow the business to move to suitable, safer premises. The review of existing planning use designations proposed through the sustainability appraisals could allow appropriate conversion to uses that would better conserve the historic structures for future generations.	Nine Protected Employment Areas (PEAs) are currently designated under Policy 22 of the Replacement Pendle Local Plan (2001-2016). This policy and the continued designation of these sites will be reviewed during the preparation of the Land-use Allocations DPD, which will follow the adoption of the Core Strategy. Paragraphs 11.43 and 11.44 in the supporting text acknowledge that only those sites that offer a high quality, accessible and economically competitive location will be protected. Paragraph 11.45 sets out the qualifying criteria for designation as a PEA. In accordance with paragraph 22 of the new National Planning Policy Framework (NPPF), existing PEAs that no longer meet these requirements will lose this designation, to encourage the re-use, or redevelopment, of sites for a broader range of uses. Also refer to comment 650 (ENV2).	No changes to the document are proposed as a result of this representation.
327679	Peel Investments (North) Ltd.			Ms. Louise Morrissey	
Document	103		The Peel Group's interests include leading companies in the port, airport, property investment and renewable energy sectors. Peel is also involved in major regeneration initiatives across the UK, including (within the North West); MediaCityUK at Salford Quays, the Mersey Waters schemes and the Port of Liverpool and Manchester Ship Canal. Within the Borough of Pendle, Peel's landholdings are located within Barrowford and are therefore included within the defined M65 Corridor. More specifically, our interests are focussed on land to the North of the M65 in Barrowford, at Riverside Business Park and land at Trough Laithe Farm, located directly to the north of aforementioned Business Park. Treatment of the 'Protected Areas' As you are aware, Peel have submitted representations to the Borough Council, at all previous stages of this Local	The Core Strategy does not consider or identify sites for allocation. The methodology for the Pendle SHLAA, clearly states that only those sites within a settlement boundary, as defined in the Replacement Pendle Local Plan (2001-2016), will be considered for inclusion. As the land at Trough Laithe Farm lies outside the Barrowford settlement boundary it has not been included in the SHLAA. The identification of sufficient land to meet the growth needs of Pendle, as outlined in the Core Strategy, will be carried out in the preparation of the Site Allocations and Development Policies DPD. The SHLAA will assist in this process, but is not the only source of information/data/evidence that will be used to allocate sites. There SHLAA will be reviewed and updated once the Core Strategy has been finalised to ensure	PROPOSED ACTION: Include an additional section at the beginning of the Core Strategy that sets out the relationship between it and the Land-use Allocations document. In this section reference should be made to a review of existing Local Plan designations including the Protected Area sites.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Development Document (LDD) as well as the associated evidence gathering exercises which fed into this draft LDD. Trough Laithe Farm is currently designated as a Protected Area under Policy 3A of the adopted Local Plan: POLICY 3A Protected Areas 3A1 Within the areas shown on the proposals Map as a Protected Area, no development will be permitted which would prejudice the open character of the area or its potential for long term development, during the plan period unto 2016. 3A2 It is intended that these areas should remain open for the plan period. They represent areas of choice for possible development to meet future long term requirements and to ensure the protection of the Green belt. The future of these areas is to be re-examined through subsequent reviews of the plan. Should long term pressure for development after 2016 prove that these areas will not be required for development, consideration will be given to their inclusion within the Green Belt... It is the clear intention of Policy 3A that Protected Areas will be re-examined in future local plan reviews. The Council has not however, included the Protected Areas in its evidence base for the Core Strategy, namely the SHLAA, as it they are located outside of the defined urban boundary. This represents a significant oversight by the Local Authority. Land within Protected Areas at Trough Laithe Farm, is suitable and viable for development, and can make an important contribution to achieving the amount and type of housing and employment land required by the Core Strategy. Specifically, the land at Trough Laithe Farm provides the opportunity to deliver family housing, a stated objective of the Preferred Options, in addition to contribution to the overall numerical requirement. It can also form part of a mixed use approach including employment uses, if brought forward in a holistic manner alongside land to the immediate south. The Protected Areas should be included in order to ensure that the Core Strategy can be found to be sound under independent examination. We suggest the following: - Key Diagrams to be amended to highlight the Protected Areas as being key areas of search within the Land Allocations DPD. - Protected Areas be specifically referenced within the text of the Core Strategy as possible contributors to housing and employment requirements, subject to identification and examination through the Allocations DPD.	that there is still sufficient land of the right quality available for development. A specific section is to be added to the Core Strategy, to provide details about the next stages of plan development - i.e. the preparation of the Site Allocations and Development Policies DPD. A reference to existing Local Plan designations and allocations, including the Protected Areas, is to be added to the introduction to the Core Strategy. It is not considered appropriate to amend the Key Diagram to include details of the Protected Areas, as this would pre-empt the findings of their re-evaluation, as required by Policy 3A of the replacement Pendle Local Plan (2001-2016). This will take place as part of the work to prepare the Site Allocations and Development Policies DPD, which can only be carried out once the strategic direction and level of future development has been established in the Core Strategy.	
Chapter 4: Vision	126		Peel welcomes the focus for growth within the Borough being the M65 Corridor and supports the Council's objectives for the majority of housing and employment development to be located along this strategic route. One concern we do have is with the	This comment is made against the Spatial Vision, the Spatial Strategy (Comment 127) and the Strategic Objectives (Comment 134). The comment is, however, better related matters covered in Policies SDP2 and SDP3. It is	PROPOSED ACTION: Include additional wording in Policies SDP2 and SDP3 to explain that the percentage figures are for guidance rather than strict targets.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			strict proportioning of this growth between the towns and villages within each of the character areas of the Borough. Whilst we note that a percentage base has been used to allow flexibility, Peel believes that this breakdown into town and village growth could remove the ability of th plan to be flexible and reactive to changes in demand and need.	important to ensure that each settlement is allocated the appropriate level of development required to meet identified needs. Policies SDP2 and SDP3 are designed to address the needs of each settlement and the opportunities within them in a flexible way. The percentage figures for growth identified for housing and employment are based on an assessment of a number of factors. They represent guiding figures rather than strict targets. The breakdown by individual settlement also helps to provide certainty and set the context for any future neighbourhood plans. For the purpose of improving clarity a statement will be added to Policies SDP2 and SDP3 making it clear that the percentage figures are for guidance rather than a strict target.	
Chapter 5: Our Strategic Objectives	134		Peel welcomes the focus for growth within the Borough being the M65 Corridor and supports the Councils objectives for the majority of housing and employment development to be located along this strategic route. One concern we do have is with the strict proportioning of this growth between the towns and villages within each of the character areas of the Borough. Whilst we note that a percentage base has been used to allow flexibility, Peel believes that this breakdown into town and village growth could remove the ability of th plan to be flexible and reactive to changes in demand and need.	Support for the strategic objectives is noted. The remainder of this comment is dealt with under the appropriate headings. Also refer to Spatial Vision (Comment 126) and Spatial Strategy (Comment 127).	No changes to the document are proposed as a result of this element of the representation.
Chapter 6: Our Spatial Strategy	127		Peel welcomes the focus for growth within the Borough being the M65 Corridor and supports the Council's objectives for the majority of housing and employment development to be located along this strategic route. One concern we do have is with the strict proportioning of this growth between the towns and villages within each of the character areas of the Borough. Whilst we note that a percentage base has been used to allow flexibility, Peel believes that this breakdown into town and village growth could remove the ability of the plan to be flexible and reactive to changes in demand and need.	This comment is made against the Spatial Strategy. It is also made against the Vision (Comment: 126) and the Strategic Objectives (Comment: 134). However, the comment seems to relate more to Policies SDP2 and SDP3. It is important to ensure that each settlement is allocated the levels of development required to meet their needs. Policies SDP2 and SDP3 include percentage levels of growth that are designed to fulfil the needs and opportunities presented in each settlement in a flexible way. The percentages are based on an assessment of a number of factors and are considered to be guiding figures to be met over the plan period and not strict targets. The breakdown of these figures also helps to set the context for potential neighbourhood plans. However, for the purposes of clarity Policies SDP2 and SDP3 will be amended to include a statement regarding the percentage figures to explain that they are a guiding principle rather than a strict target.	PROPOSED ACTION: Include additional wording in Policies SDP2 and SDP3 to explain that the percentage figures are guiding figures rather than strict targets.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 8: Key Diagram	121		The Protected Areas should be included in order to ensure that the Core Strategy can be found to be sound under independent examination. We suggestion the following: - Key Diagrams to be amended to highlight the Protected Areas as being key areas of search within the Land Allocations DPD.	The Key Diagram is intended to indicate the broad location for strategic development. The Protected Areas in the Replacement Pendle Local Plan will be revised through the Land-use Allocations process and if they are required for development they will be shown on the proposals map. It is not appropriate to show specific sites on the Key Diagram, unless they have been identified in the Core Strategy as strategic development sites. The Protected Areas have not be identified as Strategic Development sites in the Core Strategy. It should be noted that in response to Comment 103, Section 2 of the Core Strategy will be revised to explain better the Land-use Allocations process and will identify the Protected Areas as possible areas of search.	PROPOSED ACTION: Include an additional section at the beginning of the Core Strategy that sets out the relationship between it and the Land-use Allocations document. In this section reference should be made to a review of existing Local Plan designations including the Protected Area sites.
Policy LIV1	136		Whilst Peel agrees with the Borough regarding the use of the RSS housing targets being a suitable starting place (for apportioning housing growth) and welcomes the increase from 190 to 200 units per annum, we are unsure as to why the defined need of 275 units per annum (as highlighted with paragraph 10.9 of the Core Strategy and the finds of the Burnley and Pendle Strategic Housing Market assessment) is not the proposed target. Peel suggest that should the lower figure be adopted, then it should be noted that this is a minimum and not a ceiling. Whilst not mentioned in the text, Peel would like clarification as to how the Council intends to address the shortfall in housing delivery between the start point of RSS in 2003 and the adoption of this LDD. It should be noted that the Inspector residing over the Examination in Public of the Core Strategy for Rossendale Borough Council, stated that whilst the shortfall during the RSS period prior to 2008 could be discounted, that which occurred from the adoption of the RSS in 2008 should be accounted for within the Core Strategy. It would appear that very similar circumstances apply to Pendle as to Rossendale, therefore we would anticipate the same approach would need to be followed. As highlighted in Figure LIV1 'Housing Trajectory' there appears to have been a significant undersupply in units from 2008. These should be reinstated and delivered through the plan period, rather than pushed to the back of the plan period. When considering the proposed phasing housing delivery, Peel agrees with the Councils broad approach. It would appear that if the Council is to achieve the proposed phasing in terms of completions, it will need to be more flexible with its land supply in the early part of the plan. This reinforces the need to include the 'Protected Areas' as a consideration at this stage. A narrow approach focused within the urban	The housing requirement figure in the SHMA is the product of the Balancing Housing Markets (BHM) Model. The SHMA explains that this model produces "policy relevant figures which can then be subject to wider policy debate" - in essence this means that other facts, assumptions and local knowledge need to be considered and applied to obtain a realistic housing requirement figure. In Pendle there needs to be a balance between the provision of new housing with the need to regenerate the existing housing stock including the reoccupation of empty homes. The National Planning Policy Framework (NPPF) indicates that Local Planning Authorities should identify and bring back into use empty housing in-line with local housing and empty homes strategies. The Core Strategy Housing Technical Paper outlines the approach taken to the housing requirement figure. With regards to the housing shortfall against the RSS it should be noted that between 2003 and 2008 Pendle did not have a deficit of completions, indeed there was a slight surplus. Following the economic downturn and an increase in the amount of demolition taking place a deficit of 221 dwellings has now been recorded. In order to ensure this need is met, the deficit will be added to the overall housing requirement figure in the Core Strategy. The annual requirement and phasing approach will also be adjusted accordingly to reflect this change. The phasing approach is designed to be the minimum expected delivery rate during each period. This is based on a realistic assessment of the land supply within the current settlement boundaries - this is detailed in the SHLAA. The phasing approach also reflects the likely and realistic delivery rate of new housing being built. It is not the intention of the policy to restrict the	PROPOSED ACTION: Increase the overall housing requirement figure to take account of the current levels of under delivery. PROPOSED ACTION: Include an additional section at the beginning of the Core Strategy that sets out the relationship between it and the Land-use Allocations document. In this section reference should be made to a review of existing Local Plan designations including the Protected Area sites.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			nboundary could well undermine phasing as well the overall amount and type of housing.	granting of planning permission as it is acknowledged that sufficient permissions must be in place to ensure delivery / achievability of the proposed targets. However, it is not the purpose of the Core Strategy to allocate land for housing. The Land-use Allocations Development Plan Document will consider all potential allocations and review the existing Local Plan designations. The need for the Protected Areas will be considered at this stage. However, it is proposed to include a specific section in the Core Strategy which provides details of the next stages of plan development - i.e. the preparation of the Land-use Allocations document. Reference to existing Local Plan designations/allocations including the Protected Areas will be made in this new section.	
Policy WRK2	143		Peel welcomes the increase in Employment Land provision within the Borough and the focus for Major Employment Proposals to be located within the M65 Corridor. As stated previously, Peel requests that the Council make reference to the Protected Area an their potential to meet the long term development objectives of the Borough. The Trough Laithe Farm site, within the Protected Area is capable of delivering a mixed-use development as part of a comprehensive masterplanned approach including the existing Business Park land to the immediate south.	The Pendle Core Strategy does not identify any strategic development sites. Instead it identifies broad areas for future development. The future of the three Protected Areas, and the possible need to allocate these sites for future development, will be reviewed in the preparation of the Land-use Allocations DPD. As a consequence, Appendix B indicates that Policy 3a: Protected Areas will not be replaced by the Core Strategy, and that it will be saved until their future has been carefully considered in the preparation of the Land-use Allocations DPD. In preparing the Land-use Allocations DPD, Pendle Council will identify and allocate sufficient employment land to meet the future level of business growth identified in the Core Strategy. However, a new section is to be included towards the front of the Core Strategy, providing details of the next stages in the development of a new Local Plan for Pendle - i.e. the preparation of a combined document setting out proposed site allocations and detailed development management principles. Reference to the existing designations/allocations in the Replacement Pendle Local Plan, including the Protected Areas, will be included in this new section. However, the Key Diagram will not be amended at this time, as this would pre-empt any re-evaluation of the role of the Protected Areas. if appropriate the Protected Areas will be shown on a future revision of the Proposals Map. Also refer to Representations 327679/103 (Document) and 327679/121 (Key Diagram) for further comments on the Protected Areas.	PROPOSED ACTION: Include an additional section at the beginning of the Core Strategy that sets out the relationship between it and the Land-use Allocations document. In this section reference should be made to a review of existing Local Plan designations including the Protected Area sites.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
328012	RAGE			Mr Andrew Ashworth	
Document	437		In its local development framework, PBC fails to take biodiversity seriously enough. To PBC “environment” usually means the “built environment” and it does not include the “natural environment” in sufficient depth. As a result, PBC has concentrated on transport and energy conservation and neglected the natural environment. This lack of focus on biodiversity issues is reflected in the Core Strategy and the work of Pendle’s Sustainable Places Environmental Group. The work of this group illustrates the low priority placed on biodiversity. (Concerns are amply summarised in the letter to PBC sent by John Plackett on 14th January 2011.) It met on numerous occasions but rarely discussed biodiversity. No one representing biodiversity attended (or was invited to) these meetings on a regular basis. There is a biodiversity duty enshrined in the NERC Act, but PBC chose to ignore it in the workings of this group	The Core Strategy is the key planning document for Pendle. Its main focus is to promote growth and manage development in the borough. Whilst there may be an apparent 'focus' on the built environment, the importance of the natural environment is not overlooked. Indeed, at the time of writing Pendle is one of the few authorities in the North West, and the only local authority in Lancashire, with an adopted and up-to-date Biodiversity Audit. This has proved invaluable in helping to inform policies in the Core Strategy. Policy ENV1 sets out the Council's approach to the protection and enhancement of the natural environment and specifically addresses issues relating to biodiversity. The requirements of the NERC Act apply to all Council's functions that may impinge on biodiversity, not just planning. The Council considers that Policy ENV1 plays an important role in helping the Council to meet its requirements under the NERC Act, in terms of having regard to the need to conserve biodiversity. Policy ENV1 also includes the 'hooks' for other policies in the Core Strategy and subsequent planning documents, which will help to establish a viable Ecological Network in Pendle - e.g. the provision of open space in new developments. Contrary to what is stated in the representation, Policy ENV1 was prepared in conjunction with representatives of the LSPs Sustainable Places Group. Whilst planning officers cannot comment on those normally invited to attend meetings of the LSP Sustainable Places Group, the sub-group convened to consider Policy ENV1 on 15th November 2010, included representatives from a wide range of groups concerned with biodiversity both in and beyond Pendle. Organisations represented at the meeting included the Lancashire Wildlife Trust, Lancashire Environment Record Network (LERN), Lancashire Biodiversity Partnership, Nelson Naturalist Society, Friends of Greenfield LNR and Pendle Parks Forum. Also present were two representatives from the East Lancashire Ornithologists Club who are also key members of Residents Against Gib Hill Exploitation (RAGE). Following the meeting both of these representatives submitted proposed amendments to Policy ENV1 by the deadline. The majority of these proposed changes were incorporated into the revised Policy ENV1. The contact details of those representatives present at this sub-group meeting, who were not already	PROPOSED ACTION: Revise the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 4) and Spatial Strategy (Chapter 6) to include a stronger commitment to protecting and enhancing biodiversity.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				included on the LDF Database, were added to it. As a result they have been kept fully informed of progress on the Core Strategy and been given advance notice of the opportunity to comment on its content at key stages. Pendle Council also recognises that biodiversity issues are not confined by borough boundaries, but extend beyond into neighbouring local authority areas. These neighbouring authorities have been widely consulted in the preparation of the Pendle Core Strategy. The Core Strategy is not the only vehicle that seeks to deliver improvements to the natural environment. It is not the only Council document required to have regard to biodiversity and the natural environment. What the Core Strategy establishes is that designated areas need to be protected from the potentially adverse effects posed by any new development. It also seeks to secure improvements to the natural environment where this can be justified when new development is proposed. It has been acknowledged, in response to other comments made against the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 5) and Spatial Strategy (Chapter 6), that there needs to be a greater emphasis on biodiversity within these sections, in order to make it clear that it is a key element running through the Core Strategy.	
Policy SDP6	442		The wording of Policy SDP6 is weaker than in the comparable section of the adopted local plan (Policy 17.2). In SPD6, it reads that only “consideration” will be given to the sequential approach (i.e. not necessarily to be followed), whereas in Policy 17.2 specifies in more definitive terms that: “...proposal for new housing will be considered, in order of priority for: 1) The re-use or conversion of existing buildings within a settlement boundary. 2) The redevelopment of previously developed land within a settlement boundary. 3) The development of previously undeveloped land within a settlement boundary...” We believe that following the Sequential Approach to Development is vital to the sustainability of the borough’s environment and should be enforced in stronger terms, something similar to the current Policy 17.2. In addition, we feel that because of its importance in the protection of the natural environment, the Sequential Approach should be applied at a borough-wide scale, to give maximum protection to all green field sites. For example, green field sites should not be sacrificed in the West Craven Towns whilst previously developed land is in abundance in the M65 corridor (subject to any land need for “greening the urban environment” / wildlife corridors) . So we suggest the deletion of	The National Planning Policy Framework (NPPF) encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value (paragraph 17, bullet point 8). Policy SDP6 aims to direct new development to the most sustainable sites and promote the reuse of previously developed land in the first instance. It should be noted that Policy SDP6 will apply to all types of development and not just housing development. For the avoidance of doubt and to provide clarity, the policy will be revised to make clear that proposals will be considered against the sequential approach in order of priority. However, in order to comply with the NPPF the policy must provide a flexible response to achieving sustainable development. The viability of sites can affect the delivery of development. As a consequence, and in order to ensure the levels of growth proposed in the Core Strategy are met, the release of second priority sites (greenfield land within settlement boundaries) may be necessary where these are viable, in a sustainable location, and their delivery can be guaranteed. In terms of the scale at which the sequential approach is provided - this is set at the	PROPOSED ACTION: Amend the wording of the policy text to read "In order to ensure the best use of resources, the location of new development will also be considered in accordance with the following sequential approach (in order of priority):"

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			the following sentence from SDP6: "Development will be located in line with the settlement hierarchy set out in Policy SDP1." Instead, Policy SDP6 could read something like:- Proposals for new housing will only be considered on previously developed land and in vacant buildings within a settlement boundary. Where it can be demonstrated that there is less than 5 years supply of such sites available across the borough, consideration will be given to other land within settlement boundaries. Development will only be allowed on land outside the settlement boundaries in exceptional circumstances, where it is to meet a proven need as set out in studies such as the Strategic Housing Market Assessment and the Employment Land Review..." Where development is deemed necessary on green field sites, a sequential approach should be used to prioritise sites according to their biodiversity, so sites of greater biodiversity would be given more protection from development.	settlement level. Applying it on a borough wide scale could result in an inflexible policy and restrict development in areas where it is needed. Policy SDP1 sets out where new development should be located - this is based on a number of factors, including need. If development in one part of the borough was restricted because of a lack of previously developed sites this may lead to the needs of that part of the borough not being met in a sustainable way - especially if it forced people to travel to a different area. This type of policy would be seen as restricting sustainable growth and contrary to the NPPF. The two policies together aim to ensure that new development is provided in the most sustainable locations. SDP1 sets a settlement hierarchy to direct the majority of development to the existing larger settlements where services and infrastructure are already available. SDP6 then requires developers to consider the use of brownfield sites first (within the chosen settlement) as these are often situated in sustainable locations. In terms of the use of greenfield sites and the biodiversity importance of such sites - the NPPF indicates that allocations of land should be on sites of lesser environmental value (paragraph 17, bullet point 7). As part of the Land-use Allocations documents sites proposed for development will be assessed for their biodiversity importance. This will be a determining factor in the decisions as to whether to allocate a site or not. Policy ENV1 of the Core Strategy aims to protect and enhance the biodiversity assets of the borough and new development proposals will need to comply with this policy as well as SDP1 and SDP6.	
Policy ENV1	463		b) Biodiversity: Paragraphs 7.32 to 7.36 reveal a passive approach to biodiversity. (i) 7.32-Ecological networks: There are two points here. Firstly, PBC recognises their importance in allowing species migration. (They do not mention climate change as a possible cause of migration.) Secondly, development proposals should "prevent harm, add value to and enhance the existing ecological networks". The problem with this is that it is unclear what the existing ecological networks are. (Where are they and what are they?) Why does their enhancement depend on developments? They should already exist or be created whether developments occur or not. This approach is advocated in PPS9, paragraphs 11 and 12. The council's approach is reactive, not proactive as it claims. (ii) 7.33-Habitat creation and restoration: Once again, the council only considers these activities as an accompaniment to developments. The NERC Act	The reasons for species migration could be numerous and it is not the purpose of the strategy to identify these, however it is proposed to include a section on Biodiversity and Climate Change in response to representations. It is also not the purpose of the Core Strategy to identify ecological networks. These will be identified as part of the land use allocations DPD. Lancashire County Council has supported this approach in neighbouring planning authorities Core Strategies. The purpose of the Core Strategy is as a planning document to be used to guide and assess development. It is not able to have a wider remit in terms of environmental enhancement. Other policies and strategies are in place to achieve this. Paragraph 1.5 of the strategy explains the context of the document. The strategy sets the policy that will be applied to these. In addition the	PROPOSED ACTION: In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater". The Pendle Biodiversity Audit details further the particular types of habitat.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			requires local authorities to restore, to conserve and to enhance regardless of any development occurring nearby. This approach is supported by PPS9 paragraph 5(ii). The council's obsession with woodland as the only habitat worth creating is once again evident. (iii) 7.34- How will the social and economic benefits of a development be evaluated against a site's conservation value? There should be a set of criteria agreed beforehand in order to evaluate the opposing merits of a site. A single set of criteria should be created so that sites be can assessed as objectively as possible. One alternative, if a site of conservation value is threatened, would be to build on low quality farmland. A lot of Pendle's farmland consists of grassland fields where the once-rich grassland has been ploughed up and replaced with rye grass. This type of grazed grassland has little biodiversity interest.(iv) 7.35-A proactive approach to protecting biodiversity: The approach described seems anything but proactive. It is reactive, designed to reduce damage caused by development as advocated in PPS9 paragraph 14. Policy ENV1 states "biodiversity will be protected and enhanced". Making ponds, planting trees and shrubs etc. are only measures to ameliorate the effect of development. (v) 7.36-New areas of nature conservation value: Once again there is a lukewarm statement of intent—"There may be opportunities to designate new areas for their nature conservation value in the future, cf. policy ENV1 mentioned in (iv) above. Biodiversity must be enhanced by creating new areas of habitat for wildlife (see PPS9 p2, 2nd bullet point.) Whilst supporting the protection of trees, woodland and hedgerows; other habitats must not be neglected.	strategy sets the policies that will be applied to development in order to ensure networks are improved and enhanced, however it does not suggest that development in necessary for protection and enhancement of these outside of the planning system. It is agreed to make reference to other habitats in addition to woodland in the context of the policy. The criteria against which the social, economic and environmental benefits will be assessed will be determined by the Development Management Policies DPD. These are the detailed policies against which all development will be considered against. Individual sites for development will be allocated through the Site Allocations DPD. The Council considers the policy to be proactive as it is sets out the principle of protecting and enhancing natural and historic environments. Paragraph 7.36 is considered to be an appropriate indicator of the direction of the policy.	
Policy ENV1	477		Open Space and green infrastructure: Paragraph 7.42. Green infrastructure is for people to use for their health and well-being. Many facilitate the migration of wildlife, but only as a consequence of their main purpose. Through policies in their plans, PBC need to provide separate ecological corridors and stepping stones to link areas of biodiversity importance (PPS9, paragraph 12).	It is accepted that there are wider benefits to Green Infrastructure than those given. It is appropriate to reference Natural England's published benefits of Green Infrastructure. The Core Strategy looks separately at ecological networks in paragraph 7.32 - 7.36 and the policy text explains that the Council will work with partners to develop ecological networks where possible. However, it is accepted that the policy could give a more rounded explanation of such networks.	PROPOSED ACTION: The two key reasons for protecting and connecting open spaces will be removed and replaced with Natural England's six social, environmental and economic benefits of Green Infrastructure as follows: "Green Infrastructure can provide many social, economic and environmental benefits including: Places for outdoor recreation and play Space and habitat for wildlife with access to nature for people Climate change adaption Environmental education Local food production Improved health and wellbeing" http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx PROPOSED ACTION: Add to

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
					paragraph 7.32 after 'across the borough' "It is important to ensure that there are connections between the core biodiversity sites and habitats, to allow species to move freely between them in order to feed, disperse, migrate or reproduce. This is seen as a key in providing future resilience to the potential impacts of climate change. Such connections do not have to be continuous linear habitat, but can be a series of smaller isolated sites which species can use as stepping stones between the core areas. It is this network of core sites connected by buffer zones, wildlife corridors and stepping stones which is known as an ecological network (Lawton et al)."
Policy ENV1	473		Green Belt: Paragraph 7.41. It is December 2011 and no strategic review of Green Belt has taken place. Green Belt is an important part of green infrastructure as it allows species migration.	The proposed strategic review of Green Belt was set out in regional planning policy (RSS). The Governments commitment to the withdrawal of regional policy has resulted in a strategic review not being carried out. In the absence of such a review the National Planning Policy Framework states that the general extent of Green Belts is already established and that it should not be necessary to designate new Green Belts except in exceptional circumstances. In addition a strategic review of the Green Belt is not considered necessary. The levels of development in Pendle will not require a full scale review of the Green Belt. Any minor changes to the Green Belt boundaries will be considered as part of the Land Use Allocations DPD.	PROPOSED ACTION: Reference to the strategic review of Green Belt in paragraph 7.41 will be removed.
Policy ENV1	457		a) Habitat types: It does not deal systematically with the 18 UK BAP Priority habitats found in Pendle, which are listed in the Biodiversity Audit on page 27. By page 57 of the audit these have been reduced to 5 "Key" habitats. In the Core Strategy document, even these five have not been referred to. Only woodland is mentioned. Paragraphs 7.15 to 7.17 discuss woodland in general, but not woodland types classified as priority habitat. The 18 UK BAP Priority habitats are ignored. Sites where these habitats occur enjoy protection under the NERC Act.	The representation states that only woodland habitats are detailed by the Core Strategy despite the number of habitat types that are evident in Pendle. Reference to the Priority Habitat types will be added to the context to redress this.	PROPOSED ACTION: In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater". The Pendle Biodiversity Audit details further the particular types of habitat.
Policy LIV1	445		In order to minimise pressure on green field land, we believe that the numbers of new dwellings should be set at the lowest possible level. The current local plan states 190 dwellings per	The Core Strategy Housing Technical Paper provides the justification and calculations for the proposed housing requirement figure. It takes account of a number of different	PROPOSED ACTION: Update the figures relating to empty homes and clarify the difference between the overall vacancy

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			year, as specified by the Regional Spatial Strategy, and we suggest that it would still be appropriate to use this figure as the benchmark. Mention is made of significant population increases later on in the plan period (para. 10.10), but this forecasting is subject to so many variables, it seems pointless attempting to make detailed plans for it at this point in time. Rightly, mention is made of the vacancy level and ambitions to reduce it (para. 10.11), which would reduce the need for the building of new dwellings and so reduce pressure on green field sites. However, the 6% figure is not referenced (how up-to-date?), and from casual, local observations we suspect that it could have increased significantly in recent months. If so, presumably priority should be given to bringing vacant properties back into use rather than construction new dwellings, so the new dwelling figure could be even lower.	factors including housing need, population and household growth, land capacity, regeneration and empty properties. The technical paper examines a number of scenarios including an assessment of the Regional Spatial Strategy (RSS) figure. The figure proposed in the Core Strategy Preferred Options Report is considered to strike a balance between all these factors whilst ensuring housing needs are met. The National Planning Policy Framework (NPPF) (para 159) requires Local Authorities to prepare Strategic Housing Market Assessments (SHMA) to assess their full housing requirement. The SHMA should look at the scale and mix of housing needed to meet household and population projections. This evidence should be used to ensure that plans meet the full objectively assessed needs for market and affordable housing. The population and household projections have changed since the SHMA was prepared. It is therefore necessary to review the proposed housing requirement figure to ensure that the housing needs of the borough are met. The land required to deliver this level of housing will be allocated in the Land-use Allocations plan. The Strategic Housing Land Availability Assessment (SHLAA) indicates that there is insufficient previously developed (Brownfield) land to accommodate all the new housing and some Greenfield sites will be required. The proposed figure for new housing takes account of the fact that the borough has a considerable number of empty homes. The latest published figures (as of 2011 – see DCLG live tables 125 and 615 at: http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/stockincludingvacants/livestables/) show the following: Total (estimated) dwelling stock: 40,000 Total vacant dwelling stock: 2,746 (6.86% of total dwelling stock) Total long-term (more than 6 months) vacant dwelling stock: 1,770 (4.42% of total dwelling stock) The Pendle Empty Homes Strategy / Action Plan and the Sustainable Community Strategy set a target of bringing the number of long-term vacant properties down to 3.7% of the total housing stock. Given the current levels of vacant dwellings this will require the reoccupation of 290 dwellings and will bring the total long-term vacant dwelling count down to 1,480 dwellings. The date (2011) for achieving this target has now past and although progress has been made, 4.42% of the housing stock is still classified as long-term vacant. The revised Empty Homes Action Plan provides a list	level and the long-term (over 6 months) vacancy level.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				of actions to continue the work to meet the target and reduce the number of empty properties. The Core Strategy will support this approach. There are now limited funding opportunities available to continue, at the same level, the refurbishment projects that have taken place over the last few years. The Council is investigating other potential mechanisms to tackle the issue of empty homes. These include: 1) working with the Council's Joint Venture Company 2) working with absentee landlords 3) bidding for funding to renovate empty properties (Funding has recently been secured for a number of empty home schemes across Pennine Lancashire). In terms of overall vacancy levels, the national (England) average stands at 3.22% of the total housing stock. To allow a housing market to function there always needs to be a certain level of vacant homes to allow for freedom of movement. In Pendle the overall vacancy level (6.86%) is significantly higher than the national average. Together with the actions being taken to reduce the number of long-term empty properties, it is also important to bring the overall vacancy rate down to a level closer to the national average. To achieve this will require the reoccupation of 1,546 homes. The Core Strategy can help to support this objective through its requirements in Policy LIV3. This policy looks at the provision of affordable housing and in some circumstances this may be through the acquisition and refurbishment of empty properties. However, this mechanism can only work with the provision of some new build housing in order to fund the refurbishment. Evidence in the SHMA suggests that there is a need/demand to provide 4,125 dwellings over the 15 year plan period. The reoccupation of over 1,000 vacant homes would meet part of this need/demand, leaving nearly 3,000 dwellings to be newly built. However, it should be noted that the most recent population projections have suggested that there is likely to be a significant increase in the population over the next 25 years. This is likely to result in an increased need/demand for housing and may increase the local housing requirement figure. The Core Strategy offers a balanced approach to the provision of new build housing as well as aiding the reuse of empty homes.	
Policy LIV1	448		Para. 10.18 - Sewerage Mention is made in para. 10.18 and elsewhere about capacity problems at several Waste Water Treatment Works. Whilst this technicality has to be addressed, we wonder if it is necessary to include it in the Core Strategy as	The NPPF requires Local Authorities to work with Infrastructure providers (paragraphs 162, 180) to assess the quality and capacity of infrastructure and its ability to meet forecast demands. An infrastructure study was carried out to	PROPOSED ACTION: Explain in the justification text of Policies SDP2 and LIV1 how the consideration of infrastructure has been taken into account when determining

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			it has the effect of distorting the location of new dwelling construction. The utility companies should be responsible for addressing these issues: it is the simple economics of more dwellings = more waste water; borrow money to build new plant, collect the new revenue from the new dwellings; repay the money and keep the profit.	highlight any potential infrastructure capacity issues which may need to be resolved in order for development to take place in the borough. In Policy LIV1 consideration has been given to the potential capacity issues at the waste water treatment works and this is reflected in the phasing approach to development. The intention is that development, in areas affected by infrastructure capacity issues, will occur in later phases of the plan period once these issues have been resolved. However, it is not necessarily the case that the amount of development proposed has been reduced in these areas because of the infrastructure issues, just that the timing for this development has been adjusted. Policy SDP2 considers the distribution of new housing development. It again indicates that infrastructure capacity has been taken into account when considering where new housing development should take place. However, like Policy LIV1 it is the timing of the development that is affected rather than the actual percentage distribution. The wording of Policy LIV1 and Policy SDP2 will be revised to clarify how infrastructure capacity has been considered in the housing requirement and distribution calculations. In terms of the role of the utility companies, they have a duty to provide water supply and disposal services as required. Therefore when new development takes place they have to supply the necessary water infrastructure for that development. In the interests of good forward planning and efficient use of resources, the Council and the water companies are working together to identify the amount and likely timescales of new development. The water companies go through a five year financial planning cycle where they can put in bids to OFWAT for funding for new infrastructure. This forward planning process helps to avoid delays to development as it allows the right infrastructure to be put in place at the right time. Where water companies have to supply previously unidentified developments (windfalls) they have to find the resources to fund the connections to these developments. This may then have an adverse impact on the funding for other projects. In summary, there is a requirement for the Core Strategy to address the infrastructure needs of the proposed levels of development in the borough and therefore reference should continue to be made to the capacity of the waste water treatment works. The wording of Policies SDP2 and LIV1 will be amended to clarify how	the level and location of new housing.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV1	454		Para. 10.27 – Housing Market Renewal No detail is given about the future of the large areas of land designated as “HMR Reserved Housing Land” in the adopted Local Plan. The need for this land was supposed to be reviewed from time to time. Will it be kept in the LDF, given the curtailment of most of the HMR schemes? If it is kept, for how long? If the sites are found to be no longer needed, they should revert back to their previous classifications (e.g. open countryside), and where the settlement boundary was moved to accommodate these sites, it should likewise revert to its previous position.	infrastructure provision has been considered. The Core Strategy does not deal with the allocation of land. This will be dealt with in the Land-use Allocations document. Consideration of all allocations in the current Local Plan will take place as part of that process. The Government announced in 2010 that funding for the HMR programme would cease. In Pendle those unfinished projects are now being wound-up. As a consequence the sites allocated as HMR reserved housing land in the Replacement Pendle Local Plan will not be required for replacement dwellings, as the scale of clearance and replacement has not materialised. The proposed level of housing in the Core Strategy is such that the HMR sites may be required for new housing. The SHLAA process has identified them as having the potential to be developed for new housing. Furthermore, it should be noted that the allocation of the HMR sites in essence identified them as suitable for housing purposes.	No changes to the document are proposed as a result of this representation.
Policy LIV4	451		Para. 10.120 - Housing Density In the adopted local plan, Policy 20.1 specifies that new dwellings should be built at a minimum density of 30 per Ha. However, para. 10.120 of the Core Strategy mentions a figure of 30 dwellings per Ha as being a borough-wide average, not minimum – i.e. fewer dwellings per hectare. This is less sustainable and puts greater pressure on green field land. We believe the minimum density of 30 per Ha should be carried forward from the adopted local plan.	The National Planning Policy (NPPF) (paragraph 47, bullet point 5) indicates that Local Planning Authorities should set out their own approach to housing density to reflect local circumstances. Given that the predominant house type is the terraced house and these occupy high densities, which can be up to 200dph in some parts of the borough, it is considered that lower density developments are required to provide real choice in the housing market. The density figure of 30dph is presented as a guide within the policy, not an average figure. The inclusion of a minimum density figure is not the most appropriate approach, especially in some conservation areas where a proposal of 30dph may not fit with the established character of the area. It should be noted that the policy includes a requirement for developments in areas of high accessibility to be of a higher density (between 30 and 50 dph) in order to encourage sustainable development. Furthermore, the provision of a flexible density policy allows developments to be provided that fit in to the areas in which they are located. It is acknowledged that there may be some confusion about the density requirements in the different spatial areas and those for the whole of the borough. The policy will be amended to clarify the approach taken to the density of new housing developments.	PROPOSED ACTION: Amend the policy to clarify the approach taken to the density of new housing developments in each spatial area and in the borough as a whole.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
327623	RAGE (Residents Against Gib Hill Exploitation)			Dr. John Plackett	
Document	439		In its local development framework, PBC fails to take biodiversity seriously enough. To PBC “environment” usually means the “built environment” and it does not include the “natural environment” in sufficient depth. As a result, PBC has concentrated on transport and energy conservation and neglected the natural environment. This lack of focus on biodiversity issues is reflected in the Core Strategy and the work of Pendle’s Sustainable Places Environmental Group. The work of this group illustrates the low priority placed on biodiversity. (Concerns are amply summarised in the letter to PBC sent by John Plackett on 14th January 2011.) It met on numerous occasions but rarely discussed biodiversity. No one representing biodiversity attended (or was invited to) these meetings on a regular basis. There is a biodiversity duty enshrined in the NERC Act, but PBC chose to ignore it in the workings of this group	The Core Strategy is the key planning document for Pendle. Its main focus is to promote growth and manage development in the borough. Whilst there may be an apparent 'focus' on the built environment, the importance of the natural environment is not overlooked. Indeed, at the time of writing Pendle is one of the few authorities in the North West, and the only local authority in Lancashire, with an adopted and up-to-date Biodiversity Audit. This has proved invaluable in helping to inform policies in the Core Strategy. Policy ENV1 sets out the Council's approach to the protection and enhancement of the natural environment and specifically addresses issues relating to biodiversity. The requirements of the NERC Act apply to all Council's functions that may impinge on biodiversity, not just planning. The Council considers that Policy ENV1 plays an important role in helping the Council to meet its requirements under the NERC Act, in terms of having regard to the need to conserve biodiversity. Policy ENV1 also includes the 'hooks' for other policies in the Core Strategy and subsequent planning documents, which will help to establish a viable Ecological Network in Pendle - e.g. the provision of open space in new developments. Contrary to what is stated in the representation, Policy ENV1 was prepared in conjunction with representatives of the LSPs Sustainable Places Group. Whilst planning officers cannot comment on those normally invited to attend meetings of the LSP Sustainable Places Group, the sub-group convened to consider Policy ENV1 on 15th November 2010, included representatives from a wide range of groups concerned with biodiversity both in and beyond Pendle. Organisations represented at the meeting included the Lancashire Wildlife Trust, Lancashire Environment Record Network (LERN), Lancashire Biodiversity Partnership, Nelson Naturalist Society, Friends of Greenfield LNR and Pendle Parks Forum. Also present were two representatives from the East Lancashire Ornithologists Club who are also key members of Residents Against Gib Hill Exploitation (RAGE). Following the meeting both of these representatives submitted proposed amendments to Policy ENV1 by the deadline. The majority of these proposed changes were incorporated into the revised Policy ENV1. The contact details of those representatives present at this sub-group meeting, who were not already	PROPOSED ACTION: Revise the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 4) and Spatial Strategy (Chapter 6) to include a stronger commitment to protecting and enhancing biodiversity.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 2: About the Core Strategy	351		2.22 Lack of up-to-date information etc. on biodiversity has left a significant gap in the evidence base. Have external consultants been commissioned?	included on the LDF Database, were added to it. As a result they have been kept fully informed of progress on the Core Strategy and been given advance notice of the opportunity to comment on its content at key stages. Pendle Council also recognises that biodiversity issues are not confined by borough boundaries, but extend beyond into neighbouring local authority areas. These neighbouring authorities have been widely consulted in the preparation of the Pendle Core Strategy. The Core Strategy is not the only vehicle that seeks to deliver improvements to the natural environment. It is not the only Council document required to have regard to biodiversity and the natural environment. What the Core Strategy establishes is that designated areas need to be protected from the potentially adverse effects posed by any new development. It also seeks to secure improvements to the natural environment where this can be justified when new development is proposed. It has been acknowledged, in response to other comments made against the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 5) and Spatial Strategy (Chapter 6), that there needs to be a greater emphasis on biodiversity within these sections, in order to make it clear that it is a key element running through the Core Strategy. The representation argues that there is a significant gap in the evidence base in relation to biodiversity. It also questions whether consultants have been commissioned by the Council, but does not state why they need to be. Pendle Council prepared a Biodiversity Audit, to help inform policies affecting biodiversity and the wider environment. Local environmental groups and statutory bodies were widely consulted in the preparation of this document, which was adopted in September 2010. Pendle Council, which supports the Lancashire Environment Record Network (LERN), was able to access their up-to-date records on biodiversity for the area. These sources of information will provide the basis of future work to establish an Ecological Network for Pendle. The LSP Biodiversity sub-group was consulted in the preparation of Policy ENV1, which specifically addresses the protection and enhancement of biodiversity in the borough. Following a meeting with the sub-group in November 2010, the consultee recommended a number of improvements to the policy, which were largely taken on board. As there are no strategic site allocations in the Pendle Core Strategy, it is not necessary to employ consultants to carry out site specific	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 3: Our Spatial Issues	354		3.67—3.76 The spatial issues regarding biodiversity are not properly addressed. The issues raised by the NERC Act 2006, sections 40 and 41 and the Good Practice Guide need addressing. With regard to paragraph 3.71, a network of 75 locally-designated sites, do mapped ecological corridors already exist? Networks imply continuity. Of equal, if not more importance than Ancient Woodlands, are Habitats and Species of Principal Importance. They and their conservation measures should be added. The M65 corridor is proposed as the area where a highly significant proportion of housing and economic development will take place. This proposal is likely to increase further the width, length and continuity of the settlement area. The further development of this corridor will create isolation of habitats and reduce migration routes. This should be avoided. In order to prevent settlements merging and to facilitate the creation of green corridors and infrastructure, areas of Green Belt should be considered between settlements. The Open Space Audit in ascribing excesses and deficiencies is too simplistic. Many open spaces have no or restricted public access; having specific purposes in providing services to sections of the wider community, and not just to the ward in which by chance they are situated. This approach jeopardises future allocations of open spaces to such wards. 3.141 The spatial issues for the natural environment are incomplete and all should be included. If part of the Spatial Vision is “to green the urban environment”, this should be included in these bullet points.	appraisals at this time. The Sustainability Appraisal process and Habitat Regulations Assessment provide the checks and balances to ensure that policies in the Core Strategy do not have an adverse effect on the environment and biodiversity. Natural England has noted that it is happy that both these requirements have been met (See Chapter 1 Comment 195). The representation states that the issues regarding biodiversity are not properly addressed and recommends a number of additions. These are the same as Representation 378959/353.	See officer recommendation to Comment 353 (Chapter 3).
Chapter 5: Our Strategic Objectives	357		5. The agreed Strategy Objectives 9 and 10 are not in line with national legislation or PPS9. SO9 Protecting and enhancing access to green open space is highly unlikely to make a valuable contribution to biodiversity. SO10 Protection and conservation must be afforded to biodiversity irrespective of new development.	The strategic objectives for the Core Strategy were finalised after careful consideration at the Issues and Options stage. (1) The representation states that ‘protecting and enhancing access to green open space is highly unlikely to make a valuable contribution to biodiversity. The wording of SO9 is ‘Protect, enhance AND improve access.’ Whilst for biodiversity the emphasis will normally be on protection and enhancement, improvements to accessibility will be an important factor in the designation of additional Local Nature Reserves (LNR), of which there is an identified shortage in Pendle. (2) The representation goes on to note	(1) No changes to the document are proposed as a result of this element of the representation. (2) No changes to the document are proposed as a result of this element of the representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP6	444		The wording of Policy SDP6 is weaker than in the comparable section of the adopted local plan (Policy 17.2). In SPD6, it reads that only “consideration” will be given to the sequential approach (i.e. not necessarily to be followed), whereas in Policy 17.2 specifies in more definitive terms that: “...proposal for new housing will be considered, in order of priority for: 1) The re-use or conversion of existing buildings within a settlement boundary. 2) The redevelopment of previously developed land within a settlement boundary. 3) The development of previously undeveloped land within a settlement boundary...” We believe that following the Sequential Approach to Development is vital to the sustainability of the borough’s environment and should be enforced in stronger terms, something similar to the current Policy 17.2. In addition, we feel that because of its importance in the protection of the natural environment, the Sequential Approach should be applied at a borough-wide scale, to give maximum protection to all green field sites. For example, green field sites should not be sacrificed in the West Craven Towns whilst previously developed land is in abundance in the M65 corridor (subject to any land need for “greening the urban environment” / wildlife corridors) . So we suggest the deletion of the following sentence from SDP6: “Development will be located in line with the settlement hierarchy set out in Policy SDP1.” Instead, Policy SDP6 could read something like:- Proposals for new housing will only be considered on previously developed land and in vacant buildings within a settlement boundary. Where it can be demonstrated that there is less than 5 years supply of such sites available across the borough, consideration will be given to other land within settlement boundaries. Development will only be allowed on land outside the settlement boundaries in exceptional circumstances, where it is to meet a proven need as set out in studies such as the Strategic Housing Market Assessment and the Employment Land Review...” Where development is deemed necessary on green field sites, a sequential approach should be used to prioritise sites according to their biodiversity, so sites of greater biodiversity would be given more protection from development.	that protection and conservation must be afforded to biodiversity irrespective of new development. Whilst true, this misses the purpose of SO10, which is simply to ensure that new development makes a positive contribution to the protection and enhancement of our natural environment, particularly those areas officially recognised for their value for biodiversity. The National Planning Policy Framework (NPPF) encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value (paragraph 17, bullet point 8). Policy SDP6 aims to direct new development to the most sustainable sites and promote the reuse of previously developed land in the first instance. It should be noted that Policy SDP6 will apply to all types of development and not just housing development. For the avoidance of doubt and to provide clarity, the policy will be revised to make clear that proposals will be considered against the sequential approach in order of priority. However, in order to comply with the NPPF the policy must provide a flexible response to achieving sustainable development. The viability of sites can affect the delivery of development. As a consequence, and in order to ensure the levels of growth proposed in the Core Strategy are met, the release of second priority sites (greenfield land within settlement boundaries) may be necessary where these are viable, in a sustainable location, and their delivery can be guaranteed. In terms of the scale at which the sequential approach is provided - this is set at the settlement level. Applying it on a borough wide scale could result in an inflexible policy and restrict development in areas where it is needed. Policy SDP1 sets out where new development should be located - this is based on a number of factors, including need. If development in one part of the borough was restricted because of a lack of previously developed sites this may lead to the needs of that part of the borough not being met in a sustainable way - especially if it forced people to travel to a different area. This type of policy would be seen as restricting sustainable growth and contrary to the NPPF. The two policies together aim to ensure that new development is provided in the most sustainable locations. SDP1 sets a settlement hierarchy to direct the majority of development to the existing larger settlements where services and infrastructure are already available. SDP6 then requires developers to consider the use of	PROPOSED ACTION: Amend the wording of the policy text to read "In order to ensure the best use of resources, the location of new development will also be considered in accordance with the following sequential approach (in order of priority):"

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				brownfield sites first (within the chosen settlement) as these are often situated in sustainable locations. In terms of the use of greenfield sites and the biodiversity importance of such sites - the NPPF indicates that allocations of land should be on sites of lesser environmental value (paragraph 17, bullet point 7). As part of the Land-use Allocations documentsites proposed for development will be assessed for their biodiversity importance. This will be a determining factor in the decisions as to whether to allocate a site or not. Policy ENV1 of the Core Strategy aims to protect and enhance the biodiversity assets of the borough and new development proposals will need to comply with this policy as well as SDP1 and SDP6.	
Policy ENV1	475		Green Belt: Paragraph 7.41. It is December 2011 and no strategic review of Green Belt has taken place. Green Belt is an important part of green infrastructure as it allows species migration.	The proposed strategic review of Green Belt was set out in regional planning policy (RSS). The Governments commitment to the withdrawal of regional policy has resulted in a strategic review not being carried out. In the absence of such a review the National Planning Policy Framework states that the general extent of Green Belts is already established and that it should not be necessary to designate new Green Belts except in exceptional circumstances. In addition a strategic review of the Green Belt is not considered necessary. The levels of development in Pendle will not require a full scale review of the Green Belt. Any minor changes to the Green Belt boundaries will be considered as part of the Land Use Allocations DPD.	PROPOSED ACTION: Reference to the strategic review of Green Belt in paragraph 7.41 will be removed.
Policy ENV1	349		Pendle's Biodiversity Audit is not robust because it: - relies on survey work, much of which is not up-to-date - key information gaps have not been filled by further survey work - limited information makes for difficulties in identifying areas best suited for proactive enhancement - specialist expertise is required These have implications when addressing biodiversity objectives, strategies and targets and in setting a basis for development control in the LDF processes. Its late production also meant it was unavailable to carry out Sustainability Appraisal. The public consultation with responses from the public, organisations, working groups and service providers resulted in the environment receiving the highest number of comments, with the natural environment comments cross-cutting all sub-divisions of environmental issues. The National Planning Policy for Biodiversity, PPS9, places statutory obligations on local authorities regarding biodiversity objectives. Yet biodiversity or the natural environment failed to be mentioned in Our Vision for	The Council considers that the Biodiversity Audit is robust and that a Sustainability Appraisal is not required for such a document as it is a process to gather data rather than a process which will have any particular impact on sustainability. The core strategy does not designate sites - it is a strategic level document that sets the direction of policy rather than the detail of how this is to be achieved. Individual allocations will be considered though the Land Use Allocations DPD process. It is agreed that Biodiversity should be included in Our Vision for Pendle.	PROPOSED ACTION: Include a reference to the importance of biodiversity to the future sustainable development of the borough in the Spatial Vision.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Pendle. As a core component of sustainable development and provider of life support services, biodiversity, with statutory obligations and protection and conservation in spatial planning, would have been expected to feature in Our Vision for Pendle.		
Policy ENV1	361		7.8 Between bullet point 2 and 3, Circular 6/2005 should be included.. Bullet point 3 should have added sections 40 and 41. Bullet point 4 should continue with “.....and requires Local Planning Authorities to include policies encouraging management of features in the landscape defined as linear features or stepping stones which are essential for the migration, dispersal and genetic exchange of wild species.” 7.11 PPS9 may include 3 Government Objectives, but the requirement is to adhere to the six Key Principles. 7.12 Bullet point 3, as already stated, must be done irrespective of developments. 7.14 There should be an additional bullet point: - Habitats and Species of Principal Importance 7.15 and 7.36 Hedgerows are now on the S41 list. 7.24 Due to the level of planned growth there is need to review the Green Belt. This would allow migration routes, genetic exchange and add resilience to climate changes. 7.31 Local Authorities should conserve important habitat types and identify opportunities to add to them, with or without new development. 7.34 Loss of a site with conservation value should be regarded as unacceptable. Key Principle 6 of PPS9 should be adhered to. Page 70 Key Linkages: It would seem advisable to add “NERC Act 2006, section 40 and 41.	Circulars are administrative guidance on how to apply the law and as such are not law themselves. Therefore circular 6/2005 should not be included in the bullet points alongside the mentioned Acts. The whole of Natural Environment and Rural Communities Act is relevant to the policy and not just sections 40 and 41 therefore reference to the entirety is considered most appropriate. To add the requirements of the Regulations is not appropriate as this section is introducing key Acts and Regulations only. PPS9 has been replaced by the National Planning Policy Framework. It is not now appropriate to refer to the key objectives. These will be deleted and replaced with appropriate policy content from the NPPF. The Core Strategy relates to the strategic approach to development and so will include requirements for development to consider issues related biodiversity. It is accepted that Habitats and species of Principal Importance should be included. It is not contended that hedgerows are on the Section 41 list. The Core Strategy Identifies how they will be protected in accordance with Section 41 of the NERC Act. The levels of development outlined in the strategy do not require a strategic review of the Green. Detailed boundary changes will be considered as part of the Land Use Allocation DPD. In addition, the National Planning Policy Framework (NPPF) states that the general extent of Green Belts is already established and that it should not be necessary to designate new Green Belts except in exceptional circumstances. The Council does seek to enhance and add to habitat types such as woodland etc. but it also has to consider how habitats can be provided or improved through development. Indeed it is the purpose of the LDF and its component documents to consider issues relating to development and planning. Paragraph 1.5 of the strategy explains the context of the document. The presumption is that sites with conservation value should be protected and enhanced but it may also be necessary in some circumstances to balance conservation value with other benefits such as social and economic benefits. If the social and economic benefits to the borough are considered to outweigh other considerations then it is necessary to have a mechanism to allow this development to take place.	PROPOSED ACTION: Amend paragraph 7.14 to read "...Pendle has a large number of sites,habitat and species which are recognised and/or designated as being of international, national, regional and/or locally significant for biodiversity" PROPOSED ACTION: Include additional bullet point in paragraph 7.14: Habitats and Species of Principal Importance PROPOSED ACTION: Delete the three key objectives in paragraph 7.11 and replace with " The National Planning Policy Framework (paragraph 109) identifies the following requirements for the planning system in respect of biodiversity: Recognise the wider benefits of ecosystem services Minimise impacts on biodiversity and provide net gains in biodiversity, where possible, to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures" PROPOSED ACTION: At the beginning of paragraph 7.15 insert "In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater".

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				This is in compliance with paragraph 118 of the National Planning Policy Framework (NPPF) which has replaced Planning Policy Statements. The key linkages refer to key planning policies and plans for the purposes of monitoring and delivery. Reference to the NERC act would not be appropriate in this section. The NERC act is also already referenced in a prominent position at the introduction to the policy.	
Policy ENV1	460		a) Habitat types: It does not deal systematically with the 18 UK BAP Priority habitats found in Pendle, which are listed in the Biodiversity Audit on page 27. By page 57 of the audit these have been reduced to 5 “Key” habitats. In the Core Strategy document, even these five have not been referred to. Only woodland is mentioned. Paragraphs 7.15 to 7.17 discuss woodland in general, but not woodland types classified as priority habitat. The 18 UK BAP Priority habitats are ignored. Sites where these habitats occur enjoy protection under the NERC Act.	The representation states that only woodland habitats are detailed by the Core Strategy despite the number of habitat types that are evident in Pendle. Reference to the Priority Habitat types will be added to the context to redress this.	PROPOSED ACTION: At the beginning of paragraph 7.15 insert "In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater". The Pendle Biodiversity Audit details further the particular types of habitat.
Policy ENV1	469		b) Biodiversity: Paragraphs 7.32 to 7.36 reveal a passive approach to biodiversity. (i) 7.32-Ecological networks: There are two points here. Firstly, PBC recognises their importance in allowing species migration. (They do not mention climate change as a possible cause of migration.) Secondly, development proposals should “prevent harm, add value to and enhance the existing ecological networks”. The problem with this is that it is unclear what the existing ecological networks are. (Where are they and what are they?) Why does their enhancement depend on developments? They should already exist or be created whether developments occur or not. This approach is advocated in PPS9, paragraphs 11 and 12. The council’s approach is reactive, not proactive as it claims.(ii) 7.33-Habitat creation and restoration: Once again, the council only considers these activities as an accompaniment to developments. The NERC Act requires local authorities to restore, to conserve and to enhance regardless of any development occurring nearby. This approach is supported by PPS9 paragraph 5(ii). The council’s obsession with woodland as the only habitat worth creating is once again evident. (iii) 7.34- How will the social and economic benefits of a development be evaluated against a site’s conservation value? There should be a set of criteria agreed beforehand in order to evaluate the opposing merits of a site. A single set of criteria should be created so that sites be can assessed as objectively as possible. One alternative, if a site of conservation value is	The reasons for species migration could be numerous and it is not the purpose of the strategy to identify these. It is also not the purpose of the Core Strategy to identify ecological networks. These will be identified as part of the land use allocations DPD. The strategy sets the policy that will be applied to these. In addition the strategy sets the policies that will be applied to development in order to ensure networks are improved and enhanced, however it does not suggest that development is necessary for protection and enhancement of these outside of the planning system. It is agreed to make reference to other habitats in addition to woodland in the context of the policy. The criteria against which the social, economic and environmental benefits will be assessed will be determined by the Development Management Policies DPD. These are the detailed policies against which all development will be considered against. Individual sites for development will be allocated through the Site Allocations DPD. The Council considers the policy to be proactive as it sets out the principle of protecting and enhancing natural and historic environments. Paragraph 7.36 is considered to be an appropriate indicator of the direction of the policy.	PROPOSED ACTION: At the beginning of paragraph 7.15 insert "In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater". The Pendle Biodiversity Audit details further the particular types of habitat.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			threatened, would be to build on low quality farmland. A lot of Pendle's farmland consists of grassland fields where the once-rich grassland has been ploughed up and replaced with rye grass. This type of grazed grassland has little biodiversity interest. (iv) 7.35-A proactive approach to protecting biodiversity: The approach described seems anything but proactive. It is reactive, designed to reduce damage caused by development as advocated in PPS9 paragraph 14. Policy ENV1 states "biodiversity will be protected and enhanced". Making ponds, planting trees and shrubs etc. are only measures to ameliorate the effect of development. (v) 7.36-New areas of nature conservation value: Once again there is a lukewarm statement of intent—"There may be opportunities to designate new areas for their nature conservation value in the future, cf. policy ENV1 mentioned in (iv) above. Biodiversity must be enhanced by creating new areas of habitat for wildlife (see PPS9 p2, 2nd bullet point.) Whilst supporting the protection of trees, woodland and hedgerows; other habitats must not be neglected.		
Policy ENV1	340		Publications relating to biodiversity: A The Natural Environment and Rural Communities Act 2006 places a duty on public authorities to conserve biodiversity. 1. Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. B Guidance for Local Authorities on implementing the Biodiversity Duty (2007) states "Local Authorities have a key role to play in conserving biodiversity, through their role in: - Developing and influencing local policies and strategies - Planning and development control The following are important aspects of integrating biodiversity into local authority services: - Fulfilling statutory obligations for the protection and enhancement of biodiversity within the forward planning and development control processes - Incorporating the conservation of biodiversity into the relevant strategies of the local authority. These include sustainable development strategies, economic development plans and environmental management systems - Having regard to biodiversity with partnership arrangements such as community strategies and local area agreements - Delivering the key principles for biodiversity set out in national planning guidance Of particular relevance is Chapter 4, pages 38-40. N.B. Paragraphs 4.3.1, 4.5.1 and 4.5.2. C PPS9 and Circular 6/2005 with their statutory obligations have the accompanying Good Practice Guide. This guide's summaries, to be found on pages 3, 23, 32 and 44, advise of the specific details contained in each	The Core Strategy and this policy in particular state the Council's strategic approach to protecting and enhancing our natural environment and the boroughs biodiversity. The strategy adheres to many wider plans and policies and it is not necessarily appropriate to cross reference them all. It is also inappropriate to repeat higher level plans and strategies at the local level. The Core Strategy has had regard to the Sustainable Community Strategy and its biodiversity objectives. Council officers worked with a subgroup of the Local Strategic Partnership Sustainable Places Group to draw up the policy.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			chapter. In general terms the Pendle Core Strategy should show that the above have been adhered to in the appropriate places.		
Policy ENV1	480		Open Space and green infrastructure: Paragraph 7.42. Green infrastructure is for people to use for their health and well-being. Many facilitate the migration of wildlife, but only as a consequence of their main purpose. Through policies in their plans, PBC need to provide separate ecological corridors and stepping stones to link areas of biodiversity importance (PPS9, paragraph 12).	It is accepted that there are wider benefits to Green Infrastructure that those given. It is appropriate to reference Natural England's published benefits of Green Infrastructure. The Core Strategy looks separately at ecological networks in paragraph 7.32 - 7.36 and the policy text explains that the Council will work with partners to develop ecological networks where possible. However, it is accepted that the policy could give a more rounded explanation of such networks.	PROPOSED ACTION: The two key reasons for protecting and connecting open spaces will be removed and replaced with Natural England's six social, environmental and economic benefits of Green Infrastructure as follows: "Green Infrastructure can provide many social, economic and environmental benefits including: Places for outdoor recreation and play Space and habitat for wildlife with access to nature for people Climate change adaption Environmental education Local food production Improved health and wellbeing" http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx PROPOSED ACTION: Add to paragraph 7.32 after 'across the borough' "It is important to ensure that there are connections between the core biodiversity sites and habitats, to allow species to move freely between them in order to feed, disperse, migrate or reproduce. This is seen as a key in providing future resilience to the potential impacts of climate change. Such connections do not have to be continuous linear habitat, but can be a series of smaller isolated sites which species can use as stepping stones between the core areas. It is this network of core sites connected by buffer zones, wildlife corridors and stepping stones which is known as an ecological network (Lawton et al)."
Policy LIV1	447		In order to minimise pressure on green field land, we believe that the numbers of new dwellings should be set at the lowest possible level. The current local plan states 190 dwellings per year, as specified by the Regional Spatial Strategy, and we suggest that it would still be appropriate to use this figure as the benchmark. Mention is made of significant population increases later on in the plan period (para. 10.10), but this forecasting is subject to so many variables, it seems pointless attempting to make detailed plans for it at this point in time. Rightly, mention	The Core Strategy Housing Technical Paper provides the justification and calculations for the proposed housing requirement figure. It takes account of a number of different factors including housing need, population and household growth, land capacity, regeneration and empty properties. The technical paper examines a number of scenarios including an assessment of the Regional Spatial Strategy (RSS) figure. The figure proposed in the Core Strategy Preferred Options Report is considered to strike a balance	PROPOSED ACTION: Update the figures relating to empty homes and clarify the difference between the overall vacancy level and the long-term (over 6 months) vacancy level.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			is made of the vacancy level and ambitions to reduce it (para. 10.11), which would reduce the need for the building of new dwellings and so reduce pressure on green field sites. However, the 6% figure is not referenced (how up-to-date?), and from casual, local observations we suspect that it could have increased significantly in recent months. If so, presumably priority should be given to bringing vacant properties back into use rather than construction new dwellings, so the new dwelling figure could be even lower.	between all these factors whilst ensuring housing needs are met. The National Planning Policy Framework (NPPF) (para 159) requires Local Authorities to prepare Strategic Housing Market Assessments (SHMA) to assess their full housing requirement. The SHMA should look at the scale and mix of housing needed to meet household and population projections. This evidence should be used to ensure that plans meet the full objectively assessed needs for market and affordable housing. The population and household projections have changed since the SHMA was prepared. It is therefore necessary to review the proposed housing requirement figure to ensure that the housing needs of the borough are met. The land required to deliver this level of housing will be allocated in the Land-use Allocations plan. The Strategic Housing Land Availability Assessment (SHLAA) indicates that there is insufficient previously developed (Brownfield) land to accommodate all the new housing and some Greenfield sites will be required. The proposed figure for new housing takes account of the fact that the borough has a considerable number of empty homes. The latest published figures (as of 2011 – see DCLG live tables 125 and 615 at: http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/stockincludingvacants/livestables/) show the following: Total (estimated) dwelling stock: 40,000 Total vacant dwelling stock: 2,746 (6.86% of total dwelling stock) Total long-term (more than 6 months) vacant dwelling stock: 1,770 (4.42% of total dwelling stock) The Pendle Empty Homes Strategy / Action Plan and the Sustainable Community Strategy set a target of bringing the number of long-term vacant properties down to 3.7% of the total housing stock. Given the current levels of vacant dwellings this will require the reoccupation of 290 dwellings and will bring the total long-term vacant dwelling count down to 1,480 dwellings. The date (2011) for achieving this target has now past and although progress has been made, 4.42% of the housing stock is still classified as long-term vacant. The revised Empty Homes Action Plan provides a list of actions to continue the work to meet the target and reduce the number of empty properties. The Core Strategy will support this approach. There are now limited funding opportunities available to continue, at the same level, the refurbishment projects that have taken place over the last few years. The Council is investigating other potential	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				mechanisms to tackle the issue of empty homes. These include: 1) working with the Council's Joint Venture Company 2) working with absentee landlords 3) bidding for funding to renovate empty properties (Funding has recently been secured for a number of empty home schemes across Pennine Lancashire). In terms of overall vacancy levels, the national (England) average stands at 3.22% of the total housing stock. To allow a housing market to function there always needs to be a certain level of vacant homes to allow for freedom of movement. In Pendle the overall vacancy level (6.86%) is significantly higher than the national average. Together with the actions being taken to reduce the number of long-term empty properties, it is also important to bring the overall vacancy rate down to a level closer to the national average. To achieve this will require the reoccupation of 1,546 homes. The Core Strategy can help to support this objective through its requirements in Policy LIV3. This policy looks at the provision of affordable housing and in some circumstances this may be through the acquisition and refurbishment of empty properties. However, this mechanism can only work with the provision of some new build housing in order to fund the refurbishment. Evidence in the SHMA suggests that there is a need/demand to provide 4,125 dwellings over the 15 year plan period. The reoccupation of over 1,000 vacant homes would meet part of this need/demand, leaving nearly 3,000 dwellings to be newly built. However, it should be noted that the most recent population projections have suggested that there is likely to be a significant increase in the population over the next 25 years. This is likely to result in an increased need/demand for housing and may increase the local housing requirement figure. The Core Strategy offers a balanced approach to the provision of new build housing as well as aiding the reuse of empty homes.	
Policy LIV1	450		Para. 10.18 - Sewerage Mention is made in para. 10.18 and elsewhere about capacity problems at several Waste Water Treatment Works. Whilst this technicality has to be addressed, we wonder if it is necessary to include it in the Core Strategy as it has the effect of distorting the location of new dwelling construction. The utility companies should be responsible for addressing these issues: it is the simple economics of more dwellings = more waste water; borrow money to build new plant, collect the new revenue from the new dwellings; repay the money and keep the profit.	The NPPF requires Local Authorities to work with Infrastructure providers (paragraphs 162, 180) to assess the quality and capacity of infrastructure and its ability to meet forecast demands. An infrastructure study was carried out to highlight any potential infrastructure capacity issues which may need to be resolved in order for development to take place in the borough. In Policy LIV1 consideration has been given to the potential capacity issues at the waste water treatment works and this is reflected in the phasing approach to development. The intention is that	PROPOSED ACTION: Explain in the justification text of Policies SDP2 and LIV1 how the consideration of infrastructure has been taken into account when determining the level and location of new housing.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				development, in areas affected by infrastructure capacity issues, will occur in later phases of the plan period once these issues have been resolved. However, it is not necessarily the case that the amount of development proposed has been reduced in these areas because of the infrastructure issues, just that the timing for this development has been adjusted. Policy SDP2 considers the distribution of new housing development. It again indicates that infrastructure capacity has been taken into account when considering where new housing development should take place. However, like Policy LIV1 it is the timing of the development that is affected rather than the actual percentage distribution. The wording of Policy LIV1 and Policy SDP2 will be revised to clarify how infrastructure capacity has been considered in the housing requirement and distribution calculations. In terms of the role of the utility companies, they have a duty to provide water supply and disposal services as required. Therefore when new development takes place they have to supply the necessary water infrastructure for that development. In the interests of good forward planning and efficient use of resources, the Council and the water companies are working together to identify the amount and likely timescales of new development. The water companies go through a five year financial planning cycle where they can put in bids to OFWAT for funding for new infrastructure. This forward planning process helps to avoid delays to development as it allows the right infrastructure to be put in place at the right time. Where water companies have to supply previously unidentified developments (windfalls) they have to find the resources to fund the connections to these developments. This may then have an adverse impact on the funding for other projects. In summary, there is a requirement for the Core Strategy to address the infrastructure needs of the proposed levels of development in the borough and therefore reference should continue to be made to the capacity of the waste water treatment works. The wording of Policies SDP2 and LIV1 will be amended to clarify how infrastructure provision has been considered.	
Policy LIV1	456		Para. 10.27 – Housing Market Renewal No detail is given about the future of the large areas of land designated as “HMR Reserved Housing Land” in the adopted Local Plan. The need for this land was supposed to be reviewed from time to time. Will it be kept in the LDF, given the curtailment of most of the HMR	The Core Strategy does not deal with the allocation of land. This will be dealt with in the Land-use Allocations document. Consideration of all allocations in the current Local Plan will take place as part of that process. The Government announced in 2010 that funding for the HMR programme	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			schemes? If it is kept, for how long? If the sites are found to be no longer needed, they should revert back to their previous classifications (e.g. open countryside), and where the settlement boundary was moved to accommodate these sites, it should likewise revert to its previous position.	would cease. In Pendle those unfinished projects are now being wound-up. As a consequence the sites allocated as HMR reserved housing land in the Replacement Pendle Local Plan will not be required for replacement dwellings, as the scale of clearance and replacement has not materialised. The proposed level of housing in the Core Strategy is such that the HMR sites may be required for new housing. The SHLAA process has identified them as having the potential to be developed for new housing. Furthermore, it should be noted that the allocation of the HMR sites in essence identified them as suitable for housing purposes.	
Policy LIV2	435		1. p.124 Paragraph 10.63. It should not be assumed that only members of the BME community wish to live in larger family houses that can accommodate extended families. Other sections of the community should also be able to have access to such housing if there is a proven need. I understand that the government is concerned about vacant bedrooms in larger homes. People have been required to move to smaller dwellings if a bedroom becomes vacant, eg. a child goes to university. If this is true, how will this be monitored and actioned?	Policy LIV2 does not rule out the provision of larger homes for groups other than the BME community. The policy identifies that there is evidence to suggest that this is a particular need for this group of people and one that the Council should be aware of. Policy LIV2 identifies that families in general will need suitable accommodation and this may include larger dwellings. The government announced in January 2012 that they would be introducing a scheme to help older people move to smaller properties in order to free-up larger family houses in cases where these people wanted to move. However this scheme is for people living in social rented accommodation and does not apply to private sector housing (owner-occupiers). In Pendle, Housing Pendle is the main registered social landlord and they will have to decide if / how they want to implement that scheme. In terms of the Core Strategy Policy LIV2 recognises that where downsizing takes place this can often release larger family housing which can then be used to meet the needs of younger families. However, it is only one mechanism which can be used to increase family housing and does not restrict the provision of new family housing.	No changes to the document are proposed as a result of this representation.
Policy LIV4	453		Para. 10.120 - Housing Density In the adopted local plan, Policy 20.1 specifies that new dwellings should be built at a minimum density of 30 per Ha. However, para. 10.120 of the Core Strategy mentions a figure of 30 dwellings per Ha as being a borough-wide average, not minimum – i.e. fewer dwellings per hectare. This is less sustainable and puts greater pressure on green field land. We believe the minimum density of 30 per Ha should be carried forward from the adopted local plan.	The National Planning Policy (NPPF) (paragraph 47, bullet point 5) indicates that Local Planning Authorities should set out their own approach to housing density to reflect local circumstances. Given that the predominant house type is the terraced house and these occupy high densities, which can be up to 200dph in some parts of the borough, it is considered that lower density developments are required to provide real choice in the housing market. The density figure of 30dph is presented as a guide within the policy, not an average figure. The inclusion of a minimum density figure is not the most appropriate approach, especially in some	PROPOSED ACTION: Amend the policy to clarify the approach taken to the density of new housing developments in each spatial area and in the borough as a whole.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				conservation areas where a proposal of 30dph may not fit with the established character of the area. It should be noted that the policy includes a requirement for developments in areas of high accessibility to be of a higher density (between 30 and 50 dph) in order to encourage sustainable development. Furthermore, the provision of a flexible density policy allows developments to be provided that fit in to the areas in which they are located. It is acknowledged that there may be some confusion about the density requirements in the different spatial areas and those for the whole of the borough. The policy will be amended to clarify the approach taken to the density of new housing developments.	
Policy SUP3	436		2. p.188 Paragraph 12.38. I support the continuation of Sure Start programmes (programs).	The representation notes support for the continuation of the Sure Start programme. Unfortunately, this initiative has now ended its local activities, but support for children's centres and their objectives remains an important focus for this policy.	No changes to the document are proposed as a result of this representation.
378939	Reedley Hallows Parish Council			Mr R.B Allen	
Chapter 4: Vision	485	Yes		Agreement noted.	N/A
Policy ENV1	488	No	ENV1: The council should be pro-active in designating sites for nature conservation Under open spaces the framework should see to protect existing open space that is currently designated for sport and recreation for the same or similar uses.	The Core Strategy does not designate particular sites for nature conservation but will support the identification of them as stated in the first paragraph of the policy. The strategy is therefore proactive within its remit. Further policy ENV1 does seek to afford protection to open spaces including those designated for sport and recreation.	PROPOSED ACTION: Reword the fourth paragraph of ENV1 to read "The Council will work with its partners, where appropriate, to help establish coherent ecological networks across for the borough, by identifying gaps between habitats and promoting opportunities to provide links for species migration, including across administrative boundaries"
Policy ENV3	489	No	ENV3 The targets for renewable energy for new residential and commercial developments at 10% are far too low. Developer's should take advantage of solar and wind power mechanisms on new developments. Where it is not possible to ensure this target is achieved developers should commit to make a contribution elsewhere to ensure targets are met.	We have to meet a balance between increasing RLC generation and delivering much needed homes and employment in the borough. The 10% contribution is a figure which has been tested at both national and local levels and should enable contributions to be achieved whilst not preventing much needed development from coming forward. Whilst there will be a presumption towards meeting the 10% requirement, the policy needs to include an appropriate level of flexibility to ensure that if the 10%	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				cannot be met on a development and the other benefits of the development outweigh the loss of this requirement, then the development can still be granted permission. Where the 10% requirement cannot be met, the policy proposes to alternatively seek a financial contribution (which could be less than the cost of meeting the 10% requirement to ensure the viability of the development) to fund community RLC or energy efficiency projects elsewhere in the borough), ensuring all new development plays its part in increasing RLC generation and reducing or minimising carbon emissions.	
Policy ENV4	495	No	ENV4 All new developments to provide green travel plans for sites.	Policy ENV4 requires major development to submit a travel plan to show what measures will be taken to reduce the impact of the development on the transport network. Following other comments it is proposed that this part of the policy is rewritten to require a traffic/transport impact assessment in the first instance and then a travel plan to show how any potential impact will be managed. As part of this amendment the policy can require the travel plan to include green travel alternatives. This requirement is limited to major developments as these generate the majority of additional traffic.	PROPOSED ACTION: Amend the policy to require a traffic/transport impact assessment in the first instance and a travel plan (including green travel options) where the assessment shows a need to mitigate against the impact.
327450	SELRAP			Mr David Penney	
Chapter 4: Vision	362	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	365	Yes		Agreement noted.	N/A
Policy SDP1	367	Yes		Agreement noted.	N/A
Policy SDP2	369	Yes		Agreement noted.	N/A
Policy SDP3	371	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP4	373	Yes		Agreement noted.	N/A
Policy SDP5	375	Yes		Agreement noted.	N/A
Policy SDP6	377	Yes		Agreement noted.	N/A
Policy ENV1	379	No		The objector has not provided any further details of the nature of the objection; as such a detailed response is not possible.	No changes to the document are proposed as a result of this representation
Policy ENV2	381	Yes		Agreement noted.	N/A
Policy ENV3	383	No		Objection noted – however no comments providing specific reasons for the objection have been supplied.	No changes to the document are proposed as a result of this representation.
Policy ENV4	386	No	It is good that “equal priority and support will be given to the following transport schemes”: - Provision of the A56 Villages Bypass - Reinstatement of the Colne to Skipton Railway line, as well as “Protecting the route of the former Colne – Skipton railway for future transport use”. It should also be noted that the Lancashire Transport Strategy (LTP3) ensures that no developments will be allowed along this Transport Corridor which would prejudice the reopening of the railway. However, SELRAP believes that the reinstatement of the railway should be considered for development in the “medium term” rather than in the “long term” as stated in the Core Strategy: Preferred Options Report, for the following reasons: - The LTP3 three year Implementation Plan (2011 – 2014) makes provision for a £100,000 A56 Villages Bypass Study. - At the same time, SELRAP is applying for external funding, in partnership with other agencies, to carry out Stages 3 and 4 of Network Rail’s GRIP (Governance on Rail Improvement Projects) process. - SELRAP has suggested to LCC that a joint road and rail study is carried out together to minimise and reduce cost. - SELRAP is also in the process of forming a Project Development Forum, which will drive the project forward to the delivery stage. - Further, SELRAP has requested that LCC purchase the BR RPB track bed between Colne and Foulridge, as it already owns the rest of the track bed to the County Boundary with North Yorkshire. These factors would indicate that the rail scheme should be completed in the	The Core Strategy has to be based on a robust and credible evidence base and proposals in the plan must be deliverable. The current information available suggests that the delivery of the railway is unlikely to come forward in the next 15 years due to the lack of funding. Until firm evidence is supplied that shows that funding for this project has been secured the Core Strategy has to take a precautionary approach. However, the Core Strategy could be amended to acknowledge that should funding become available sooner then the railway (and/or the bypass) could come forward. With regards to the ownership of the former track bed - this is an issue for Lancashire County Council to resolve.	PROPOSED ACTION: Amend the supporting text to acknowledge that the delivery of the railway and/or the bypass is funding dependent and that although they have been identified as long term projects the policy will not restrict these schemes coming forward should funding become available.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			medium term and well within the 15 year timeframe of the Local Development Framework (2011 – 2026).		
Policy ENV5 and Policy ENV6	389	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	393	Yes		Agreement noted.	N/A
Policy LIV1	396	No	No comments provided.	Objection noted - however no comments providing specific reasons for objection supplied.	No changes to the document are proposed as a result of this representation.
Policy LIV2	398	No	No comments provided.	Objection noted - however no comments providing specific reasons for objection supplied.	No changes to the document are proposed as a result of this representation.
Policy LIV3	400	No	No comments provided.	Objection noted, however no comments providing specific reasons for the objection have been supplied.	N/A
Policy LIV4	402	No	No comments provided.	Objection noted - however no comments providing specific reasons for the objection have been supplied.	N/A
Policy WRK1	404	Yes		Agreement noted.	N/A
Policy WRK2	406	Yes		Agreement noted.	N/A
Policy WRK3	408	Yes		Agreement noted.	N/A
Policy WRK4	410	Yes		Agreement noted.	N/A
Policy WRK5	412	Yes		Agreement noted.	N/A
Policy SUP1	414	Yes		Agreement noted.	N/A
Policy SUP2	416	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SUP3	418	Yes		Agreement noted.	N/A
Policy SUP4	420	Yes		Agreement noted.	N/A
328009	Simpsons Furniture			Mssrs. Steve & Phil Simpson	
Chapter 5: Our Strategic Objectives	434		The strategic objectives outlined in the Core Strategy are worthy of support, especially the following which are relevant to us: 1 Assist regeneration; 4 Respond to the causes of climate change; 5 Deliver sufficient quality housing; 6 Strengthen the local economy; 7 Improve the choice, variety and quality of the retail offer; 10 Ensure the new development respects our man made heritage.	Agreement noted.	N/A
Policy WRK2	432		Our business operates from the Grade II listed former loomworks at Primet Bridge which we value very much. While we have been able to adapt to its idiosyncrasies, it is not ideal for modern production and makes expansion very difficult. We feel that in this particular location as a heritage building it could be sensitively converted under other use categories which might finance the relocation of the manufacturing business into more efficient accomodation. This is why flexibilty of the change of use designation from Medium industry is important and it would secure the long term future of these heritage premises. There has always been insufficient liquidity for us to invest as much as we would like into this historic works and this is unlikely to improve in current economic circumstances. We were pleased to see the Officer's Recommendations and welcome the proposed review of exisiting planning use designations and sustainability appraisals. The flexibility this implies could be great help which we would wish to discuss further with you when the planning issues move to more detailed levels.	Nine Protected Employment Areas (PEAs) are currently designated under Policy 22 of the Replacement Pendle Local Plan (2001-2016). This policy and the contnued designation of these siteswill be reviewed during the preparation of theLand-use Allocations DPD, which will follow the adoption of the Core Strategy. Paragraphs 11.43 and 11.44 in the supporting text acknowledge that only those sites that offer a high quality, accessible and economically competitive location will be protected. Paragraph 11.45 sets out the qualifying criteria for designation as a PEA. In accordance with paragraph 22 of the new National Planning Policy Framework (NPPF), existing PEAs that no longer meet these requirements will lose this designation, to encourage the re-use, or redevelopment, of sites for a broader range of uses.	No changes to the document are proposed as a result of this representation.
327620	Sport England North West				
Chapter 3: Our Spatial Issues	17		This chapter includes a portrait of Pendle from which spatial issues are identified. However, there is no explicit reference to sport and recreation. The profile offers the opportunity to give an overview of the sports facilities in the borough and also to identify any key issues that might relate to them. For example, are there any issues relating to the mix of facilities, the age / quality of facilities, the spatial distribution or the levels of	It is acknowledged that the Spatial Portrait should make more explicit reference to sport and recreation.	PROPOSED ACTION: After paragraph 3.72 add: Sports facilities allow people to participate in a wide range of activities that help to support healthy lifestyles. The Pendle Open Space Audit records a total of 82 outdoor sports facilities in Pendle, covering 256 hectares, almost one-quarter

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			participation? The chapter also provides the opportunity to link sport with health, a link that has been emphasised recently through physical activity guidelines published by the Chief Medical Officer See http://www.dh.gov.uk/en/Aboutus/Features/DH_128215 The guidelines above provide further evidence for the positive role that sport can play in improving health outcomes.		of all open space provision in the Borough. Pendle Council maintains 28 football pitches, 7 rugby pitches, 7 cricket wickets, 15 tennis courts and 10 bowling greens across the borough. In 2011 almost three-quarters (71.5%) of the respondents to the Customer Satisfaction Survey felt that the Council's outdoor sports and recreation facilities were good or excellent. Community use of the sports facilities at two new 'super schools' at Pendle Vale in Nelson and Marsden Heights in Brierfield has improved the quality of sports and recreation provision and helped to increase levels of participation in two towns where health issues amongst young people are of greatest concern. Of the four golf courses in Pendle, one is in public ownership. Marsden Park Golf Course, and four sports centres in Nelson, Colne and Barnoldswick are operated by Pendle Leisure Trust. Three centres include a public swimming pool, with the Wavelengths Leisure Pool in Nelson also benefitting from a modern health spa and gymnasium.
Chapter 3: Our Spatial Issues	18		As a result of no explicit reference to sport and recreation in the profile, there are no explicit spatial issues identified that relate to sport and recreation. Whilst there is implicit reference to sport and recreation (eg improving health, addressing population growth), I would recommend explicit reference to sport and recreation issues. These issues would usually be sourced from an open space sport and recreation assessment, a playing pitch strategy, and a sports facilities or sport and recreation strategy. It is important that issues relating to quantity, quality and accessibility are identified in order for the core strategy to be able to address them.	It is acknowledged that the Spatial Portrait should highlight any spatial issues relating to sport and recreation.	See officer recommendation to Comment 323.
Chapter 4: Vision	19		Sport England welcomes the encouragement of healthy and active lifestyles within the vision, and would point out that improved opportunities for sport and recreation can help to achieve this. However, it is felt that the objective would appear better justified if sport and recreation issues were identified in the earlier profile.	It is agreed that additional reference to Sport and Recreation in the Spatial Portrait will provide a better link to the Spatial Vision's aspiration to help people to live healthier and active lives.	PROPOSED ACTION: Include a reference in the Spatial Portrait which sets out the current levels of sporting activity in the borough etc.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 5: Our Strategic Objectives	20		The inclusion of strategic objective 9 which seeks to protect, enhance and improve access to green open spaces, sports and recreation facilities is supported. However, I would point out that some sport and recreation facilities would not provide a valuable contribution to biodiversity (eg a swimming pool), whereas the wording of the objective suggests that all such facilities do make a valuable contribution to biodiversity. I would therefore recommend that the wording of this policy amended.	The strategic objectives for the Core Strategy were finalised after careful consideration at the Issues and Options stage. It is however accepted that, as the representation suggests, a minor revision to the wording of SO9 would help to improve clarity by removing the inference that all sports and recreation facilities make a contribution to biodiversity. Also refer to Spatial Portrait (Comment 251)	PROPOSED ACTION: Amend SO9: Insert the word 'may' between 'they' and 'make'.
Policy SDP5	21		The table that summarises infrastructure provision appears somewhat ambiguous in relation to 'Leisure and Culture'. On the one hand it identifies a deficit in 12 wards of sports pitches / courts, whilst on the other it states that there are no significant gaps in provision or capacity in relation to traditional sports centre facilities. I would recommend this text is amended to provide greater clarity.	It is accepted that in this instance the proposed wording could lead to some confusion. As such it will be amended to help improve the distinction between the two comments. The comment in the second column of the table on page 57 highlights a deficiency in sports pitch provision in 12 of the 19 wards in Pendle. However, sports pitch provision tends to be concentrated at specific sites - notably Swinden, Nelson; Holt House, Colne; Bull Holme, Barrowford and Vicory Park, Barnoldswick. It is also associated with the six secondary schools across the borough. The deficits recorded are not critical to plan delivery and no issues have been identified with regard to the existing spatial distribution. The intention over the plan period (as stated in Column 3) will be to improve the quality of existing provision in Pendle and increase levels of usage. The comments relating to sports centres in Columns 2 and 3 are self explanatory.	PROPOSED ACTION: Amend the references to 'sports pitches' and 'traditional sports centre facilities' to read 'outdoor sports pitches' and 'sports/leisure centres' to help improve the distinction between the two comments on leisure and culture.
Policy ENV1	22		Whilst it is accepted there is a footnote, the scope of this policy is somewhat unclear with respect to 'open space and green infrastructure'. Does this policy, for example, include all open space, sport and recreation facilities covered by PPG17 or just the open spaces? If the latter, does the scope include playing fields? Assuming the scope of the policy does include playing fields and other types of sport facilities, then the policy is considered to weaken the protection currently offered by national planning policy in the form of PPG17. Paragraph 15 of PPG17, for example, sets out only very specific circumstances in which playing fields can be developed. Likewise paragraph 10 and 13 of PPG17 prevent the loss of land and buildings used for sport and recreation unless they have been demonstrated as surplus to requirement, or equivalent replacement facilities are provided.	It is agreed that the policy should more clearly state which open space the policy relates to and in which exceptional circumstances development of open space may be acceptable in accordance with the National Planning Policy Framework. Clearer linkages to SUP2 (Health and Well-Being) will also be made to set the wider context that the policy works within.	PROPOSED ACTION: Reword footnote 118 to read "As defined on the proposals map or in the Council's Open Space Audit." PROPOSED ACTION: Add additional footnote after "Existing Open Spaces" to read "Open spaces are defined as the following: Parks, Woodland, Natural Greenspaces, Green Corridors, Outdoor Sports, Amenity Greenspaces, Play Areas, Equipped Areas for Play, Allotments, Cemeteries, Civic Spaces. Policy SUP2 Health and Well-Being covers aspects relating to Built Sport and Recreation Facilities". PROPOSED ACTION: Replace footnote 119 with "These exceptional circumstances are set out in the National Planning Policy Framework, paragraph 74".

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV1	25		Evidence Base In order to ensure effective planning, PPG17 states that local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sports and recreational facilities. As a minimum, the assessment of needs should cover the range of open spaces and built sports and recreational facilities set out in the Annex to PPG17. In addition, the planning policy guidance note states that local authorities should also undertake audits of existing open space, sports and recreational facilities. For the purposes of assessments of need and audits of existing built facilities for sport and recreation, PPG17 states that local authorities should use a typology which includes swimming pools, indoor sports halls and leisure centres, indoor bowls centres, indoor tennis centres, ice rinks, community centres, and village halls. Pendle's evidence base includes an Open Space Audit published in 2008. However, the scope of the document does not include built facilities for sport. Moreover, the document presents the findings of an audit of provision, and does not include an assessment of need. Sport England considers an up to date PPG17 compliant audit / needs assessment an essential component of the core strategy evidence base, and that this should cover outdoor sports facilities as well as built facilities for sport and recreation. In addition, the assessment of outdoor sports facilities should incorporate the findings of an up to date playing pitch assessment / strategy which follows the 'Towards a Level Playing Field' methodology. For information, playing pitch strategies were identified as tools / techniques to support assessments in the companion guide to PPG17 (Assessing Needs and Opportunities). In terms of playing pitch assessments / strategies, Sport England only regards playing pitch strategies to be up to date where they have been produced and adopted, or substantially reviewed and updated, within the last 3 years. The guidance in Towards A Level Playing Field (which sets out the methodology for playing pitch strategies) actually recommends that a review of demand data should be undertaken every 2 years to account for the constantly changing number of teams playing pitch team sports. The supply of pitches is also subject to change. In terms of indoor sports, Sport England's Facility Planning Model (FPM) can be used to help understand the interaction of supply and demand in relation to sports halls and swimming pools. High level indicators would suggest that there could be issues that Pendle might need to address. For example, the number of courts per 1000 population (a crude indicator of	The Pendle Open Space Audit provides a useful starting point to assess the current provision of (non-built) areas of open space. This audit together with other recent strategies produced by the Council can be used to look at future needs. The Council is going to undertake a joint Open Space and Green Infrastructure Study including a needs assessment in the near future. The policy in the Core Strategy provides a broad framework for protecting and enhancing existing open space and the provision of new open space. However, the specific types of open space to be provided is considered too detailed for this policy. This will come forward through the review of the evidence base and more specific guidance in the Land Use Allocations and Development Management Principles DPD.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			supply) is lower for Pendle than it is for Lancashire, the North West and for England. The FPM estimates demand for sports halls from Pendle residents as equating to 25 badminton courts across the borough, whereas supply of sports halls in Pendle only equates to 17 courts. I should stress that these are only headline indicators that raise issues to be explored. It could be that Pendle's demand is being satisfied by facilities outside the borough, for example. The FPM can be used to explore such issues. In light of the above, would like to make you aware that Sport England has developed a number of panels (comprising of consultants) to support its work in relation to Strategic Planning for Sport. One of these panels relates to the production of playing pitch strategies, and one relates to PPG17 assessments. Panel members have been chosen in relation to their skills, experience, knowledge, price and quality of their work in the relevant areas. Sport England is allowing other partners to have access to its panels without going through the OJEU (Official Journal of the European Union) process. Eligible partner organisations include Local Authorities To access the panels, external partners first need to sign a letter of agreement with Sport England before details of the panels (including rates) can be released. External partners should consult their legal/procurement departments before applying to use the panels. Partners will need to put in place their own contracts with Panel members, and these should follow the Framework contract already in place between Sport England and the preferred supplier. An added advantage of using the panel members is that the Towards a Level Playing Field methodology for producing playing pitch strategies is being revised. The consultancies on the panel are involved in this revision process and will be looking to trial some of the revised methodology in the coming months. Further information can be found at: http://www.sportengland.org/facilities__planning/planning_tool_s_and_guidance/strategic_planning_framework.aspx		
Policy SUP2	23		The broad aim of this policy to support the provision of new or improved facilities for health, leisure and social care is welcome. However, it is important that any new provision is informed by a robust and up to date evidence base. Please refer to the separate section on evidence for further comments.	The support for the broad aim of the policy is noted. The policy does not set out the level of need for the different types of health, leisure and social care facilities as these are constantly changing and are determined by other bodies (e.g. NHS, LCC etc). The general approach taken by the policy is that the Council will support the provision of new facilities and especially where they are provided to meet an identified need or deficiency in provision. The responses to Policy ENV1 (see Comments 22 and 25) cover the comments relating to the evidence base.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SUP3	24		This objective could be improved by promoting community use of facilities on school and other education sites. Such facilities often include sports facilities like playing fields and indoor sports halls. Opening up school sites for community use can increase accessibility to facilities, and also contribute towards sustainable development objectives by making more intensive and efficient use of resources. In addition, using school sites in this way can benefit young people by strengthening the links between their involvement in sport during school time and continued participation in their own time.	The representation states that the policy could be improved by promoting the community use of facilities on school and other education sites. This objective is already recognised in Para 12.48 of the supporting text and the fourth bullet point within the policy itself.	No changes to the document are proposed as a result of this representation
327795	Stonehaven Consultants Ltd			Mr Geoff Hook	
Chapter 4: Vision	507	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	519	Yes		Agreement noted.	N/A
Policy SDP1	520	Yes		Agreement noted.	N/A
Policy SDP2	522	No	No comments supplied.	The objection to this policy is noted, however, no comments outlining the specific reasons for the objection were supplied.	N/A
Policy SDP3	529	No	Employment should be welcomed in all areas of Pendle; I see no need for any such restrictive planning policy.	The comment suggests that planning policy should not interfere with market forces and that any proposal for employment growth should be permitted, irrespective of its location. There are a number of negative implications associated with this suggested approach. For example, future infrastructure provision could not be adequately planned for, environmental constraints would be ignored and incompatible land uses could be located next to one another. Fundamentally there could be no certainty that an adequate amount of employment land could be provided in a timely manner and in sustainable locations and the unconstrained delivery of unlimited amounts of employment land would not be in accordance with the National Planning Policy Framework (NPPF). New employment opportunities are of course welcomed in all	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				parts of the Borough. What Policy SDP3 is seeking to ensure is that development is of a scale and nature that reflects the ability of the local community to accommodate future growth. Policy SDP1 establishes the settlement hierarchy for Pendle, and this is reflected in Policy SDP3. If there were no restrictions placed on employment development, future growth could have undesirable consequences and fail to assist local regeneration initiatives and the very people we wish to see benefit from the new employment opportunities created. For example development in attractive, but remote locations would result in longer journeys to work that could prevent elements of the local community from being able to access the new jobs created and an inadequate infrastructure could contribute to increased levels of congestion, pollution etc.	
Policy SDP4	534	Yes		Agreement noted.	N/A
Policy SDP5	537	Yes	It would appear that a major problem in achieving targets within SDP2 and SDP3 is the lack of the upgrade within the sewage system within certain areas, it would be useful to be informed when such upgrades are likely to be completed.	Unfortunately it is not possible to state when upgrades to the sewage system will take place. United Utilities have indicated that they cannot confirm if capacity will be available until the connection points, flows and completion dates for a proposed development are confirmed (see Comment 204). This stance places 'forward planning' in a Catch 22 situation, as the planning process cannot guarantee, with any degree of certainty, what type of development is proposed and when it will take place until a full planning application has been approved, and even then cannot guarantee that development will take place.	No changes to the document are proposed as a result of this representation.
Policy SDP6	541	Yes		Agreement noted.	N/A
Policy ENV1	558	No	I see no reason for the Green Belt to wash over Winewall when the residents of much smaller villages in the Western Parishes enjoy an Urban Boundary around their settlement and thereby are not caught by the existing Policy 1 of the Local Plan. An urban boundary needs to be drawn around Winewall.	The proposed strategic review of Green Belt was set out in regional planning policy (RSS). The Government's commitment to the withdrawal of regional policy has resulted in a strategic review not being carried out. In the absence of such a review the National Planning Policy Framework states that the general extent of Green Belts is already established and that once established Green Belt boundaries should only be altered in exceptional circumstances. In addition paragraph 86 of the NPPF states that where it is necessary to prevent development in a village primarily because of the important contribution	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				which the open character of the village makes to openness of the Green Belt, the village should be included in the Green Belt. It is considered that this is the case in Winewall.	
Policy ENV2	559	Yes		Agreement noted.	N/A
Policy ENV3	560	Yes		Agreement noted.	N/A
Policy ENV4	561	No	The support for a railway link to be re-established along the former Colne Skipton line is extremely optimistic, consideration should be given to a road link to Barnoldswick along the former track that would allow an industrial park to be formed on land from the north of Foulridge through to Salterforth to the east of the Leeds to Liverpool Canal.	The re-instatement of the Colne-Skipton Railway is supported as a long term proposal which is dependent on funding. The A56 Villages Bypass is also supported, although similar funding issues exist. If this scheme goes ahead connections to Barnoldswick will be improved. In terms of the provision of an industrial park, the Core Strategy does not allocate sites for development. The Land-use Allocations Development Plan Document (DPD) will consider a range of site options for different uses.	No changes to the document are proposed as a result of this representation.
Policy ENV5 and Policy ENV6	562	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	564	Yes		Agreement noted.	N/A
Policy LIV1	565	No	The policy appears to be rigid and inflexible, the support for Housing Regeneration not being jeopardised by other development, I would sound a word of caution as projects in Brierfield have been opposed in support of schemes by the Council that haven't borne fruition.	One of the intentions of Policy LIV1 is to provide support for those housing regeneration schemes that are considered to be priorities by the Council. The Council wants to ensure that by allowing other new build housing schemes within these housing regeneration priority areas that they are appropriate for that area in terms of the type, size and tenure of housing that is to be provided. It is not that the Policy will restrict other sites coming forward, just that the applicant will need to demonstrate that consideration has been given to how their scheme complements the regeneration work. This may be done by explaining how their scheme provides for the needs of the local community in terms of the sizes, types and tenure of housing to be provided.	PROPOSED ACTION: The policy will be amended to clarify the requirements of applicants.
Policy LIV2	566	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV3	567	No	No comments provided.	Objection noted - however no comments providing specific reasons for the objection have been supplied.	N/A
Policy LIV4	568	No	Totally against this policy, it assumes that the LPA are the fountain of knowledge when it comes to housing provision, the disgraced Housing Moratorium should be a warning to all and interference at Council level should be kept to a minimum. Developers should be left to decide the area and type of housing that will be suit the market and what they can sell. Council would be better concentrating on their housing provision.	Policy LIV4 does not look at the provision / restriction of the amount of housing that can be built - this is considered in Policy LIV1 - it should be noted that Local Planning Authorities are required by the National Planning Policy Framework (NPPF) (paragraphs 47, 50, 159) to use an evidence base to ensure that their plan meets the full requirements for market and affordable housing. i.e. set out the amount of housing that need to be delivered over the plan period. The purpose of such a target in the Core Strategy is to enable the monitoring of the delivery of new housing and where delivery is not occurring consider reviewing the policy to encourage delivery. The housing moratorium was implemented in response to the requirements of national and regional policy at the time. The national policy position has changed and it is now for Local Planning Authorities to set out the amount of new housing that is required in an area. The provision of housing needs to be in line with need and demand - the over provision of housing will ultimately lead to problems of empty properties and abandoned communities. It should be noted that Policy LIV1 is not a restrictive policy in terms of housing provision - the figures are a minimum requirement and additional dwellings may be acceptable to meet further demand etc. Policy SDP2 provides direction in terms of where the majority of new housing should be located - this is important to ensure settlements develop in a sustainable way - developers can still choose where to develop but their proposals must be on a scale appropriate to that location (e.g. they should not be proposing to build 200 dwellings in a rural village). Policy LIV4 sets out the type of housing that should be provided. It is a national requirement that Local Plans should do this (NPPF, paragraph 50). Furthermore it is not a rigid requirement, it is a guide based on research which shows that these are the types of dwellings that are needed / demanded in the borough - this should therefore be in-line with the type of dwellings developers can sell in the market. The Council no longer owns any dwellings as all the Council Houses were transfered to Housing Pendle in 2006. The provision of new social housing is provided through various mechanisms (see Policy LIV3).	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK1	569	Yes		Agreement noted.	N/A
Policy WRK2	570	Yes	Please see my opinion ref ENV4 unless we are going to grasp the nettle on provision of industrial land I am afraid that Pendle will fall behind in the provision for jobs.	Agreement noted.	N/A
Policy WRK3	571	No		The objection is noted, but without further reasoning it is not possible to consider possible amendments to the wording of the policy, or supporting text.	No changes to the document are proposed as a result of this representation.
Policy WRK4	572	Yes		Agreement noted.	N/A
Policy WRK5	573	Yes		Agreement noted.	N/A
Policy SUP1	574	Yes		Agreement noted.	N/A
Policy SUP2	575	Yes		Agreement noted.	N/A
Policy SUP3	576	Yes		Agreement noted.	N/A
Policy SUP4	577	Yes		Agreement noted.	N/A
Appendices	578		My first observation is that there is no reference to this on the Representation Form Andrew Walker has carried out a full and concise review of the appendix and has pointed out that the Core Strategy in its present form is confusing and as a legal document will not stand up to scrutiny. Appendix A refers to policies that are omitted or replaced from that of the current Local Plan, unfortunately the cross referencing between the Local Plan policies and the Core Strategy are resulting in some cases that retained policies refer to policies that have been deleted this should be addressed. I fully support Andrews comments. It would appear that a number of policies are being retained and are designated as being "Not replaced" however I am informed the Policy Team that this will be replaced by Development Management Policies if this is correct then why is it not indicated as such I strongly object to this as if left in its	It is accepted the Appendix B should make clear in addition to those policies reflected in the Core Strategy which policies are not to be replaced at all and which are to be reviewed as part of the Land Use Allocation and Development Management DPD's. Policy 20 of the Adopted Replacement Local Plan and the reasoned justification do not form part of the Core Strategy as it is too detailed for this strategic level of plan. The issues covered by the policy will be addressed as part of the Development Management Principles DPD. Policies 1 and 26 of the Local Plan do not form part of the Core Strategy as they are too detailed for this strategic purpose. The content of the policies will be reviewed as part of the Development Management Principles DPD. Until the Development Management Principles DPD has some weight through consultation and	'PROPOSED ACTION: Include at the end of second the bullet point in paragraph 2.12: - such as a detailed in the Pendle Local Plan Part 2: Site Allocations and Development Policies. PROPOSED ACTION: At the end of paragraph 2.13 include: Some of the more detailed policies will be included in the Pendle Local Plan Part 2: Site Allocations and Development Policies as mentioned above. PROPOSED ACTION: In appendix B indicate which policies will be included in the Pendle Local Plan Part 2: Site Allocations and Development Policies. Add a column to the appendix showing where Local Plan Part 2 policies will be relevant.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			present state as the following policies will be carried forward automatically. . 20.8 For the purposes of this Policy development on curtilage must be regarded as infill, that is land which is within a settlement boundary and has no other Local Plan designation. The land must be developed on 3 immediate sides (including the residential property within which curtilage the land sits) OR, where the land is bounded by a settlement boundary or Local Plan allocation, there should be development on all other immediate sides except 1 OR, the filling of a small gap within a built up frontage. Neighbouring garden land will be regarded as 'developed' land. The above policy is confusing subject to interpretation and has been used in an ad hoc manner in the past, if the Planning Policy Team do not desire development within certain curtilage's of the Borough then they should draw the settlement boundary to exclude such sites and then it is clear to all concerned the principle of development has or has not been established. 6) The proposal is for the small scale extension or alteration of an existing building. Any proposed extension in the Open Countryside should not increase the size of the original building (as at 1st July 1948 or as originally constructed if it was after this date) by more than 25%. Proposed extensions in the AONB or Green Belt must also comply with the criteria set out in Policies 2 and 3 respectively. I have carried out a certain amount of research on the above policy by contacting our neighbouring Local Authorities Burnley, Hyndburn, Rossendale, Craven, Ribble Valley and Blackburn all of whom inform me that a policy of "reasonable" is adopted. The above policy is discriminative in that a person with a small bungalow within the Green Belt may only be able to extend a metre but on larger premises a substantial extension can take place. Ribble Valley takes a different view and many substantial dwellings have been constructed, many by entrepreneurs located in Pendle. A recent Appeal Decision stated 5. But in any event it does not follow that extension adding more than 25% to the size of a building will in all situations adversely affect the openness of the countryside. Standards such as this, though often useful as a rule of thumb and as a starting point should be applied flexibly and pragmatically, having regard to what the policy is seeking to achieve. Unfortunately the LPA takes the view that until the Local Plan is revised then a strict adherence to the Local Plan Policies will be observed. 26.2 The proposal would result in the total proportion of non-shopping uses (including unimplemented valid planning permissions) exceeding 25% of a defined primary frontage or 50% of a defined secondary or local	adoption, these policies will continue to form part of the framework for the decision making process. In response to the conclusion of the comments, the Core Strategy outlines the strategic direction of the policies. Detailed development management policies will be developed at a later stage.	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			frontage (in terms of frontage length). Again this policy is far too stringent, it should be left up to officers to officer recommendation, retailing within town centres is problematic and going through rapid change, its time for thinking out of the box, no good trying to sell goods that are sold by the national stores, boutique or specialised stores will have best chance of survival, Takeaways, the pet hate of many, may be encouraged to be within the same area giving choice being more control with policing and litter but with imagination could run akin to Newton Circus in Singapore where a central dining area around such establishments bring colour and vibrancy. I also think in certain areas a reduction in retail area should be considered and buildings such as Phoenix Chambers in Nelson may be converted to residential. Conclusion Whilst in general I welcome this report and I hope I have made some constructive comments to enable a more balanced Core Strategy to be adopted. Serious attention should be paid to the former policies within the Local Plan that I have outlined above, these have caused concern to applicants, agents, councillors and at times, to the planners themselves, a clearer strategy is required and I sincerely hope that the LPA enters into meaningful dialogue in order to produce a less intrusive Core Strategy		
328010	Textile Engineering & Architectural Historian			Mr Anthony Pilling	
Chapter 5: Our Strategic Objectives	510		I support all the strategic objectives set out in the above documentation which set out a logical and appropriate framework for the future planning of the area at an overview level of detail. However, I also appreciate it will not be until the next levels of detail are discussed that the interpretation and implementation of these laudable objectives will become completely clear as real outcomes. Only when actual sites and planning designations have been proposed and drawn on a sufficiently detailed plan, will their consequences be sufficiently understood for a sustainability appraisal dialogue to take place before plans can become reality.	Agreement noted.	N/A
Policy ENV1	511	Yes	B) Need to identify nationally, regionally and locally important Heritage and Townscape assets not yet formally protected by Listing or Conservation Area status The Autumn 2011 English Heritage Saving the Age of Industry initiative links with the 2010 Lancashire Textile Mills initial rapid assessment survey commissioned by LCC and EH (carried out by Oxford Archaeology North based in Lancashire). The draft report shows	It is not a purpose of the core strategy to identify heritage assets. Proposals for listing or conservation area status are made outside of this process. The Core Strategy supports this approach. In addition the Core Strategy should be read as a whole - policy ENV2 supports the reuse of historic buildings.	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Pendle to be the most important Lancashire borough in this context. It also draws attention to the high attrition rate of textile mills in the decade since the RCHM Pendle textile mill and related buildings survey was commissioned by Pendle BC (RCHM is now part of EH). EH have published the results of an independent public opinion survey which shows that 80% of voters nationally value their industrial heritage as highly as country houses and this % is even higher in Lancashire and Yorkshire. However, the textile significance of Pendle is as yet only reflected in a limited way in current Listed Building and Conservation Area designations, and this now requires further, comprehensive review. Nationally important and potentially attractive textile buildings remain in many parts of Pendle which are worthy of retention, conversion and reuse. A few examples include Pendle St Mill – the largest weaving mill in the world built especially for the famous local innovation, the Room and Power system of factory production; Georgian Lomeshaye Mill, the earliest and most complete Nelson mill dating from the 18th Century; The Hendon Valley from and including the remains of Marsden Hall, its park and the largely intact weaving mills down to the railway and incorporating Bowling Mill and the late Victorian terraced housing up to Barkerhouse Road together with the later housing over to Walton Lane including the Cemetery gates and Chapel which would form a nationally important and attractive potential Conservation Area. (This area encapsulates the story of mill town development, since the land owning Waltons who lived in the Hall, had the money and land to invest in the weaving manufacturers and machine makers to create the mills and looms that made Pendle prosper and grow – it illustrates why we exist and from whence we came.) Heritage designations must not be used to prevent change, but to allow change to be informed appropriately by the Borough's Conservation Officer with the objective of making this a valued local asset which will enhance our townscape when sensitively handled. This should further all the Strategic Objectives in A above i.e. 1, 4,5,6,7 &10.		
Policy ENV2	509		A) Issue 6b Option other, my comment 328010/1304 intended to relate to all Historic Buildings in addition to buildings that are Listed and buildings in Conservation Areas I am pleased to note the Officer's Recommendations responding to my comments and welcome the proposed review of existing planning use designations via sustainability appraisals. This will give hope to occupants of historic buildings who find their industrial businesses constrained physically and financially by important	Site specific designations are not made or previously identified ones repealed as part of this document. Policy ENV2 supports the reuse of historic buildings with the optimum viable use preferred.	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			historic fabric which they cannot easily modify nor afford to adequately maintain. The flexibility to allow alternative uses where appropriate and sustainable should help retain existing employment, introduce additional diversification with new uses while at the same time reusing and upgrading our historic environments and townscape quality. Such flexibility means that appropriate new uses could be attracted, so that a model which enables vulnerable historic buildings to be conserved and converted into sustainable heritage assets can become a reality and reap environmental and other benefits. The current English Heritage initiative Saving the Age of Industry raises serious concerns about the vulnerability of important industrial and related heritage assets while numerous textile mill conversion projects prove their value time after time. Coordinated action on this will at the same time raise the townscape quality of the area as well as the uniqueness and variety of the local offering. It should make it commercially feasible for industrial businesses struggling in historic buildings to relocate in more practical and economic industrial units on appropriate designated sites within Pendle where the businesses can develop and expand, operate safely on level sites and provide better work environments for their employees while other uses migrate to the heritage setting. The following strategic objectives should be supported by this type of building reuse: 1 Assist regeneration - by reuse of existing buildings and directing growth to the most sustainable locations. 4 Respond to the causes of climate change - as the reused buildings save embodied energy loss, will be better insulated and more efficiently serviced for their new uses than is currently possible in present usage – also the relocated businesses will be in better insulated, efficiently serviced units which will be easier to maintain. Arising deliveries, waste, industrial fumes can be more efficiently arranged and controlled with the potential for reduced fuel and carbon consequences. 5 Deliver sufficient quality housing - Some of the new uses could well be residential units where appropriately located. 6 Strengthen the local economy – New uses could include office based businesses thereby assisting diversification. The conversion and upgrading of the historic buildings and relocation of the industrial employment to more suitable modern premises will improve working environments 7 Improve the choice, variety and quality of the retail offer – Some of the new uses could be retail units or office or storage services that support retail businesses. 10 Ensure the new development respects our man made heritage – Protecting maintaining and enhancing our		

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK2	508		heritage sites Consultation Statement [Issue 6b, Option - Other, Comment 328010/1304] My comment (is) intended to relate to all Historic Buildings in addition to buildings that are Listed and buildings in Conservation Areas. I am pleased to note the Officer's Recommendations responding to my comments and welcome the proposed review of existing planning use designations via sustainability appraisals. This will give hope to occupants of historic buildings who find their industrial businesses constrained physically and financially by important historic fabric which they cannot easily modify nor afford to adequately maintain. The flexibility to allow alternative uses where appropriate and sustainable should help retain existing employment, introduce additional diversification with new uses while at the same time reusing and upgrading our historic environments and townscape quality. Such flexibility means that appropriate new uses could be attracted, so that a model which enables vulnerable historic buildings to be conserved and converted into sustainable heritage assets can become a reality and reap environmental and other benefits. The current English Heritage initiative Saving the Age of Industry raises serious concerns about the vulnerability of important industrial and related heritage assets while numerous textile mill conversion projects prove their value time after time. Coordinated action on this will at the same time raise the townscape quality of the area as well as the uniqueness and variety of the local offering. It should make it commercially feasible for industrial businesses struggling in historic buildings to relocate in more practical and economic industrial units on appropriate designated sites within Pendle where the businesses can develop and expand, operate safely on level sites and provide better work environments for their employees while other uses migrate to the heritage setting. The following strategic objectives should be supported by this type of building reuse: 1 Assist regeneration - by reuse of existing buildings and directing growth to the most sustainable locations. 4 Respond to the causes of climate change - as the reused buildings save embodied energy loss, will be better insulated and more efficiently serviced for their new uses than is currently possible in present usage – also the relocated businesses will be in better insulated, efficiently serviced units which will be easier to maintain. Arising deliveries, waste, industrial fumes can be more efficiently arranged and controlled with the potential for reduced fuel and carbon consequences. 5 Deliver sufficient quality housing - Some of the new uses could	Nine Protected Employment Areas (PEAs) are currently designated under Policy 22 of the Replacement Pendle Local Plan (2001-2016). This policy and the continued designation of these sites will be reviewed during the preparation of the Land-use Allocations DPD, which will follow the adoption of the Core Strategy. Paragraphs 11.43 and 11.44 in the supporting text acknowledge that only those sites that offer a high quality, accessible and economically competitive location will be protected. Paragraph 11.45 sets out the qualifying criteria for designation as a PEA. In accordance with paragraph 22 of the new National Planning Policy Framework (NPPF), existing PEAs that no longer meet these requirements will lose this designation, to encourage the re-use, or redevelopment, of sites for a broader range of uses. Also refer to comment 509 (ENV2).	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			well be residential units where appropriately located. 6 Strengthen the local economy – New uses could include office based businesses thereby assisting diversification. The conversion and upgrading of the historic buildings and relocation of the industrial employment to more suitable modern premises will improve working environments 7 Improve the choice, variety and quality of the retail offer – Some of the new uses could be retail units or office or storage services that support retail businesses. 10 Ensure the new development respects our man made heritage – Protecting maintaining and enhancing our heritage sites		
327456	The Coal Authority			Miss Rachael Bust	
Document	426		BACKGROUND TO COAL RELATED ISSUES IN PENDLE Surface Coal Resources, Energy Minerals and Prior Extraction As you will be aware, the Pendle area contains coal resources across the southern half of the Borough which are capable of extraction by surface mining operations. The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In cases where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Coal Mining Legacy The Pendle area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature potential public safety and stability problems can be triggered and uncovered by development activities. Within the Pendle area there approximately 178 recorded mine entries and around 5 other recorded coal mining related surface hazards. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy is as a result of mineral workings it is important that new development delivered through the DPD, recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that	It is accepted that mineral resources are a valuable, but finite resource that, wherever practicable, should not be sterilised by new development. As a result changes to Policies ENV1 and ENV5 have been proposed to refelcet this.	PROPOSED ACTION: Policy ENV1 to be amended to include details on the prior extraction of mineral resources (including coal) in order to prevent sterilisation by new development (see response to Comment 440). PROPOSED ACTION: Policy ENV5 is to be renamed and amended to address issues of land stability and include a specific reference to the issues arising from the local mining legacy (see response to Comment 441).

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Document	433		because mining legacy matters have been addressed the new development is safe, stable and sustainable. Relationship to the Lancashire Minerals Core Strategy and the Lancashire Minerals Site Allocations and Development Management Policies DPD – Mineral Safeguarding General: Objection – Whilst The Coal Authority fully acknowledges that this Core Strategy will not designate Mineral Safeguarding Areas as this is to be done by the Lancashire Minerals Site Allocations and Development Management Policies DPD, there needs to be some co-ordination and consistency between that DPD and this Core Strategy. At present there appears to be no reference to minerals and waste issues being addressed in the County level. This type of cross reference needs to be made and should indicate how policies within that DPD may need to be taken into account in this Core Strategy. The Core Strategy is not clear about prior extraction and the protection of mineral resources in relation to any strategic sites nor is there any recognition that this requirement will also need to apply to the identification of other site allocations. Change Requested – The Coal Authority suggests the inclusion of the following wording in the Introduction to the Plan: “Lancashire County Council has responsibility for identifying sites and policies for Minerals and Waste Development in the County. Therefore Minerals and Waste Issues are not covered in the Pendle Core Strategy. Issues where Minerals and Waste issues will be relevant to this Core Strategy will include: • The designation of Mineral Safeguarding Areas in the Lancashire County plan, sites then allocated or identified by Pendle in this Core Strategy will need to consider the potential impact that development may have on sterilising those minerals, i.e. preventing access to the mineral resource by building over it and consider whether the mineral should be extracted ahead of development; Mineral Safeguarding Areas will be shown in the Site Allocations and Proposals Map DPD when it is produced. Pendle will consider the issue of protecting the unnecessary sterilisation of mineral resources for the strategic sites identified in this Core Strategy. For other sites the issue will be addressed in the methodology undertaken for the choice of sites included in the Site Allocations and Proposals Map DPD in due course.” Reason – In order to comply with the national policy advice on mineral safeguarding in MPS1 (Planning & Minerals) and MPG3 (Coal Mining and Colliery Spoil Disposal) and national planning policy in PPG14 in relation to land instability issues	Section 2: About the Core Strategy includes a diagram which shows the relationship between the Core Strategy and the Lancashire Minerals and Waste Development Framework - setting out the documents that make up the Development Plan for Pendle. However, it is acknowledged that further explanation could be provided in Section 2 to show how the two documents work together. Policy ENV1 is to be modified, in response to another comment submitted by the Coal Authority. This policy address the need to avoid the sterilisation of mineral resources and express support for prior extraction, where these options are practicable (see response to Comment 440). As there are no strategic sites identified within the Core Strategy, it is not necessary to make any reference to mineral issues relating to such sites. A new section is to be added to explain the relationship between Pendle Local Plan Part 1: The Core Strategy and Pendle Local Plan Part 2: Site Allocations and Development Policies. This will include details of the site selection process and a reference to the Mineral Safeguarding Areas will be included here.	PROPOSED ACTION: Amend the diagram in 'Section 2: About the Core Strategy' and include further explanation of how the Core Strategy and the Lancashire Minerals and Waste Development Framework work together. PROPOSED ACTION: Include a new section in Chapter 2 About the Core Strategy to explain its relationship with Pendle Local Plan Part 2 - Site Allocations and Development Policies. Make reference to the Mineral Safeguarding Areas within this additional text.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 6: Our Spatial Strategy	427		Comment – Whilst the Coal Authority has no preference for any choice of spatial strategy, as this is a matter to be determined locally, the focus of development into the M65 Corridor will result in new development being concentrated in the southern part of the Borough where the surface coal resource and mining legacy are concentrated. Whilst this is not necessarily a constraint on the spatial strategy being chosen it highlights the need to ensure that the Core Strategy allows for an effective and suitable policy framework to be developed to ensure that new development does not needlessly sterilise the surface coal resources and that unstable land arising from mining legacy is properly addressed. This is an issue both for future site allocations and for future development proposals. Reason – In order to comply with National Planning Policy set out in MPS1 in relation to the safeguarding of mineral resources and with PPG14 in relation to addressing unstable land.	This comment has been addressed through the response to comments made against Policy ENV2. As a result of similar comments (Comments 440 and 441) Policies ENV1 and ENV5 will be revised to ensure that the policy framework for development is such that it does not needlessly sterilise the surface coal resources and that unstable land issues arising from the mining legacy are addressed.	See officer recommendation for Comment 440 (Policy ENV2 but change recommended to Policy ENV1) and Comment 441 (Policy ENV5).
Policy SDP1	428		Comment – Whilst the Coal Authority has no preference for any choice of spatial strategy, as this is a matter to be determined locally, the focus of development into the M65 Corridor will result in new development being concentrated in the southern part of the Borough where the surface coal resource and mining legacy are concentrated. Whilst this is not necessarily a constraint on the spatial strategy being chosen it highlights the need to ensure that the Core Strategy allows for an effective and suitable policy framework to be developed to ensure that new development does not needlessly sterilise the surface coal resources and that unstable land arising from mining legacy is properly addressed. This is an issue both for future site allocations and for future development proposals. Reason – In order to comply with National Planning Policy set out in MPS1 in relation to the safeguarding of mineral resources and with PPG14 in relation to addressing unstable land.	The Spatial Strategy and Policy SDP1 identifies that the majority of development will take place in the M65 Corridor - this is based on a number of factors. Policy ENV1 will be amended to encourage developers to assess proposed development sites for potential mineral resources (including coal) and to consider whether these could be feasibly extracted prior to development in order to avoid the sterilisation of such resources. In terms of land instability - Policy ENV5 will be amended to include a statement on the need for developments to ensure that there are no issues of potential land instability and where such issues exist they can be sufficiently rectified by remediation etc.	PROPOSED ACTION: Amend Policies ENV1 and ENV5 to include references to the mineral and coal mining resources, and land instability issues.
Policy SDP2	429		Comment – Whilst the Coal Authority has no preference for any choice of spatial strategy, as this is a matter to be determined locally, the focus of development into the M65 Corridor will result in new development being concentrated in the southern part of the Borough where the surface coal resource and mining legacy are concentrated. Whilst this is not necessarily a constraint on the spatial strategy being chosen it highlights the need to ensure that the Core Strategy allows for an effective and suitable policy framework to be developed to ensure that new development does not needlessly sterilise the surface coal resources and that unstable land arising from mining legacy is	Policy SDP2 relates to the distribution of new housing development. It is proposed to locate the majority of new housing in the M65 Corridor. This is based on a number of factors including evidence relating to population and household growth, land availability and housing needs. The representation acknowledges that the presence of former mine workings does not necessarily restrict new development taking place in this area. It is accepted that consideration will need to be given to the potential sterilisation of mineral resources, where development is permitted, but this is not something that is confined to	PROPOSED ACTION: Amend Policies ENV1 and ENV5 to include references to the mineral and coal mining resources, and land instability issues.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			properly addressed. This is an issue both for future site allocations and for future development proposals. Reason – In order to comply with National Planning Policy set out in MPS1 in relation to the safeguarding of mineral resources and with PPG14 in relation to addressing unstable land.	housing developments alone. As such it is considered more appropriate to make amendments to an overarching policy concerning development rather than to Policy SDP2. As a consequence, and in response to similar comments, Policy ENV1 will be amended to encourage developers to assess proposed development sites for potential mineral resources (including coal) and to consider whether these could be feasibly extracted prior to development in order to avoid the sterilisation of such resources. This will also help to meet the relevant requirements in the National Planning Policy Framework (NPPF) (Para 143). In terms of land instability - Policy ENV5 will be amended to include a statement on the need for developments to ensure that there are no issues of potential land instability and where such issues exist they can be sufficiently rectified by remediation etc.	
Policy SDP3	430		Comment – Whilst the Coal Authority has no preference for any choice of spatial strategy, as this is a matter to be determined locally, the focus of development into the M65 Corridor will result in new development being concentrated in the southern part of the Borough where the surface coal resource and mining legacy are concentrated. Whilst this is not necessarily a constraint on the spatial strategy being chosen it highlights the need to ensure that the Core Strategy allows for an effective and suitable policy framework to be developed to ensure that new development does not needlessly sterilise the surface coal resources and that unstable land arising from mining legacy is properly addressed. This is an issue both for future site allocations and for future development proposals. Reason – In order to comply with National Planning Policy set out in MPS1 in relation to the safeguarding of mineral resources and with PPG14 in relation to addressing unstable land.	Policy SDP3 relates to the distribution of new employment development. It is proposed to locate the majority of new employment in the M65 Corridor. This is based on a number of factors including evidence relating to the demand/supply of land in this area, the concentration of the existing population, the level of services available, accessibility and spatial strategy which focusses growth in this area. The representation acknowledges that the presence of former mine workings does not necessarily restrict new development taking place in this area. It is accepted that consideration will need to be given to the potential sterilisation of mineral resources, where development is permitted, but this is not something that is confined to employment developments alone. As such it is considered more appropriate to make amendments to an overarching policy concerning development rather than to Policy SDP3. As a consequence, and in response to similar comments, Policy ENV1 will be amended to encourage developers to assess proposed development sites for potential mineral resources (including coal) and to consider whether these could be feasibly extracted prior to development in order to avoid the sterilisation of such resources. This will also help to meet the relevant requirements in the National Planning Policy Framework (NPPF) (Para 143). In terms of land instability - Policy ENV5 will be amended to include a statement on the need for developments to ensure that there are no issues of potential land instability and where such issues existthey can be sufficiently rectified by remediation etc.	PROPOSED ACTION: Amend Policies ENV1 and ENV5 to include references to the mineral and coal mining resources, and land instability issues.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP4	431		Comment – Whilst the Coal Authority has no preference for any choice of spatial strategy, as this is a matter to be determined locally, the focus of development into the M65 Corridor will result in new development being concentrated in the southern part of the Borough where the surface coal resource and mining legacy are concentrated. Whilst this is not necessarily a constraint on the spatial strategy being chosen it highlights the need to ensure that the Core Strategy allows for an effective and suitable policy framework to be developed to ensure that new development does not needlessly sterilise the surface coal resources and that unstable land arising from mining legacy is properly addressed. This is an issue both for future site allocations and for future development proposals. Reason – In order to comply with National Planning Policy set out in MPS1 in relation to the safeguarding of mineral resources and with PPG14 in relation to addressing unstable land.	Policy SDP4 relates to the distribution of new retail development. It is proposed to locate the majority of new housing in the M65 Corridor. This is based on a number of factors including evidence relating to the retail hierarchy, the current population distribution, and the projected levels of growth. The representation acknowledges that the presence of former mine workings does not necessarily restrict new development taking place in this area. It is accepted that consideration will need to be given to the potential sterilisation of mineral resources, where development is permitted, but this is not something that is confined to retail developments alone. As such it is considered more appropriate to make amendments to an overarching policy concerning development rather than to Policy SDP4. As a consequence, and in response to similar comments, Policy ENV1 will be amended to encourage developers to assess proposed development sites for potential mineral resources (including coal) and to consider whether these could be feasibly extracted prior to development in order to avoid the sterilisation of such resources. This will also help to meet the relevant requirements in the National Planning Policy Framework (NPPF) (Para 143). In terms of land instability - Policy ENV5 will be amended to include a statement on the need for developments to ensure that there are no issues of potential land instability and where such issues exist they can be sufficiently rectified by remediation etc.	PROPOSED ACTION: Amend Policies ENV1 and ENV5 to include references to the mineral and coal mining resources, and land instability issues.
Policy ENV2	440	No	Objection – The Core Strategy at present does not reflect National Planning Policy in relation to the need to ensure that new development does not result in the unnecessary sterilisation of mineral resources including the surface coal resources. Consequently we consider the Core Strategy in its present form to be FUNDAMENTALLY UNSOUND. We recognise the difficulties that arise in the two-tier areas of England, particularly where the Mineral Planning Authority has not yet designated the relevant Mineral Safeguarding Areas. However the obligations set out in MPS1 in relation to mineral safeguarding apply equally to both tiers of plans and this Core Strategy must ensure compliance with National Planning Policy. The unsoundness can be addressed through the introduction of the following wording into Policy ENV2; the Coal Authority would recommend the following: “...General requirements: Developers should demonstrate consideration of the above, as	The need to encourage the prior extraction of minerals is accepted as emphasised in paragraph 143 of the National Planning Policy Framework. However it is considered that this issue would be better addressed in Policy ENV1 where the issues around mineral extraction are discussed.	PROPOSED ACTION: Amend Policy ENV1 to include reference to the prior extraction of minerals.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			applicable, through their Design and Access Statement. Proposals should have regard to the Lancashire Landscape Assessment, Lancashire Historic Landscape Assessment and Lancashire Extensive Urban Survey Work and show an understanding of how proposals fit within the landscape and townscape character. Developers should comply with the requirements of the Lancashire Minerals and Waste Core Strategy DPD with regards to maximising the use of recycled and secondary materials. Development should also not lead to the unnecessary sterilisation of mineral resources, through the consideration of the prior extraction of the mineral resource ahead of development. These are the guiding principles for the design of all new development in Pendle. They are expanded upon in further design policies (Policy LIV4, WRK5 and SUP4) which outline the specific measures that will be expected in particular types of development, and through other Development Plan Documents (DPD) and Supplementary Planning Documents (SPD).” Reason – In order to comply with the requirements of National Planning Policy set out in MPS1, the MPS1 Practice Guide and in the BGS/Coal Authority document ‘A Guide to Mineral Safeguarding in England’		
Policy ENV5 and Policy ENV6	441	No	Objection – The Core Strategy does not set out any policy framework for addressing unstable land. Mining legacy is present within the southern part of the Borough where the spatial strategy is looking to focus most of the future development. PPG14 requires development plans to set out both strategic and development management policies to ensure that unstable land is suitably addressed and remediated. The Coal Authority would suggest that Policy ENV5 should be widened in its scope to address Pollution, Contaminated Land and Unstable Land; we would suggest the following wording: “Policy ENV 5, Pollution, Contaminated Land and Unstable Land Pendle Council will work with its partners to minimise air, water, noise and light pollution and to address the risks arising from contaminated land, unstable land and hazardous substances. In particular, new development will be required to: • improve air quality by minimising pollutant emissions and public exposure to pollution, both during and after construction, particularly in any areas identified as having poor air quality. Criteria for assessing applications will be set out in the Development Management Principles DPD. Area Action Plans will consider how pollution can be reduced or successfully mitigated against at a local level; • ensure that water quality is not compromised and, where appropriate, secure improvements to water quality (see Policy	Agree with the objector. The intention was not to repeat strategic policy as set out in PPG14: Development on Unstable Land. However, with the emergence of the National Planning Policy Framework (NPPF) the need to address unstable land within the Core Strategy is acknowledged, in order to provide the necessary hooks for more detailed policies in the upcoming Development Management Principles DPD.	PROPOSED ACTION: Re-name the Policy: The Policy title should be amended to read ‘Pollution, contaminated Land and Unstable Land’ to better reflect its expanded content. PROPOSED ACTION: Include additional supporting text: Include reference to the coal mining legacy in the southern part of the Borough, and note that this is where the spatial strategy is looking to focus future development. PROPOSED ACTION: Include an amendment to the Policy text: Pendle Council will work with its partners to minimise air, water, noise and light pollution and to address the risks arising from contaminated land, unstable land and hazardous substances. In particular, new development will be required to: improve air quality by minimising pollutant emissions and public exposure to pollution, both during and after construction, particularly in any areas identified as having poor air quality. Criteria for assessing applications will be set out in the Development

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			ENV7); • ensure that the potential for noise and light pollution is minimised; • address the risks arising from contaminated land or unstable land including that arising from mining legacy through remediation work that makes the site suitable for the proposed end use and in the case of contaminated land wherever possible uses sustainable and green technologies. Proposals on, or in the vicinity of, contaminated land (including landfill sites) or unstable land will be assessed according to criteria set out in the Development Management Principles DPD; and • assess and minimise the risks associated with the use or storage of hazardous materials, and consider the implications when siting new development in the vicinity of such establishments.” Reason – To ensure that the Core Strategy meets the requirement of National Planning Policy set out in PPG14 in relation to unstable land		Management Principles DPD. Area Action Plans will consider how pollution can be reduced or successfully mitigated against at a local level; ensure that water quality is not compromised and, where appropriate, secure improvements to water quality (see Policy ENV7); ensure that the potential for noise and light pollution is minimised; address the risks arising from contaminated land or unstable land, including that arising from mining legacy, through remediation work that makes the site suitable for the proposed end use. In the case of contaminated land sustainable and green technologies should be employed wherever possible. Proposals on, or in the vicinity of, contaminated land (including landfill sites) or unstable land will be assessed according to criteria set out in the Development Management Principles DPD; and assess and minimise the risks associated with the use or storage of hazardous materials, and consider the implications when siting new development in the vicinity of such establishments.
327609	The Theatres Trust			Ms. Rose Freeman	
Policy WRK4	307		Policy WRK 4 Tourism, Culture and Leisure It is unfortunate that theatres do not easily fit under any exact planning guidance heading – they can be a main town centre use, an element in a town’s evening economy, a heritage asset, a tourist attraction, a business unit, a leisure facility, a cultural component or a community facility. They have been included within all these headings in various local authority LDF planning policy documents over the last seven years. We are therefore surprised that cultural facilities for cultural activities (e.g. theatres and cinema) are not mentioned in a policy that has the word ‘culture’ in its title. We note that your theatres are protected in Policy SUP 1 which we support, but strongly suggest for clarity and to avoid confusion that the title of Policy WRK 4 is amended as, strictly speaking, it does not concern cultural facilities which are covered in both SUP 1 and WRK 3. We assume the word culture’ in the context of this particular policy	The representation notes that there is no mention of cultural activities, such as theatres and cinemas, within the policy and suggests that the title of the policy be amended to exclude any reference to culture. It is acknowledged that the omission of any reference to cultural facilities in Policy WRK4 is an oversight. However, rather than exclude the reference to culture from the title of the policy, it is felt that the spatial and strategic objectives of the Core Strategy would be better served by revising the wording of the introductory paragraph to include a reference to culture and by including cross references to Policies SUP1 (Community Facility Provision) and Policy WRK3 (Retailing and Town Centres), which also address development that will help to improve the tourism, leisure and cultural offer in Pendle. The representation notes that the reference within the policy to promoting development that helps to improve the	PROPOSED ACTION: Amend Policy text at paragraph 1: Proposals associated with the provision of new or improved facilities for tourism, leisure and cultural activities, including accommodation for visitors, will be supported where they: PROPOSED ACTION: Amend Policy text at paragraph 3: To encourage socially inclusive tourism, leisure and cultural uses that help to improve the vitality and viability of Nelson and Colne Town Centres in the early evening and into the night proposals should also have regard to Policies WRK3, SUP1 and SUP4, as appropriate.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			refers to the historic, natural and cultural environment concerning landscapes etc. Also in this policy is a sentence mentioning the vitality of the evening economy in Nelson and Colne. The same sentence (almost) is repeated in WRK 3, which is the most appropriate policy for dealing with town centres' evening economies, and we suggest this sentence is expanded within WRK 3 to provide guidance for town centres and excluded from WRK 4 where it provides no specific information regarding the tourism and leisure offer.	vitality and viability of the night-time economy in Nelson and Colne (Para 3) is also included almost word for word in Policy WRK3, and suggests that it should be removed from WRK 4 and expanded in WRK3. The emphasis here however is intended to be somewhat different. In Policy WRK4 the wording seeks to encourage the provision or enhancement of tourism, leisure and cultural facilities in order to help encourage the expansion of the retail offer. Conversely in Policy WRK3 the emphasis is on encouraging uses (i.e. cafes) that will compliment the tourism, leisure and cultural offer.	
328008	Trojan Plant Services Ltd			Mr Lester Spencer	
Chapter 5: Our Strategic Objectives	653		I support the strategic objectives outlined in the Core Strategy, of which our ideas would support: 1 Assist Regeneration; 4 Respond to the causes of climate change; 6 Strengthen the economy; 10 Ensure that new development respects our man made heritage	Agreement noted.	N/A
Policy WRK2	654		Consultation Statement [Issue 6b, Option - Other, Comment 328010/1306]. My business operates from a grade 2 listed silk loom assembly shop. While the premises work at a basic level, they have limitations for heavy equipment repair (Medium Industry) and expansion on this historic site is impossible. The business is doing well but needs to move to larger modern premises without columns, with better insulation and services to reduce the carbon footprint and improve working conditions. Change of use to allow the premises to be better aligned with the market will be essential to allow us to expand and take on more employees. The Officer's Recommendations suggesting the proposed reviews of existing planning use designations with sustainability appraisals would help us to improve the contribution we make to the local economy.	Nine Protected Employment Areas (PEAs) are currently designated under Policy 22 of the Replacement Pendle Local Plan (2001-2016). This policy and the continued designation of these sites will be reviewed during the preparation of the Land-use Allocations DPD, which will follow the adoption of the Core Strategy. Paragraphs 11.43 and 11.44 in the supporting text acknowledge that only those sites that offer a high quality, accessible and economically competitive location will be protected. Paragraph 11.45 sets out the qualifying criteria for designation as a PEA. In accordance with paragraph 22 of the new National Planning Policy Framework (NPPF), existing PEAs that no longer meet these requirements will lose this designation, to encourage the re-use, or redevelopment, of sites for a broader range of uses.	No changes to the document are proposed as a result of this representation.
327423	United Utilities			Mr David Sherratt	
Policy SDP1	236		Windfall Sites: Windfall sites siphon investment and resources away from defined development plans; sabotaging infrastructure investment identified to address specific water and wastewater infrastructure needs. For LPAs this could greatly impact their development plans to address areas of deprivation; poor housing; high unemployment; education and health care issues. A single development site [windfall] must not impair and/or sabotage the time; resources; infrastructure investment	The purpose of the forward planning process is to plan for future development in a sustainable way. The Core Strategy sets the level and broad location for new development. The Land-use Allocations DPD will set out the specific locations and requirements for new developments. Together this information should be used by infrastructure providers to plan for investment. Windfall developments will occasionally occur and contingencies should be put in place to	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			and partnerships developed to support the future growth of a LPA and/or number of LPAs. (This comment is not made against any specific point of the document - given the nature of response it has been referenced against point 6.15).	accommodate these developments.	
Policy SDP5	225		Development adjacent to infrastructure assets The future expansion of infrastructure assets to meet the needs of future development and changes in legalisation could create a potential conflict with development plans, this may result in £Millions of customers money being spent in building a new infrastructure outside the locality; therefore developments adjacent to United Utilities PLC assets should be discouraged by LPA Water and sewerage companies have a legal right of access to their assets; this can be for their operational and/or maintenance therefore United Utilities PLC will not permit the building over and/or near its infrastructure assets. By their nature, wastewater processes generate odour levels, which the public may deem to be unacceptable; in addition, the filter processes attract flies. To avoid any conflict historically these facilities have been sited away from the general population. To protect the public from these by-products United Utilities PLC would ask that the Environmental Health Authority be consulted in any future developments adjacent to wastewater infrastructure assets. In most cases, the distance of 400 metres from the WWTW is used as a guide, but this can differ due to local topography, climatic conditions, size and nature of the wastewater infrastructure asset and development in question. United Utilities PLC would seek the support of LPA in the LDF and planning application processes to protect/secure land for infrastructure use. Failure could mean United Utilities PLC cannot provide the additional capacity required to support your growth plans therefore a failed and/or unsound development plan. Infill land You should be aware that, on occasion, gaps are left between properties; this is due to the presence of underground utility assets. United Utilities PLC will not allow the building over or near to these assets and development will not be acceptable in these locations.	This representation is concerned with the protection of infrastructure assets. Whilst the detailed requirements are best dealt with in the Development Management Principles DPD, that will follow on from the Core Strategy, it is considered prudent to provide a hook in the Core Strategy	PROPOSED ACTION: Re-word first sentence to include reference to buffer zones around Utilities Plant and Infrastructure.
Policy SDP5	204		Water and wastewater services are vital for the future health and well-being of your community and the protection of the environment. When developing your Local Development Framework [LDF] and future policies LPA should consider the impacts on the health and well-being its community, environment and ensure infrastructure capacity is available. If infrastructure deficiencies cannot be addressed, an alternative	The representation states that infrastructure capacity should be available and that where it is not, and cannot be addressed, alternative locations or timescales should be sought. Two evidence base studies, the Sustainable Settlements Study and the Infrastructure Study, consider existing physical, social and green infrastructure provision in Pendle. These studies and the policies within the Core	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			location and/or timescale should be sought where infrastructure capacity is available and it meets the LPA development needs. Inappropriate development could result in the closing of a hospital and/or school etc, due to the inappropriate development siphoning off the historical water or wastewater infrastructure capacity; no water supply for washing and catering facilities and/or sewage flooding of the property/highway. United Utilities PLC would like to make the following comments and to be included in future consultations; if possible, the future development of the Pendle Borough Council's [Council] growth plans PPS12 - Infrastructure The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations. [Reason: Satisfactory and sustainable development] Infrastructure To preserve the quality of life for the existing community and to prevent environmental damage; developments should not be permitted until infrastructure capacity is available. United Utilities PLC cannot confirm if capacity is available until the connection point/s, flows and completion dates are confirmed, therefore the LPA should work closely with United Utilities PLC and other utility providers to ensure funding and infrastructure plans are secured with their Regulators before granting planning approval; failure may result in the deterioration of the community's quality of life and/or environmental damage. The scale and type of development needs to be defined so the appropriate infrastructure is in place to ensure growth is sustainable. United Utilities PLC has a number of recent examples where infrastructure has been provided based on identified growth, but not delivered; this has resulted in major operational issues; the treatment process is under loaded; it is failing to operate because it cannot reach its operational capacity. Additional temporary engineer solutions are in place; this represents a significant risk to the exiting customers; the environment and United Utilities PLC; not forgetting the additional financial burden on United Utilities PLC's customers. The Council has a number of capacity issues; any additional developments in these and/or adjoining areas without firstly ensuring funding and infrastructure plans are implemented could result in an increased number and frequency	Strategy have been prepared on the basis of up-to-date information provided in one-to-one meetings with the relevant infrastructure providers such as United Utilities, the Highways Agency, Lancashire County Council (Education, Social Services etc.). Based on the preferred options emerging following the earlier Issues and Options consultation, United Utilities highlighted that one of the main constraints to development during the plan period, would be capacity issues at the Waste Water Treatment Works in Colne, Foulridge and Earby. As such new the Core Strategy, where applicable has phased development proposals in those areas affected (e.g. Policy SDP2 Housing Distribution). The representation goes on to state that development should not be permitted until infrastructure capacity is available, but that United Utilities cannot confirm if capacity is available until the connection points, flows and completion dates are confirmed. This stance places 'forward planning' in a Catch 22 situation. The Core Strategy sets-out the proposed scale of development within broad spatial areas and subsequent site allocations will identify particular development locations. However, the planning process cannot guarantee, with any degree of certainty, what type of development will be proposed and when it will take place. (1) The identification of broad areas and strategic sites within a Core Strategy does not offer permission for development in those locations. The Pendle Core Strategy merely establishes a proposed distribution for sustainable patterns of development in the future. As noted above, the proposed level of development and its phasing reflect existing infrastructure capacity and known constraints. (2) The Land-use Allocations DPD, which is the next stage in the process, will allocate specific sites for future development, in line with the broad allocations set out in the Core Strategy. Whilst modelling can be used to indicate the likely scale of development on these sites, this level of detail would appear to be insufficient to secure investment in new infrastructure by United Utilities. (3) The specific details for a proposed development are not known until a full application for planning permission is submitted and approved. But, even the granting of planning permission cannot guarantee that development will take place. The issue of whether infrastructure providers can respond to future demand in a timely manner cannot be guaranteed with any degree of certainty, given their understandable reluctance to provide	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			of sewer flooding incidents.	new infrastructure without developer commitment and the time-lag between obtaining this 'commitment' and securing funding in their 5-year Asset Management Plans.	
Chapter 7: Our Foundations for a Sustainable Future	221		Carbon impact LPA and developers should consider to the total carbon impact of future developments; not only the footprint of the development but also the carbon impact for additional infrastructure assets; their associated treatment processes and their future maintenance and operation requirements. To meet future reduction targets LPA and Developers should considered the wider carbon impact when determining the location of future developments.	221 The Core Strategy considers a number of carbon impact and sustainability issues. Policy ENV2 requires development to design for climate change mitigation and adaption. Policy ENV3 requires development to consider renewable and low carbon energy generation. Policy ENV1 also requires development to consider the use of recycled and secondary materials as this is more sustainable. Alongside this Building Regulations also require certain standards of energy efficiency in developments. All development requiring planning permission will be considered against the appropriate policies. However to try to cover all of the wider implications of development that are suggested would mean policies that too detailed for the Core Strategy to address and not always something that planning policies can control such as maintenance.	No changes to the document are proposed as a result of this representation.
Chapter 7: Our Foundations for a Sustainable Future	228		Climate change adaptation Planners and Developers should consider that the impacts of climate change on future development, existing infrastructures and the environment. Developments to be designed to reduce the impacts of climatic change on the development itself, the existing infrastructure and the environment; with consideration for hotter, drier summers, greater flood risk and more severe weather events. To reduce the impacts of climate change on the existing infrastructure LA Planners should seek a significant reduction in the discharge from developments. Paving over front gardens has potential contribution to flood risk and should be discouraged.	It is accepted that policy ENV1 should be expanded to detail the effects of climate change on the environment. Whilst policies can take account of the impact of new development on climate change they cannot be applied to existing infrastructure except when alternations that are classed as development are promoted. The second part of Policy ENV2 'Designing for Climate Change Mitigation and Adaption' requires development to have a positive or at least neutral impact on climate change for instance to minimise water usage through incorporation of water saving and recycling measures. In addition to ENV2, policies LIV4, WRK5 and SUP4 all address water efficiency in the design of new developments. Policy ENV7 also requires drainage issues to be considered. The issue of paving front gardens is too detailed for the core strategy but policy ENV2 does state that hard standing in developments should generally be permeable. Detailed issues such as this could be considered as part of the local plan part two site allocation and development policies and are also covered in the Design Principles SPD.	No changes to the document are proposed as a result of this representation.
Policy ENV1	231		Green Infrastructure The Council should seek opportunities to use developer contributions and/or resources to meet common objectives. Use green and open spaces, sports and recreation facilities to address surfacewater and climate change issues.	The representation suggests the use of developer contributions. This is an area which is going to be addressed as part of the review of the Community Infrastructure Levy. The policy adequately reflects that open space and green	PROPOSED ACTION: After the 5 purposes of green infrastructure state: "Examples of Green Infrastructure can include, amongst others; parks, open spaces, woodlands,

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Building green infrastructure assets such as ponds, swales and wetlands will not only meet the Council's Green Space needs but also their local existing and/or future surface water/ climate change issues. Artificial pitches; cycle paths; play areas multi-use games areas and skate parks can be used to local underground civil engineering SUDS solutions. SUDS solutions that incorporate irrigation systems will help support and maintain the Council's allotments, parks and garden areas. The Council's should identify opportunities for the installation retro fitting SUDS.	infrastructure can meet green space needs but also surface water and climate change issues. However it is accepted that types of green infrastructure could be better defined. The issues surrounding SUDS and development are considered to be appropriately addressed in policy ENV7 and do not need to be repeated in ENV1.	rivers, ponds, swales and wetlands."
Policy ENV7	215		Water Resources Planning Our Water Resources Management Plan published in 2009, sets out our strategy for water resources management for the next twenty-five years and highlights areas where there is likely to be a supply deficit and what activities will be put in place to mitigate any shortfall in supply. The plan can be accessed here: http://www.unitedutilities.com/WaterResourcesPlan.aspx. We would encourage all developers and planners to contact United Utilities PLC at the earliest opportunity to enable identification of points of connection with least cost to the developer. Increased Water Capacity The developer is required to pay for their increased capacity (up to the point of a treatment works) and they are only allowed to connect at specific points identified by United Utilities PLC and following approval to connect. Planners and Developer should obtain local capacity information from the United Utilities PLC Area Teams\Connections who would be able to identify areas where there is current capacity for development; this would be on a case by case basis and developers are required to pay a fee for this service (a pre development enquiry). General Water Efficiency Guidance United Utilities encourages the use of water efficient designs and development wherever this is possible. There are a number of actions developers can undertake to ensure that their developments are water efficient. The most up to date advice for water efficiency and water efficiency products can be found at Waterwise who have recently published a best practise guide on water efficiency for new developments. We would encourage utilisation of the following water efficiency activities: • Installing of the latest water efficient products, such as a 4.5l flush toilet instead of the 6l type. • Minimise run lengths of hot and cold water pipes from storage to tap/shower areas. This minimises the amount of waste during the time the water goes from cold to hot. • Utilising drought resistant varieties of trees, plants and grasses when landscaping. • Install water efficient appliances such as dishwashers, washing machines.	The representation addresses a number of issues, which are dealt with individually below: (1) Encourage all developers to contact United Utilities (UU) at the earliest opportunity to enable identification of points of connection with least cost. This is a detailed comment more appropriately addressed in the Development Management Principles DPD. (2) UU are able to identify areas where there is current capacity for development. Discussions have taken place with UU, in the preparation of the Core Strategy and Infrastructure Study. These have highlighted areas where there are potential constraints on capacity, based on the levels of development proposed. Any detailed reference to fee paying advice for developers is more appropriately dealt with in the Development Management Principles DPD. (3) Policy - UU encourages developers to use water efficient designs and references the best practice guidelines available at Waterwise. The policy text (Para 2) makes direct reference of the need for all new developments to address Policy ENV2. The final bullet point under 'Designing for climate change mitigation and adaptation' in Policy ENV2 states that new developments should "incorporate water saving and recycling measures where possible to minimise water usage." In addition the three specific design policies LIV4, WRK5 and SUP4 all address water efficiency in the design of new developments, and encourage use of the highest level in the Code for Sustainable Homes or BREEAM ratings. Again more detailed policy requirements will be set out in the Development Management Principles DPD.	(1-3) No changes to the document are proposed in response to these elements of the representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV7	219		Surface Water The treatment and processing of surface water [storm water; rainwater] is a not a sustainable solution; the sites' current natural discharge solution should be continued and/or mimicked; if the existing surface water does not have an existing natural solution, United Utilities PLC questions the development of a flooded site. Surfacewater should be managed at source and not transferred; if not this only transfers the issue to another location; generally to a single pinch point, generating further problems in that location. Developments must drain on a separate sewerage system, with only foul drainage connected into the foul sewerage network. Every option should be investigated before discharging surface water into a public sewerage network. Connecting surface water to the public sewerage network is not a sustainable solution and LPA should discourage this practice. The priority options for the management of surface water discharges are: • Continue and/or mimic the site's current natural discharge process • Store for later use • Discharge into infiltration systems located in porous sub soils • Attenuate flows into green engineering solutions such as ponds; swales or other open water features for gradual release to a watercourse and/or porous sub soils • Attenuate by storing in tanks or sealed systems for gradual release to a watercourse • Direct discharge to a watercourse • Direct discharge to a surface water sewer • Controlled discharge into the combined sewerage network ~ this option is a last resort when all other options have been discounted. Development on greenfield sites shall not discharge surface water into the public combined sewerage network and shall not increase the rate of run-off into the public surface water network ~ this statement does not replace the priority options for surface water management above. On previously developed land, a reduction of at least 30% will be sought, rising to a minimum of 50% in critical drainage areas ~ this statement does not replace the priority options for surface water management above Any discharge to the public sewerage system must be via approved SUDS and will require an approved discharge rate. Consideration should given for green infrastructure, low carbon, soft engineering SUDS solutions, such as ponds; swales; wet land areas and detention basins etc. A discharge to groundwater or watercourse may require the consent of the Environment Agency.	The representation addresses a number of specific issues: (1) Para 7.180 and Policy text - The representation states that surface water should be managed at source and not transferred. It notes that developments must drain on a separate sewerage system, with only drainage connected to the foul sewerage network. Finally it suggests a list of priority options for the management of surface water discharges are: (a) Continue and/or mimic the current natural discharge process (b) Store for later use (c) Discharge into infiltration systems located in porous sub soils (d) Attenuate flows into green engineering solutions such as ponds, swales or other open water features for gradual release to a watercourse (e) Attenuate by storing in tanks or sealed systems for gradual release to a watercourse (f) Direct discharge to a surface water sewer (g) Controlled discharge into the combined sewerage network only as a last resort when other options have been discounted. The priorities for the management of surface water will be addressed in a re-working of Paragraph 7.180 and additional references within the policy text. (2) Policy - Include targets for reducing surface water run-off rates. Unlike PPS25 the NPPF is not prescriptive on this matter. As national guidance is inconsistent, an amendment to the context rather than the inclusion of additional targets is considered to be the most appropriate course of action. Also refer to Policy ENV7 (Comment 68)	(1) PROPOSED ACTION: Include additional wording in the Supporting text (before paragraph 7.180): In all new developments surface water should be managed at source rather than transferred. Part H of the Building Regulations requires that the first choice of surface water disposal should be to discharge to infiltration systems where practicable. Infiltration techniques should therefore be applied wherever they are appropriate. PROPOSED ACTION: Amend the wording of the Supporting text (paragraph 7.180): Amend the opening sentence to read: The use of Sustainable Drainage Systems (SuDS) will be encouraged. SuDS seek to mimic the drainage of Greenfield sites and their use will help to reduce the rate and quantity of surface water runoff. They also help to improve the quality of water discharged back into the land, or to a watercourse, by providing passive treatment through filtering and infiltration, thereby increasing the amenity value of surface water in the urban environment. PROPOSED ACTION: Include additional wording in the Policy Text: Additional paragraphs to be inserted before "Developments should ensure." Surface water should drain on a separate system, and only be connected to the combined/foul sewerage network as a last resort when all other options have been discounted. In order, the priority for the management of surface water discharges are: (a) Continue or mimic the current natural discharge process (b) Store for later use (c) Discharge into infiltration systems located in porous sub soils (d) Attenuate flows into green engineering solutions such as ponds, swales or other open water features for gradual release to a watercourse (e) Attenuate by storing in tanks or sealed systems for gradual release to a watercourse (f) Direct discharge to a

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
					surface water sewer (g) Controlled discharge into the combined sewerage network. (2) PROPOSED ACTION: Include additional wording in the Context: National guidance requires flood risk to be reduced wherever possible by limiting peak surface water discharge, but is not consistent with regard to the expected scale of reduction. Recommendations vary from no detriment to a preference that Brownfield solutions provide similar run-off characteristics to Greenfield development. PROPOSED ACTION: Include additional wording in the Policy text: Drainage proposals for development on Brownfield sites will be measured against the existing performance of the site, although it is preferable for solutions to provide runoff characteristics, which are similar to Greenfield behaviour. All new development will be required to include the implementation of Sustainable Drainage Systems (SUDS) unless it can be demonstrated that this is not technically feasible, or viable. More specifically: All Brownfield development will be required to demonstrate that there will be a reduction of at least 30% in existing runoff rates, rising to a minimum of 50% in critical drainage areas (Footnote - The Town and Country Planning (General Development Procedure) (Amendment) (No. 2) (England) Order 2006 introduces the concept of critical drainage areas as "an area within Flood Zone 1 which has critical drainage problems and which has been notified... [to]...the local planning authority by the Environment Agency".) Any proposal for development on a Greenfield site, must demonstrate no alteration to runoff rates upon completion. Peak discharge should be restricted to five litres per second per hectare, this also being the requirement for sites of less than one hectare. Any additional volume of runoff must be taken into account by providing

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV1	210		Responding Strategic Housing Land Availability Assessment [SHLAA] Responding to an individual site identified in a SHLAA will not give a true reflection on impact on the existing infrastructure or provide a clear investment plan for the future. A single plot will not be constructed, a number of plots will and therefore numerous build scenarios can be created from the list of sites identified in a SHLAA. What if: Plots A, B, C and Z are constructed Or Plots B; C; D; Y and Z are constructed. United Utilities PLC can not provide a true impact assessment on the development plots identified in your SHLAA, United Utilities PLC would prefer to meet a member of your team to discuss this in further detail.	The purpose of the SHLAA is to identify sites with potential for housing, assess their housing potential and assess when they are likely to be developed. As part of the assessment high level infrastructure constraints need to be identified to consider whether this will impede the delivery of a site. The level of certainty that can be applied to the delivery of a site can never be guaranteed. The nature of planning often means that different scenarios need to be considered and the delivery of schemes is dependent on a number of factors. The sites identified in the SHLAA will be considered for allocation in the Land-use Allocations document. The allocation of sites will provide more certainty to their potential development. Infrastructure providers such as United Utilities will need to be involved in the allocation process to ensure sufficient infrastructure capacity is available or can be made available to accommodate the proposed level of development. The NPPF (para 180) states that Local Authorities should work collaboratively with utility and infrastructure providers. Further discussion needs to take place with these providers regarding the specific sites identified with potential for housing development. However, in terms of progressing the Core Strategy clarity will need to be sought with United Utilities over the infrastructure capacity issues raised previously regarding the proposed level of development.	storage capacity within the surface water drainage system. Retrofitting for flood prevention and SuDS within the existing built environment must be explored where it would not damage environmental assets. PROPOSED ACTION: Obtain updated information from United Utilities regarding the infrastructure capacity issues in the borough.
619584	Waterside Action Group			Mr Derek Mann	
Chapter 6: Our Spatial Strategy	717		We welcome the emphasis on regeneration in the M65 corridor.	Comment noted.	No changes to the document are proposed as a result of this representation.
Policy ENV3	720	No	I hope far more attention is given to other renewable sources of energy to compensate for the strong feelings about Wind Turbines.	The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred	PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				technology status, which is not the case. The policy simply sought to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. The position of the Core Strategy is that it equally supports all types of RLC generation in principle and would encourage the use of the most appropriate technology in a location.	board.
Policy LIV1	718		We welcome: The need for housing regeneration The emphasis on reducing/halving the number of empty homes The group would like to build on the South Valley Action Plan in particular the restriction of the link of housing to the Nelson boundary	Due to the withdrawal of funding by the Government for the Housing Market Renewal initiative it is now unlikely that the South Valley Area Action Plan will go ahead. However, there is scope within the Land-use Allocations Development Plan Document to incorporate sites within the South Valley for regeneration. In terms of restricting housing to the Nelson boundary from the South Valley, it should be noted that the Core Strategy only considers broad locations for development and does not allocate specific sites. The Land-use Allocations Development Plan Document will consider which sites are best placed to meet the needs of the community and Pendle as a whole. The level of proposed housing outlined in the Core Strategy may require the use of some greenfield sites. However, the Core Strategy supports a sequential approach which directs new development to previously developed land in the first instance.	No changes to the document are proposed as a result of this representation.
327387			Wildlife Trust for Lancashire, Manchester and North Merseyside	Mr. John Lamb	
Chapter 3: Our Spatial Issues	323		Page nos. 22-23, Environment 3.67-3.76. The description of the natural environment has been underplayed and undervalued. For example, the moorland on Boulsworth Hill is described as desolate (typically describing derogatory situations), when in fact it is the only site of international importance in the Borough. There are no globally designated sites (i.e. World Heritage Sites, Biosphere Reserves or Ramsar sites) in Pendle, hence the area of land in Pendle that is part of the South Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA) is the single most important area or thing in the Borough. There is no mention of the statutorily-designated Local Nature Reserves in the Borough. Page no. 23, Environment, 3.71. Semi-natural ancient woodlands are highlighted as being of particular note but there are also semi-natural ancient grasslands and heathlands that are of particular	The representation states that the description of the natural environment has been underplayed and undervalued and recommends a number of additions. The description of the environment in the Spatial Portrait has tried to be as succinct as possible. However, it is acknowledged that as a result the importance of some environmental designations, habitats and species may have been underplayed. A number of changes are proposed to address these deficiencies.	PROPOSED ACTION: Amend paragraph 3.71 to read: The high quality of the landscape, and the importance of the habitats and species found within, is recognised by a wide range of environmental designations that offer some form of protection to over half the open countryside in the Borough. A total of 18 UK BAP key habitats and 39 key species (of which 29 are UK Priority Species) have been identified in Pendle. Three landscape character areas are to be found in Pendle. Their boundaries are defined by those for the Natural Areas and National Character Areas, which are almost co-existent: Forest of Bowland (NA12) /

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			note. Woodland in general is given much more emphasis and reference than other habitat types, which is unbalanced and unjust. Page no. 25, Connections, 3.77-3.80, doesn't include the connections/connectivity (or lack of it) between sites or habitats, which are important for species and are necessary for flora and fauna to be able to adapt to the effects of climate change. A description of the situation could be included here, in the environment section 3.67-3.76, or elsewhere, as appropriate. Page no. 25, Conclusions, 3.81-3.83. There is no conclusion to the environment section, the value of the natural environment, the fact that Boulsworth Hill is the single most important area or thing in the Borough, or the problems and opportunities facing our natural environment.		Bowland Fringe and Pendle Hill (JCA33) Lancashire Plain and Valleys (NA13) /Lancashire Valleys (JCA35) South Pennines (NA14 and JCA36) Much of the area around Pendle Hill lies within the Forest of Bowland Area of Outstanding Natural Beauty (AONB). Its essential landscape character is one of grandeur and isolation, where deeply incised gritstone fells with summits above 550 metres and vast tracts of heather-covered peat moorland are dissected by steep-sided valleys, which open out into rich green lowlands. The South Pennines is one of the largest unenclosed moorland areas in the country. The peat moorland and Atlantic blanket bogs along the fringes of Boulsworth Hill are recognised internationally for their importance in supporting upland bird and plant communities and are consequently designated as both Special Protection Area (SPA) and Special Area of Conservation (SAC). Covering a total area of 1,542 hectares, this is the only Site of Special Scientific Interest in Pendle. In contrast the Lancashire Valleys are an intensively farmed landscape, where agricultural intensification and urban development over the past two hundred years has seen the majority of wildlife habitats - notably species rich grasslands [Footnote: Thirty examples of species rich neutral grassland are protected by BHS status] and lowland heath - reduced to fragmented remnants of a once extensive resource. Sites of biodiversity value are protected by a wide variety of statutory and local designations. In addition to the South Pennine Moors SSSI referred to above, Pendle also has four Local Nature Reserves (LNR) offering statutory protection to 15.3 hectares. Locally designated sites account for a further 1,427 hectares in the form of 62 Biological Heritage Sites (BHS); seven Sites of Local Natural Importance (LNI) and

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
					eleven Special Biodiversity Verges. Areas of particular geological interest can be found at three locations in the borough. These have Local Geodiversity Site (LGS) status and offer protection to an additional 6.0 hectares. These sites form the basis for the creation of an Ecological Network that will protect, enhance and connect sites of biodiversity value necessary for flora and fauna to adapt to the effects of climate change. Further information can be found in the Pendle Biodiversity Audit (Pendle Council, September 2010).
Chapter 3: Our Spatial Issues	326		Page no. 33, Our Key Issues, 3.141. Protect our valuable natural and built heritage, should be 'Protect and enhance our valuable natural and built heritage' inline with the wording in 3.142 Page no. 34, Our Key Issues, 3.142. The Wildlife Trust supports the four headings as the primary focus for spatial interventions in Pendle.	Support for the four headings in Para 3.142 is noted. It is agreed that the final bullet point in Para 3.141 should reflect the wording used in Para 3.142, which better reflects Government guidance.	PROPOSED ACTION: Amend paragraph 3.141: Final bullet point to read 'Protect and enhance our valuable natural and built heritage.'
Chapter 5: Our Strategic Objectives	328		Page no. 38, Strategic Objectives. The Wildlife Trust supports the inclusion of Strategic Objectives 2, 4, 9 and 10	Agreement noted.	N/A
Policy ENV1	332		Page nos. 62-63, Our Foundations for a Sustainable Future, The Wildlife Trust agrees with the statement and bullet points listed in 7.2 and 7.8. Page nos. 62-63, Our Foundations for a Sustainable Future, 7.1-7.10. The section doesn't mention the need to be aware of and cater for the needs of flora and fauna to be able to adapt to the effects of climate change. Page no. 63, Our Foundations for a Sustainable Future, The Wildlife Trust agrees with the statements made in 7.7 and 7.10. Page nos. 63-64, Biodiversity, The Wildlife Trust supports the statements made in 7.11-7.18. However, the section doesn't describe the connections/connectivity (or lack of it) between sites or habitats in Pendle that are necessary for flora and fauna to be able to adapt to the effects of climate change. A description of the situation should be included here, and elsewhere, as appropriate. In 7.15-7.17 Trees and woodland are given much more emphasis and reference than other habitat types, which is unbalanced and unjust. Page no. 64, Biodiversity, 7.17. The role that peat bogs play in carbon capture and storage should also be mentioned together with the re-wetting of lowland and upland	The support for much of the policy is noted. It is accepted that the policy should reflect the need to mitigate and adapt to climate change. Paragraphs 7.11-7.18 are the context element of the policy. Paragraph 7.32 of the strategy section refers to ecological networks allowing for species migration across the borough. Paragraph 7.32 acknowledges that ecological networks are an important way of allowing species migration across the borough, however additional detailed description of individual sites or linkages (or lack of) is not considered appropriate for this strategic level of document. Such sites will be identified as part of the Land Use Allocation DPD. An emphasis is given to woodland habitats in the policy due to the fact that there is a significant deficiency of woodland in the borough. Only 4.1% of the borough is covered by woodland and therefore improving this coverage is a key objective of the policy. However, It is accepted that more of the habitats within the borough should be included in the policy where they relate to specific examples, such as peat bogs, which would give	PROPOSED ACTION: Insert in paragraph 7.17: Of concern to all biodiversity assets is the impact of climate change. There is significant evidence [1] that climate change adversely affects biodiversity, indeed it is likely to become one of the most significant drivers of biodiversity loss by the end of the century. Climate change is already forcing biodiversity to adapt either through shifting habitat, changing life cycles, or the development of new physical traits. Conversely biodiversity can help to reduce the negative effects of climate change. Other habitats are also important in this respect. Upland peat bogs play a significant role in carbon capture and storage. Their conservation and restoration through the re-wetting of upland and lowland peat soils helps to create suitable conditions for a

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			peat soils helping society to adapt to climate change. Page no. 65, Geodiversity, The Wildlife Trust supports the statements made in 7.19. Page no. 65, Landscapes, The Wildlife Trust supports the statements made in 7.21-7.23. Page no. 66, Open space and green infrastructure, The Wildlife Trust supports the statements made in 7.25-7.28. Page no. 66, Strategy, The Wildlife Trust supports the statement made in 7.31. Page no. 67, Biodiversity, The Wildlife Trust supports the statements made in 7.32-7.36. However, trees and woodland are given much more emphasis and reference than other habitat types, which is unbalanced and unjust. Page no. 67, Geodiversity, The Wildlife Trust supports the statement made in 7.37. Page no. 68, Landscapes, The Wildlife Trust supports the statements made in 7.39-7.41. Page no. 68, Open space and green infrastructure, The Wildlife Trust supports the statements made in 7.42-7.43. Pages nos. 69-70. Policy ENV 1. The Wildlife Trust supports the policy.	the policy greater depth.	layer of living plants which absorb CO 2 from the atmosphere. PROPOSED ACTION: Add to paragraph 7.32 after 'across the borough' "It is important to ensure that there are connections between the core biodiversity sites and habitats, to allow species to move freely between them in order to feed, disperse, migrate or reproduce. This is seen as a key in providing future resilience to the potential impacts of climate change. Such connections do not have to be continuous linear habitat, but can be a series of smaller isolated sites which species can use as stepping stones between the core areas. It is this network of core sites connected by buffer zones, wildlife corridors and stepping stones which is known as an ecological network (Lawton et al)."

Pendle Core Strategy: Preferred Options Report: Consultation Comments, Officer Responses and Recommendations

Person Order

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
379170	Joanna Antemes				
Document	48		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618630	Ms. Sally Armstrong				
Document	59		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619486	Mr & Mrs B Atkinson				
Policy ENV3	632		I wish to make comments in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other renewable sources. · The noise from wind turbines has been blamed for health problems including stress and insomnia · Wind turbines only work at maximum capacity for a third of time, meaning they have to be backed up by other technologies such as coal and nuclear · The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power · Wind farms are expensive to build and only last up to 25 years · They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists, including James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: · A significant lowering of the proportion of	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient · A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives, as well as an understanding that other areas are better placed to provide the nation's renewable energy, such as the potential for a Severn Estuary barrage, which could supply a quarter of this nation's energy needs. · No go-ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered I hope that my comments will be placed before elected members and I look forward to your response to these points in due course.	drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
618638	Mr. & Mrs. Bryan & Joanne Atkinson				
Document	66		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
620057	Mr. & Mrs Chris & Brenda Bainbridge				
Document	1112		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	This representation was submitted and received following the publicised closing date for the public consultation, on Monday 12th December 2011. It is for Members of the Council's Executive to decide whether to accept this representation. See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475055	Mr & Mrs Christopher & Jackie Baldwin				

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Document	72		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474898	Mr. & Mrs. Keith & Pauline Barrett				
Document	81		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474605	Mr Neil Berry				
Document	96		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
592124	Dr Alison Birkinshaw				
Document	104		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV1	1	No	Policy ENV1 is not strong enough. It does not provide enough protection against development of Pendle and Colne's open countryside and provides opportunities for developers to 'buy their way in' to developing previously undeveloped areas that are well used by local people. Additionally there is no cross referencing to the need for open spaces to be protected to ensure communities remain and improve their health and are able to access open and green space for walking and other recreational activities. Additionally there is no specific reference to sites to be protected in the overall core strategy and a lack of specific identification of the 'use' of sites which makes much of this consultation meaningless, for as always, the detail is important. The consultation should also refer to the work of local action groups such as 'Lidgett and Beyond' and others which work to protect the green spaces of Colne and Pendle as specific groups to be consulted in the development of the detail behind this strategy.	The policy does not allow developers to "buy their way into developing previously undeveloped areas" as stated. It sets in place a mechanism when development is considered necessary in socio-economic terms that mitigation is required or where this is not possible compensation is required. However the core strategy should be read as a whole. Policy SDP1 ensures that development outside of settlement boundaries i.e. in the open countryside will not generally be permitted and policy SUP2 seeks to improve the health and well being of Pendle residents. Cross referencing between the policies and themes is generally avoided where is not considered essential to the understanding of the policies themselves. The core strategy does not designate sites - it is a strategic level document that sets the direction of policy rather than the detail of how this is to be achieved. Individual allocations will be considered through the Land Use Allocations DPD process.	No changes to the document are proposed as a result of this representation.
328087	Mr. & Mrs. Barry & Eileen Birtwistle				
Document	114		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	306	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			renewable sources. - The noise from wind turbines has been blamed for health problems including stress and insomnia - Wind turbines only work at maximum capacity for a third of the time, meaning they have to be backed up by other technologies such as coal nuclear - The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power - Wind farms are expensive to build and only last up to 25 years - They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of the Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient - A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives as well as an understanding that other areas are better placed to provide the nations renewable energy, such as the potential for a Severn Estuary barrage, which could supply a quarter of this nations energy needs. - No go ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered.	Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough.	PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
619491	Mr & Mrs J Bleasdale				
Policy ENV3	639		I wish to make comment in relation to Section 7 'Our Foundations for a Sustainable Future: improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: · A reduction in the Council's quota for renewable energy · A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) · A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
378951	Mrs. Susan Boardwell				
Document	119		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
378956	Mr. T. Boardwell				
Document	125		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619565	Mrs Anne Bottomley				
Document	659		I write as a concerned resident about the issue of your influence concerning the area including the 'Lidgett Triangle' and the 'Rough' in Colne. As a long term resident neighbouring this area (78 years) I am deeply disturbed at the prospect of the 'Regeneration' which I understand is now under review. To us, the residents, (Lidgett and Beyond group) it is of vital importance that this beautiful and largely unspoilt part of Lancashire's upland countryside should be preserved. The quality of life that it enhances both to us and to future generations cannot be overstated. Will you please consider re-writing the following paragraphs of your report: 6.58, 6.59, 7.44, 10.90 and paragraphs two and nine within Policy ENV1 so that	Similar comments have been made regarding paragraphs 6.58 and 6.59 (see officer response to Policy SDP1, Comment 185). Similar comments have been made regarding paragraph 7.44 (see officer response to Policy ENV1, Comment 186). Similar comments have been made regarding paragraphs two and nine in the policy text for Policy ENV1 (see officer response to Policy ENV1, Comment 186). Similar comments have been made regarding paragraph 10.90 (see officer response to Policy LIV3, Comment 187).	See officer recommendation to Comments 185 (Policy SDP1), 186 (Policy ENV1), and 187 (Policy LIV3).

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			they will be more effective in achieving your Report's targets of - increasing open space - increasing designated land - resisting loss of heritage assets - creating a coherent design approach for Lidgett and beyond. We look to you to ensure, in appropriate documentation, to ensure that these areas do not become sacrificed to the targets of building developers.		
379377	Mr. & Mrs. Stephen and Josie Boyd				
Document	132		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475347	Mrs D Braithwaite				
Document	139		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618694	Mr. Stuart Braysford				
Document	146		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474890	Mrs. Norma Brennan				
Document	153		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
378981	Mr. & Mrs. B. Brown				
Document	160		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619596	L Brown				
Policy ENV3	731	No	I write in reference to (this policy) which I have to say is deeply concerning with particular reference to the proposed commercial scale wind power. My views are the following: - The amount of 'commercial' energy documented is extremely high. What considerations have been made to other green sources. - There are numerous reports from studies that prove the inefficiency, poor reliability, high cost vs payback of the turbines. Not to mention the visual impact in a beautiful part of the county, the noise disturbance - in particular to the nearby residents concerned. The 'flicker' that can be seen from great distances. Both of which can result in long term health issues for	The policy is equally supportive of all RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010) and demonstrate how a full assessment has been given to all RLC technologies. They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in	PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			those nearby. I also understand the government are already making changes to the policies on this and that this is not a legal requirement. To summarise - the visual impact of the turbines would be inescapable and the harm caused to the character and appearance of the landscape, the distress to anyone nearby, the disruption to the local highways, surely outweigh any benefits it might bring.	Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. It is not for this document to debate the financial or technical pros and cons of a technology. National Planning Policy requires local authorities to adopt a positive position with regards to renewable energy development. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. In July 2011 the National Policy Statements for Energy were approved by Parliament and included within them is an acknowledgement of the role of major commercial scale wind farms in helping to meet the UK's energy requirements and commitment for the decarbonisation of the national grid. I would therefore suggest that the Government has not withdrawn support for the development of onshore wind farms and there continues to be a presumption in national planning policy for the development of renewable energy including wind in suitable locations. In addition, the UK has passed legislation that introduces the world's first long-term legally binding framework to tackle the dangers of climate change. The Climate Change Bill was introduced into Parliament on 14 November 2007 and became law on 26 November 2008. The Government has committed to a legally binding target to cut greenhouse gas emissions by at least 80% by 2050, compared to 1990 levels. This is set out in the Climate Change Act 2008 and its subsequent implementation documents including The Carbon Plan: Delivering our low carbon future (Dec 2011, HM Government). Whilst the Government has not introduced a requirement for local authorities to set local targets, current and emerging national planning policy does require local planning policy to 'support and encourage', 'not restrict' and 'help increase' the development of RLC infrastructure. In	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage.	
474741	Mrs Kathleen Butterworth				
Document	165		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
479156	Ms Claire Byrne				
Chapter 4: Vision	141	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	142	Yes		Agreement noted.	N/A
Policy SDP1	144	Yes		Agreement noted.	N/A
Policy SDP2	147	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Junction 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	150	Yes		Agreement noted.	N/A
Policy SDP4	151			Agreement noted.	N/A
Policy SDP5	152	Yes		Agreement noted.	N/A
Policy SDP6	155	Yes		Agreement noted.	N/A
Policy ENV1	156	Yes		Agreement noted.	N/A
Policy ENV2	157	Yes		Agreement noted.	N/A
Policy ENV3	159	Yes		Agreement noted.	N/A
Policy ENV4	161	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV5 and Policy ENV6	162	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	163	Yes		Agreement noted.	N/A
Policy LIV1	164	Yes		Support noted.	N/A
Policy LIV2	168	Yes		Agreement noted.	N/A
Policy LIV3	170	Yes		Agreement noted.	N/A
Policy LIV4	171	Yes		Agreement noted.	N/A
Policy WRK1	172	Yes		Agreement noted.	N/A
Policy WRK2	794	Yes		Agreement noted.	N/A
Policy WRK3	795	Yes		Agreement noted.	N/A
Policy WRK4	796	Yes		Agreement noted.	N/A
Policy WRK5	797	Yes		Agreement noted.	N/A
Policy SUP1	798	Yes		Agreement noted.	N/A
Policy SUP2	799	Yes		Agreement noted.	N/A
Policy SUP3	801	Yes		Agreement noted.	N/A
Policy SUP4	802	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
328032	Mr Peter Capstick				
Policy ENV3	750		My Cousing told me a tale of putting empty jam jars on the fire during the 30's depression. Dangerous but off possible use in a furnace or incinarator (e.g. Government Buildings). Presumably glass is currently sent to landfill. Possible effective useage to be considered.	Glass is generally collected for recycling.	No changes to the document are proposed as a result of this representation.
378986	Mr. & Mrs. David & Yvonne Carroll				
Document	197		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619533	Mr John Catlow				
Policy ENV3	657	No	I am aware that due to Pendle having to find locations for 110 wind turbines that the Noyna hill area is being considered. I have never felt the need to write on any planning issue before but knowing the disruptive effect that these monstrous looking things make has compelled me to do so. Taking out my personal objections to this I can't help thinking that to even consider placing something like this in areas of outstanding natural beauty and at a time when the efficiency of this form of renewable energy is in question is nothing short of reckless. Is it worth destroying the landscape, and the untold upset this will cause, for something that is losing favour and is nowhere near delivering the benefits we were told initially it would. Other forms of renewable energy are also attracting mixed results and reviews but I would suggest no other would affect the 'fabric' of our land like a wind turbine. I fully appreciate renewable energy has to be explored and tested but surely not at such a cost..... I respectfully request that the whole renewable energy debate is looked at wholly, whilst I am sure nobody is rushing into this headlong, has anybody thought that future generations will look on what we have done with dismay and anger. I hope we do not have to endure something that will spoil our green and pleasant land for the sake of questionable numbers and no doubt the profits of individuals and Wind Turbine Companies. I therefore strongly object to this proposal.	This document does not propose any specific sites (e.g. Noyna Hill) for wind developments, it simply sets out the Council's general approach to renewable energy developments. The suitability of any specific site would need to be assessed if and when a planning application is submitted. This would include an assessment of the landscape and visual impact of the proposal, as required by this policy. A current commercial scale wind turbine would be in the height range of 80-120m tall and would have a generating capacity of around 2.5MW. As such, if we were to try to achieve 15MW from large scale wind proposals this would, with current technology, take in the region of 6-24 turbines (depending on the efficiency of the specific equipment; on average current turbines have an estimated efficiency level of around 27%). It is highly unlikely that a 15MW target would be achieved by the use of 100 x 0.5MW turbines because commercial wind operators would not use turbines of this scale in wind farms; instead turbines of this scale are likely to be restricted to individual turbines hosted by individual landowners. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies.	PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
327598	Ms. Helen Clegg				
Document	203		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618703	Mr David Cockburn-Price				
Document	217		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Document	216		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475285	Mr Edward Cockburn-Price				
Document	226		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475284	Ms Sarah Cockburn-Price				
Document	250		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	253	No	I also wish to make comments in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' the Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other renewable sources. - The noise from wind turbines has been blamed for health problems including stress and insomnia - Wind turbines only work at maximum capacity for a third of time, meaning they have to be backed up by other technologies such as coal and nuclear - The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power - Wind farms are expensive to build and only last up to 25 years - They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists, including James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient - A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives, as well as an understanding that other areas are better placed to provide the nation's renewable energy, such as the potential for a Severn Estuary barrage, which could supply a quarter of this nation's energy needs - No go-ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered	capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
619399	Mrs Stephanie Cork				
Policy ENV3	589		I live in Skipton Old Road in Colne and although not a member of The Lidgett & Beyond Group I appreciate the work they have done over the years in trying to keep my local area green and unspoilt and agree with them that the Lidgett and Noyna area is a magnet to walkers and hikers, as reflected by the "Walkers Welcome" status, and it is part of Colne's Green Lung, a view endorsed by Councillor Mike Calvert and in that respect I wish to	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			make comments in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am deeply concerned that the Council is rushing into a policy that appears to be favour wind turbines over other renewable sources. · The noise from wind turbines has been blamed for health problems including stress and insomnia · Wind turbines only work at maximum capacity for a third of time, meaning they have to be backed up by other technologies such as coal and nuclear · The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power · Wind farms are expensive to build and only last up to 25 years · They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists, including James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: · A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient · A stronger commitment from the Council to examine alternatives, as well as an understanding that other areas are better placed to provide the nation's renewable energy, such as the potential for a Severn Estuary barrage, which could supply a quarter of this nation's energy needs. · No go-ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered I hope that my comments will be placed before the Council's Executive and I look forward to your response to these points in due course.	considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. 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				policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
619215	Mr Mark Cornthwaite				
Policy ENV3	545		I wish to comment in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am pleased that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be areas of outstanding natural beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives. I hope that my comments will be placed before elected members and I look forward to your response to these points in due course.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

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				accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
379037	Mr. & Mrs. P. & A. Cruise				
Document	240		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379040	Mr Mark Cutler				
Document	246		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189
Policy ENV3	288	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

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				Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
379043	Ms Sharon Dale (Jason, Grace & Annie Heavey				
Document	262		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV1	263	No	The dice now seem to be loaded in favour of the developers and away from residents and community groups such as ours. We hope you will help us protect this valuable amenity land and	The policy sets out how our natural and historic environments will be protected. The Core Strategy does not allocate particular areas for development. Site specific	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			fabulous wildlife habitat. The number of people who use it is phenomenal. It is popular with walkers from all parts of Colne and, indeed, from all over Pendle and beyond. There may be a housing shortage and Government is certainly providing financial incentives to local authorities who say "yes" to development but the land around "Lidgett and beyond" is what makes this part of Colne so attractive to visitors (and to developers looking for a fast buck). By allowing it to be concreted over you would destroy that. We would also like to say that, thanks to SatNav, this area is now a very important gateway into the town for those driving over from Yorkshire. Many comment on how beautiful and characterful it is. One recent visitor, a successful Harrogate businesswoman, remarked to us recently that she didn't realise Colne was so pretty. She thought it was "a bit rough round the edges". "Lidgett and beyond" proved that perception wrong. What fantastic PR for our town. However, if developers carpeted the land here with scores of homogenous and uninspired new builds that first glimpse would be truly dismal. A PR disaster! Colne has much to offer and this area is one of the jewels in its crown. It must be cherished and protected.	allocations will be made through the Site Allocations DPD. The 2011 Localism Act gives provision for local communities to prepare Neighbourhood Plans for their area. These plans will allow communities to influence future change by setting out policies to help guide development and the use of land. This could include determining the location of homes amongst other types of development, which may be of interest	
378973	Mrs. C. Dart				
Policy SDP6	317	Yes	I strongly disagree with Greenfield and green land being used, especially when Brown(field) sites and disused commercial and residential is available. This would seriously effect (sic) village life for which we pay a premium.	Policy SDP6 aims to direct development to the most sustainable locations and make the best use of resources by prompting the reuse of PDL and vacant buildings as a first priority. However, there will be a need to develop some greenfield land to meet future growth requirements. The policy provides a balanced approach to the development of different types of land.	No changes to the document are proposed as a result of this representation.
378968	Mr. C.A. Dart				
Document	320		I am sure many of your constituents find this (representation) form unanswerable with all its codes that they would not return it, therefore you (are) missing out (on) hearing their comments.	Anyone wishing to comment on the Core Strategy had the option to respond to the public consultation using the representation form, or by letter /email. This was made clear in all correspondence and advertised on the Council's website. In addition, a number of petitions were also accepted as valid representations. The representation form was deliberately designed to be as simple as possible and to avoid the use of planning jargon. The same question format was used throughout, asking consultees if they agreed or disagreed with each of the policies and allowing additional comments where appropriate. It was intended that the	No changes to the Core Strategy are proposed as a result of this representation, as it references materials produced to accompany the public consultation, rather than the document itself.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				representation form should be completed alongside a copy of the Core Strategy (Preferred Options Report). As such, copies of the form were only available at locations where the Core Strategy was available for inspection - local libraries, council shops and online at the Pendle Council and Feedback websites. When the representation form is completed alongside a copy of the Core Strategy, it is clear that the 'codes' refer to policies in the document. It is accepted that an acknowledgement of this on the form would have been useful prior to the first question. The Core Strategy is a complex planning document and covers a wide range of issues. An Executive Summary was produced and placed on the Council's website, to help make it easier for people to pick out the key issues. In addition, a number of roadshows were held throughout Pendle, where planning officers were available to help explain the document to residents in more detail. Within the limited resources available, every effort has been made to fully engage with local people and key partners throughout the preparation of the Pendle Core Strategy. A summary of the consultation that has taken place; details of the responses that have been received; and how these comments have influenced the Core Strategy are set-out in the Consultation Statement. Copies have been produced to accompany each subsequent stage of the consultation process. The final Consultation Statement, accompanying the version of the Core Strategy submitted to the Secretary of State for examination will pull-together details the consultation and engagement carried out at each stage. Consideration will be given to improving the content and design of consultation materials (including the representation form) for future consultation exercises.	
Policy SDP1	318	No	I strongly disapprove earmarking for potential development any fields around Kelbrook, do you really want to ruin our village further?	The Core Strategy does not allocate sites for development. The Land-use Allocations document will identify the land that is needed for new development. Kelbrook has been identified as a Rural Service Centre which will accommodate slightly higher levels of development than Rural Villages, however, this will still be on a scale appropriate to the existing settlement. The Rural Service Centres have a certain level of services and land available for development within the existing settlement limits. The designation of Kelbrook as a Rural Service Centre does not necessarily mean the expansion of the village outside the existing settlement boundaries.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
618979	Mr. George De-Sykes				
Document	524		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379050	Mr. Peter Dewhurst				
Document	261		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618882	Mrs. Margaret Diggins				
Document	267		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618892	Ms. Emma Donnelly				
Document	280		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379061	Mr. & Mrs. John & Susan Downham				
Document	274		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379063	Mr. & Mrs. J.R. & M.M. Downing				
Document	287		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379067	Mr. & Mrs. Michael & Elizabeth Dyson				
Document	295		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618900	Ms. Karen Eccles				
Document	303		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618904	Mr. Nick Elliott				
Document	314		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
618909	Mr. & Mrs. R.V. Evans				
Document	325		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619968	Mr. Alan Farras				
Chapter 4: Vision	961	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	962	Yes		Agreement noted.	N/A
Policy SDP1	963	Yes		Agreement noted.	N/A
Policy SDP2	965	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Juntion 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	967	Yes		Agreement noted.	N/A
Policy SDP4	969	Yes		Agreement noted.	N/A
Policy SDP5	971	Yes		Agreement noted.	N/A
Policy SDP6	972	Yes		Agreement noted.	N/A
Policy ENV1	973	Yes		Agreement noted.	N/A
Policy ENV2	974	Yes		Agreement noted.	N/A
Policy ENV3	975	Yes		Agreement noted.	N/A
Policy ENV4	976	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	978	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	979	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV1	981	Yes		Agreement noted.	N/A
Policy LIV2	983	Yes		Agreement noted.	N/A
Policy LIV3	984	Yes		Agreement noted.	N/A
Policy LIV4	985	Yes		Agreement noted.	N/A
Policy WRK1	986	Yes		Agreement noted.	N/A
Policy WRK2	987	Yes		Agreement noted.	N/A
Policy WRK3	988	Yes		Agreement noted.	N/A
Policy WRK4	989	Yes		Agreement noted.	N/A
Policy WRK5	990	Yes		Agreement noted.	N/A
Policy SUP1	991	Yes		Agreement noted.	N/A
Policy SUP2	992	Yes		Agreement noted.	N/A
Policy SUP3	994	Yes		Agreement noted.	N/A
Policy SUP4	996	Yes		Agreement noted.	N/A
619971	Mrs. Marela Farras				
Chapter 4: Vision	998	Yes		Agreement noted.	N/A
Chapter 6:	999	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Our Spatial Strategy					
Policy SDP1	1001	Yes		Agreement noted.	N/A
Policy SDP2	1002	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Juntion 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	1035	Yes		Agreement noted.	N/A
Policy SDP4	1036	Yes		Agreement noted.	N/A
Policy SDP5	1037	Yes		Agreement noted.	N/A
Policy SDP6	1039	Yes		Agreement noted.	N/A
Policy ENV1	1042	Yes		Agreement noted.	N/A
Policy ENV2	1044	Yes		Agreement noted.	N/A
Policy ENV3	1047	Yes		Agreement noted.	N/A
Policy ENV4	1054	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	1055	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	1058	Yes		Agreement noted.	N/A
Policy LIV1	1060	Yes		Agreement noted.	N/A
Policy LIV2	1061	Yes		Agreement noted.	N/A
Policy LIV3	1063	Yes		Agreement noted.	N/A
Policy LIV4	1065	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK1	1068	Yes		Agreement noted.	N/A
Policy WRK2	1070	Yes		Agreement noted.	N/A
Policy WRK3	1072	Yes		Agreement noted.	N/A
Policy WRK4	1075	Yes		Agreement noted.	N/A
Policy WRK5	1077	Yes		Agreement noted.	N/A
Policy SUP1	1079	Yes		Agreement noted.	N/A
Policy SUP2	1080	Yes		Agreement noted.	N/A
Policy SUP3	1081	Yes		Agreement noted.	N/A
Policy SUP4	1082	Yes		Agreement noted.	N/A
619690	Mr. & Mrs. Ian & Janet Ferguson				
Policy ENV3	300	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			alternatives.	may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	only acceptable developments approved.
379104	Mr. & Mrs. R. & M. Fielden				
Document	338		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
618765	Ms Alicia Fitton				
Policy LIV3	188	No	Under Housing, the preferred options report talks about social and intermediate rent rather than the new affordable rent scheme which the government introduced earlier this year. The report states: 10.89: With regard to the different tenures of affordable housing that are required, evidence from the SHMA suggests that 80% of the affordable housing requirement should be of a social rented tenure with the remaining 20% being made up of intermediate housing (167). In some situations it may be appropriate to vary these percentages, for example, where the proposed site is located in an area where there is already a high proportion of socially rented accommodation, or where there is an identified need for a higher proportion of intermediate housing. The HCA's new affordable housing programme 2011-15 is specifically predicated on the fact that registered providers are expected to deliver new units under the Affordable Rent regime and to retain the words "social housing" alone would cause difficulties in delivery. This means that Housing Pendle, and perhaps other registered providers would be unable to assist with the delivery of affordable housing schemes in the borough. We request that this paragraph is reviewed and that specific references to 'Social' and 'Intermediate' rent are changed to 'Affordable' in line with the Homes and Communities Funding arrangements for the affordable housing programme 2011-15.	The National Planning Policy Framework (NPPF) provides the definition of affordable housing in planning terms. It states that affordable housing is "social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market". This definition introduces the concept of affordable rent – a scheme introduced by the Government in 2011 which signifies a change in the way social housing is funded. Policy LIV3 will be amended to take account of this change in definition. Affordable Rent falls within the definition of social housing under section 68 of the Housing and Regeneration Act 2008. It is therefore considered to be a type of social rented housing. Affordable rents can be set at up to 80% of local market rents. In Pendle analysis shows that if affordable rents were set at this level they would be of a similar cost as current social rent levels. As a consequence the proportion of affordable housing that should be of a social rented tenure can include properties of an affordable rented tenure.	PROPOSED ACTION: Amend the policy and justification text to clarify the proportions of the different tenures of affordable housing that are required in the borough. PROPOSED ACTION: Amend the footnote relating to the definition of the different tenures of affordable housing. PROPOSED ACTION: Amend the Glossary to provide an updated definition of what constitutes affordable housing in planning terms.
379106	Mr. & Mrs. D. & J. Fitzpatrick				
Document	384		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619990	M Folley				
Policy ENV3	980		I wish to make comment in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbine over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be of	This representation was submitted and received following the publicised closing date for the public consultation, on Monday 12th December 2011. It is for Members of the Council's Executive to decide whether to accept this representation. 1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or requirement for each technology they simply show the identified potential from	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			outstanding natural beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy. - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives. I hope that my comments will be placed before elected members and I look forward to your response to these points in due course.	each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national	detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
618945	Miss Sally Franco				
Document	512		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619415	Mr Neville French				
Policy ENV3	604		I am supportive of the Council looking to develop a policy for renewable and sustainable energy. I am deeply concerned that the Council is rushing headlong into wind turbines. The evidence that wind farms will solve the problem of energy supply would mean that we would need hundreds on every hill in England and then not supply our future energy needs. The last week has shown that in high winds that the wind turbines do not work and that there are hazards relating to fire . The moorland area you are considering will be very susceptible to fire. We had a moorland fire several years ago and it burned for days creating a severe health hazard for all but especially those with breathing problems. I would urge the Council to look again at Section 7 and amend this section to: 1. Reduce the Council's quota for renewal energy. 2. Lower the quotas on Wind Turbines which are highly inefficient and erratic production of energy. 3. In addition I would like to see more empasis in the plan for energy from solar sources, hydro power and nuclear energy. I am sure you will provide this email to elected members of the Council and I look forward to your response. As a long term resident of Colne I have deep concerns with the destruction of a site of outstanding beauty.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
379140	Ms. Ruth Greenall				
Document	513		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474612	Mr Christopher W. Hacking				
Document	514		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189
618949	Mrs. T. Hanson				
Document	515		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474935	Ms Mary Hardacre				
Document	516		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619181	Mr. Graham L. Hargreaves				
Document	232		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
379383	Mrs. Christine Hartley				
Document	517		See Lidgett & Beyond Group response (Comment 183).	See officer response to Comment 183.	See officer recommendation to Comment 183.
379264	Mrs Christine A. Hartley				
Document	518		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	647		I wish to make comment in relation to section 7 'Our Foundations for a Sustainable Future : Improving The Environment We Live In' of the above report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer to this Section for re-consideration with a view to amending the policy so that there is : * A reduction in the Council's quota for renewable energy * A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) * A stronger commitment from the Council to examining alternatives such as bio-mass , solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
619475	Mr John Hartley				
Document	254		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	629		May I respectfully suggest that the renewable energy requirement - laudable in intent - might best take advantage of Pendle's more dependable resources - hills and rain! Hydro systems have the benefit of being able to store energy which can be called on at peak times. Our height differential between high and low land gives extra benefits of potential energy associated with a pressure head. We seem to have plenty of water and reservoirs already. All of the water leaving these reservoirs through existing water courses, natural or man-made, is a source of energy waiting to be tapped (sorry!). So our lack of sunshine; the inconsistency of wind; our high rainfalls (already recognised and used by the textile industry in the past) and the existence of existing reservoirs and water courses, would all point to hydro-electric as being the best solution for our renewable energy requirement. I hope you can find a way of producing the necessary evidence to reinforce what would seem to be a logical conclusion and that we can look forward to developments in this direction.	The Core Strategy supports all forms of renewable energy generation, including Hydro power. However, local evidence base reports, including the Forest of Bowland AONB (LCC) led Hydro power study, (available at http://www.forestofbowland.com/climatechange#hydro) suggest that there is limited potential for Hydro power of any significant scale in the Borough. However where such schemes are appropriate Hydro proposals will be supported as they can contribute towards the overall renewable and low carbon mix in the borough.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV1	265	No	We look to you as the experts not to leave any stone unturned with the Pendle documentation to ensure that these areas [i.e. land at Lidgett Triangle, Windermere Avenue and Skipton Old Road/Castle Road] do not become sacrificed in the short term and leave us, our children and visitors to the area regretting the changes made by hungry/greedy developers. Some extracts from your own document "...whilst continuing to protect and enhance those assets that make the area both attractive and locally distinctive." "...making Pendle a better place to live, work, learn, play and visit." 10.12 The housing market is intrinsically linked to the state of the economy." Note: 275 extra houses per year at, say, £150k each, would necessitate an extra funding level of £41.25m annually to be raised by personal savings and borrowings - encouraging more debt - have we not learnt anything recently?	The Core Strategy does not look at the allocation of sites - this is for the Land-use Allocations document. The need for sites such as those at Windermere Avenue, Lidgett Triangle etc will be considered as part of that document and their status will be confirmed then. In terms of the level of development, the Core Strategy Preferred Options Report sets an annual average housing target of 200 dwellings (not 275 dwellings as stated in the representation). This provision figure is based on a number of factors including population and household growth projections, housing need, land capacity etc. The figure includes a requirement for a proportion of affordable housing. Restricting the supply of housing will lead to higher house prices that people cannot afford. It is not the purpose of the planning system to intervene in people's decision as to whether to buy a house or not. The policies in the Core Strategy are designed to find a sustainable balance between meeting the needs of the people in Pendle, allowing for economic growth and protecting our natural and historic environments.	No changes to the document are proposed as a result of this representation.
379159	Mr. Michael Hartley				
Document	521		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619693	Miss Diane Hayward				
Policy ENV3	302	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
618980	Mr. Stuart Henderson				
Document	525		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379163	Mr. Kevin Hey				
Document	266		See Lidgett & Beyond Group response (Comment 183).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP6	269	No	I do have very grave concerns about paragraphs 6.58, 6.59. I fear that these paragraphs will allow developers to 'game play' the system and in doing so they will be able to ride roughshod over the wishes of local communities; and this will be to the detriment of Pendle as a whole. Moreover, the deployment of these exceptions will set precedents that could well encourage exponential development over which the Council will have ceded control. Taking paragraph 6.58 as an example: "However, the use of Brownfield land can often be expensive and therefore lead to circumstances where development is not viable, for example where a site requires expensive land remediation measures or in times of economic recession." This paragraph allows developers a number of opportunities to 'game play' the system. It essentially says that if, taking Colne as an example, well known derelict former factory and mill sites are found to be costly to remediate (as they undoubtedly will be), they can be ignored in favour of virgin ground on the outskirts and rural fringes of town. This will lead to an increase in the doughnut effect. Furthermore, potential developers will additionally be able to simply claim "we are in recession" (which we are thereabouts) thus generating another justification for undertaking development in areas that are currently designated Green Belt, Protected or Site of Settlement Character (SoSC). I have to say in all candour that recession provides no justification for the wholesale surrender of existing policy. When we emerge from this recession, there could well be widespread national and local regret that beautiful, yet desirable, areas like Lidgett & Beyond were sacrificed for short term gain. I would urge you strongly to consider rewriting these paragraphs using more discouraging terms.	The National Planning Policy Framework (NPPF) encourages "the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value" (paragraph 17, bullet point 8). Policy SDP6 directs new development to the most sustainable sites and promotes the reuse of previously developed land in the first instance. However, to achieve the levels of growth identified in the Core Strategy will require some greenfield sites to be developed in the future. The NPPF also states that "allocations of land for development should prefer land of lesser environmental value" (paragraph 17, bullet point 7). Policy SDP6 and the strategy will be revised to include details of the relationship between the sequential approach and the allocation of land. It is proposed to delete paragraph 6.58 and address issues relating to the viability and delivery of both brownfield and greenfield sites within the strategy section at paragraph 6.59. Paragraph 6.59 sets out the strategy for Policy SDP6 in terms of the priority given to the development of different types of land. It is proposed to reword this paragraph to set out in more detail how the development of brownfield and greenfield land is prioritised, and how the viability of sites can affect delivery. In order to comply with the NPPF the policy must provide a flexible response to achieving sustainable development. This may require the development of greenfield sites in advance of previously developed land. The paragraph will also include details relating to development outside of settlement boundaries. Development on Green Belt land is covered under Policy ENV2. Other designations will be reviewed in the Land-use Allocations DPD.	PROPOSED ACTION: Delete paragraph 6.58. PROPOSED ACTION: Reword paragraph 6.59 to read: "New development will be expected to re-use vacant buildings and previously developed land within a defined settlement boundary as the first priority, in order to help recycle land and make a positive contribution to regeneration in the borough. The second priority for development will be other land (Greenfield) within a settlement boundary. However, in order to not unduly restrict development, and ensure that the levels of growth proposed in the Core Strategy are achieved, it is recognised that the release of some of these greenfield sites may be necessary in advance of development on previously developed land. This flexible approach will only be supported where such sites are shown to be economically viable and in a sustainable location. It is important to achieve a balance between the sustainable development of sites whilst not compromising development that may bring employment and housing opportunities to the borough. The development of land outside a defined settlement boundary will be limited to appropriate rural uses. Qualifying uses are identified in the NPPF (paragraphs 28 and 55) and other policies in the Core Strategy. They may also be defined in subsequent local plan documents. PROPOSED ACTION: Include an additional paragraph in the strategy after paragraph 6.59 which reads: "In line with the NPPF the allocation of sites should prefer land of lesser environmental value and should follow the sequential approach". PROPOSED ACTION: Revise the third bullet point and final paragraph of the policy to read: "Land outside of a defined settlement boundary for appropriate rural uses¹" Footnote to read: "¹ Appropriate rural uses are defined in the National Planning Policy Framework

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
					(NPPF) and other policies in the Core Strategy. The Pendle Local Plan Part 2: Site Allocations and Development Policies will provide further, specific details of appropriate rural uses." PROPOSED ACTION: Include a final paragraph at the end of the policy which reads: "The allocation of land for development in Local Plan Part 2: Site Allocations and Development Policies should follow the sequential approach and prefer land of lesser environmental value."
Policy ENV1	270	No	I do have very grave concerns about paragraph 7.44 and paragraphs two and nine within Policy ENV1. I fear that these paragraphs will allow developers to 'game play' the system and in doing so they will be able to ride roughshod over the wishes of local communities; and this will be to the detriment of Pendle as a whole. Moreover, the deployment of these exceptions will set precedents that could well encourage exponential development over which the Council will have ceded control. I have to say in all candour that recession provides no justification for the wholesale surrender of existing policy. When we emerge from this recession, there could well be widespread national and local regret that beautiful, yet desirable, areas like Lidgett & Beyond were sacrificed for short term gain. I would urge you strongly to consider rewriting these paragraphs using more discouraging terms.	It is not clear what the objector does not consider appropriate about paragraph 7.44 as this sets out the strategy for protecting and enhancing the historic environment and is not related to criteria for development of sites. In addition the Core Strategy does not allocate particular areas for development. Paragraphs 2 and 9 of the policy do not allow development to be carried out on valued open space or sites with biodiversity value unchecked. The presumption is that sites with conservation value should be protected and enhanced but it may also be necessary in some circumstances to balance conservation value with other benefits such as social and economic benefits. If the social and economic benefits to the borough are considered to outweigh other considerations then it is necessary to have a mechanism to allow this development to take place. This is in compliance with paragraph 118 of the National Planning Policy Framework (NPPF) which has replaced Planning Policy Statements.	No changes to the document are proposed as a result of this representation
Policy ENV1	272	No	No mention whatsoever is made of two Protected Areas (PAs) and the Site of Settlement Character (SOSC). Currently these latter designations protect an appreciable chunk of Lidgett & Beyond's area. If these designations are now defunct, as may be clarified by the projected Land-use Allocations in 2012, I would urge the Council, in the strongest terms possible, to adjust the SOSC outside the Settlement Boundary and redesignate it with the PAs as Green Belt and reject any planning applications in this area of unquestionably exceptional natural beauty. Addressing this is essential as I understand that such designations are hard to amend once set and I would hope that you, as the experts in this field, will ensure that the Pendle documentation will retain existing areas of natural beauty and thus prevent them being sacrificed on the altar of misguided and short-term National	The types of designation mentioned are not part of the strategic approach of the plan. The need for any such designations will be considered as part of the Site Allocations DPD process. There is no strategic review of the Green Belt planned and the National Planning Policy Framework states that once designated Green Belt boundaries should only be altered in exceptional circumstances. The planning system is based on a general presumption in favour of sustainable development - planning applications are judged against the policies in the development plan - where the application meets these requirements planning permission is granted. In some instances there may be material considerations that over rule the policy requirements of the plan. (The National	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Policy, which would leave us, our children and visitors to the area regretting the changes made by developers that have no interest in this area other than the pursuit of commercial financial reward. The Lidgett & Beyond Group is composed of residents from the Lidgett, Skipton Old Road, Bents, Hill Lane, Favordale, Keighley Road, Castle Road and Windermere Avenue area, which as you will know covers a beautiful, largely unspoilt slice of Lancashire's traditional Pennine landscape. The area is a magnet to walkers and hikers (as reflected and acknowledged by the recent designation of Colne to the status of "Walkers Welcome". This is a vital part of Colne's Green Lung, a view endorsed by County Councillor Mike Calvert. Members of the Lidgett & Beyond Group aim to preserve the wildlife, the vibrancy and the character of this special place. I would like to work with the Council's Delivery Bodies to help meet the Report's targets on: - Increasing open space and designated land - Resisting the loss of irreplaceable local heritage assets by creating a coherent design approach for Lidgett & Beyond The dice are being loaded in favour of corporate interests and the proposed Core Strategy presents the real danger of dis-empowering the local community. I object to this in the strongest terms possible.	Planning Policy Framework expands on this presumption - in the form of the presumption in favour of sustainable development). The Government Localism Agenda puts in places to possibilities of individual communities to create Neighbourhood Plans which allows groups to shape the planning of their area.	
Policy ENV3	286	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
Policy LIV3	271	No	I do have very grave concerns about paragraph 10.90. I fear that (this paragraph) will allow developers to ‘game play’ the system and in doing so they will be able to ride roughshod over the wishes of local communities; and this will be to the detriment of Pendle as a whole. Moreover, the deployment of these exceptions will set precedents that could well encourage exponential development over which the Council will have ceded control. I have to say in all candour that recession provides no justification for the wholesale surrender of existing policy. When we emerge from this recession, there could well be widespread national and local regret that beautiful, yet desirable, areas like Lidgett & Beyond were sacrificed for short term gain. I would urge you strongly to consider rewriting (this	Paragraph 10.90 explains that there may be some instances in rural settlements where there are not sites available to provide the affordable housing that is needed in that area. In these instances sites outside of the defined settlement boundary may be considered to provide for this need. The policy cannot be used to justify the development of sites outside of the settlement boundaries of the main towns. The policy specifically relates to rural settlements. The National Planning Policy Framework (NPPF) indicates that in rural areas Local Planning Authorities should plan housing development to reflect local needs, particularly for affordable housing, including through rural exceptions sites where appropriate. It also indicates that Local Planning	PROPOSED ACTION: Amend the Policy and Justification Text to ensure compliance with the National Planning Policy Framework (NPPF). The justification text should explain why rural exception sites may be needed and when market housing on such a site could be acceptable to deliver the affordable housing.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			paragraph) using more discouraging terms.	Authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The policy will need to be amended to ensure compliance with the NPPF.	
475076	Ms. Kathryn Heyworth				
Document	523		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618983	Ms. Ann H. Hindle				
Document	528		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619610	Mrs C Hird				
Policy ENV3	749	No	I disagree with this policy, particularly regarding commercial scale wind, for the following reasons: - 1. Pragmatic energy generation of 15.3mw by commercial scale wind as shown on your table is a very large amount to commit to as opposed to other alternative energy types. 2. I feel it would be wrong for Pendle District Council to make a long term commitment to such a high requirement of electricity to come from commercial onshore wind when evidence is showing that wind power is uneconomical, unreliable, expensive and increasingly unable to meet expectations. There is the possibility that government policy may change on this issue. 3. The Council have stated that one of their key issues is to protect the natural environment i.e. the landscape and visual character of the area and its vital contribution to the quality of life for residents. Commercial wind power locally i.e. large turbines, would have an unacceptable and negative impact.	The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or commitment/requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. The policy also clearly states that wind farms would only be considered favourably where they would have no detrimental impact on the landscape and visual character of the area. As per national policy, the policy gives greatest priority to protecting designated landscape and wildlife areas. This is to ensure that the best quality landscapes and habitats are protected and the impact on wildlife etc minimised. Inevitably there would be some loss of visual or landscape quality in areas developed	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				for wind farms but it is about finding a balance between protecting the most valuable areas and securing a low carbon energy supply for the UK moving forward.	
619983	Mr J B Hird				
Chapter 4: Vision	966	No	No comments provided relating to this section of the document.	Disagreement noted. However, the consultee has not provided any specific comments indicating why the Spatial Vision is not supported, or how it could be improved.	No changes to the document are proposed as a result of this representation.
Policy ENV1	968	Yes		Agreement noted.	N/A
Policy ENV3	970	No	I do not agree with the above policy. I think it will be a mistake to make a commitment and place a reliance on energy generated by a commercial scale wind farm i.e. 15.3MW as in your table. The Government is now reconsidering its policy on wind farms due to their inefficiencies which are subsidised by the tax payer, they require back up and do not work when there is no wind. In my opinion they are an eyesore and have no placed in our Pendle countryside.	The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or commitment/requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. In July 2011 the National Policy Statements for Energy were approved by Parliament and included within them is an acknowledgement of the role of major commercial scale wind farms in helping to meet the UK's energy requirements and commitment for the decarbonisation of the national grid. I would therefore suggest that the Government has not withdrawn support for the development of onshore wind farms and there continues to be a presumption in national planning policy for the development of renewable energy, including wind. Whilst the Government has not introduced a requirement for local authorities to set local targets, current and emerging national planning policy does require local planning policy to 'support and encourage', 'not restrict' and 'help increase'	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				the development of RLC infrastructure. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage.	
619789	Mr K.G Hird				
Chapter 4: Vision	783		I agree with some parts of it but not all.	No further information has been provided with regard to those parts of the Spatial Vision that the consultee disagrees with.	No changes to the document are proposed as a result of this representation.
Policy ENV1	784	Yes		Agreement noted.	N/A
Policy ENV3	785	No	I do not agree with the above policy. I think that it will be a mistake to have a commitment, at this stage, to place so much reliance on energy generated by commercial scale wind i.e. 15.3MW as in your published table, as opposed to other alternative forms of energy. This is because the Government is now considering its policy on wind farms due to their being inefficient, expensive and requiring constant back-up by other conventional forms of power. I would also like to point out that although the Government has made a commitment to carbon reduction, it is not a legal requirement that has to be followed to the letter. Caution is required.	The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or commitment/requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. In July 2011 the National Policy Statements for Energy were approved by Parliament and included within them is an acknowledgement of the role of major commercial scale wind farms in helping to meet the UK's energy requirements and commitment for the decarbonisation of the national grid. I would therefore suggest that the Government has not withdrawn support for the development of onshore wind farms and there continues to be a presumption in national planning policy for the development of renewable energy, including wind. In	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				addition, the UK has passed legislation that introduces the world's first long-term legally binding framework to tackle the dangers of climate change. The Climate Change Bill was introduced into Parliament on 14 November 2007 and became law on 26 November 2008. The Government has committed to a legally binding target to cut greenhouse gas emissions by at least 80% by 2050, compared to 1990 levels. This is set out in the Climate Change Act 2008 and its subsequent implementation documents including The Carbon Plan: Delivering our low carbon future (Dec 2011, HM Government). Whilst the Government has not introduced a requirement for local authorities to set local targets, current and emerging national planning policy does require local planning policy to 'support and encourage', 'not restrict' and 'help increase' the development of RLC infrastructure. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage.	
Policy ENV5 and Policy ENV6	786	Yes		Agreement noted (Policy ENV6)	N/A
Policy LIV2	787	No	No comments supplied.	The consultee has disagreed with Policy LIV2 but has not provided any comments explaining the reasons for their disagreement.	No changes to the document are proposed as a result of this representation.
379181	Mr. B. Hoban				
Document	535		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618984	Ms. Jennette Holden				
Document	530		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379186	Mr. Michael Holehouse				
Document	533		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
379199	Mrs. Judith Howard				
Document	536		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379202	Mr. & Mrs. Michael & Angela Howells				
Document	538		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	630		I wish to make comments in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other renewable sources. • The noise from wind turbines has been blamed for health problems including stress and insomnia • Wind turbines only work at maximum capacity for a third of time, meaning they have to be backed up by other technologies such as coal and nuclear • The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power • Wind farms are expensive to build and only last up to 25 years • They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists, including James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: • A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient • A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives, as well as an understanding that other areas are better placed to provide the nation's renewable energy, such as	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			the potential for a Severn Estuary barrage, which could supply a quarter of this nation's energy needs. • No go-ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered	usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
379204	Mr. John Howson				
Document	539		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618986	Mrs. Marie Howson				
Document	540		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
479040	Mrs P Hudson				
Chapter 4: Vision	1083	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	1084	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP1	1085	Yes		Agreement noted.	N/A
Policy SDP2	1086	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Junction 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP3	1087	Yes		Agreement noted.	N/A
Policy SDP4	1088	Yes		Agreement noted.	N/A
Policy SDP5	1089	Yes		Agreement noted.	N/A
Policy SDP6	1090	Yes		Agreement noted.	N/A
Policy ENV1	1091	Yes		Agreement noted.	N/A
Policy ENV2	1092	Yes		Agreement noted.	N/A
Policy ENV3	1093	Yes		Agreement noted.	N/A
Policy ENV4	1094	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	1096	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	1097	Yes		Agreement noted.	N/A
Policy LIV1	1099	Yes		Agreement noted.	N/A
Policy LIV2	1100	Yes		Agreement noted.	N/A
Policy LIV3	1101	Yes		Agreement noted.	N/A
Policy LIV4	1102	Yes		Agreement noted.	N/A
Policy WRK1	1103	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK2	1104	Yes		Agreement noted.	N/A
Policy WRK3	1105	Yes		Agreement noted.	N/A
Policy WRK4	1106	Yes		Agreement noted.	N/A
Policy WRK5	1107	Yes		Agreement noted.	N/A
Policy SUP1	1108	Yes		Agreement noted.	N/A
Policy SUP2	1109	Yes		Agreement noted.	N/A
Policy SUP3	1110	Yes		Agreement noted.	N/A
Policy SUP4	1111	Yes		Agreement noted.	N/A
620022	Mr Ray Hudson				
Chapter 4: Vision	1031	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	1032	Yes		Agreement noted.	N/A
Policy SDP1	1033	Yes		Agreement noted.	N/A
Policy SDP2	1034	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Junction 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	1038	Yes		Agreement noted.	N/A
Policy SDP4	1040	Yes		Agreement noted.	N/A
Policy SDP5	1041	Yes		Agreement noted.	N/A
Policy SDP6	1043	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV1	1045	Yes		Agreement noted.	N/A
Policy ENV2	1046	Yes		Agreement noted.	N/A
Policy ENV3	1049	Yes		Agreement noted.	N/A
Policy ENV4	1050	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	1051	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	1052	Yes		Agreement noted.	N/A
Policy LIV1	1053	Yes		Agreement noted.	N/A
Policy LIV2	1056	Yes		Agreement noted.	N/A
Policy LIV3	1057	Yes		Agreement noted.	N/A
Policy LIV4	1059	Yes		Agreement noted.	N/A
Policy WRK1	1062	Yes		Agreement noted.	N/A
Policy WRK2	1064	Yes		Agreement noted.	N/A
Policy WRK3	1067	Yes		Agreement noted.	N/A
Policy WRK4	1069	Yes		Agreement noted.	N/A
Policy WRK5	1071	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SUP1	1073	Yes		Agreement noted.	N/A
Policy SUP2	1074	Yes		Agreement noted.	N/A
Policy SUP3	1076	Yes		Agreement noted.	N/A
Policy SUP4	1078	Yes		Agreement noted.	N/A
357636	Ms Alison Hunt				
Chapter 4: Vision	281	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	289	Yes		Agreement noted.	N/A
Policy SDP1	322	Yes		Agreement noted.	N/A
Policy SDP2	285	Yes		Agreement noted.	N/A
Policy SDP3	291	Yes		Agreement noted.	N/A
Policy SDP4	296	Yes		Agreement noted.	N/A
Policy SDP5	298	Yes	Policy SDP 5. Contributions should be sought from all developers, where building one house, 100 houses or commercial premises to make a wider contribution to the area	Agreement noted in respect of developer contributions.	N/A
Policy SDP6	301	Yes	Policy SDP6. Development need to really add value to the area to draw people into the area and business, and not be scrappy infill. We have to make Pendle somewhere better than the norm. Perhaps some high quality high profile development may be a good thing – even if on land outside the settlement boundaries.	Policy SDP6 aims to direct development to the most sustainable locations. It helps to make best use of existing resources by promoting the reuse of PDL. The regeneration of such sites can add value to the area. However, the policy will allow development on greenfield sites in order to meet the growth requirements of the Core Strategy. It is considered that this is a balanced approach to allow developments to come forward in the right locations.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV1	312	Yes		Agreement noted.	N/A
Policy ENV2	316	Yes		Agreement noted.	N/A
Policy ENV3	319	Yes	Policy ENV 3. Development should be meeting the 10% target, it should not be optional.	We have to meet a balance between increasing RLC generation and delivering much needed homes and employment in the borough. Whilst there will be a presumption towards meeting the 10% requirement, the policy needs to include an appropriate level of flexibility to ensure that if the 10% cannot be met on a development, and the other benefits of the development outweigh the loss of this requirement, then the development can still be granted permission. Where the 10% requirement cannot be met, the policy proposes to alternatively seek a financial contribution (which could be less than the cost of meeting the 10% requirement to ensure the viability of the development) to fund community RLC or energy efficiency projects elsewhere in the borough), ensuring all new development plays its part in increasing RLC generation and reducing or minimising carbon emissions.	No changes to the document are proposed as a result of this representation.
Policy ENV4	324	Yes	Policy ENV 4 – should be top priority, we will address deprivation by job opportunites and transport links. And exceptional new housing to draw people in.	Policy ENV4 aims to tackle a number of transport related issues including: strategic transport links, enhanced connections and the location of new development in accessible areas. The planning system is only one mechanism that can help improve the transport network. Policy ENV4 supports the schemes and initiatives outlined in the County Council's Local Transport Plan (LTP). The LTP identifies the County Council's priorities for transport improvements in Pendle. The delivery of the strategic transport schemes are subject to the availability of funding and are considered to be long-term projects.	No changes to the document are proposed as a result of this representation.
Policy ENV5 and Policy ENV6	327	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	334	Yes		Agreement noted.	N/A
Policy LIV1	336	Yes	Policy LIV 1. We need big eye catching schemes to improve the character of some areas. Good accommodation for business should be the priority to create more long term productive jobs.	Policy LIV1 is specifically concerned with the amount and deliverability of new housing in the borough. The underlying aim of all the housing policies in the Core Strategy is to	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				ensure the provision of high quality housing to meet the needs of the people of Pendle. "Big, eye catching schemes" have their place in the portfolio of housing to be provided and the Land-use Allocations document may include some larger sites where inovative / inspirational housing could be developed. The work that is being carried out in the Regeneration Areas (e.g. Brierfield Canal Corridor and Bradley, Nelson) aims to improve the character of these areas with the new developments that are taking place. In terms of the provision of good accommodation for businesses, the policies in the Working Chapter of the Core Strategy aim to support development that helps to attract new investment into the area and encourages new business formation, both of which are seen as key components in helping to diversify and strengthen the local economy. In doing so the policies aim to address the locational requirements of businesses, and the design of new business premises, which both have a major influence on economic performance. It is considered that these policies help to address the concerns raised by this representation.	
Policy LIV2	341	Yes		Agreement noted.	N/A
Policy LIV3	346	Yes		Agreement noted.	N/A
Policy LIV4	347	Yes	Policy LIV 4 we need to set targets for housing types to create a really good spread of housing. We need to be knocking down terraced housing and not permitting much new terraced housing. We need more intermediate type houses.	In line with the National Planning Policy Framework (NPPF) (paragraph 50) Policy LIV4 sets out the sizes and types of dwellings that are required in the borough to help bring about a more balanced housing market with a choice of dwelling types. In terms of the demolition of terraced housing - this is occurring in some parts of the borough where regeneration activities are underway. However, the Government has changed its emphasis on how regeneration should be undertaken and is now more focused on bringing empty dwellings back into use. The SHMA recognises that there is an oversupply of terraced properties in certain parts of the borough and that the demand for these properties does not outweigh the supply. Taking this information forward it recommends that a mix of dwelling types should be provided and that this is closely monitoring to help avoid aggravating the situation in terms of the oversupply of terraced housing. Policy LIV4 follows this approach and specifically in the M65 corridor and West	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Craven Towns where the problem is particularly acute, recommends that new developments avoid the provision of further terraced housing. Although it does also recognise that a modern terraced property is a different type of product compared to the older terraced stock. Policy LIV4 already supports the provision of a mix of types and sizes to address the imbalance in the housing market.	
Policy WRK1	352	Yes		Agreement noted.	N/A
Policy WRK2	356	Yes		Agreement noted.	N/A
Policy WRK3	358	Yes		Agreement noted.	N/A
Policy WRK4	360	Yes	Policy WRK4 We should not permit developments that act counter to tourism, leisure and culture	Agreement noted. The policy seeks to promote further development of the tourism, leisure and cultural offer in sustainable locations such as town centres.	N/A
Policy WRK5	363	Yes		Agreement noted.	N/A
Policy SUP1	422	Yes		Agreement noted.	N/A
Policy SUP2	423	Yes	Policy SUP2. More emphasis on working with the NHS, better premises for health care.	The strategy section of Policy SUP2 identifies that the NHS has a key objective of strengthening service delivery at a local level. The policy indicates that the Council will work with partners to support the provision of new facilities for health, leisure and social care. Additional wording could be added to the strategy section of the policy to acknowledge the importance of partnership working between the Council and the NHS.	PROPOSED ACTION: Amend the third sentence of paragraph 12.29 to read: "Policy SUP2 sets out how we will work with partners, such as the NHS, to support the development of such facilities..."
Policy SUP3	424	Yes		Agreement noted.	N/A
Policy SUP4	425	Yes		Agreement noted.	N/A
483917	JRO Hutchinson				
Chapter 4: Vision	752	Yes	In 1987 on the Pendle Green Belt subject plan 'B' a small parcel of land fronting onto Barnoldswick Road in Higherford zoned as 'White Land' outside of the Green Belt was identified as a	This comment does not relate to the Spatial Vision. As it relates to the development of a specific site it would be more appropriate to address this representation during the	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			possible infill site for housing. Since that date a property numbered 32 has been built leaving vacant plots for housing development between house numbers 32 and 78 Barnoldswick Road at Higherford. This small infill site should be considered for future development by the council.	preparation of the Site Allocations & Development Polices DPD, which will follow on from the Core Strategy.	
379207	Mr. John Ilott				
Document	579		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379211	Mr Brian Ingham				
Document	582		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619721	Mr. Harold Ingham				
Policy ENV3	1113	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
Policy ENV3	309	No	The proposed wind farm at Great Edge will cause much up evil (sic) in the construction, with regards to traffic through Colne, Castle Road and Skipton Old Road. If built, there would be unsightly pylons to transport power to the grid. They are not guaranteed to be safe as events in Scotland recently showed, as one unit was not able to shut down in very windy conditions and was destroyed as it set on fire and disintegrated. They are a terrible blot on the landscape, a landscape that is one of the best in Lancashire and the Northwest of England. That failure could have caused serious injury and damage. I understand that there is a need for clean energy. There are alternatives to wind power, that is to utilise Colne Water for micro hydro generation. There are two such schemes working using a reverse Archimedian screw. The one at New Mills in Derbyshire generates 70Kw. For this plant on the River Goyt shares were offered to the public. The one on the Ribble at Settle generates 50Kw and is expected to generate 16,500 Kw in 40 years, saving an estimated 3,200 tonnes of Co2. The projected cost was	This document does not propose any specific sites (e.g. Great Edge) for wind developments, it simply sets out the Council's general approach to renewable energy developments. The suitability of any specific site would need to be assessed if and when a planning application is submitted. This would include an assessment of the landscape and visual impact of the proposal, as required by this policy. There are over 35,000 wind turbines worldwide and there is not one reported incident where a member of the public has been injured by wind turbines. In extreme weather events, all forms of development have the possibility of failure, for example the loss of roofs from buildings etc. Wind farm developers already have to consider distances to buildings, roads and footpaths etc to protect the public should a wind turbine fall over, sometimes referred to as 'topple distance'. This aspect would continue to be considered as part of any planning application. The Core Strategy supports all forms of	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			£410,000 again the finance was raised by a share offer. Work commenced by Lakeland Marine Construction June 2009 and was completed October 2009. Likewise the New Mills project was started September 2007 and completed September 2008. For years the mills of Colne (were) powered by the local rivers and streams. Water generating plant can become a magnet for tourism as at New mills and at Hawes. Whereas wind turbines on Great Edge will not help in the attempt to bring tourism to Pendle. I suspect that footpaths in the vicinity will be closed, walking is what Pendle is noted for and the paths must be protected. Biomass, Combined Heat and Power generation could be used. On micro power plants using methane being one of the by-products. cattle sludge is collected from dairy farms by tanker, taken to a digester plant and the methane produced is used to power gas powered generating sets feeding into the grid. The plant will produce greenhouse gasses. However, in the USA a plant there is processing electricity from human waste and is using fuel cell technology to produce clean electricity. In conclusion and with regard to Section 7 'Our Foundations for a Sustainable Future: Improving the Environment We Live In' I would say a wind farm will not improve the environment, it will spoil the landscape for generations to come. Say no to the wind farm.	renewable energy generation, including Biomass and Hydro power. However, local evidence base reports, including the Forest of Bowland AONB (LCC) led Hydro power study, (available at http://www.forestofbowland.com/climatechange#hydro) suggest that there is limited potential for Hydro power of any significant scale in the Borough. However where such schemes are appropriate Hydro proposals will be supported as they can contribute towards the overall renewable and low carbon mix in the borough. The construction of a wind farm does not necessarily mean a footpath has to be close; in many cases footpaths can continue to pass through wind farms. Schemes can also sometimes improve access to the open countryside with improvements to footpaths and bridleways etc secured as part of the development.	
475388	Mrs Julia Ingham				
Document	580		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618996	Mr. R. Ingham				
Document	581		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
618999	Mr Andrew Jackson				
Document	583		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619003	Mr. R. Jackson				
Document	584		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
619911	Mr Edward Johnson				
Chapter 4: Vision	811	Yes		Agreement noted.	N/A
Policy SDP2	814	No	The core strategy is based upon population estimates that are at best guesswork. There is a prolonged history of mistakes in terms of population figures both at county and national level. (This comment has also been input against SDP3 C817)	The National Planning Policy Framework (NPPF) (paragraph 50) requires Local Planning Authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. It is recognised that population and household projections are not forecasts and can never be completely accurate, however, they are based on a series of modelled scenarios and these techniques have improved over the last few years. Furthermore, the proposed distribution of new housing is not solely based on this information - other factors such as land availability, infrastructure capacity, and housing need have all been used in the calculation.	No changes to the document are proposed as a result of this representation.
Policy SDP3	817	No	The core strategy is based upon population estimates that are at best guesswork. There is a prolonged history of mistakes in terms of population figures both at county and national level. Earby has not been given the importance it delivers particularly in terms of increasing employment. Not enough has been planned to allow for employment in small firms in the towns and villages of Hinterland Pendle.	The first part of this comment is addressed under Comment 184 (Policy SDP2) and the second part under Comment 837 (Policy WRK2). The Office for National Statistics (ONS) Sub-national Population Projections (SNPP) projects the number of people usually resident in an area at the 30 th June each year. The projections are updated using a standard approach where the starting point is the mid-year population estimate. For each year of the projections: - the previous year's figure is "aged on" by one year, - births, which are projected to occur during the year, are added, - deaths, which are projected to occur during the year, are removed and - changes in migration are included. The projections are based on a top-down approach which means they are consistent with the national population projections. However, it is important to note that population projections are only based on demographic trends. They do not take into account other issues such as future planned housing, or policy changes which may influence the size of the population. The projections are, therefore, not forecasts of what is expected to happen. The ONS acknowledged that the migration component in the 2006-based SNPP overemphasised future population growth. As such the calculation of migration figures has been improved in subsequent statistical releases. The analysis in the Pendle Core Strategy (Preferred Options Report) used the 2008-based SNPP as the basis in any relevant calculations. Also	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV3	821	No	The policy for wind farms around Earby is deeply flawed. The hills hereabout are somewhat sheltered in character and the on/off nature of wind speed would render the wind farms borderline economics at best.	refer to Policy SDP2 (Comment 814) The Core Strategy does not designate or even 'suggest' any land for wind turbines. The evidence base report on RLC does identify the areas of most potential. This is based on an analysis of suitable wind speeds and removing areas of most constraint e.g. national landscape and wildlife designations, proximity to settlements, roads and railway etc. However, this is a high level, theoretical analysis and it is not to say that all this land identified as potentially suitable would be, due to individual site level constraints such as visual and landscape impact, proximity to isolated dwellings etc as well as actual wind speed at specific locations within these wider mapped areas. Only at an application stage could these more detailed levels of analysis be carried out because they depend on the specifics of a development i.e. the specific heights/sizes and individual siting of the turbines.	No changes to the document are proposed as a result of this representation.
Policy LIV1	824	No	Housing schemes are based too much in terms of new builds rather than renovation and augmentation of old stock. House insulation should be given a higher priority.	Policy LIV1 of the Core Strategy aims to achieve a balanced housing market which allows for the provision of new-build housing whilst also trying to promote the reuse of empty properties and the existing housing stock. The evidence used to develop the Core Strategy shows that there is a need for additional housing as well as the reoccupation of empty terraced properties. This is due to a number of factors including issues of overcrowding, population and household projections. In terms of housing insulation - this is not specifically a planning issue. Policy LIV4 encourages developers that are refurbishing the existing housing stock to meet the BREEAM for Domestic Refurbishment scheme - which considers how to improve the energy efficiency of the property. Policy LIV1 encourages new housing to meet the highest level possible of the Code for Sustainable Homes. New housing also has to meet the current Building Regulations in terms of energy performance which is affected by the installation of insulation. The Council also runs a scheme directing people to where they can access discounted loft and cavity wall insulation to improve the energy efficiency of their property.	No changes to the document are proposed as a result of this representation.
Policy LIV3	827	No	The Housing policy envisaged could lead to less houses being available in the "affordable housing" bracket.	Policy LIV3 requires developers of new housing schemes to include a proportion of affordable housing within their developments. The level of provision is set by the Dynamic Viability Model (DVM) which responds to changing economic circumstances. It is acknowledged that in poor economic times the DVM will reduce the amount of affordable housing	PROPOSED ACTION: Amend the Policy and Justification text to clarify that where work has not commenced within two years schemes will be retested for their viability and may be required to provide additional affordable housing.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				that is required and this may mean that less affordable housing is provided. However, this is in response to the requirement in the National Planning Policy Framework (NPPF) (paragraph 173) which indicates that development should not be subject to such a scale of obligations and policy burdens that its ability to be delivered viably is threatened. The policy includes an additional requirement for schemes to be retested for affordable housing contributions once permission has been granted if work has not commenced within two years. This requirement aims to capture potential additional affordable housing in cases where the market improves. It is hoped that these requirements will ensure the provision and delivery of additional affordable housing within the borough over the plan period.	
Policy WRK1	964		The key for pendle is hi-tech companies. The more we can work with Rolls Royce etc. all the better.	to help deliver the strategic objectives of the Integrated Economic Strategy for Pennine Lancashire, Policy WRK1 supports employment growth, particularly development associated with businesses within the identified growth sectors. In Pendle advanced manufacturing (including aerospace) is one of two growth sectors and this is acknowledged in Paragraphs 11.20-11.22 and Bullet Point 1 of the strategy. The importance of aerospace to the local economy in West Craven is also recognised in the relevant spatial segment of the policy.	No changes to the document are proposed as a result of this representation.
Policy WRK2	837	No	Earby has not been given the importance it delivers particularly in terms of increasing employment. Not enough has been planned to allow for employment in small firms in the towns and villages of Hinterland Pendle.	This comment also relates to the proposed employment distribution addressed under Policy SDP3 (see comment 817). It is widely acknowledged that any form of forecasting must be based on assumptions that are extrapolated (i.e. based on past experience), judgemental (i.e. not bound by historical data), or a mixture of both. As such they represent a starting point rather than an actual prediction - for example there can be no guarantee that past trends will continue into the future. To help minimise the potential for any one factor to have undue influence on the employment land requirement, and its proposed distribution, a wide range of possible influences have been considered. These factors include, but are not limited to population and household projections (Office for National Statistics); the proposed distribution of housing (Core Strategy Policy SDP2); past housing completions and employment land take-up (Annual Monitoring Reports, Pendle Council); and the availability of land for housing (Strategic Housing Land	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Availability Assessment, Pendle Council) and employment (Employment Land Review, Pendle Council). Additional constraints, such as the capacity of the local infrastructure to cope with additional development, have also been taken into account. further details can be found in the Employment Technical Paper (Chapter 3 and in particular Table 3.2). Pendle Council is confident that the proposed distribution of employment land in Pendle, as set out in Policy SDP3, is based on the most up-to-date and reliable statistical information available, together with additional empirical research and analysis in order to better reflect local circumstances. The pre-eminence of the M65 Corridor and Barnoldswick, in terms of the supply and demand for employment land, established in Policy SDP3, is reflected in Policy WRK2. Whilst the policy envisages that Earby will play a supporting role to Barnoldswick, in terms of levels of employment provision, it will nevertheless have an important part to play in the economic future of West Craven.	
472645	Mr Martin Johnson				
Chapter 6: Our Spatial Strategy	872	No	No comments supplied.	The disagreement with the Spatial Strategy is noted, however, no specific comments relating to this part of the document have been provided to explain the reasons for the disagreement.	No changes to the document are proposed as a result of this representation.
Policy SDP1	875	No	No comments supplied.	Objection noted, however, no comments have been supplied to explain the reasons for the objection.	N/A
Policy SDP4	877	No	No comments supplied.	The representation objects to Policy SDP4, but does not state why. As a result it is not possible for officers to address the concerns of the consultee.	No changes to the document are proposed as a result of this representation
Policy WRK3	878	No	My point relates particularly to Barnoldswick, specifically I would recommend the following:- 1. Further emphasis on "Retail proposals on edge-of-centre or out of centre sites will generally be resisted" Under the section "West Craven Towns" there is a statement "Barnoldswick is the main focus for shopping in the north of the borough. Its primary role is to serve the day to day needs of the West Craven residents and to compliment retail provision in Nelson and Colne". This needs to be clarified and needs to re-emphasise that "edge-of-town" and "out-of-town" sites will be resisted (not generally resisted). Mention is made that edge-of-town sites must be less than 300 metres from the town centre. This should be included in the Barnoldswick section	Paragraph 3 in the policy clearly states that all retail applications that are intended to serve a borough-wide catchment should be located in Nelson or Colne. The policy advocates a town centre first approach, but recognises that suitable sites may not always be available within town centre locations. In such circumstances, where the available evidence indicates that there is unmet need and that the exploration of alternative sites has been adequately addressed, the policy encourages development to take place on the most sequentially preferable site, which is usually, but not always, the closest to the town centre. This is considered to be the most appropriate mechanism for	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			of "West Craven Towns"The statement"All major retail applications should be located in Barnoldswick Town Centre, or on an edge-of-centre site in the town, whilst Earby will have a more localised role", should be reviewed as a reported 85% of Barnoldswick retail grocery shopping is already provided for in Nelson, Colne, Skipton therefore any new development of this nature just serves to move business around. therefore this whole statement should be re-written to say"Within the strategy no major retail applications should be located in Barnoldswick or Earby as these places will have a more localised role"	ensuring that local needs are met in the most sustainable way. To resist all proposals for development outside the defined town centre in Barnoldswick would not be appropriate. [N.B. See Policy WRK3, Comment 241 (above) for proposed changes to the wording of this policy]. The requirement for an edge of centre site to be within 300 metres of a primary shopping area was included in PPS4 (Annex B). It has been repeated in Annex 2 of the National Planning Policy Framework (NPPF), which replaced PPS4 in March 2012 and as such does not need to be repeated in the Pendle Core Strategy. In planning, a retail scheme aimed primarily at serving local needs can still be considered to be a 'major' application, as this terminology applies to all applications occupying a site of one hectare or more, or in excess of 1,000 square metres. The policy, as worded, seeks to ensure that any applications in West Craven that exceed this threshold are located within Barnoldswick. The policy requirement is for all retail applications that are intended to serve a borough-wide catchment to be located in Nelson or Colne. This seeks to promote new retail development that is consistent with the scale and function of the respective shopping centres, does not undermine their vitality and viability or create unsustainable shopping patterns.	
619162	Mr Patrick Jolly				
Chapter 4: Vision	491	No	I almost entirely agree with the chapter on spatial vision and particularly welcome the strong views on preservation of the countryside and the promotion of tourism in the region.	Comment noted. See additional comments and responses made to Policy SDP5 (Comment 494) and Policy ENV4 (Comment 497).	No changes to the document are proposed as a result of this representation.
Policy SDP5	494	No	However, I do not believe that the construction of an A56 villages bypass is necessary or appropriate and that it would have an adverse effect on the environment and the economies of the bypassed villages. I have noticed that since the structural improvements made to North Vally Road in Colne, traffic to and from the M65 has been significantly less congested with a knock on benefit to the weight of traffic on the A56 itself. I would hope that more of these intelligent and cost effective solutions could be used to address anu infrastructure issues rather than the hugely expensive and intrusive construction of a new road. A new road would also inevitable increase car usage which is contrary to the stated strategy. (Same comment made against ENV4 - Comment 497)	The policy provides broad support for infrastructure improvements, which may include the provision of all or part of the A56 bypass and/or the reinstatement of the Colne-Skipton railway where these projects can demonstrate that they will help to alleviate congestion along the A6068 Vivary Way/North Valley Road/Windsor Street/Byron Road. The A56 has been recognised by Lancashire County Council as a high priority for a number of years and that it will help to stimulate growth and improve quality of life. The current Lancashire Transport Plan indicates that the need for the A56 bypass will be reviewed as part of the 'M65 to Yorkshire Corridor Study' which will look at traffic conditions across Pennine Lancashire. Also refer to Policy ENV4 (Comment 497).	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV3	503	No	Whilst, I am supportive of many of the proposals put forward for improving our carbon footprint I am most concerned that the drive towards utilisation of wind power is based on unproven technology and a lack of corroborated scientific data. In these circumstances, I believe that the policy of general support towards the use of wind turbines and the creation of wind farms needs revision. I think it very important that local residents and their representatives in council take charge of all issues surrounding renewable energy and make sure that the future of the region is protected and that any development is demonstrably for the direct benefit of local residents not international corporations. Specifically: 1) The impact on our environment. If we have a proliferation of wind turbines around Pendle and current or future studies show them to be less advantageous than their supporters advocate (as seems likely) then we will have adversely affected one of the area's most significant attributes (landscape and environment) for no benefit and be left with a legacy problem. 2) Wind farms will have a negative effect on tourism and thereby the regional economy. 3) Wind turbines have been shown to be only approximately 25% efficient. Further, the heat generated by the turbines actually contributes to global climate change rather than diminishes it. 4) Wind turbines have a proven negative impact on wildlife and biodiversity. 5) Proximity to residences is clearly an issue. Turbines close to residences not only have a material adverse impact on value but also are capable of generating significant health issues for individuals. This is recognised by the bill currently undergoing parliamentary scrutiny on this aspect which outlines a minimum distance of 1.5km from to residence. 6) Wind turbines can be dangerous. The fireball generated by the turbine in Ardrossan this week could happen to any turbine and is a significant risk factor. The majority of commercial proposals for the erection of wind turbines have little or no benefit to the local economy. Many of the developers are overseas companies who repatriate our tax generated government subsidies to their own countries. 8) The electricity generated by turbines cannot be stored. As such during areas of high demand when there is low wind, there needs to be back up generation infrastructure in place in any event bringing into question the rationale for the turbine in the first place. 9) Further, there have been numerous examples of payments being made to wind turbine operators to cease generating during periods of high wind as the national grid cannot deal with the surplus capacity generated. Again, a significant proportion of these tax generated payments do not	3&7,8,9: It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. As such the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 1.The issue of the long term legacy or impact of wind farms once they are no longer required is dealt with by ensuring any planning permissions have conditions placed upon them which require the equipment to be removed and the landscape reinstated should a wind farm cease operation. This is current standard practice. 2.There is no significant evidence that tourists are put off returning to an area because of the presence of a wind farm. Some wind farms have actually proved themselves as tourist attractions. The UK's first commercial wind farm at Delabole in Cornwall received 350,000 visitor in its first eight years. 4.Wind turbines are less of a danger to birds than electricity cables. Larger turbines turn more slowly presenting even less of a hazard. In many cases the ecology of a site can be improved by a wind farm through conditions required on a planning approval. 5.The Royal Institution of Chartered Surveyors reports there is no evidence that suggest an effect either way of turbines on house prices. Recent surveys have suggested respondents reporting no difference in house prices, with some even reporting an increase. Either way, property values are not a planning consideration. If turbines are located a sufficient distance from nearby dwellings noise should not be an issue. Wind farm developers already consider the potential noise impacts from turbines and their conformity with industry standards set out in the document ETSU-R-97 - The Assessment and Rating of Noise from Wind Farms can be assessed as part of a planning application. A bill is being considered by the House of Lords, which proposes setting minimum separation distances between turbines and dwellings. Establishing such standards is not without difficulties as each turbine - depending on its	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			go towards benefiting the local economy but go offshore. These are just examples of why i beleive that the use of wind energy needs review. Untilk these issues can be addressed I think that there should be a focus on more benign, less intrusive forms of renewable energy such as solar and biomass. Consideration needs to be given to the interaction between local plans and a national nuclear strategy, which continues to be promoted as the most efficient and environmentally friendly solution to out energy requirements.	specific details e.g. height, blade length, the topography of the area, its proximity to other sources of background noise etc - will have different impacts and with changing technologies, standards could quickly become out of date. If such an approach is eventually adopted by Government then planning applications in Pendle will be required to adhere to such standards. Until such a time, planning applications will need to continue to consider noise impacts as per present best practice guidance. 6. There are over 35,000 wind turbines worldwide and there is not one reported incident where a member of the public has been injured by wind turbines. In such extreme weather events, all forms of development have the possibility of failure, for example the loss of roofs from buildings etc. Wind farm developers already have to consider distances to buildings, roads and footpaths etc to protect the public should a wind turbine fall over, sometimes referred to as 'topple distance'. This aspect would continue to be considered as part of any planning application. 10. National Energy Policy is decided by Government and set out in such documents as the National Policy Statements for Energy. The role of the local plan is not to set an energy strategy but to manage the planning applications for such energy proposals through the planning system (although major energy developments have now been effectively taken out of the planning system and are being approved by the Infrastructure Planning Commission). Local plans have to have regards to this energy strategy and as such be supportive of the energy types being proposed in the strategy, which includes both renewables (inc. wind) and nuclear energy as well as traditional fossil fuel energy generation.	
Policy ENV4	497		However, I do not believe that the construction of an A56 villages bypass is necessary or appropriate and that it would have an adverse effect on the environment and the economies of the bypassed villages. I have noticed that since the structural improvements made to North Valley Road in Colne, traffic to and from the M65 has been significantly less congested with a knock on benefit to the weight of traffic on the A56 itself. I would hope that more of these intelligent and cost effective solutions could be used to address any infrastructure issues rather than the hugely expensive and intrusive construction of a new road. A new road would also inevitable increase car usage which is contrary to the stated strategy. (Same comment made against SDP5. Comment 494)	Policy ENV4 supports the provision of the A56 Villages Bypass, however, it is acknowledged that this is dependant on further studies being undertaken to assess the need, impact and funding. There has to be a balance in terms of the provision of new road infrastructure and relieving traffic congestion in parts of the borough. In addition to the long-term strategic projects, the policy aims to encourage a change in the way people travel and the introduction of better traffic management systems as part of new developments.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
379226	Mr. & Mrs. Kenneth & Lindsay Jones				
Document	585		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619008	Mr. & Mrs. Andrew & Helen Kay				
Document	586		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	633		I wish to make comments in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other renewable sources. - The noise from wind turbines has been blamed for health problems including stress and insomnia - Wind turbines only work at maximum capacity for a third of time, meaning they have to be backed up by other technologies such as coal and nuclear - The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power - Wind farms are expensive to build and only last up to 25 years - They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists, including James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient - A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives, as well as an understanding that other areas are better placed to provide the nation's renewable energy, such as	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			the potential for a Severn Estuary barrage, which could supply a quarter of this nation's energy needs. • No go-ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered	usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
619909	Mr Tim Langridge				
Chapter 4: Vision	810	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	812	Yes		Agreement noted.	N/A
Policy SDP1	813	Yes		Agreement noted.	N/A
Policy SDP2	815	Yes		Agreement noted.	N/A
Policy SDP3	816	Yes		Agreement noted.	N/A
Policy SDP4	819	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP5	820	Yes		Agreement noted.	N/A
Policy SDP6	822	Yes		Agreement noted.	N/A
Policy ENV1	823	Yes		Agreement noted.	N/A
Policy ENV2	826	Yes		Agreement noted.	N/A
Policy ENV3	829	No	My main concerns are with power generation. The piece meal building of wind turbines will ruin the amenity of Pendle Borough whilst failing to produce enough electricity reliably for a large population with continuing manufacturing ambitions. My counter proposal is that Pendle actively supports the building of additional reactors at Heysham, thereby creating a dependable power supply and many construction and technical jobs.	National energy and planning policy both support the development of wind farms as part of the UK energy mix going forward. It is not seen that they would provide for all the UK's or indeed Pendle's energy needs but that they would contribute towards this and reduce the reliance on more polluting and finite fossil fuels. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. This document would be found unsound was it to adopt that policy approach. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	No changes to the document are proposed as a result of this representation.
Policy ENV4	831	Yes	With regards to transport the Colne Skipton railway line should be built with all haste and bypass roads from the end of the M65 leading to Leeds Bradford conurbation and north to Skipton. To reduce commuting there should be a mix of housing and industry so that many residents can walk or cycle to work. Commuting options should be challenged.	The key obstacle to the provision of new transport links (rail and/or road) is the funding. Neither Lancashire County Council or Network Rail have the finance available at present to bring forward these strategic transport projects - hence they are seen as long-term projects that the council will support if/when funding becomes available. Policy ENV4 aims to direct new developments to accessible locations and to encourage the use of alternative travel modes.	No changes to the document are proposed as a result of this representation.
Policy ENV5 and Policy ENV6	838	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV7	840	Yes		Agreement noted.	N/A
Policy LIV1	843	Yes		Agreement noted.	N/A
Policy LIV2	845	No	There is no immediate housing shortage in Pendle and abandoned terraces of housing should be dismantled using the materials to build aspirational family housing where there is some garden and off road parking.	The housing policies in the Core Strategy aim to strike a balance between the provision of new housing and the better use of the existing housing stock. In some of the Regeneration Schemes across the borough (e.g. Churchfields in Colne, Canal Corridor in Brierfield and Bradley in Nelson) the Council has followed a policy of retaining some of the materials from demolished terraced blocks for reuse in the new housing that will eventually be built in these locations. Policy LIV4 (Designing better places to live) could be amended to include a statement about the reuse of materials from demolished housing. However, this proposal can only be implemented through targeted regeneration schemes. The Core Strategy sets the overall strategic approach to the provision of new housing over the next 15 years - some of which will be new build housing. The evidence indicates that there is a need to provide additional housing as well as reoccupying empty homes.	PROPOSED ACTION: Include a section in Policy LIV4 relating to the demolition of housing and the reuse of materials to build new housing.
Policy LIV3	850	Yes		Agreement noted.	N/A
Policy LIV4	852	Yes		Agreement noted.	N/A
Policy WRK1	855	Yes		Agreement noted.	N/A
Policy WRK2	856	No	No comments supplied	The representation objects to Policy WRK2, but does not state why. As a result it is not possible for officers to address the concerns of the consultee.	No changes to the document are proposed as a result of this representation.
Policy WRK3	858	Yes	Parking in town centres for high st shops. Also, extended opening times to compete with out of town shopping centres.	Policy ENV4 (Paragraph 7.120) acknowledges the need for car parking in town (and local shopping) centres to "help boost trade and the local economy." Revised car parking standards will be set out in the Development Management Principles DPD, and this is acknowledged in both the supporting text (Paragraph 7.134) and the last line of the policy. Until these new standards are adopted, the maximum car parking standards in Policy 31 of the Replacement Pendle Local Plan (2001-2016) will be retained,	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				as noted in the final line of the policy and Appendix B. Planning conditions are rarely, if ever, used to limit the trading times of retail premises within a town centre, although they may be used to help preserve residential amenity in out-of-centre locations. As such the issue of opening times is entirely a matter for the proprietor.	
Policy WRK4	861	Yes		Agreement noted.	N/A
Policy WRK5	863	Yes		Agreement noted.	N/A
Policy SUP1	867	Yes		Agreement noted.	N/A
Policy SUP2	868	Yes		Agreement noted.	N/A
Policy SUP3	869	Yes		Agreement noted.	N/A
Policy SUP4	870	Yes		Agreement noted.	N/A
619209	Mr Brian Lees				
Policy ENV3	542		Looking at the "Core Strategy - Preferred Options" summary, there's a couple of items that will alarm the "Not In My Backyard" types (that is, the vast majority of us). Firstly, as mentioned on Board 5, the "Potential For Wind Turbine Developments".	Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere.	No changes to the document are proposed as a result of this representation.
Policy LIV2	543		Looking at the "Core Strategy - Preferred Options" summary, there's a couple of items that will alarm the "Not In My Backyard" types (that is, the vast majority of us). Secondly, as mentioned on Board 7, "Sites For The Gypsy and Traveller Communities".	The Government's new Planning Policy for traveller sites sets out the requirements of Local Authorities for the provision of sites for the Gypsy and Traveller community. The policy requires Local Authorities to: 1) set pitch targets for gypsies and travellers and plot targets for travelling show people. 2) set criteria for allocating sites and/or determining applications. To do this Local Planning Authorities should	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				assess the likely permanent and transit site accommodation needs of travellers in their area. Addressing the needs of the Gypsy and Traveller community through the planning system aims to reduce the likelihood of illegal encampments. If used effectively the planning system can help to locate the Gypsy and Traveller community in places where they can access services alongside the settled community and in a way that is not detrimental to either community. The overall intention of the Planning Policy for Traveller Sites is that Local Authorities still need to assess the accommodation needs of travellers (this is a legal requirement under the Housing Act 2004) and plan accordingly to provide for this need. Therefore Policy LIV2 needs to make provision for the Gypsy and Traveller community.	
619014	Mr. S. Lorimer				
Document	587		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619482	Ms Liz Lorrison				
Policy ENV3	631		I wish to make comment in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be of outstanding natural beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: A reduction in the Council's quota for renewable energy A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives. I hope that my comments will be placed before elected members and I look forward to your response to these points in due course.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
379246	Ms. Janet Lowe				
Document	588		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619093	Miss Anita Lyness				
Document	617		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619029	Mrs. S. Machereth				
Document	592		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
619034	Mr. Keith Marsh				
Document	593		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	645		I wish to make comment in relation to Section 7 'Our Foundations for a Sustainable Future: improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: . A reduction in the Council's quota for renewable energy · A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) · A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
379253	Mr. & Mrs. Michael A. & S.D. Martin				
Document	594		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619058	Mr. Andrew McDowall				
Document	601		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474913	Mr. & Mrs. Philip & Rebecca McGranaghan				
Document	590		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475237	Mr Michael McIlroy				
Document	1095		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	This representation was submitted and received following the publicised closing date for the public consultation, on Monday 12th December 2011. It is for Members of the Council's Executive to decide whether to accept this representation. See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474602	Ms Gillian McIvor				
Document	275		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV1	277	No	My company (Farmhouse Biscuits) owns a huge factory building in Colne centre (off Dockray Street), which I would prefer to be developed rather than going to ruin and looking horrendous, rather than developing the beautiful area of 'The Lidgett' in Colne.	This strategy does not allocate particular areas for development; however the sequential approach to development outlined as part of policy SDP6 makes it clear that it is preferable for previously developed land and vacant buildings within settlement boundaries to be developed first.	No changes to the document are proposed as a result of this representation
619021	Mr. Kevin McNulty				
Document	591		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474136	Mr Jim Metcalfe				
Document	948		I had a brief chat with John Halton this afternoon and it would appear far too early to make a meaningful judgement. We will have to wait until specific lines are drawn and specific proposals made. Having lived in Pendle all my life (Nelson, Brierfield and now Barrowford) I am obviously keen to see any plan that will help rejuvenate the borough but please try to keep the rural areas rural by using / regenerating urban sites. Please also try to keep any additional building in the Barrowford area to a minimum. The only 'main' road (A682) is already very congested (an accident blackspot on the outskirts) and most of the sidestreets are virtually single file as a result of parked cars ! Any additional building (domestic or industrial) will merely aggravate the situation.	The Core Strategy proposes that the majority of development is focussed in the M65 Corridor. Specificall Policies SDP2 and SDP3 set out the amountof developmentfor housing and employment and its proposed distribution throughout the borough. However, specific site allocations will be determined during the preparation of theSite Allocations and Development Policies DPD. This will follow on from the submission of the Core Strategy to the Secretary of State. At that time further public consultation will take place to consider the proposed site allocations. There are safeguards for the open countryside in the Core Strategy. Policies SDP1 and ENV1 seek to protect the open countryside by requiring development to be located within a defined settlement boundary, and only allowing appropriate development in rural areas. The sequential approach set out in Policy SDP6 requires development to be located on brownfield sitesin the first instance and Policy ENV4 considers the transport implications of new development, requiring mitigation measures to be provided where necessary.	No changes to the document are proposed as a result of this representation.
619038	Mr. Kevin Morris				
Document	595		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619040	Ms. Penny Murphy				
Document	596		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379265	Mr. & Mrs. William & Anne and John Newbou				

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Document	597		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	290	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
618877	Ms Anna Noble				
Policy SDP1	264		Sainsbury's support Preferred Policy SDP1 which maintains the Borough's retail hierarchy and identifies Colne as a Key Service Centre. Sainsbury's also support the Council's intention to direct new retail development based on the settlement hierarchy with proposals for future retail development to be focussed in the Key Service Centres.	Policy SDP1 sets out the Settlement Hierarchy for the borough - this is used to direct developments to the most sustainable locations. The retail hierarchy is set out in Policy SDP4. The Key Service Centres are best placed to support and accommodate the majority of new development.	No changes to the document are proposed as a result of this representation.
Policy SDP4	268		Sainsbury's support the aim of preferred Policy SDP4 in directing any major new retail development towards the three main town centres. In accordance with PPS4, development proposals for town centre uses within or on the edge of each of the identified centres should be given clear support where they are of an appropriate scale and function to the centre.	Support noted. Policy SDP4 sets out the retail hierarchy and clearly supports new retail development where this is at a scale that is consistent with a settlements position in this hierarchy. Policy WRK3 expands on this position by introducing a sequential test that supports the town centre first approach set out in the National Planning Policy Framework (NPPF) (Para 24), with development on edge of centre sites supported where the proposed development cannot be accommodated within the defined town centre.	No changes to the document are proposed as a result of this representation.
Policy WRK3	273		Sainsbury's support Preferred Policy WRK3 and the requirement for new retail development to make a positive contribution towards the vitality and viability of the Centre in which it is to be located. Notwithstanding this, Sainsbury's request that the sentence stating that "there is no identified requirement to provide additional floorspace for convenience retail during the plan period" is removed from the Policy text which conflicts with the findings of the Pendle Retail Capacity Study (PRCS) (Nathaniel Lichfield & Partners, 2007), which forms part of the evidence base for the Local Development Framework. In addition, Sainsbury's request that reference is made at Preferred Policy WRK3 to the potential for additional convenience retail development in the north of the Borough. This capacity position is clearly identified by the PRCS and is referred at Paragraph 6.40	The representation states that a reference to the potential for additional convenience retail development "to the north of the Borough", as identified in the Pendle Retail Capacity Study (Para 13.6) should be included within the policy. As noted in the representation this reference is properly included in the supporting text for Policy SDP4 (Para 6.40), which is concerned with retail growth and distribution rather than Policy WRK3, which is concerned with the mechanisms for ensuring the sustainable delivery of this projected growth. The supporting text to Policy WRK3 (Paras 11.72-11.74 inclusive) set out the strategic approach to future retail provision in Pendle, whilst the Policy text (Para 2) includes a link back to Policy SDP4, creating the link back to the proposed spatial distribution of any future provision.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
of the Core Strategy Preferred Options document.					
479153	J T Nutter				
Chapter 4: Vision	101	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	102	Yes		Agreement noted.	N/A
Policy SDP1	105	Yes		Agreement noted.	N/A
Policy SDP2	106	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Junction 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	107	Yes		Agreement noted.	N/A
Policy SDP4	108	Yes		Agreement noted.	N/A
Policy SDP5	110	Yes		Agreement noted.	N/A
Policy SDP6	111	Yes		Agreement noted.	N/A
Policy ENV1	112	Yes		Agreement noted.	N/A
Policy ENV2	113	Yes		Agreement noted.	N/A
Policy ENV3	115	Yes		Agreement noted.	N/A
Policy ENV4	116	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	117	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	118	Yes		Agreement noted.	N/A
Policy LIV1	120	Yes		Support noted	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV2	122	Yes		Agreement noted.	N/A
Policy LIV3	123	Yes		Agreement noted.	N/A
Policy LIV4	124	Yes		Agreement noted.	N/A
Policy WRK1	128	Yes		Agreement noted.	N/A
Policy WRK2	129	Yes		Agreement noted.	N/A
Policy WRK3	130	Yes		Agreement noted.	N/A
Policy WRK4	131	Yes		Agreement noted.	N/A
Policy WRK5	133	Yes		Agreement noted.	N/A
Policy SUP1	135	Yes		Agreement noted.	N/A
Policy SUP2	137	Yes		Agreement noted.	N/A
Policy SUP3	138	Yes		Agreement noted.	N/A
Policy SUP4	140	Yes		Agreement noted.	N/A
379268	Mr. & Mrs. Stefan & Helen Odor				
Document	1098		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619509	Mr & Mrs John O'Gara				
Policy ENV3	649		I wish to make comment in relation to section 7 “Our Foundations for a Sustainable Future: Improving The	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken	PROPOSED ACTION: It is proposed to remove the table from the document to

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Environment we live in” of the above report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as people would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be of outstanding natural beauty. I also refer you to the recent article in The Daily Mail on Friday 9th December, where a Wind turbine in Ardrossan had exploded in flames due to high winds, and another turbine was knocked over in Coldingham, causing several homes to be evacuated. I believe this enforces a case against wind turbines on health and safety grounds. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: A reduction in the Council’s quota for renewable energy A lowering of the proportion of renewable energy to be generated from wind turbines A stronger commitment from the Council to examining alternatives such as solar and hydro. I hope that my comments will be placed before elected members and I look forward to your response to these points in due course	from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local	stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. There are over 35,000 wind turbines worldwide and there is not one reported incident where a member of the public has been injured by wind turbines. In extreme weather events, all forms of development have the possibility of failure, for example the loss of roofs from buildings etc. Wind farm developers already have to consider distances to buildings, roads and footpaths etc to protect the public should a wind turbine fall over, sometimes referred to as 'topple distance'. This aspect would continue to be considered as part of any planning application.	
619046	Mrs. Margaret J. Oliver				
Document	598		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619050	Mr. & Mrs. Ronald & Carole Parker				
Document	599		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619055	Miss Melanie Petriv				
Document	600		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619060	Miss Janet Philbrook				
Document	602		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619066	Mr. Colin Phillips				
Document	603		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619072	Mr. J. Pickles				

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Document	607		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379276 Ms. Margaret Pickles					
Document	606		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	634		I wish to make comments in relation to Section 7 'Our Foundations for a Sustainable Future: Improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other renewable sources. • The noise from wind turbines has been blamed for health problems including stress and insomnia • Wind turbines only work at maximum capacity for a third of time, meaning they have to be backed up by other technologies such as coal and nuclear • The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power • Wind farms are expensive to build and only last up to 25 years • They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists, including James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: • A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient • A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives, as well as an understanding that other areas are better placed to provide the nation's renewable energy, such as the potential for a Severn Estuary barrage, which could supply a quarter of this nation's energy needs.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
619069	Miss Megan Pickles				
Document	605		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619075	Mr. S.C. Pickles				
Document	609		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619076	Valerie & Anne Pickles				
Document	610		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
378959	Mrs Alison Plackett				
Document	438		In its local development framework, PBC fails to take biodiversity seriously enough. To PBC “environment” usually means the “built environment” and it does not include the “natural environment” in sufficient depth. As a result, PBC has concentrated on transport and energy conservation and neglected the natural environment. This lack of focus on biodiversity issues is reflected in the Core Strategy and the work of Pendle’s Sustainable Places Environmental Group. The work of this group illustrates the low priority placed on biodiversity. (Concerns are amply summarised in the letter to PBC sent by	The Core Strategy is the key planning document for Pendle. Its main focus is to promote growth and manage development in the borough. Whilst there may be an apparent 'focus' on the built environment, the importance of the natural environment is not overlooked. Indeed, at the time of writing Pendle is one of the few authorities in the North West, and the only local authority in Lancashire, with an adopted and up-to-date Biodiversity Audit. This has proved invaluable in helping to inform policies in the Core Strategy. Policy ENV1 sets out the Council's approach to the	PROPOSED ACTION: Revise the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 4) and Spatial Strategy (Chapter 6) to include a stronger commitment to protecting and enhancing biodiversity.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			John Plackett on 14th January 2011.) It met on numerous occasions but rarely discussed biodiversity. No one representing biodiversity attended (or was invited to) these meetings on a regular basis. There is a biodiversity duty enshrined in the NERC Act, but PBC chose to ignore it in the workings of this group	protection and enhancement of the natural environment and specifically addresses issues relating to biodiversity. The requirements of the NERC Act apply to all Council's functions that may impinge on biodiversity, not just planning. The Council considers that Policy ENV1 plays an important role in helping the Council to meet its requirements under the NERC Act, in terms of having regard to the need to conserve biodiversity. Policy ENV1 also includes the 'hooks' for other policies in the Core Strategy and subsequent planning documents, which will help to establish a viable Ecological Network in Pendle - e.g. the provision of open space in new developments. Contrary to what is stated in the representation, Policy ENV1 was prepared in conjunction with representatives of the LSPs Sustainable Places Group. Whilst planning officers cannot comment on those normally invited to attend meetings of the LSP Sustainable Places Group, the sub-group convened to consider Policy ENV1 on 15th November 2010, included representatives from a wide range of groups concerned with biodiversity both in and beyond Pendle. Organisations represented at the meeting included the Lancashire Wildlife Trust, Lancashire Environment Record Network (LERN), Lancashire Biodiversity Partnership, Nelson Naturalist Society, Friends of Greenfield LNR and Pendle Parks Forum. Also present were two representatives from the East Lancashire Ornithologists Club who are also key members of Residents Against Gib Hill Exploitation (RAGE). Following the meeting both of these representatives submitted proposed amendments to Policy ENV1 by the deadline. The majority of these proposed changes were incorporated into the revised Policy ENV1. The contact details of those representatives present at this sub-group meeting, who were not already included on the LDF Database, were added to it. As a result they have been kept fully informed of progress on the Core Strategy and been given advance notice of the opportunity to comment on its content at key stages. Pendle Council also recognises that biodiversity issues are not confined by borough boundaries, but extend beyond into neighbouring local authority areas. These neighbouring authorities have been widely consulted in the preparation of the Pendle Core Strategy. The Core Strategy is not the only vehicle that seeks to deliver improvements to the natural environment. It is not the only Council document required to have regard to biodiversity and the natural environment. What the Core	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 2: About the Core Strategy	350		2.22 Lack of up-to-date information etc. on biodiversity has left a significant gap in the evidence base. Have external consultants been commissioned?	Strategy establishes is that designated areas need to be protected from the potentially adverse effects posed by any new development. It also seeks to secure improvements to the natural environment where this can be justified when new development is proposed. It has been acknowledged, in response to other comments made against the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 5) and Spatial Strategy (Chapter 6), that there needs to be a greater emphasis on biodiversity within these sections, in order to make it clear that it is a key element running through the Core Strategy. The representation argues that there is a significant gap in the evidence base in relation to biodiversity. It also questions whether consultants have been commissioned by the Council, but does not state why they need to be. Pendle Council prepared a Biodiversity Audit, to help inform policies affecting biodiversity and the wider environment. Local environmental groups and statutory bodies were widely consulted in the preparation of this document, which was adopted in September 2010. Pendle Council, which supports the Lancashire Environment Record Network (LERN), was able to access their up-to-date records on biodiversity for the area. These sources of information will provide the basis of future work to establish an Ecological Network for Pendle. The LSP Biodiversity sub-group was consulted in the preparation of Policy ENV1, which specifically addresses the protection and enhancement of biodiversity in the borough. Following a meeting with the sub-group in November 2010, the consultee recommended a number of improvements to the policy, which were largely taken on board. As there are no strategic site allocations in the Pendle Core Strategy, it is not necessary to employ consultants to carry out site specific appraisals at this time. The Sustainability Appraisal process and Habitat Regulations Assessment provide the checks and balances to ensure that policies in the Core Strategy do not have an adverse effect on the environment and biodiversity. Natural England has noted that it is happy that both these requirements have been met (See Chapter 1 Comment 195).	No changes to the document are proposed as a result of this representation.
Chapter 3: Our Spatial Issues	353		3.67—3.76 The spatial issues regarding biodiversity are not properly addressed. The issues raised by the NERC Act 2006, sections 40 and 41 and the Good Practice Guide need addressing. With regard to paragraph 3.71, a network of 75 locally-designated sites, do mapped ecological corridors already	The representation states that the issues regarding biodiversity are not properly addressed and recommends a number of additions. (1) No mention is made of the NERC Act 2006 or Sections 40 and 41 of the Good Practice Guide - The purpose of the Spatial Portrait is to describe the main	PROPOSED ACTION: (1) No changes to the document are proposed as a result of this element of the representation (2) Amend paragraph 3.71 - See response to Comment 327387/323 (3) No changes to the

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			exist? Networks imply continuity. Of equal, if not more importance than Ancient Woodlands, are Habitats and Species of Principal Importance. They and their conservation measures should be added. The M65 corridor is proposed as the area where a highly significant proportion of housing and economic development will take place. This proposal is likely to increase further the width, length and continuity of the settlement area. The further development of this corridor will create isolation of habitats and reduce migration routes. This should be avoided. In order to prevent settlements merging and to facilitate the creation of green corridors and infrastructure, areas of Green Belt should be considered between settlements. The Open Space Audit in ascribing excesses and deficiencies is too simplistic. Many open spaces have no or restricted public access; having specific purposes in providing services to sections of the wider community, and not just to the ward in which by chance they are situated. This approach jeopardises future allocations of open spaces to such wards. 3.141 The spatial issues for the natural environment are incomplete and all should be included. If part of the Spatial Vision is "to green the urban environment", this should be included in these bullet points.	features of Pendle and the key issues it needs to address; it is not the correct place to address legislation. The legislation relevant to biodiversity is properly referenced in the supporting text for Policy ENV1, which addresses the protection and enhancement of the natural (and historic) environment. (2) Habitats and species of special importance are as important as woodland, which is referenced in the text - This concern has also been raised in representations 618780/192 and 327387/323. Woodland was identified within the Spatial Portrait as Pendle has an extremely low level of woodland cover. As such it is a key issue for the area. However, it is acknowledged that reference should also be made to the habitats and species of special importance present in Pendle. (3) Further development in the M65 Corridor should be avoided in order to prevent further isolation of habitats - The dispersal option (see Policy SDP1) was not considered to be the most practical or sustainable option at the Issues and Options stage. As such Policy SDP1 represents a solution that focuses on elements from the regeneration and concentration options. In recognition that new development could potentially contribute to further fragmentation and/or the isolation of habitats, the Core Strategy contains a number of policy hooks to help facilitate the establishment of a robust Ecological Network in Pendle. These hooks recognise the need to protect and enhance existing sites of biodiversity importance including buffering, where necessary. Within built up areas the creation of new corridors, or stepping stones within new developments, will be promoted to help improve connectivity wherever necessary. The extent of the Ecological Network in Pendle will be set out in the Land-use Allocations DPD, which will follow in 2013. (4) Green Belt should be considered between settlements - The extent of the Green Belt in Pendle was established with the adoption of the Pendle Local Plan in January 1994. The National Planning Policy Framework (NPPF) states (paragraph 83) that new Green belts should only be established in exceptional circumstances, and none are proposed in Pendle at this time. (5) The Pendle Open Space Audit in ascribing excesses and deficiencies by ward is too simplistic - Whilst the Pendle Open Space Audit identifies deficiencies and surpluses by ward, it also recognises that open space provision may benefit a wider catchment (Para 4.11). In response it considers open space provision by the five area committee areas (Tables 5, 6 and	document are proposed as a result of this element of the representation (4) No changes to the document are proposed as a result of this element of the representation (5) No changes to the document are proposed as a result of this element of the representation (6) Include additional bullet points (paragraph 3.141): Reduce fragmentation and/or isolation of habitats Seek to establish green corridors and 'stepping stones' within built-up areas.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 5: Our Strategic Objectives	355		5. The agreed Strategy Objectives 9 and 10 are not in line with national legislation or PPS9. SO9 Protecting and enhancing access to green open space is highly unlikely to make a valuable contribution to biodiversity. SO10 Protection and conservation must be afforded to biodiversity irrespective of new development.	10) in order to acknowledge that additional provision, even within a ward with an identified surplus, may be the most appropriate solution. This is particularly true for larger sites where opportunity for additional provision is heavily influenced by locational factors. A new Green Infrastructure Strategy, which will look at all green spaces in terms of their value as open space (including sport and recreation) and their value for biodiversity, will inform the Land-use Allocations DPD. (6) The spatial issues for the natural environment are incomplete (Para 3.141) - It is accepted that further priorities for the natural environment should be included within this list. The strategic objectives for the Core Strategy were finalised after careful consideration at the Issues and Options stage. (1) The representation states that 'protecting and enhancing access to green open space is highly unlikely to make a valuable contribution to biodiversity. The wording of SO9 is 'Protect, enhance AND improve access.' Whilst for biodiversity the emphasis will normally be on protection and enhancement, improvements to accessibility will be an important factor in the designation of additional Local Nature Reserves (LNR), of which there is an identified shortage in Pendle. (2) The representation goes on to note that protection and conservation must be afforded to biodiversity irrespective of new development. Whilst true, this misses the purpose of SO10, which is simply to ensure that new development makes a positive contribution to the protection and enhancement of our natural environment, particularly those areas officially recognised for their value for biodiversity.	(1) No changes to the document are proposed as a result of this element of the representation. (2) No changes to the document are proposed as a result of this element of the representation.
Policy SDP6	443		The wording of Policy SDP6 is weaker than in the comparable section of the adopted local plan (Policy 17.2). In SPD6, it reads that only "consideration" will be given to the sequential approach (i.e. not necessarily to be followed), whereas in Policy 17.2 specifies in more definitive terms that: "...proposal for new housing will be considered, in order of priority for: 1) The re-use or conversion of existing buildings within a settlement boundary. 2) The redevelopment of previously developed land within a settlement boundary. 3) The development of previously undeveloped land within a settlement boundary..." We believe that following the Sequential Approach to Development is vital to the sustainability of the borough's environment and should be enforced in stronger terms, something similar to the current	The National Planning Policy Framework (NPPF) encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value (paragraph 17, bullet point 8). Policy SDP6 aims to direct new development to the most sustainable sites and promote the reuse of previously developed land in the first instance. It should be noted that Policy SDP6 will apply to all types of development and not just housing development. For the avoidance of doubt and to provide clarity, the policy will be revised to make clear that proposals will be considered against the sequential approach in order of priority. However, in order to comply with the NPPF the policy must provide a flexible response to	PROPOSED ACTION: Amend the wording of the policy text to read "In order to ensure the best use of resources, the location of new development will also be considered in accordance with the following sequential approach (in order of priority):"

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			Policy 17.2. In addition, we feel that because of its importance in the protection of the natural environment, the Sequential Approach should be applied at a borough-wide scale, to give maximum protection to all green field sites. For example, green field sites should not be sacrificed in the West Craven Towns whilst previously developed land is in abundance in the M65 corridor (subject to any land need for "greening the urban environment" / wildlife corridors) . So we suggest the deletion of the following sentence from SDP6: "Development will be located in line with the settlement hierarchy set out in Policy SDP1." Instead, Policy SDP6 could read something like:- Proposals for new housing will only be considered on previously developed land and in vacant buildings within a settlement boundary. Where it can be demonstrated that there is less than 5 years supply of such sites available across the borough, consideration will be given to other land within settlement boundaries. Development will only be allowed on land outside the settlement boundaries in exceptional circumstances, where it is to meet a proven need as set out in studies such as the Strategic Housing Market Assessment and the Employment Land Review..." Where development is deemed necessary on green field sites, a sequential approach should be used to prioritise sites according to their biodiversity, so sites of greater biodiversity would be given more protection from development.	achieving sustainable development. The viability of sites can affect the delivery of development. As a consequence, and in order to ensure the levels of growth proposed in the Core Strategy are met, the release of second priority sites (greenfield land within settlement boundaries) may be necessary where these are viable, in a sustainable location, and their delivery can be guaranteed. In terms of the scale at which the sequential approach is provided - this is set at the settlement level. Applying it on a borough wide scale could result in an inflexible policy and restrict development in areas where it is needed. Policy SDP1 sets out where new development should be located - this is based on a number of factors, including need. If development in one part of the borough was restricted because of a lack of previously developed sites this may lead to the needs of that part of the borough not being met in a sustainable way - especially if it forced people to travel to a different area. This type of policy would be seen as restricting sustainable growth and contrary to the NPPF. The two policies together aim to ensure that new development is provided in the most sustainable locations. SDP1 sets a settlement hierarchy to direct the majority of development to the existing larger settlements where services and infrastructure are already available. SDP6 then requires developers to consider the use of brownfield sites first (within the chosen settlement) as these are often situated in sustainable locations. In terms of the use of greenfield sites and the biodiversity importance of such sites - the NPPF indicates that allocations of land should be on sites of lesser environmental value (paragraph 17, bullet point 7). As part of the Land-use Allocations documents sites proposed for development will be assessed for their biodiversity importance. This will be a determining factor in the decisions as to whether to allocate a site or not. Policy ENV1 of the Core Strategy aims to protect and enhance the biodiversity assets of the borough and new development proposals will need to comply with this policy as well as SDP1 and SDP6.	
Policy ENV1	474		Green Belt: Paragraph 7.41. It is December 2011 and no strategic review of Green Belt has taken place. Green Belt is an important part of green infrastructure as it allows species migration.	The proposed strategic review of Green Belt was set out in regional planning policy (RSS). The Government's commitment to the withdrawal of regional policy has resulted in a strategic review not being carried out. In the absence of such a review the National Planning Policy Framework states that the general extent of Green Belts is already established and that it should not be necessary to	PROPOSED ACTION: Reference to the strategic review of Green Belt in paragraph 7.41 will be removed.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				designate new Green Belts except in exceptional circumstances. In addition a strategic review of the Green Belt is not considered necessary. The levels of development in Pendle will not require a full scale review of the Green Belt. Any minor changes to the Green Belt boundaries will be considered as part of the Land Use Allocations DPD.	
Policy ENV1	479		Open Space and green infrastructure: Paragraph 7.42. Green infrastructure is for people to use for their health and well-being. Many facilitate the migration of wildlife, but only as a consequence of their main purpose. Through policies in their plans, PBC need to provide separate ecological corridors and stepping stones to link areas of biodiversity importance (PPS9, paragraph 12).	It is accepted that there are wider benefits to Green Infrastructure than those given. It is appropriate to reference Natural England's published benefits of Green Infrastructure. The Core Strategy looks separately at ecological networks in paragraph 7.32 - 7.36 and the policy text explains that the Council will work with partners to develop ecological networks where possible. However, it is accepted that the policy could give a more rounded explanation of such networks.	PROPOSED ACTION: The two key reasons for protecting and connecting open spaces will be removed and replaced with Natural England's six social, environmental and economic benefits of Green Infrastructure as follows: "Green Infrastructure can provide many social, economic and environmental benefits including: Places for outdoor recreation and play Space and habitat for wildlife with access to nature for people Climate change adaption Environmental education Local food production Improved health and wellbeing" http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx PROPOSED ACTION: Add to paragraph 7.32 after 'across the borough' "It is important to ensure that there are connections between the core biodiversity sites and habitats, to allow species to move freely between them in order to feed, disperse, migrate or reproduce. This is seen as a key in providing future resilience to the potential impacts of climate change. Such connections do not have to be continuous linear habitat, but can be a series of smaller isolated sites which species can use as stepping stones between the core areas. It is this network of core sites connected by buffer zones, wildlife corridors and stepping stones which is known as an ecological network (Lawton et al)."
Policy ENV1	337		Publications relating to biodiversity: A The Natural Environment and Rural Communities Act 2006 places a duty on public authorities to conserve biodiversity. 1. Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the	The Core Strategy and this policy in particular state the Council's strategic approach to protecting and enhancing our natural environment and the borough's biodiversity. The strategy adheres to many wider plans and policies and it is not necessarily appropriate to cross reference them all. The	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			purpose of conserving biodiversity. B Guidance for Local Authorities on implementing the Biodiversity Duty (2007) states “ Local Authorities have a key role to play in conserving biodiversity, through their role in: - Developing and influencing local policies and strategies - Planning and development control The following are important aspects of integrating biodiversity into local authority services: - Fulfilling statutory obligations for the protection and enhancement of biodiversity within the forward planning and development control processes - Incorporating the conservation of biodiversity into the relevant strategies of the local authority. These include sustainable development strategies, economic development plans and environmental management systems - Having regard to biodiversity with partnership arrangements such as community strategies and local area agreements - Delivering the key principles for biodiversity set out in national planning guidance Of particular relevance is Chapter 4, pages 38-40. N.B. Paragraphs 4.3.1, 4.5.1 and 4.5.2. C PPS9 and Circular 6/2005 with their statutory obligations have the accompanying Good Practice Guide. This guide’s summaries, to be found on pages 3, 23, 32 and 44, advise of the specific details contained in each chapter. In general terms the Pendle Core Strategy should show that the above have been adhered to in the appropriate places.	Core Strategy has had regard to the Sustainable Community Strategy and its biodiversity objectives. Council officers worked with a subgroup of the Local Strategic Partnership Sustainable Places Group to draw up the policy.	
Policy ENV1	467		b) Biodiversity: Paragraphs 7.32 to 7.36 reveal a passive approach to biodiversity. (i) 7.32-Ecological networks: There are two points here. Firstly, PBC recognises their importance in allowing species migration. (They do not mention climate change as a possible cause of migration.) Secondly, development proposals should “prevent harm, add value to and enhance the existing ecological networks”. The problem with this is that it is unclear what the existing ecological networks are. (Where are they and what are they?) Why does their enhancement depend on developments? They should already exist or be created whether developments occur or not. This approach is advocated in PPS9, paragraphs 11 and 12. The council’s approach is reactive, not proactive as it claims.(ii) 7.33-Habitat creation and restoration: Once again, the council only considers these activities as an accompaniment to developments. The NERC Act requires local authorities to restore, to conserve and to enhance regardless of any development occurring nearby. This approach is supported by PPS9 paragraph 5(ii). The council’s obsession with woodland as the only habitat worth creating is once again evident. (iii) 7.34- How will the social and economic benefits of a development be evaluated against a site’s conservation value?	The reasons for species migration could be numerous and it is not the purpose of the strategy to identify these. It is also not the purpose of the Core Strategy to identify ecological networks. These will be identified as part of the land use allocations DPD. The strategy sets the policy that will be applied to these. In addition the strategy sets the policies that will be applied to development in order to ensure networks are improved and enhanced, however it does not suggest that development is necessary for protection and enhancement of these outside of the planning system. It is agreed to make reference to other habitats in addition to woodland in the context of the policy. The criteria against which the social, economic and environmental benefits will be assessed will be determined by the Development Management Policies DPD. These are the detailed policies against which all development will be considered against. Individual sites for development will be allocated through the Site Allocations DPD. The Council considers the policy to be proactive as it sets out the principle of protecting and enhancing natural and historic environments. Paragraph 7.36 is considered to be an appropriate indicator of the	PROPOSED ACTION: At the beginning of paragraph 7.15 insert "In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater". The Pendle Biodiversity Audit details further the particular types of habitat.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			There should be a set of criteria agreed beforehand in order to evaluate the opposing merits of a site. A single set of criteria should be created so that sites be can assessed as objectively as possible. One alternative, if a site of conservation value is threatened, would be to build on low quality farmland. A lot of Pendle's farmland consists of grassland fields where the once-rich grassland has been ploughed up and replaced with rye grass. This type of grazed grassland has little biodiversity interest. (iv) 7.35-A proactive approach to protecting biodiversity: The approach described seems anything but proactive. It is reactive, designed to reduce damage caused by development as advocated in PPS9 paragraph 14. Policy ENV1 states "biodiversity will be protected and enhanced". Making ponds, planting trees and shrubs etc. are only measures to ameliorate the effect of development. (v) 7.36-New areas of nature conservation value: Once again there is a lukewarm statement of intent—"There may be opportunities to designate new areas for their nature conservation value in the future, cf. policy ENV1 mentioned in (iv) above. Biodiversity must be enhanced by creating new areas of habitat for wildlife (see PPS9 p2, 2nd bullet point.) Whilst supporting the protection of trees, woodland and hedgerows; other habitats must not be neglected.	direction of the policy.	
Policy ENV1	359		7.8 Between bullet point 2 and 3, Circular 6/2005 should be included.. Bullet point 3 should have added sections 40 and 41. Bullet point 4 should continue with ".....and requires Local Planning Authorities to include policies encouraging management of features in the landscape defined as linear features or stepping stones which are essential for the migration, dispersal and genetic exchange of wild species." 7.11 PPS9 may include 3 Government Objectives, but the requirement is to adhere to the six Key Principles. 7.12 Bullet point 3, as already stated, must be done irrespective of developments. 7.14 There should be an additional bullet point: - Habitats and Species of Principal Importance 7.15 and 7.36 Hedgerows are now on the S41 list. 7.24 Due to the level of planned growth there is need to review the Green Belt. This would allow migration routes, genetic exchange and add resilience to climate changes. 7.31 Local Authorities should conserve important habitat types and identify opportunities to add to them, with or without new development. 7.34 Loss of a site with conservation value should be regarded as unacceptable. Key Principle 6 of PPS9 should be adhered to. Page 70 Key Linkages: It would seem advisable to add "NERC Act 2006, section 40 and 41.	Circulars are administrative guidance on how to apply the law and as such are not law themselves. Therefore circular 6/2005 should not be included in the bullet points alongside the mentioned Acts. The whole of Natural Environment and Rural Communities Act is relevant to the policy and not just sections 40 and 41 therefore reference to the entirety is considered most appropriate. To add the requirements of the Regulations is not appropriate as this section is introducing key Acts and Regulations only. PPS9 has been replaced by the National Planning Policy Framework. It is not now appropriate to refer to the key objectives. These will be deleted and replaced with appropriate policy content from the NPPF. The Core Strategy relates to the strategic approach to development and so will include requirements for development to consider issues related biodiversity. It is accepted that Habitats and species of Principal Importance should be included. It is not contended that hedgerows are on the Section 41 list. The Core Strategy Identifies how they will be protected in accordance with Section 41 of the NERC Act. The levels of development outlined in the strategy do not require a strategic review of the Green Belt. Detailed boundary changes will be considered as part of the Land Use	PROPOSED ACTION: Amend paragraph 7.14 to read "...Pendle has a large number of sites,habitat and species which are recognised and/or designated as being of international, national, regional and/or locally significant for biodiversity" PROPOSED ACTION: Include additional bullet point in paragraph 7.14: Habitats and Species of Principal Importance PROPOSED ACTION: Delete the three key objectives in paragraph 7.11 and replace with " The National Planning Policy Framework (paragraph 109) identifies the following requirements for the planning system in respect of biodiversity: Recognise the wider benefits of ecosystem services Minimise impacts on biodiversity and provide net gains in biodiversity, where possible, to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures" PROPOSED ACTION:

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Allocation DPD. In addition, the National Planning Policy Framework (NPPF) states that the general extent of Green Belts is already established and that it should not be necessary to designate new Green Belts except in exceptional circumstances. The Council does seek to enhance and add to habitat types such as woodland etc. but it also has to consider how habitats can be provided or improved through development. Indeed it is the purpose of the LDF and its component documents to consider issues relating to development and planning. Paragraph 1.5 of the strategy explains the context of the document. The presumption is that sites with conservation value should be protected and enhanced but it may also be necessary in some circumstances to balance conservation value with other benefits such as social and economic benefits. If the social and economic benefits to the borough are considered to outweigh other considerations then it is necessary to have a mechanism to allow this development to take place. This is in compliance with paragraph 118 of the National Planning Policy Framework (NPPF) which has replaced Planning Policy Statements. There are other mechanisms outside of the planning process which allow for sites/habitats to be designated and protected e.g. Local Nature Reserves etc. The key linkages refer to key planning policies and plans for the purposes of monitoring and delivery. Reference to the NERC act would not be appropriate in this section. The NERC act is also already referenced in a prominent position at the introduction to the policy.	At the beginning of paragraph 7.15 insert "In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater".
Policy ENV1	459	No	a) Habitat types: It does not deal systematically with the 18 UK BAP Priority habitats found in Pendle, which are listed in the Biodiversity Audit on page 27. By page 57 of the audit these have been reduced to 5 "Key" habitats. In the Core Strategy document, even these five have not been referred to. Only woodland is mentioned. Paragraphs 7.15 to 7.17 discuss woodland in general, but not woodland types classified as priority habitat. The 18 UK BAP Priority habitats are ignored. Sites where these habitats occur enjoy protection under the NERC Act.	The representation states that only woodland habitats are detailed by the Core Strategy despite the number of habitat types that are evident in Pendle. Reference to the Priority Habitat types will be added to the context to redress this.	PROPOSED ACTION: In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater". The Pendle Biodiversity Audit details further the particular types of habitat.
Policy ENV1	344		Pendle's Biodiversity Audit is not robust because it: - relies on survey work, much of which is not up-to-date - key information gaps have not been filled by further survey work - limited information makes for difficulties in identifying areas best suited	The Council considers that the Biodiversity Audit is robust and that a Sustainability Appraisal is not required for such a document as it is a process to gather data rather than a process which will have any particular impact on	PROPOSED ACTION: Include a reference to the importance of biodiversity to the future sustainable development of the borough in the Spatial Vision.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			for proactive enhancement - specialist expertise is required These have implications when addressing biodiversity objectives, strategies and targets and in setting a basis for development control in the LDF processes. Its late production also meant it was unavailable to carry out Sustainability Appraisal. The public consultation with responses from the public, organisations, working groups and service providers resulted in the environment receiving the highest number of comments, with the natural environment comments cross-cutting all sub-divisions of environmental issues. The National Planning Policy for Biodiversity, PPS9, places statutory obligations on local authorities regarding biodiversity objectives. Yet biodiversity or the natural environment failed to be mentioned in Our Vision for Pendle. As a core component of sustainable development and provider of life support services, biodiversity, with statutory obligations and protection and conservation in spatial planning, would have been expected to feature in Our Vision for Pendle.	sustainability. The core strategy does not designate sites - it is a strategic level document that sets the direction of policy rather than the detail of how this is to be achieved. Individual allocations will be considered through the Land Use Allocations DPD process. It is agreed that Biodiversity should be included in Our Vision for Pendle.	
Policy LIV1	455		Para. 10.27 – Housing Market Renewal No detail is given about the future of the large areas of land designated as “HMR Reserved Housing Land” in the adopted Local Plan. The need for this land was supposed to be reviewed from time to time. Will it be kept in the LDF, given the curtailment of most of the HMR schemes? If it is kept, for how long? If the sites are found to be no longer needed, they should revert back to their previous classifications (e.g. open countryside), and where the settlement boundary was moved to accommodate these sites, it should likewise revert to its previous position.	The Core Strategy does not deal with the allocation of land. This will be dealt with in the Land-use Allocations document. Consideration of all allocations in the current Local Plan will take place as part of that process. The Government announced in 2010 that funding for the HMR programme would cease. In Pendle those unfinished projects are now being wound-up. As a consequence the sites allocated as HMR reserved housing land in the Replacement Pendle Local Plan will not be required for replacement dwellings, as the scale of clearance and replacement has not materialised. The proposed level of housing in the Core Strategy is such that the HMR sites may be required for new housing. The SHLAA process has identified them as having the potential to be developed for new housing. Furthermore, it should be noted that the allocation of the HMR sites in essence identified them as suitable for housing purposes.	No changes to the document are proposed as a result of this representation.
Policy LIV1	449		Para. 10.18 - Sewerage Mention is made in para. 10.18 and elsewhere about capacity problems at several Waste Water Treatment Works. Whilst this technicality has to be addressed, we wonder if it is necessary to include it in the Core Strategy as it has the effect of distorting the location of new dwelling construction. The utility companies should be responsible for addressing these issues: it is the simple economics of more dwellings = more waste water; borrow money to build new plant, collect the new revenue from the new dwellings; repay the money and keep the profit.	The NPPF requires Local Authorities to work with Infrastructure providers (paragraphs 162, 180) to assess the quality and capacity of infrastructure and its ability to meet forecast demands. An infrastructure study was carried out to highlight any potential infrastructure capacity issues which may need to be resolved in order for development to take place in the borough. In Policy LIV1 consideration has been given to the potential capacity issues at the waste water treatment works and this is reflected in the phasing approach to development. The intention is that	PROPOSED ACTION: Explain in the justification text of Policies SDP2 and LIV1 how the consideration of infrastructure has been taken into account when determining the level and location of new housing.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				development, in areas affected by infrastructure capacity issues, will occur in later phases of the plan period once these issues have been resolved. However, it is not necessarily the case that the amount of development proposed has been reduced in these areas because of the infrastructure issues, just that the timing for this development has been adjusted. Policy SDP2 considers the distribution of new housing development. It again indicates that infrastructure capacity has been taken into account when considering where new housing development should take place. However, like Policy LIV1 it is the timing of the development that is affected rather than the actual percentage distribution. The wording of Policy LIV1 and Policy SDP2 will be revised to clarify how infrastructure capacity has been considered in the housing requirement and distribution calculations. In terms of the role of the utility companies, they have a duty to provide water supply and disposal services as required. Therefore when new development takes place they have to supply the necessary water infrastructure for that development. In the interests of good forward planning and efficient use of resources, the Council and the water companies are working together to identify the amount and likely timescales of new development. The water companies go through a five year financial planning cycle where they can put in bids to OFWAT for funding for new infrastructure. This forward planning process helps to avoid delays to development as it allows the right infrastructure to be put in place at the right time. Where water companies have to supply previously unidentified developments (windfalls) they have to find the resources to fund the connections to these developments. This may then have an adverse impact on the funding for other projects. In summary, there is a requirement for the Core Strategy to address the infrastructure needs of the proposed levels of development in the borough and therefore reference should continue to be made to the capacity of the waste water treatment works. The wording of Policies SDP2 and LIV1 will be amended to clarify how infrastructure provision has been considered.	
Policy LIV1	446		In order to minimise pressure on green field land, we believe that the numbers of new dwellings should be set at the lowest possible level. The current local plan states 190 dwellings per year, as specified by the Regional Spatial Strategy, and we suggest that it would still be appropriate to use this figure as the	The Core Strategy Housing Technical Paper provides the justification and calculations for the proposed housing requirement figure. It takes account of a number of different factors including housing need, population and household growth, land capacity, regeneration and empty properties.	PROPOSED ACTION: Update the figures relating to empty homes and clarify the difference between the overall vacancy level and the long-term (over 6 months) vacancy level.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			benchmark. Mention is made of significant population increases later on in the plan period (para. 10.10), but this forecasting is subject to so many variables, it seems pointless attempting to make detailed plans for it at this point in time. Rightly, mention is made of the vacancy level and ambitions to reduce it (para. 10.11), which would reduce the need for the building of new dwellings and so reduce pressure on green field sites. However, the 6% figure is not referenced (how up-to-date?), and from casual, local observations we suspect that it could have increased significantly in recent months. If so, presumably priority should be given to bringing vacant properties back into use rather than construction new dwellings, so the new dwelling figure could be even lower.	The technical paper examines a number of scenarios including an assessment of the Regional Spatial Strategy (RSS) figure. The figure proposed in the Core Strategy Preferred Options Report is considered to strike a balance between all these factors whilst ensuring housing needs are met. The National Planning Policy Framework (NPPF) (para 159) requires Local Authorities to prepare Strategic Housing Market Assessments (SHMA) to assess their full housing requirement. The SHMA should look at the scale and mix of housing needed to meet household and population projections. This evidence should be used to ensure that plans meet the full objectively assessed needs for market and affordable housing. The population and household projections have changed since the SHMA was prepared. It is therefore necessary to review the proposed housing requirement figure to ensure that the housing needs of the borough are met. The land required to deliver this level of housing will be allocated in the Land-use Allocations plan. The Strategic Housing Land Availability Assessment (SHLAA) indicates that there is insufficient previously developed (Brownfield) land to accommodate all the new housing and some Greenfield sites will be required. The proposed figure for new housing takes account of the fact that the borough has a considerable number of empty homes. The latest published figures (as of 2011 – see DCLG live tables 125 and 615 at: http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/stockincludingvacants/livestables/) show the following: Total (estimated) dwelling stock: 40,000 Total vacant dwelling stock: 2,746 (6.86% of total dwelling stock) Total long-term (more than 6 months) vacant dwelling stock: 1,770 (4.42% of total dwelling stock) The Pendle Empty Homes Strategy / Action Plan and the Sustainable Community Strategy set a target of bringing the number of long-term vacant properties down to 3.7% of the total housing stock. Given the current levels of vacant dwellings this will require the reoccupation of 290 dwellings and will bring the total long-term vacant dwelling count down to 1,480 dwellings. The date (2011) for achieving this target has now past and although progress has been made, 4.42% of the housing stock is still classified as long-term vacant. The revised Empty Homes Action Plan provides a list of actions to continue the work to meet the target and reduce the number of empty properties. The Core Strategy	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				will support this approach. There are now limited funding opportunities available to continue, at the same level, the refurbishment projects that have taken place over the last few years. The Council is investigating other potential mechanisms to tackle the issue of empty homes. These include: 1) working with the Council's Joint Venture Company 2) working with absentee landlords 3) bidding for funding to renovate empty properties (Funding has recently been secured for a number of empty home schemes across Pennine Lancashire). In terms of overall vacancy levels, the national (England) average stands at 3.22% of the total housing stock. To allow a housing market to function there always needs to be a certain level of vacant homes to allow for freedom of movement. In Pendle the overall vacancy level (6.86%) is significantly higher than the national average. Together with the actions being taken to reduce the number of long-term empty properties, it is also important to bring the overall vacancy rate down to a level closer to the national average. To achieve this will require the reoccupation of 1,546 homes. The Core Strategy can help to support this objective through its requirements in Policy LIV3. This policy looks at the provision of affordable housing and in some circumstances this may be through the acquisition and refurbishment of empty properties. However, this mechanism can only work with the provision of some new build housing in order to fund the refurbishment. Evidence in the SHMA suggests that there is a need/demand to provide 4,125 dwellings over the 15 year plan period. The reoccupation of over 1,000 vacant homes would meet part of this need/demand, leaving nearly 3,000 dwellings to be newly built. However, it should be noted that the most recent population projections have suggested that there is likely to be a significant increase in the population over the next 25 years. This is likely to result in an increased need/demand for housing and may increase the local housing requirement figure. The Core Strategy offers a balanced approach to the provision of new build housing as well as aiding the reuse of empty homes.	
Policy LIV4	452		Para. 10.120 - Housing Density In the adopted local plan, Policy 20.1 specifies that new dwellings should be built at a minimum density of 30 per Ha. However, para. 10.120 of the Core Strategy mentions a figure of 30 dwellings per Ha as being a borough-wide average, not minimum – i.e. fewer dwellings per hectare. This is less sustainable and puts greater pressure on green field	The National Planning Policy (NPPF) (paragraph 47, bullet point 5) indicates that Local Planning Authorities should set out their own approach to housing density to reflect local circumstances. Given that the predominant house type is the terraced house and these occupy high densities, which can be up to 200dph in some parts of the borough, it is	PROPOSED ACTION: Amend the policy to clarify the approach taken to the density of new housing developments in each spatial area and in the borough as a whole.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			land. We believe the minimum density of 30 per Ha should be carried forward from the adopted local plan.	considered that lower density developments are required to provide real choice in the housing market. The density figure of 30dph is presented as a guide within the policy, not an average figure. The inclusion of a minimum density figure is not the most appropriate approach, especially in some conservation areas where a proposal of 30dph may not fit with the established character of the area. It should be noted that the policy includes a requirement for developments in areas of high accessibility to be of a higher density (between 30 and 50 dph) in order to encourage sustainable development. Furthermore, the provision of a flexible density policy allows developments to be provided that fit in to the areas in which they are located. It is acknowledged that there may be some confusion about the density requirements in the different spatial areas and those for the whole of the borough. The policy will be amended to clarify the approach taken to the density of new housing developments.	
479346	Mrs Jane Platt				
Document	611		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475044	Mr David Pollitt				
Document	612		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475052	Mrs. Susan Pollitt				
Document	613		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379278	Mr. & Mrs. G.M. & A. Pool				
Document	614		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619086	Miss Joanna Louise Reay				
Document	615		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
619089	Mr. Barry Reeve				
Document	616		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619107	Mrs. A. Richards				
Document	618		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
335467	Dr Terry Richards				
Document	109		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475214	Mr. Malcolm Rochford				
Document	619		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
474775	Mr. & Mrs. Mark & Elizabeth Rogers				
Document	620		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	304	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other renewable sources. - The noise from wind turbines has been blamed for health problems including stress and insomnia - Wind turbines only work at maximum capacity for a third of the time, meaning they have to be backed up by other technologies such as coal nuclear - The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power - Wind farms are expensive to build and only last up to 25 years - They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of the Environment who served on a number of government committees on	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient - A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives as well as an understanding that other areas are better placed to provide the nations renewable energy, such as the potential for a Severn Estuary barrage, which could supply a quarter of this nations energy needs. - No go ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered.	several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
619600	Mr. Jeffrey Romanis				
Document	278		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV1	283	No	My ancestors have lived in this part of Colne (i.e. Lidgett) for more than a century. Having been born in Colne and raised in bents, having played in the fields, walked the paths, and had a happy childhood here, now 50 years later, being drawn back to the area because of its magnificent beauty I am enjoying the wonderful scenery all around Colne, but particularly the views and paths around the Bents/Lidgett area. I feel so dismayed that this part of Colne may soon fall under the threat of short-sighted planning ideas. So much of Colne has disappeared. think what a magnet it would have been now to visitors, bringing money into the town. Think how people from afar are drawn to haworth, Heptonstall, hebden Bridge and Wycoller just because they were left alone by developers. We still have some of old Colne left, Lidgett, Castle Road and bents are part of it. They are the old routes out of the town. Please don't spol this area by allowing development. Once the houses are here, they can't be got rid of. Please look to the future for the people who will come after us. In this time of trying to make everything simple, I support the notion of re-inforcing the existing protections around Lidgett and beyond by incorporating them into the Green Belt.	The policy sets out how our natural and historic environments will be protected. The Core Strategy does not allocate particular areas for development. The Land Use Allocations DPD will consider sites in detail. There is no strategic review of the Green Belt planned and NPPF states that once designated Green Belt boundaries should only be altered in exceptional circumstances. The strategic level of development proposed in the Core Strategy does not require a strategic review. Detailed boundary changes will again be considered as part of the Land Use Allocations DPD.	No changes to the document are proposed as a result of this representation
612090 Mr Schofield					
Policy ENV3	5	No	I strongly disagree with section ENV3 calling for over 15 MW from industrial type wind generators,an unrealistic target, unless we consider it acceptable to splatter large numbers of these over our upland areas. It's known that these devices are at best less than 30 % efficient that would mean over 100 of the 0.5MW 74M high which would presumeably be concentrated in the areas identified on your wind flow charts. Once these are in place it becomes largely sterile of wildlife in the surrounding area. This is in my opinion in total contradiction to the aims of the vision for Pendle in your document 4.14 and indeed would go a long way to ruining our beautiful environment. Our economy would also suffer as tourism(again another important part of the plan) would inevitably decline people who want to enjoy the open countryside consider these things to be hideous and would simply go elsewhere. More commitment should be made to solar instead of the very dissapointing figure you state ,all new builds could incorporate these, evevations permitting, biomass, small scale HEP as used in other areas (we have fast flowing river through Colne for example, rivers rarely stop but the wind does) . If every household reduced their consumption by just 10% we would easily meet our targets without erecting 1 turbine , this could be council driven. It is also a fact that no	The Policy does not require over 15MW to be achieved from large scale turbines. The tables at 7.85 in the document are taken from an evidence basedocument (South Pennine Renewable and Low Carbon Energy study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or requirement from each technology; they simply show the identified technical potential from each technology, given consideration of the relevant constraints and the technical abilities of the equipment etc. They do show that if the Council was to achieve a target of 15.4MW that due to the current limitations of other technologies, that this target could not be reached without the use of some large scale wind generation. Currently, a commercial scale wind turbine in the UKis in the height range of 80-120m tall and would have a generating capacity of around 2.5MW. As such, if we were to try to achieve 15MW from large scale wind turbines alone this would take in the region of 6-24 turbines (depending on the efficiency of the specific equipment; on average current turbines have an estimated efficiency level of around 27%). It is highly unlikely that a 15MW target would be achieved by the use of 100 x 0.5MW turbines because commercial wind operators would not use	PROPOSED ACTION: To ensure there is no confusion to users of the document, it is proposed the table at 7.85 is removed and the readers directed to the evidence base report from where it was taken should they seek such information. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			wind generators would get built if it was not for our subsidising of them through higher bills , the only real winners are the installation company and the land owners but we have to endure them. Its time to make a stand against these unpopular and inefficient devices which will surely ruin our countryside now and for future generations, this is a local issue lets not be dictated to by central government policy , keep Pendle turbine free.	turbines of this scale in wind farms as this would be inefficient; instead turbines of this scale are likely to be restricted to individual turbines hosted by individual landowners. Some of the areas of constraint identified on the wind speed maps are related to protecting designated landscape and wildlife areas. This is to ensure that the best quality landscapes and habitats are protected and the impact on wildlife etc minimised. It is about finding a balance between protecting the most valuable areas and securing a low carbon energy supply for the UK moving forward. There is no significant evidence that tourists are put off returning to an area because of the presence of a wind farm. Some wind farms have actually proved themselves as tourist attractions. The UK's first commercial wind farm at Delabole in Cornwall received 350,000 visitor in its first eight years. The document has considered all forms of RLC technologies and supports the use of all technologies as appropriate for their location. It is incorrect that the document has discounted other technologies apart from wind. All technologies are seen as able to form a part of the RLC technology mix and contribute towards RLC generation in the borough. It would be difficult to achieve a 10% reduction in consumption for all households through the planning regime,as this can only influence new development. However, the policy does require all new development seeking planning permission during the plan period to achieve a 10% RLC contribution to their energy requirements and encourages the use of energy efficiency measures as part of an overall solution to reduce its energy use and carbon emissions. The future Development Management Principles DPD is also proposing to look as to how we can require householder proposing improvement schemes e.g. domestic extensions, to reduce the property's energy use and carbon emissions at the same time. With regards to the safety of wind turbines, there are over 35,000 wind turbines worldwide and there has not been one reported incident where a member of the public has been injured by a wind turbine.In extreme weather events, all forms of development have the possibility of failure, for example the loss of roofs from buildings etc. Wind farm developers already have to consider distances to buildings, roads and footpaths etc to protect the public should a wind turbine fall over, sometimes referred to as 'topple distance'. This aspect would continue to be considered as part of any	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				planning application.	
612089	Mrs Suzanne Schofield				
Policy ENV3	4	No	I appreciate that we must look towards alternative forms of energy in order to safeguard our supply and environment, however i do not feel that the proposals listed are 1. achievable, 2 economically viable 3 in the best interests of the borough The policy ENV3 calls for over 15MW to be achieved from large scale wind turbines. Given the current stated outputs I assume that this would mean the erection of over 100 large turbines across the borough. Having studied the wind maps published on your site and discounting the areas with constraints this leaves areas of concentrated development which would inevitably lead to the destruction of our countryside and wildlife (contadicting 4.14 vision for Pendle), would have a huge impact on many peoples quality of life due to the inevitable close proximity and be a financial burden on the borough. I notice from the document that other forms of renewable energy were considered (ie the recommendation to include solar on new developments) but discounted as not able to achieve targets. With the current efficiency levels of turbines, I suggest that the level of power achievable from other sources cannot be disregarded. Perhaps a drive to ensure that every household were to reduce its consumption by 10% would go a long way to achieve our aims. A very recent disturbing aspect to the possibility of wind farms over the borough is the failure of the turbine in the high winds in Scotland this week - the safety of our residents must be paramount.	The Policy does not require over 15MW to be achieved from large scale turbines. The tables at 7.85 in the document are taken from an evidence base document (South Pennine Renewable and Low Carbon Energy study, Maslen Environmental, 2010). They do not show the Council's chosen strategy or requirement from each technology; they simply show the identified technical potential from each technology, given consideration of the relevant constraints and the technical abilities of the equipment etc. They do show that if the Council was to achieve a target of 15.4MW that due to the current limitations of other technologies, that this target could not be reached without the use of some large scale wind generation. Currently, a commercial scale wind turbine in the UK is in the height range of 80-120m tall and would have a generating capacity of around 2.5MW. As such, if we were to try to achieve 15MW from large scale wind turbines alone this would take in the region of 6-24 turbines (depending on the efficiency of the specific equipment; on average current turbines have an estimated efficiency level of around 27%). It is highly unlikely that a 15MW target would be achieved by the use of 100 x 0.5MW turbines because commercial wind operators would not use turbines of this scale in wind farms as this would be inefficient; instead turbines of this scale are likely to be restricted to individual turbines hosted by individual landowners. Some of the areas of constraint identified on the wind speed maps are related to protecting designated landscape and wildlife areas. This is to ensure that the best quality landscapes and habitats are protected and the impact on wildlife etc minimised. It is about finding a balance between protecting the most valuable areas and securing a low carbon energy supply for the UK moving forward. The document has considered all forms of RLC technologies and supports the use of all technologies as appropriate for their location. It is incorrect that the document has discounted other technologies apart from wind. All technologies are seen as able to form a part of the RLC technology mix and contribute towards RLC generation in the borough. It would be difficult to achieve a 10% reduction in consumption for all households through the planning regime,as this can only influence new	PROPOSED ACTION: To ensure there is no confusion to users of the document, it is proposed the table at 7.85 is removed and the readers directed to the evidence base report from where it was taken should they seek such information. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				development. However, the policy does require all new development seeking planning permission during the plan period to achieve a 10% RLC contribution to their energy requirements and encourages the use of energy efficiency measures as part of an overall solution to reduce its energy use and carbon emissions. The future Development Management Principles DPD is also proposing to look as to how we can require householder proposing improvement schemes e.g. domestic extensions, to reduce the property's energy use and carbon emissions at the same time. With regards to the safety of wind turbines, there are over 35,000 wind turbines worldwide and there has not been one reported incident where a member of the public has been injured by a wind turbine. In extreme weather events, all forms of development have the possibility of failure, for example the loss of roofs from buildings etc. Wind farm developers already have to consider distances to buildings, roads and footpaths etc to protect the public should a wind turbine fall over, sometimes referred to as 'topple distance'. This aspect would continue to be considered as part of any planning application.	
474917	Mr. Ray Sharpe				
Document	621		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379201	Mr. Alistair Sherriffs				
Document	624		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619119	Ms. Jessie Sherriffs				
Document	623		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619115	Sylvia & Nicola Shore				
Document	622		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379299	Mr. & Mrs. David & Jennifer Short				

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Document	625		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379301	Ms. Clare Shutt				
Document	626		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
475028	Mr. & Mrs. Roy & Jill Shuttleworth				
Document	636		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379295	Mrs. Joan Sill				
Document	199		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619130	Mr & Mrs Philip & Andrea Simpson				
Document	637		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	644		I wish to make comment in relation to Section 7 'Our Foundations for a Sustainable Future: improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: · A reduction in the Council's quota for renewable energy · A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) · A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
379298	Dr. & Mrs. R. Singh				
Document	526		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619136	Mr. M. Slinger				
Document	638		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619141	Ms. Geraldine Sloan				

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Document	640		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619146 Mrs. S. Smith					
Document	641		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
478805 Ms Sheila Smith					
Chapter 3: Our Spatial Issues	461		Ref. 3.33 The high proportion of private rented tenants who are dissatisfied with their homes would suggest that the condition of the properties is poor. The council should take action to ensure that these landlords repair and maintain their properties.	This comment does not relate to a matter that can be addressed through planning policy, but has been forwarded to Housing Regeneration for their information.	No changes to the document are proposed as a result of this representation.
Chapter 3: Our Spatial Issues	458		Ref.3.28 Assistance should be given to homeowners who struggle to repair their homes. Grants issued to homeowners who cannot afford to mend guttering, replace roof tiles, etc., would prevent their properties from deteriorating and becoming unfit for habitation, and would save money in the long run.	This comment does not relate to a matter that can be addressed through planning policy, but has been forwarded to Housing Regeneration for their information.	No changes to the document are proposed as a result of this representation.
Policy LIV1	466		It is important to keep encroachment into the countryside to a minimum. There is always great resistance to new housing on the outskirts of towns. Open space is treasured for many reasons – for its beauty, its wildlife, its history, or its recreational opportunities. Local people, even when not directly affected by proposals, are concerned about the character of their towns and villages. There is great affection for the old terraced houses, and much opposition to urban sprawl, which is generally not in keeping with the traditional architecture. I do not agree that sufficient land should be made available for 217 dwellings to be built each year. Many of these dwellings could be provided, at a fraction of the cost, by renovating empty houses. In addition, numerous disused spaces above commercial properties could be transformed into attractive dwellings. It is not clear how much Greenfield land would be needed each year to build 35% of 217 homes each year. If they were to be built to a low density of 15 per hectare, then about 12 acres a year would be needed – about 216 over an 18 year period. This is an unacceptable amount, and should be drastically reduced.	The requirement for 200 dwellings per annum (3,000 dwellings over the 15 year plan period) is calculated by looking at the assessment of need / demand and a number of additional factors including the reuse of empty properties. Even if all the empty properties were brought back into use there would still be a need for new-build dwellings. Evidence shows that the supply of terraced housing in Pendle outstrips the demand for this type of property - therefore it is necessary to provide new housing of a different type to meet the needs of the population. Policy SDP6 promotes a sequential approach directing new development to previously developed land in the first instance. In terms of the amount of Greenfield land needed – previously the national density standard was set at 30dph for new housing. Although this has been removed from national guidance it is still an appropriate benchmark figure for development in Pendle as there is a need to improve the mix of housing densities across the borough – providing some lower density developments in contrast to the significant proportion of highly dense terraced properties that exist in some areas. If 35% of the total 3,000 dwellings are to be built on Greenfield land this equates to 1,050 dwellings. If these were built at the average density of 30dph they would require a total of 35ha. (2.3ha (5.6	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV1	464		Ref. 10.11 It is shocking that there are around 2400 empty houses in Pendle. The council's aim to bring half of these back into use is not good enough. Empty houses deteriorate quickly and blight entire neighbourhoods. Action should be taken swiftly to halt the decay because, once an area has a few boarded up properties, it fails to attract home buyers. It becomes ghettoised, and the people who remain, or the people who move there because they cannot afford to live elsewhere, tend to be too poor to be able to maintain their homes properly. I have been told that there are plans to require builders of new estates to finance the renovation of a few empty houses as a condition of planning approval. This is a welcome step, but it is hardly likely to have much impact, given the scale of the problem. Priority should be given to renovating empty houses, and locating premises above shops that could be easily converted into flats, rather than building new homes. There are ways of funding this, for instance through loans to landlords.	acres)per year).This is a smaller amount than suggested by the consultee. The Strategic Housing Land Availability Assessment (SHLAA) indicates that there are sites available to accommodate this amount of housing within the existing settlement limits i.e. without the need to expand into the wider open countryside. There are many reasons why homes become vacant /empty (for example reposessions, regeneration proposals, low demand housing areas, people moving and being unable to sell). The NPPF encourages Local Planning Authorities to identify and bring back into residential use empty housing. The Pendle Empty Homes Strategy / Action Plan and the Sustainable Community Strategy set a target of bringing the number of long-term vacant properties down to 3.7% of the total housing stock. This will require the reoccupation of 290 dwellings (given the current vacancy levels) and will bring the total long-term vacant dwelling count down to 1,480 dwellings. The date (2011) for achieving this target has now past and although progress has been made, 4.42% of the housing stock is still classified as long-term vacant. The revised Empty Homes Action Plan provides a list of actions to continue the work to meet the target and reduce the number of empty properties. The Core Strategy will support this approach. There are now limited funding opportunities available to continue, at the same level, the refurbishment projects that have taken place over the last few years. The Council is investigating other potential mechanisms to tackle the issue of empty homes. These include: 1) working with the Council's Joint Venture Company 2) working with absentee landlords 3) bidding for funding to renovate empty properties (Funding has recently been secured for a number of empty home schemes across Pennine Lancashire). In terms of overall vacancy levels, the national (England) average stands at 3.22% of the total housing stock. To allow a housing market to function there always needs to be a certain level of vacant homes to allow for freedom of movement. In Pendle the overall vacancy level (6.86%) is significantly higher than the national average. Together with the actions being taken to reduce the number of long-term empty properties, it is also important to bring the overall vacancy rate down to a level closer to the national average. To achieve this will require the reoccupation of 1,546 homes. The Core Strategy can help to support this objective through its requirements in Policy LIV3. This policy looks at	PROPOSED ACTION: Update the figures relating to empty homes and clarify the difference between the overall vacancy level and the long-term (over 6 months) vacancy level.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				the provision of affordable housing and in some circumstances this may be through the acquisition and refurbishment of empty properties. However, this mechanism can only work with the provision of some new build housing in order to fund the refurbishment. The Strategic Housing Market Assessment (SHMA) shows that there is both a need and a demand for new housing in Pendle. This is partly due to the types of houses that are needed. The supply of terraced housing in Pendle outstrips the demand for this type of housing and limits the range of homes available for people in Pendle. Building new homes of different types will help to provide a more balanced housing mix in the borough. The priority in Pendle is to create a balance between renovating empty homes and providing new homes. The Council's Housing Regeneration service is tasked with securing funding to help bring empty homes back into use. The Planning system can be used to aid this process but its main purpose is to look at the amount of new housing that is needed and how this can be managed over a period of time - ensuring housing need is met.	
Policy LIV2	470		Ref.10.48 It is clear that there are lots of families living in unsuitable and overcrowded accommodation. However, this problem could be solved without building large numbers of new houses. One idea would be to combine adjoining vacant houses, whenever the opportunity arises, in order to make a large family home. Incentives could be given to homeowners living next to a vacant house to move, in order to create further larger homes. This would be a relatively cheap method of increasing the stock of large family homes, and would add to the variety of housing in the older terraced districts, thus helping to correct the current imbalances in the type of housing available. It would also be a way of integrating different types of households, because it would not be obvious whether a family owned their home or was in social housing. Too often, social housing is lumped together on an estate and looks shoddy compared to the other houses, further stigmatising and isolating the occupants.	The remodelling of some terraced properties by knocking two into one has been trialled in some of the regeneration areas in the borough e.g. Whitefield, Nelson. The purpose of this is to create the larger family houses that are needed whilst retaining the fabric and character of the area. However, this method is not always appropriate as many of the terraced properties in Pendle have no or little outside space. Policy LIV4 (Designing Better Places to Live) could be revised to include a section on remodelling the existing terraced stock / combining vacant properties where this is feasible and appropriate in order to move part way to changing the mix of housing. However, in terms of providing incentives for homeowners living next door to vacant houses to move out - there is unlikely to be the funding available to progress such an approach especially on a large scale basis. The Council already has a scheme in place (Improvement for Sale scheme) where it targets 'rotten tooth' (vacant) properties in a neighbourhood to buy them, improve them and resell them. In some areas this has included buying two properties together and combining them to create larger properties. However this method is only used when the opportunity arises. Combining properties to increase the size portfolio of the existing stock can only be one option / method to help meet housing needs. There is still a need	PROPOSED ACTION: Amend Policy LIV4 to include a section on combining properties.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV2	471		10.52 Since there is an abundance of 2-bedroomed terraced houses, surely these could be made attractive to older person households. They could be renovated, instead of building new ones.	and requirement to provide different types of housing (not just different sizes). The SHMA acknowledges that there is a significant proportion of under-occupation in older person households and there is potential for older people to "downsize" and release larger properties for families. However, this cannot be an enforceable measure (especially not in the owner-occupied sector). The policy (at 10.52) indicates that the provision of more suitable accommodation for older people could allow them to 'downsize' releasing larger homes for younger families. The term "more suitable accommodation" is a broad term which may include specialist elderly accommodation, the provision of new housing which is adaptable for older persons, or the renovation of existing properties - it is not solely about building new houses.	No changes to the document are proposed as a result of this representation.
Policy LIV4	472		10.108 I do not agree that there is an over-dominance of terraced housing. These houses are our heritage and give our towns and villages their special character. They are built solidly of local materials and blend well with the surrounding countryside. The grids and patterns of their layouts give rhythm and structure to the environment. In contrast, much new housing is out of character with its surroundings. It lacks character and is of the same design and layout as countless estates all over Britain. The newly renovated houses in Whitefield are superb examples of what can be done to improve homes and communities while preserving our heritage. They do lack open space and trees, however, and need play facilities. High density housing is perfectly acceptable, so long as it includes areas of well-designed open space and sufficient facilities, such as play areas. The social unrest, poor health and crime prevalent in areas of high density housing are more likely to be caused by poverty than anything else. It is certainly possible to build ecologically sound, desirable, spacious terraced housing to a high density, with gardens and areas of open space. They need not be any more expensive than the usual type of housing that is built nowadays, and could include a mixture of large family homes and smaller units. Because there is less space taken up with roads in this type of development, there would be greater opportunity to provide open space and gardens.	The SHMA shows that nearly 59% of the existing housing stock is comprised of terraced properties. This is considerably higher than the Lancashire (32.9%) or national (25.9%) average. Policy LIV4 is looking to readdress the balance by encouraging the provision of alternative types of dwellings that are required. The National Planning Policy Framework (NPPF) (paragraph 50) requires Local Planning Authorities to identify the size, type, tenure and range of housing that is required in particular locations - reflecting local demand. The SHMA (and supplementary work) provides this information which has then been used in Policy LIV4 to put forward a suggested profile of the type and sizes of dwellings that should be provided in the borough. It can be seen that terraced properties still play a role in the types of dwellings to be provided in the borough. The SHMA shows that there is a surplus of terraced housing when comparing the demand for this type of property to the supply. Not everyone wants to live in a terraced house (even if they are refurbished). The policy is positive about the refurbishment of existing properties. Encouraging the use of the BREEAM for Domestic Refurbishment scheme which aims to increase the sustainability of the property (increasing energy efficiency etc). The Policy allows for the provision of different types of open space in new developments - this may include private gardens or communal space for higher density developments. In terms of the density of new developments - the Policy clearly states that new housing should be developed at densities	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				appropriate to their location taking account of townscape and landscape character and accessibility. The general design policy (Policy ENV2) requires new development to be informed by and reflect the history and development of a place. The principle aim of Policy ENV2 is to ensure that new developments are of a high design quality. This is further emphasised and referenced in Policy LIV4.	
474832	Mr. William G. Smith				
Document	209		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379304	Mr. Glen Southworth				
Document	642		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619619	Mr. Alan Spencer				
Policy ENV3	292	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
379306	Mr. Rodney B. Spencer				
Document	282		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
327646	Mr. Roy St. Pierre				
Document	1026		Final comment: Overall I support the general thrust of the document, despite having made a number of comments. I feel it is in general moving Pendle in the right direction. Congratulations also to those involved in producing such a comprehensive document.	Support / comment noted.	No changes to the document are proposed as a result of this representation.
Chapter 4: Vision	982	No	Agree with it generally, support for carbon reduction and creating accessible sustainable communities. However, aerospace is a major and growing contributor to pollution and	The Core Strategy supports investment by "businesses in the priority (growth) sectors" identified in the Pennine Lancashire Economic Development Strategy. Advanced	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			global warming so we should reduce any focus advanced manufacturing centred on aerospace and instead focus on non-nuclear renewable technology and other green industries. Also I object to the term 'M65 corridor'. In a document promoting sustainable communities it would be better called the 'Colne Water Valley' or the 'Colne to Brierfield Valley' or 'Colne to Burnley Valley'. We need to move away from the car and lorry and the motorway towards sustainable forms of transport, the train, bus, cycling and walking and the messages we give out by the terms we use are part of that.	manufacturing is one of two priority sectors listed for Pendle. The advanced manufacturing sector provides and will continue to provide a significant amount of employment in Pendle and in particular in West Craven. The aerospace industry remains a key industry in the UK and across the world. It is specifically mentioned under the West Craven Towns, as Barnoldswick is the location of a large Rolls-Royce manufacturing facility, which supports a large range of sub-contractors across Pendle and Pennine Lancashire. Failure to support development that builds on the areas existing strength in aerospace could potentially see large scale job losses across Lancashire and West Yorkshire. Rolls-Royce and its partners are at the forefront of designing aircraft engines that are increasingly fuel efficient and environmentally friendly. For the foreseeable future commercial aviation will remain one of the three principle modes of transport across the world. The development and installation of technologically advanced engines on commercial aircraft will potentially have far reaching positive benefits for the global environment. The Core Strategy supports inward investment, new businesses formation and the diversification of existing businesses. This may help to reinforce the area's existing specialisms, but is also intended to support investment in sectors that can use, or develop, the skills available within the local workforce. Whilst "non-nuclear renewable technology and other green industries" are not currently a local strength, the Core Strategy does not restrict the potential for them to be in the future. The dichotomy is that the level of employment growth required, following on from an economic downturn as severe as the one we have just experienced, is unlikely to contribute to the sought after reductions in carbon emissions. Indeed, in the short-term the opposite is more than likely. It is the responsibility of the Core Strategy and subsequent planning documents, to ensure that all new development is, within reason, as environmentally friendly as possible. The motorway is a clearly distinguishable linear feature, which connects the main urban centres of Brierfield, Nelson Barrowford and Colne. As such the use of the term M65 Corridor is wholly appropriate in describing this urban belt in the south of the borough. The motorway will continue to play an important part in facilitating economic growth in the borough for the foreseeable future. However, the Core Strategy acknowledges the need to move towards	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 6: Our Spatial Strategy	993	No	No comments submitted.	more sustainable modes of transport in Policy ENV4. This transition will not happen overnight and is likely to take longer than 15 years. As such the motorway will continue to play a vital part in the movement of goods and people, even if it is being used by vehicles that are considered to be more sustainable than today's cars and lorries. The disagreement with the Spatial Strategy is noted, however, no specific comments relating to this part of the document have been provided to explain the reasons for the disagreement.	No changes to the document are proposed as a result of this representation.
Policy SDP1	995	No	If Barnoldswick being designated a 'Key Service Centre' makes it easier for Tesco or other large supermarkets to move in, then it should not be designated as such. To protect its character and the vibrancy of a multitude of small shops, maybe it should be in a category of its own such as 'Heritage Key Service Centre' where there would be restrictions on large developments which would put small traders out of business.	Barnoldswick is already considered to be the main town in West Craven and therefore the focus for major development in that part of the Borough. The designation as a Key Service Centre in the Core Strategy reaffirms this position and is based on a number of factors including: population size, physical area, the number of and access to services, and the availability of land for development. Barnoldswick meets the criteria for a Key Service Centre and offers a sustainable location for development in the West Craven area. There are numerous policies in place at a national and local level that aim to protect heritage and the vitality of town centres. For example Core Strategy Policies ENV1 and ENV2 aim to protect the historic environment. Policy WRK3 looks at where new retail development should be located within a settlement. It provides a sequential approach, which promotes new retail development in town centres as the first priority ahead of development on edge-of-centre and out-of-centre sites. This aims to help to maintain the vitality and viability of town centres. It is not the purpose of planning policy to restrict competition and place restrictions on the size of developments. However, the National Planning Policy Framework (NPPF) (paragraph 26) requires that an impact assessment is carried out for developments of 2500sqm or more that are proposed outside of the town centre - this is to ensure that they would not have an unacceptable impact on businesses within the existing centre.	No changes to the document are proposed as a result of this representation.
Policy SDP2	1000	No	1. There is no mention of renovating existing housing / bringing empty housing into use. This should be the first priority before new housing is considered. 2. There is no mention of what proportion of this new housing is a) social housing b) affordable housing c) market housing (* I've since noticed there is a	Policy SDP2 outlines the distribution of new housing only - other policies in the Core Strategy (Policies LIV1-4) look at the amount, type, size and sustainability issues. 1. The issue of renovating existing housing / bringing empty housing back into use is considered in Policies LIV1, LIV3 and LIV4. In	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			reference to this is another section, SDP5) 3. If in Foulridge and Kelbrook the capacity of the Waste Water Treatment Works is not resolved, will this mean that Trawden and Fence will have double the development to reach the 6% for Rural Service Centres? 4. In terms of sustainable communities all renovations / new housing should be to a high environmental standard.	particular the amount of new housing proposed takes into account the high levels of vacant properties in the borough and looks at how these can be used to provide some of the additional housing that is required. Other sections of the Council are tasked with obtaining funding and identifying the properties where action can be taken. Planning can aid in this process but is only one mechanism that can be used. 2. Policy LIV3 sets out the proportions of housing that should be market and affordable. 3. The utility providers have a duty to connect new development to the waste water network and make provision to deal with this additional waste. The issues at the waste water treatment works will need to be resolved by the relevant utility company. The purpose of the policy is to highlight these issues to potential developers so that they can choose sustainable sites and to help the forward planning process for the utility companies by setting out the level of development in each area so that they can respond in terms of their investment planning. It is the method of funding of these improvements that is the issue rather than whether the provision will be made or not. If development goes ahead then the provision has to be made. Therefore distribution of new housing to the Rural Service Centres is still appropriate. 4. Policy LIV4 looks at designing better places to live. This policy sets certain requirements on developers to meet national sustainability standards (Code for Sustainable Homes etc). Where the renovation of properties is proposed the Policy encourages the use of the BREEAM for Domestic Refurbishment scheme in order to raise the standards of refurbished properties.	
Policy SDP3	1003	Yes		Agreement noted.	N/A
Policy SDP4	1004	No	Allowing major new retail developments in Barnoldswick will ruin the town and put small local traders out of business. With Barnoldswick being poorly served by public transport and especially there being no railway station in West Craven, new developments will encourage unsustainable car travel.	The settlement hierarchy set out in Policy SDP1 reflects the ability of towns and villages in Pendle to accommodate future growth. This hierarchy is reflected in the proposed location of retailing in Pendle. Policy SDP1 indicates that Barnoldswick, like Nelson and Colne, is considered to be a Key Service Centre. However, although Barnoldswick exhibits the characteristics of a Key Service Centre, it does so within the context of West Craven. Its role within the borough as a whole is less influential due to its relative isolation and more limited range of services. Policy SDP4 establishes a retail hierarchy, but must be read in conjunction with Policy WRK3, which clearly states that all	PROPOSED ACTION: Include a reference within Policy SDP4 stating that it must be read in conjunction with Policy WRK3.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				retail applications that are intended to serve a borough-wide catchment should be located in Nelson or Colne (Paragraph 3 of the Policy). In combination Policy SDP4 and Policy WRK3 seek to ensure that any retail provision in Barnoldswick, is consistent with the scale and function of the town as a shopping centre, so that it does not undermine the vitality and viability of the town centre or create unsustainable shopping patterns within the Borough.	
Policy SDP5	1005	No	Transport: Summary of position-3rd sentence to read "no major capacity issues on public transport but need to improve linkages and frequency to Manchester, Leeds and Preston (rail) Delivery: 1. Remove A56 villages by-pass as unsustainable development 2. Keep 'reinstatement of Colne-Skipton railway line' 3. Add 'redouble Colne-Burnley to enable increased frequency'. This would give much better journey times to London and Glasgow/Edinburgh-current wait at Preston 58 minutes. 4. Add strongly urge the Leeds-Blackpool North and the new Manchester to Accrington service via the Todmorden curve to both stop at Rose Grove. This would cut an hour off the current journey time from Pendle to Leeds making it 1 1/2 hours instead of 2 (also for Bradford) and an hour of the journey time to and from Manchester. This is VITAL for Pendle and just needs timetable tweaking. 5. The cycle route from Barnoldswick to Earby that got overwhelming public support in a consultation in 2004 needs implementing as do other cycle path proposals such as Colne, Cottontree, Laneshawbridge, Wycoller and Every Street. 6. Nowhere is there any mention of pedestrians or any measures to make our streets safer or more people friendly environments (as opposed to vehicle dominated environments).	The policy provides broad support for infrastructure improvements, which include improvements to the local rail infrastructure. The points made here are, however, too detailed for inclusion in a strategic document such as the Core Strategy. Pendle Council has already made representations to Northern Rail for services to/from Pennine Lancashire and Manchester via the Todmorden Curve to call at Rose Grove. This will ensure the best possible connections with services to/from destinations in Pendle. The reduction in journey times afforded by this proposal will be key to making the new service an attractive alternative for people living in Pendle. The policy supports the possible construction of the A56 bypass, which is noted as a long standing proposal in the Lancashire Transport Plan (Implementation Plan). As such it must be reflected in the Core Strategy.	No changes to the document are proposed as a result of this representation.
Policy SDP6	1006	Yes		Agreement noted.	N/A
Policy ENV1	1007	Yes		Agreement noted.	N/A
Policy ENV2	1008	Yes		Agreement noted.	N/A
Policy ENV3	1009	Yes		Agreement noted.	N/A
Policy ENV4	1010	No	Remove 'provision of A56 villages bypass' Improvements to the railway networks to Skipton, Manchester, Leeds and Preston will reduce car use removing congestion from Colne and reducing	Policy ENV4 supports the possible provision of both the railway (re-instatement) and the A56 Villages Bypass. Both options have support in the community and to some extent	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			vehicle flow. Similarly, freight moving to rail will reduce lorry flow. Such a switch from road to rail (and other public transport, cycling and walking) is already happening as fuel prices increase. Last year, according to Sainsburys, over a million drivers in the UK gave up their car (the increasing costs of insurance etc also played a part). The rail reopening and other rail improvements should be implemented before any bypass which would do enormous damage to the mile-tunnel valley. Once the railway has been in operation at least a year the situation can be reassessed. Other measures can also be contemplated. The Mayor of Hassault, a City in Belgium, said in about 1990, 'Either I can building a ring road for motorists to travel on free or else I can bring in free public transport for everyone. No Contest !' Since then public transport use has increase thirteen fold. With other measures, car use has declined dramatically.	in the Local Transport Plan (LTP3). The main obstacle to the provision of the strategic transport projects is funding. If funding can be obtained the Council will support the implementation of either project. The policy acknowledges the importance of reducing the need to travel and helping people to make smarter choices. However the planning system is only one element in the wider transport policy debate.	
Policy ENV5 and Policy ENV6	1011	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	1012	Yes		Agreement noted.	N/A
Policy LIV1	1013	Yes		Agreement noted.	N/A
Policy LIV2	1014	Yes		Agreement noted.	N/A
Policy LIV3	1015	Yes		Agreement noted.	N/A
Policy LIV4	1016	Yes		Agreement noted.	N/A
Policy WRK1	1017	No	Remove aerospace as outlined in previous comments under Spatial Vision (Comment 982), which state that "aerospace is a major and growing contributor to pollution and global warming so we should reduce any focus (on) advanced manufacturing centred on aerospace and instead focus on non-nuclear renewable technology and other green industries."	Policy WRK1 supports investment by "businesses in the priority (growth) sectors" identified in the Integrated Economic Strategy for Pennine Lancashire. Advanced manufacturing is one of two priority sectors identified in Pendle. The supporting text (Para 11.21) acknowledges that aerospace is particularly important to the Pendle economy. However, the policy itself only explicitly mentions aerospace under the West Craven Towns, as Barnoldswick is the location of a large Rolls-Royce manufacturing facility, which supports a large range of sub-contractors across Pendle and	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Pennine Lancashire. Failure to support development that builds on the areas existing strength in aerospace could potentially see large scale job losses not only in Pendle, but across Lancashire and West Yorkshire. For the foreseeable future commercial aviation will remain one of the three principle modes of transport across the world. The continued development and installation of technologically advanced engines on commercial aircraft will potentially have far reaching positive benefits for the global environment. Rolls-Royce and its partners are at the forefront of this evolution, designing aircraft engines that are increasingly fuel efficient and environmentally friendly. Policy WRK1 supports inward investment, new businesses formation and the diversification of existing businesses. This may help to reinforce the areas existing specialisms, but is also intended to support investment in sectors that can use, or develop, the skills available within the local workforce. Whilst "non-nuclear renewable technology and other green industries" are not currently a local strength, and hence not addressed specifically within the policy, any opportunities to exploit their potential locally is not restricted by this policy. The dichotomy is that all employment growth, particularly following on from an economic downturn as severe as the one we have just experienced, is unlikely to contribute the sought after reductions in carbon emissions. Indeed, in the short-term the opposite is more than likely. It is the responsibility of other policies within the Core Strategy (e.g. ENV5-7), and subsequent planning documents, to ensure that all new development is, within reason, as environmentally friendly as possible. Also refer to comment 982 (Spatial Vision).	
Policy WRK2	1018	Yes		Agreement noted.	N/A
Policy WRK3	1019	Yes		Agreement noted.	N/A
Policy WRK4	1020	Yes		Agreement noted.	N/A
Policy WRK5	1021	Yes		Agreement noted.	N/A
Policy SUP1	1022	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SUP2	1023	No	Add to key bullet points (in green box) support and develop healthy ways to travel.	This additional bullet point will be added to the policy and a link will be made to Policy ENV4: Promoting Sustainable Travel.	PROPOSED ACTION: Add the following bullet point to the policy: - Support and develop healthy ways to travel (also see Policy ENV4).
Policy SUP3	1024	Yes		Agreement noted.	N/A
Policy SUP4	1025	Yes		Agreement noted.	N/A
619155	Mrs. J. Standley				
Document	198		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
612159	Mr Jeremy Stanford				
Policy ENV3	6	No	Wind turbine technology consumes more carbon in construction, (including construction access provision, structure and foundations, maintenance, consumable components and network connection) than they can save in generation. The average large-scale farm annual output is around 30% of their theoretical maximum, they also cannot operate in high winds or very light winds and require an electrical input to maintain the equipment when they are static. In climatic high pressure periods and when wind speed is too high conventional power stations have to take over so the latter have to exist alongside making turbines irrelevant. Government figures in £/MWhour quote nuclear generation as 38, coal 51, gas 52, onshore wind 72 and offshore wind 92. Urban and house attached turbines are virtually useless because of building interference with wind direction. Wind turbines are counter-productive and only viable because of huge tax-payer subsidies paid largely to non-British organisations. The demand for new developments to achieve 10% renewables is unrealistic (for chiefly the above reasons) and should be softened to an aspiration where viable.	It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which can contribute towards UK targets and the Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. Local evidence base studies have also shown it has technical potential in the borough. The role of the Core Strategy is to best manage such potential developments in Pendle through the Planning system by ensuring that we can achieve suitable developments, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. .	PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. PROPOSED ACTION: With regards to the 10% on-site renewables target, it has been demonstrated both nationally and locally that a requirement for on-site renewables to meet 10% of the buildings energy generation has been an achievable target for many years and will become even easier to meet as technologies become more efficient and cost effective. However, the policy makes an exception for where such a requirement is not financially viable. The policy will be amended to show that where it can be proved that 10% is not viable the Council will enter into negotiations to ensure a lower viable amount. It is also proposed to re-prioritise the position of district heating/energy networks in this policy requirement as at the correct scale these can be more efficient than the use of building scale individual technologies.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV4	7	No	The rail option should be broader to seek a two track electric powered connection extended to Manchester and Preston to the west and Skipton for Leeds onwards to the east. This will engage with European freight plans connecting container traffic from overseas and Ireland across UK to Denmark, Germany and eastern Europe. It provides a second value on rendering the M65 corridor a better commuter dormitory area for both the western Yorkshire conurbations and the Manchester area. This will reduce road traffic and hence pollution, be more sustainable and environmentally friendly whilst bringing greater wealth to Pendle. This will require close cooperation with LCC and other large partners to achieve. An additional proposal is needed to work to improve traffic engineering to reduce congestion in the north valley of Colne and the main street which is currently unacceptable as a thoroughfare especially at peak periods.	Policy ENV4 supports the long term proposal to reinstate the Colne to Skipton railway line. However, the Council considers that the delivery of this proposal is unlikely to occur before the end of the plan period. The form/nature of the reinstatement is not set out in the Core Strategy as no specific scheme has been approved and there is no commitment from LCC or other partners to deliver this project in the short term. The general support for the railway reinstatement in Policy ENV4 of the Core Strategy provides a flexible approach and allows a range of options to be considered. The supporting text could be improved by including a reference to the partnership working which is taking place to improve the existing railway provision. Policy ENV4 seeks to reduce the impact of new development on areas of current traffic congestion such as those in Colne. The planning system can only deal with issues arising from new development. The Local Transport Plan (LTP) recognises the congestion issues faced in Colne and is proposing a study to assess the potential solutions.	PROPOSED ACTION: At the beginning of paragraph 7.109 include the following wording: "Lancashire County Council is also involved in working with various stakeholders to improve the local railway environment, and sustainability of the railway lines in Lancashire."
Policy LIV1	8	No	I believe greater emphasis should be placed on recovering existing unused/decrepit housing stock as a preference to new build to achieve the desired additional provision. The basic quality of the traditional terraces in Pendle is far superior to modern housing and the addition of modern energy conservation will produce good-quality new homes more cheaply and effectively.	Policy LIV1 explains that the net housing provision is set at a level which takes account of the large number of empty homes in the borough. The Housing Technical Paper indicates that the overall housing requirement figures has been reduced to take account of the number of empty properties in the borough, with the aim to bring a proportion of these empty properties back into use. Policy LIV1 includes a specific policy point to support the re-use of empty properties. Policy LIV3 (Affordable Housing) also indicates that where affordable housing cannot be provided on-site as part of a new development, consideration should be given to acquiring empty properties and refurbishing them for use as affordable housing. The National Planning Policy Framework (NPPF) requires Local Authorities to identify and bring back into use empty housing and buildings in line with local housing and empty homes strategies. The updated Pendle Empty Homes Action Plan indicates that over the last 3 years 361 long-term empty properties have been brought back into use. Additional funding has been secured across Pennine Lancashire to fund a number of empty home schemes. This together with the policies in the Core Strategy can help to bring empty homes back into use.	PROPOSED ACTION: Make reference in the supporting text to the NPPF in relation to the reuse of empty homes.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
619152	Miss Caroline Stephenson				
Document	643		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379313	Mr. & Mrs. M. & A.B. Stott				
Policy ENV3	293	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
619473	Mr Chris Stridgeon				
Policy ENV3	627		I wish to register my objections to the councils proposals to install wind turbines on Noyna Hill. I have resided in Pendle for many years and one the main attractions has been the beautiful landscapes and the many public rights of way that allow keen walkers such as myself to explore the area and enjoy the magnificent countryside and wildlife that thrive in thge area. To position these monstrous machines in such an area of natural beauty is nothing more than pure vandalism! To the best of my knowledge the turbines are not fully proven to gain the best solutions to our energy problems and are not as efficient as some bodies would have us believe. We should be encouraging more of our residents to look at solar power alternatives and even hydro options given the terrain. As is usually the case government and councils alike steam ahead destroying all that is good and later regretting the lack of propoper alternatives.	This document does not propose any specific sites (e.g. Noyna Hill) for wind developments, it simply sets out the Council's general approach to renewable energy developments. The suitability of any specific site would need to be assessed if and when a planning applicationis submitted. This would include an assessment of the landscape and visual impact of the proposal, as required by this policy. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	PROPOSED ACTION: Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV4	628		As is usually the case government and councils alike steam ahead destroying all that is good and later regretting the lack of proper alternatives. To name one good example, the M65 terminating at Boundary Mill and causing chaos and misery to local people. Have the council got a solution to this problem? I think not.	The termination of the M65 at Colne is a historic decision based on a number of issues present at that time. The aspiration to provide an A56 Villages Bypass looks to solve part of the congestion problem. However, the funding for such a project is unlikely to be available in the short term. Alternative measures to try and relieve congestion in Colne are being considered. Policy ENV4 aims to reduce the impact of new development on such problems. Lancashire County Council is the highways authority for Pendle and produce a Local Transport Plan (LTP3). This plan includes the provisions for a study to assess the issues and potential options to relieve congestion in the Colne area.	No changes to the document are proposed as a result of this representation.
619160	Ms. Jacqueline Sunderland				
Document	201		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379363	Mr. & Mrs. Paul & Marina Swinton				
Document	202		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619164	Miss Clare Tambling				
Document	208		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619489	Mr & Mrs D Tattersall				
Policy ENV3	635		I wish to make comment in relation to Section 7 'Our Foundations for a Sustainable Future: improving The Environment We Live In' of the above Report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: . A reduction in the Council's quota for renewable energy · A lowering of the proportion of renewable energy to be	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			generated from wind turbines (which are grossly inefficient) · A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	only acceptable developments approved.
619166	Miss Victoria Taylor				
Document	211		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
619128	Mr & Mrs David & Kathryn Teasdale				
Chapter 4: Vision	476		Vision for Pendle: 4.13: West Craven's residents generally do not consider themselves as part of Pendle. They have a stronger identity with Yorkshire and want stronger transport links with towns and cities such as Skipton, Harrogate, Bradford and Leeds. I believe therefore that spending money linking them with the M65 would be wasted. There was a train line which linked Pendle to West Craven which wasn't used. 4.14: Traditional farming should be invested in rather than encouraging diversification. There is enough housing in rural Pendle and housing is affordable. Many new and old houses are empty or unused. Investment would be better spent re-generating existing housing stock.	The overall vision for Pendle is to provide better linkages between the borough as a whole in three directions north and east towards the major conurbations of North and West Yorkshire and west to the Manchester City Region and the rest of Lancashire. It is envisaged that this will be achieved through improvements to existing road and rail connections and the services along these routes, as well as through the provision of new infrastructure. In terms of specific infrastructure, the vision sees the strengthening of existing links north towards North Yorkshire and south towards the M65 Corridor as an essential requirement. Improved linkages from Pendle to the Manchester City Region and growth points in Lancashire and Yorkshire will bring potential economic benefits businesses in the M65 Corridor and West Craven areas and open up new opportunities for residents in the borough. Research in the Strategic Housing Market Assessment (SHMA) suggests that housing in the rural areas of Pendle is no longer affordable, and in limited supply, making it difficult for young people to remain in the area they grew up in. The majority of empty homes are located in the urban areas and the Core Strategy includes policies which aim to help to renovate and reoccupy these properties. It is acknowledged that traditional farming practices still have an important role to play in the rural areas and the vision will be amended to reflect this. However, it must be recognised that there are instances where support for the diversification of agricultural is required to ensure their long term survival and contribute to the continued sustainability of rural areas.	PROPOSED ACTION: Amend the second sentence of the Vision (paragraph 4.14) to read: "The revival, and where appropriate, the diversification of traditional agricultural practices..."
Chapter 6: Our Spatial Strategy	478	No	Spatial Strategy: Rural Pendle: Foulridge and other Pendle villages cannot take any more new housing. Many new houses in Foulridge, for example, remain empty and new houses are starting to take away the charm of the village (which generates tourism) and threaten its strong usually crime free community. Housing in the area is affordable. I do not want every scrap of green land to be built upon. It is harmful to the environment, wildlife and destroys the very essence of what attracts tourists to Pendle: its varied walks & rural charm.	The strategy has to take a balanced approach to the need for new development. The Plan covers a 15 year period and needs to account for changes in population and the sustainable development of the borough. In the villages of Pendle a limited amount of new housing will be needed and this is reflected in the levels set out in Policies SDP2 and LIV1. Evidence in the Strategic Housing Market Assessment (SHMA) shows that rural housing in Pendle is not affordable, especially for young people who may wish to stay in the area in which they grew up. Other policies in the Core Strategy are designed to: 1) direct new development to brownfield sites in the first instance (Policy SDP6). 2) protect the countryside and natural environment (Policy ENV1). The	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP1	481	No	SDP1 and SDP2 and SDP3 and SDP4 and SDP5 and SDP6: I do not want new developments in Pendle's rural villages or rural service centres. If Rolls Royce etc want a more secure future why don't they re-locate to somewhere closer to the M65 rather than Pendle Council improving links to West Craven?! (The same comment is made at 482,483,484,486,487).	Strategy is clear that housing growth in the Rural Areas is about meeting needs rather than unchecked village expansion. There can be benefits of development including helping to support / sustain rural services, facilities and retail. New development in the Rural Service Centres and Rural Villages is necessary in order to sustain existing services and allow the borough to grow to meet its needs. The level of development proposed in the Rural Service Centres and Rural Villages is of a scale that is appropriate to the size of the settlements. The National Planning Policy Framework (NPPF) (paragraph 14) requires Local Planning Authorities to "positively seek opportunities to meet the development needs of their area and that Local Plans should meet objectively assessed needs..." The evidence shows that Pendle's population is likely to grow and these people will require housing, employment and facilities.	No changes to the document are proposed as a result of this representation.
Policy SDP2	482	No	SDP1 and SDP2 and SDP3 and SDP4 and SDP5 and SDP6: I do not want new developments in Pendle's rural villages or rural service centres. If Rolls Royce etc want a more secure future why don't re-locate to somewhere closer to the M65 rather than Pendle council improving links to West Craven?! (Same comment as 481,483,484,486,487)	The National Planning Policy Framework (NPPF) requires Local Planning Authorities to identify and plan for the housing needs of their communities (paragraph 50). The evidence base (SHMA etc) indicates there is a need to provide additional housing throughout the borough. The SHMA specifically identifies that there is a need to provide additional housing in rural areas. The level of housing proposed reflects the changes in population, housing need and available land. It is also proportionate to the size and scale of each settlement.	No changes to the document are proposed as a result of this representation.
Policy SDP3	483	No	SDP1 and SDP2 and SDP3 and SDP4 and SDP5 and SDP6: I do not want new developments in Pendle's rural villages or rural service centres. If Rolls Royce etc want a more secure future why don't re-locate to somewhere closer to the M65 rather than Pendle council improving links to West Craven?!	This comment has been made against policies SPD1-6 (also refer to Comments 481, 482, 484, 486 and 487). The response below specifically addresses the proposed distribution of employment land (Policy SDP3). The settlement hierarchy set out in Policy SDP1 reflects the ability of towns and villages in Pendle to accommodate future growth. This hierarchy is reflected in the proposed distribution of employment land, with only 3% of the total provision identified as being appropriate for Rural Service Centres and Rural Villages. The policy text notes that "any development in rural villages should be of a scale and nature that fulfils the needs of local communities" rather than a borough-wide catchment. As such any new development is expected to relatively small scale to support further diversification of the rural economy and tourism, helping to reduce the need to travel for employment. In contrast the Rolls-Royce facility is situated in Barnoldswick,	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				one of the three Key Service Centres identified in Policy SDP1. These are regarded as the key drivers for future growth in Pendle. Should the Core Strategy fail to support improvements in essential infrastructure (e.g. transport, broadband, local services) it is highly likely that in the long-term local employment opportunities would be lost to the area. This would set in motion a potentially irreversible spiral of decline in that the existing levels of retail and service provision would no longer be viable leading to not only to further loss of employment but a potential decline in population. One of the key objectives of the Core Strategy is to promote sustainable patterns of development that help to enhance the vitality and viability of all our communities, at a scale that is appropriate for their position within the settlement hierarchy (Policy SDP1). This in turn promotes sustainable patterns of movement between settlements. It would be irresponsible for planning policy to initiate the loss of employment opportunities, reducing spend in the local economy and requiring the majority of residents to travel long distances to access work. If all new employment was concentrated in the M65 Corridor and links with West Craven were not improved, the likelihood is that the North Valley in Colne would come to a standstill and West Craven would be a less desirable place to live for young people and those of working age. Also refer to Policy SDP1 (Comment 481), SDP2 (Comment 482), SDP4 (Comment 484), SDP5 (Comment 486) and SDP6 (Comment 487).	
Policy SDP4	484	No	SDP1 and SDP2 and SDP3 and SDP4 and SDP5 and SDP6: I do not want new developments in Pendle's rural villages or rural service centres. If Rolls Royce etc want a more secure future why don't re-locate to somewhere closer to the M65 rather than Pendle council improving links to West Craven?!	This comment has also been made against policies SPD1-6 (see comments at 481,482,484,486,487). The response below specifically addresses the proposed distribution of retailing (Policy SDP4). The settlement hierarchy set out in Policy SDP1 reflects the ability of towns and villages in Pendle to accommodate future growth. This hierarchy is reflected in the proposed location of retailing in Pendle. Policy SDP1 indicates that Barnoldswick, like Nelson and Colne, is considered to be a Key Service Centre. However, although Barnoldswick exhibits the characteristics of a Key Service Centre, it does so within the context of West Craven. Its role within the borough as a whole is less influential due to its relative isolation and more limited range of services. Policy SDP4 establishes a retail hierarchy, but must be read in conjunction with Policy WRK3, which clearly states that all retail applications that are intended to serve a borough-wide catchment should be located in Nelson or Colne (Paragraph	PROPOSED ACTION: Include a reference within Policy SDP4 stating that it must be read in conjunction with Policy WRK3.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				3 of the Policy). In combination Policy SDP4 and Policy WRK3 seek to ensure that any retail provision in Barnoldswick, is consistent with the scale and function of the town as a shopping centre, so that it does not undermine the vitality and viability of the town centre or create unsustainable shopping patterns within the Borough. Also refer to Policy (Comment 481), SDP2 (Comment 482), (Comment 483), SDP5 (Comment 486) and SDP6 (Comment 487)	
Policy SDP5	486	No	SDP1 and SDP2 and SDP3 and SDP4 and SDP5 and SDP6: I do not want new developments in Pendle's rural villages or rural service centres. If Rolls Royce etc want a more secure future why don't re-locate to somewhere closer to the M65 rather than Pendle council improving links to West Craven?!	This comment has been made against all the policies within the Spatial Strategy. The response below specifically addresses future infrastructure requirements (Policy SDP5). The settlement hierarchy set out in Policy SDP1 reflects the ability of towns and villages in Pendle to accommodate future growth. This hierarchy is reflected in the proposed location of housing (Policy SDP2), employment (Policy SDP3) and retailing (Policy SDP4) in Pendle. In combination with Policy SDP5 these policies ensure that any proposed development: is a sustainable location (SDP1) is appropriate in both size and scale to the settlement in which it is to be located (SDP2-4 inclusive) will not overwhelm existing infrastructure provision (SDP5); or is delayed until such time that the essential infrastructure can be provided (SDP2-5 inclusive) Whilst not improving the existing infrastructure or supporting new development in Barnoldswick is an option, this has not been reflected in earlier rounds of public consultation. Improvements to the transport network (road and/or rail) and broadband connections in particular have been highlighted as important for the future vitality and viability of the town. Also refer to Policy SDP1 (Comment 481), SDP2 (Comment 482), SDP3 (Comment 483), SDP4 (Comment 484) and SDP6 (Comment 487)	No changes to the document are proposed as a result of this representation
Policy SDP6	487	No	SDP1 and SDP2 and SDP3 and SDP4 and SDP5 and SDP6: I do not want new developments in Pendle's rural villages or rural service centres. If Rolls Royce etc want a more secure future why don't they re-locate to somewhere closer to the M65 rather than Pendle council improving links to West Craven?! (The same comment has been made against Policy SDP1: Comment: 481, Policy SDP2: Comment: 482, Policy SDP3: Comment: 483, Policy SDP4: Comment: 484, Policy SDP5 Comment: 486).	Policy SDP6 aims to direct development to the most sustainable locations and make the best use of resources by prioritising the reuse of previously developed land. It is proposed, in response to other consultation comments, to clarify that development outside of settlement boundaries will only be considered for appropriate rural uses.	No changes to the document are proposed as a result of this representation.
Policy ENV1	490	No	Again I do not agree with building houses or any other development in Pendle's rural villages and rural service centres. I am opposed to wind turbines and fracking in Pendle's rural villages and rural service centres.	Comment noted. However this policy relates to the natural and historic environments. As stated in response to similar objections to other policies - national planning policy requires consideration of all technologies where appropriate	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				and a policy which included a blanket ban on a particular technology would not be found sound at examination. Instead, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
Policy ENV2	492	No	Again I do not agree with building houses or any other development in Pendle's rural villages and rural service centres. I am opposed to wind turbines and fracking in Pendle's rural villages and rural service centres.	The policy does not set out location of development or potential types of alternative technologies. It supports good design and the requirement for development to have a positive or at least neutral impact on climate change.	No changes to the document are proposed as a result of this representation
Policy ENV3	493	No	Again I do not agree with building houses or any other development in Pendle's rural villages and rural service centres. I am opposed to wind turbines and fracking in Pendle's rural villages and rural service centres.	Comment noted. However national planning policy requires consideration of all technologies where appropriate and a policy which included a blanket ban on a particular technology would not be found sound at examination. Instead, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	No changes to the document are proposed as a result of this representation.
Policy ENV4	496	No	A56 by-pass. I do not feel that I can disagree or agree as there are no details about where this by-pass would be. I feel that more money needs to be invested in public transport and getting freight off the roads onto more environmentally friendly methods such as rail. Re-instatement of the Colne-Skipton railway line should only happen if there will be enough usage. It should not be another rural service which is not viable & has to be subsidised. I think improved railway connections from Nelson & Colne to Manchester is the way forward but rail fares need to be reduced to make it an affordable commute.	The proposals for the A56 bypass and rail re-instatement are long term strategic projects. It is acknowledged in the supporting text that they may not come forward during the plan period. Improving rail connections from Colne and Nelson to Manchester is difficult. The re-instatement of the Todmorden Curve in Burnley may provide some benefits to rail users from Pendle, however, they will still need to change trains and this may not significantly improve travel times. Policy ENV4 supports measures outlined in the Local Transport Plan (LTP3) to improve public transport systems where possible. Contributions from new developments can help to facilitate this approach.	No changes to the document are proposed as a result of this representation.
Policy LIV1	498	No	As stated before, I am opposed to any new housing in Pendle's rural villages & rural service centres. I agree with new housing being built in other areas of Pendle only when existing housing stock has been regenerated and there is evidence that new housing is needed. Housing in Pendle is already affordable. Any new housing which is built in Pendle should be built so that it generally meets the needs of disabled people. (Same comment at 499,500,501)	Policy SDP2 deals with the distribution / location of new housing development. Policy LIV1 aims to create a balanced housing market - this involves the reuse of empty properties and the better use of the existing housing stock but also requires new housing to be built in order to meet the needs and requirements of the local population by increasing the mix of types, sizes and tenures of housing in the borough. The SHMA shows that there is a net additional need/demand for new housing in Pendle. In some circumstances where the provision of affordable housing cannot be provided on-site contributions will be sought from	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				the developer to be used to regenerate the existing housing stock in order to provide affordable housing - without this finance the regeneration of empty properties will not happen- it is therefore necessary for new build housing to occur at the same time as regeneration. The perception that housing in Pendle is already affordable is not always correct - although house prices are low in many of Pendle's settlements, the average incomes of the people living in those parts of Pendle are also very low and so there are still issues of affordability. Furthermore given the current economic conditions there are issues with people being able to obtain mortgages. The SHMA provides the evidence of the need for affordable housing in Pendle, which is mainly of a social rented tenure. Policy LIV4 deals with the design of new housing. It requires developers to meet the Lifetime Homes Standards which means that new housing should be built to allow for easy adaptation for the needs of the occupant - including the elderly and people with disabilities.	
Policy LIV2	499	No	As stated before, I am opposed to any new housing in Pendle's rural villages & rural service centres. I agree with new housing being built in other areas of Pendle only when existing housing stock has been regenerated and there is evidence that new housing is needed. Housing in Pendle is already affordable. Any new housing which is built in Pendle should be built so that it generally meets the needs of disabled people. This comment is also made against Policy LIV1 - Comment 498, Policy LIV3 - Comment 500 and Policy LIVe4 - Comment 501.	The main point of this comment is dealt with under Policy LIV1 - Comment 498. With regard to meeting the needs of people with disabilities: Policy LIV2 looks at the different housing needs of different groups of people. It considers how these needs can be met through different types of accommodation. This may include supported or non-supported accommodation or the adaptation of the existing housing stock to meet the specific needs of the occupant. Policy LIV4 deals with the design of new housing. It requires developers to meet the Lifetime Homes Standards which mean that new housing should be built to allow for easy adaptation for the needs of the occupant -including the elderly and people with disabilities.	No changes to the document are proposed as a result of this representation.
Policy LIV3	500	No	As stated before, I am opposed to any new housing in Pendle's rural villages & rural service centres. I agree with new housing being built in other areas of Pendle only when existing housing stock has been regenerated and there is evidence that new housing is needed. Housing in Pendle is already affordable. Any new housing which is built in Pendle should be built so that it generally meets the needs of disabled people. (Same comment made against Policy LIV1 - Comment 498, Policy LIV2 - Comment 499, and Policy LIV4 - Comment 501).	The main points of this comment are dealt with under Policy LIV1 - Comment 498. The perception that housing in Pendle is already affordable is not correct. Although house prices are low in many of Pendle's settlements, the average incomes of the people living in those parts of Pendle are also very low and so there are still issues of affordability for these people. Furthermore given the current economic conditions there are issues with people being able to obtain a mortgage. The SHMA provides the evidence of the need for affordable housing in Pendle, which is mainly of a social rented tenure.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV4	501	No	As stated before, I am opposed to any new housing in Pendle's rural villages & rural service centres. I agree with new housing being built in other areas of Pendle only when existing housing stock has been regenerated and there is evidence that new housing is needed. Housing in Pendle is already affordable. Any new housing which is built in Pendle should be built so that it generally meets the needs of disabled people. (Same comment at 499, 500, 501)	Policy LIV4 deals with the design of new housing. It requires developers to meet the Lifetime Homes Standards which mean that new housing should be built to allow for easy adaptation for the needs of the occupant - including the elderly and people with disabilities.	No changes to the document are proposed as a result of this representation.
Policy WRK1	502	No	I do not agree with the council investing in private businesses, apart from farming because everybody relies on farming for food. It should be up to private businesses to sustain themselves. I do not want any retail development in Pendle's rural villages or rural service centre and in other areas of Pendle it should be up to private business to create such developments as market forces dictate – not the council creating another unoccupied Nelson ACE or Millenium centre.	Pendle Council does not invest directly in private businesses. It has benefitted from external funding (e.g. European Regional Development Fund), to support specific objectives (e.g. investment in new technology, infrastructure improvements etc.). The Core Strategy, and in particular Policy WRK1, seeks to support new development, where it can be demonstrated that it will help to strengthen the local economy, in line with the objectives set out in the Integrated Economic Strategy for Pennine Lancashire . Planning policy makes no distinction between public or private sector development, as the source of funding for individual projects is not a planning matter. Also refer to comments 504 (WRK2), 505 (WRK3) and 506 (WRK5).	No changes to the document are proposed as a result of this representation.
Policy WRK2	504	No	I do not agree with the council investing in private businesses, apart from farming because everybody relies on farming for food. It should be up to private businesses to sustain themselves. I do not want any retail development in Pendle's rural villages or rural service centre and in other areas of Pendle it should be up to private business to create such developments as market forces dictate – not the council creating another unoccupied Nelson ACE or Millenium centre.	Pendle Council does not invest directly in private businesses. It has previously benefitted from external funding (e.g. European Regional Development Fund) and used this to help provide an appropriate infrastructure for future employment growth (e.g. premises improvement grants, land assembly, the provision of new workspace for small businesses etc.). Policy WRK2 seeks to support new development that will facilitate investment by businesses in identified growth sectors. This may be in the form of new build schemes, or innovative refurbishment projects that help to retain the best examples of our historic legacy. Planning policy makes no distinction between public or private sector development, as the source of funding for individual projects is not a planning matter. Also refer to comments 502 (WRK1), 505 (WRK3) and 506 (WRK5).	No changes to the document are proposed as a result of this representation.
Policy WRK3	505	No	I do not agree with the council investing in private businesses, apart from farming because everybody relies on farming for food. It should be up to private businesses to sustain themselves. I do not want any retail development in Pendle's rural villages or rural service centre and in other areas of Pendle it should be up to private business to create such developments as market forces dictate – not the council creating another	This comment has also been made against Policies WRK1 (Comment 502), WRK2 (Comment 504) and WRK 5 (Comment 506). Pendle Council does not invest directly in private businesses. It has benefitted from external funding (e.g. European Regional Development Fund), to support specific objectives (e.g. shop-front improvements, improvements to the public realm etc.). Policy WRK3, seeks	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			unoccupied Nelson ACE or Millenium centre.	to ensure that new retail development is directed to where it is most needed and provided at a scale that is appropriate for centre in which it is to be located (as set out in Policy SDP4). Planning policy makes no distinction between public or private sector development, as the source of funding for individual projects is not a planning matter.	
Policy WRK5	506	No	I do not agree with the council investing in private businesses, apart from farming because everybody relies on farming for food. It should be up to private businesses to sustain themselves. I do not want any retail development in Pendle's rural villages or rural service centre and in other areas of Pendle it should be up to private business to create such developments as market forces dictate – not the council creating another unoccupied Nelson ACE or Millenium centre.	Also refer to comments 502 (WRK1), 504 (WRK2) and 505 (WRK3). Pendle Council does not invest directly in private business. It has benefitted from external funding (e.g. European Regional Development Fund), to support specific objectives (e.g.investment in new technology, infrastructure improvements etc). The Core Strategy, and in particular Policy WRK1, seeks to support new development, where it can be demonstrated that it will help to strengthen the local economy, in line with the objectives set out in the Pennine Lancashire Economic Development Strategy. Planning policy makes no distinction between public or private sector development, as the source of funding for individual projects is not a planning matter.	No changes to the document are proposed as a result of this representation.
619418 Mr C.C Thistlethwaite					
Policy ENV3	608		Regarding Section 7 of the Pendle Core Strategy Preferred Options Report, may I voice my concern that the Council seems to be favouring Wind Turbines as a renewable energy source and not seriously addressing the potential of other renewable sources. Although I am in favour of renewable energy sources and most pleased that Pendle Council are active in looking to develop them, I fear that Wind Turbines are not the way forward, especially in Pendle and other sources should be considered. Wind Turbines are not as efficient as some would have us believe and are certainly not an attractive addition to the countryside, more the opposite. I would ask the council to re-consider their policy regarding the generation of energy so that there will be less reliance on Wind Turbines as a source of renewable energy and look to alternative sources eg. hydro, as we are not without water in Pendle. Would you please inform me as to how the Council propose to progress with this, to my mind, unacceptable method of generating energy, at their earliest convenience.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
619942	Mr Mike Thompson				
Document	938		There appears to be a lot of "support" in these documents without any clarity of how this will actually be delivered by the local authority, which in some ways is disappointing and whilst demonstrating some flexibility it certainly lacks direction and determination to overcome some of the issues identified within this very comprehensive document	The Core Strategy is a strategic planning document, which sets out the anticipated levels of growth and development that are needed to meet the needs of people living in Pendle over the next 15 years. In particular, the Spatial Vision and Spatial Strategy establish a clear direction for future growth and change in the borough. Pendle Council is not the only organisation responsible for delivering the proposed levels of development identified in the Core Strategy. A large number of projects will be the responsibility of key public sector partners, whilst others will be delivered by the private sector. The strategic nature of the Core Strategy means that,	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 4: Vision	892	Yes		with the exception of Policy SDP5, individual policies do not identify specific projects. Policy SDP5 sets out the key infrastructure projects required to support the level of development proposed in the Core Strategy. The identification site specific development will be carried out in the Site Allocations and Development Policies DPD. This document will also identify those organisations that will be responsible for delivering these projects. Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	921	No	No comments submitted.	This choice contradicts a second form submitted by the same person on 10/11/2011 where they answered 'Yes' to this question (see Comment: 893). The disagreement with the Spatial Strategy is noted, however, no specific comments relating to this part of the document have been provided to explain the reasons for the disagreement.	No changes to the document are proposed as a result of this representation.
Chapter 6: Our Spatial Strategy	893	Yes		Agreement noted.	N/A
Policy SDP1	894	Yes		Agreement noted.	N/A
Policy SDP2	895	Yes		Agreement noted.	N/A
Policy SDP3	896	Yes		Agreement noted.	N/A
Policy SDP4	897	No	SDP4 says Barnoldswick needs retail development but the map shows the current proposed Tesco as a town centre site and yet it is outside the current town centre and in a protected employment area which would require a change of policy.	The Key Diagram (Pages 107 and 109) does not use an Ordnance Survey map base, as it is intended to be for illustrative purposes only. Symbols are used to indicate what types of development are proposed within a particular settlement. Variations in the size of the symbol are intended to indicate the scale of development that will take place. However, their positioning is not intended to show the precise location of this development, which is likely to take place at several locations, particularly in the case of housing. It is unfortunate that subsequent to the publication of the Core Strategy (Preferred Options Report) that a planning application for a Tesco supermarket was submitted in	PROPOSED ACTION: The use and placement of symbols on the Key Diagram should be reviewed and a disclaimer provided to help avoid confusion.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				Barnoldswick, for a site close to where the symbol was placed on the Key Diagram.	
Policy SDP5	898	Yes		Agreement noted.	N/A
Policy SDP6	899	Yes		Agreement noted.	N/A
Policy ENV1	900	Yes		Agreement noted.	N/A
Policy ENV2	901	Yes		Agreement noted.	N/A
Policy ENV3	902	No	ENV 4 does not say how the Council will actually champion this policy or implement it onto current council standards.	This comment is stated against ENV 4 however tick box shows disagreement with ENV3 so placed here. Comments noted.	PROPOSED ACTION: More guidance about implementation is required, including more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.
Policy ENV3	925	Yes		This submission contradicts a second submission by the same person submitted on 10/11/11 where they answered 'no' with comments (C902).	No changes to the document are proposed as a result of this representation.
Policy ENV4	903	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	904	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	905	Yes		Agreement noted.	N/A
Policy LIV1	906	Yes		Agreement noted.	N/A
Policy LIV2	907	Yes		Agreement noted.	N/A
Policy LIV3	908	Yes		Agreement noted.	N/A
Policy LIV4	909	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK1	910	Yes		Agreement noted.	N/A
Policy WRK2	911	Yes		Agreement noted.	N/A
Policy WRK3	912	No	There is no need for major retail development in Barnoldswick or any retail outside the town centre	In planning, a retail scheme aimed primarily at serving local needs can still be considered to be a 'major' application, as this terminology applies to all applications occupying a site of one hectare or more, or in excess of 1,000 square metres. The policy, as worded, seeks to ensure that any applications in West Craven that exceed this threshold are located within Barnoldswick. The policy requirement is for all retail applications that are intended to serve a borough-wide catchment to be located in Nelson or Colne. This seeks to promote new retail development that is consistent with the scale and function of the respective shopping centres, does not undermine their vitality and viability or create unsustainable shopping patterns. The policy goes on to promote a town centre first approach, but recognises that suitable sites may not always be available within town centre locations. In such circumstances, where the available evidence indicates that there is unmet need and that the exploration of alternative sites has been adequately addressed, the policy encourages development to take place on the most sequentially preferable site, which is usually but not always the closest to the town centre. This is considered to be the most appropriate mechanism for ensuring that local needs are met in the most sustainable way. To resist all proposals for development outside the defined town centre in Barnoldswick would not be appropriate. [N.B. See Policy WRK3, Comment 241 (above) for proposed changes to the wording of the policy].	No changes to the document are proposed as a result of this representation.
Policy WRK4	913	No	Why will the Council not support the Arts in Barnoldswick, preferring to concentrate on Colne & Nelson	The representation states that Pendle Council does not support investment in the Arts in Barnoldswick to the same extent that it does in Nelson and Colne. It is not clear whether this is a response to the policy or a general observation. The comments below are limited to observations on planning policy, as set out in Policy WRK4. As the Policy text deals with the M65 Corridor and West Craven Towns under a single heading, there is clearly no differentiation in terms of spatial planning policy between	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK4	930	Yes		Barnoldswick, Nelson and Colne. In supporting the policy, this submission contradicts comment 619942/913 from the same consultee. Comment 913, submitted on 10/11/2011, objected to the Policy WRK4, stating that the Council favoured support for the arts in Nelson and Colne.	N/A
Policy WRK5	914	Yes		Agreement noted.	N/A
Policy SUP1	915	Yes		Agreement noted.	N/A
Policy SUP2	916	Yes		Agreement noted.	N/A
Policy SUP3	917	Yes		Agreement noted.	N/A
Policy SUP4	918	Yes		Agreement noted.	N/A
327965 Mr K.H. Thorp					
Policy SDP2	753	No	PG 46 PARA 6.25 Despite the optimism shown in the report, reality will show there will be little or no growth in industry. There will however be a considerable population explosion in parts of Burnley-Nelson and Brierfield that will require the type of housing that allows close knit groups to segregate themselves from the indigenous population, in this respect resources should be used to update, convert and modify existing properties and areas. New housing should be on brownfield sites only and the name 'affordable housing' should be dropped as history shows that many of these schemes introduced over the last 5 years have the majority of properties empty or unfinished. Whilst it is necessary to provisionally allocate some greenfield sites for development there should be no building of housing whilst the present economic situation continues. It is ludicrous to suggest that structures and buildings create poverty. It is people who create poverty and deprivation by not maintaining property.	Policy SDP2 sets out the proportion of new housing to be located in the different settlements in the borough. The distribution takes account of the levels of housing need due to population and household increases - this is seen in the M65 Corridor where there are likely to be the largest increases in population and hence the majority of new housing is to be located in this area. The reuse of existing (vacant) properties is one element of the Council's approach to providing accommodation for the borough's population, however the lack of funding to progress this approach and the likely levels of growth mean that there is a requirement to build some new houses. Policy SDP6 requires that new development utilise brownfield sites as the first priority, however, the level of growth means that some development on greenfield sites may be necessary. The National Planning Policy Framework (NPPF) (paragraph 47) requires Local Planning Authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. Policies LIV1-LIV4 set out in more detail the approach taken in the Core Strategy to housing provision.	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV4	754	No	The construction of a bypass will be the final nail in the coffin as far as Colne is concerned. We are already isolated as far as rail connections are concerned and the suggested bypass will do exactly as it says: it will bypass Colne. In the 2003 survey by Thornton & Grimley on behalf of Colne Council for 15 years, the people of Colne wanted: Canals for leisure, the railway reinstating and the land around the railway for industrial development. They did not want a bypass - they wanted a dual carriageway ring road using infrastructure already in place along north valley, running from end of M65 to Lidgett roundabout or thereabouts and continuing into Yorkshire picking up on M65 proposed route had it gone south valley way. The north valley ring road replacing south valley road proposal. This report or survey was never made public neither were the two public consultations reportedly held behind closed doors as it was rumoured the peoples ideas did not agree with certain of our then councillors.	The provision of the A56 Villages Bypass has been a long-standing project in the County Council's Local Transport Plans (LTPs). The most recent LTP (LTP3) has identified funding for a new study to look at the current issues and options for relieving traffic congestion in and around Colne. This will consider whether there is still a case for a bypass scheme. Policy ENV4 supports both the re-instatement of the railway and the provision of the bypass. The policy recognises that these projects are important strategic transport issues for the borough, however, the availability of funding is the main obstacle to delivering these projects and as such they are seen as longer-term ambitions. Policy ENV4 also supports the provision of alternative modes of transport and looks to encourage improved public transport provision. Contributions from new development can help to put new traffic management schemes in place to help current congestion hot spots.	No changes to the document are proposed as a result of this representation.
Policy LIV2	755	No	This issue is far too complex to be condensed into 4-5 pages as it appears to have omitted or ignored the countries of origin, ways of living, cultures, religious followings and demands, colour etc. People from different countries have different ways of living. People who come from countries where the practice of parents, grandparents, uncles, aunts, cousins, children etc all living together could be housed in converted mill complex's which would allow them to maintain their traditions whilst providing affordable housing. Other nationalities seek immediate family closeness for example updated terraced properties. Others require solitude perhaps detached. Travellers to be put into two classes: Long stay travellers and genuine travellers. Long stay travellers should not be accommodated. Short stay travellers on allocated sites restricted to so many pitches - payable in advance or on arrival and limited to 1 week maximum.	Policy LIV2 is based on evidence of housing need from the SHMA. This study considers the housing needs of all the different types of households including those from a Black and Minority Ethnic background. Policy LIV2 sets out a profile of the proportion of the different types of households that require housing. Policy LIV4 sets out the different types and sizes of housing that are required in the borough - based on this assessment of the different household needs. The Government's new Planning Policy for traveller sites sets out the requirements of Local Authorities for the provision of sites for the Gypsy and Traveller community. The policy requires Local Authorities to: 1) set pitch targets for gypsies and travellers and plot targets for travelling show people. 2) set criteria for allocating sites and/or determining applications. To do this Local Planning Authorities should assess the likely permanent and transit site accommodation needs of travellers in their area. Addressing the needs of the Gypsy and Traveller community through the planning system aims to reduce the likelihood of illegal encampments. If used effectively the planning system can help to locate the Gypsy and Traveller community in places where they can access services alongside the settled community and in a way that is not detrimental to either community. The overall intention of the Planning Policy for Traveller Sites is that Local Authorities still need to assess the accommodation needs of travellers (this is a legal requirement under the Housing Act 2004) and plan accordingly to provide for this need. It is	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				considered that Policy LIV2 and LIV4 provide a sufficiently detailed basis with regards to the different housing needs of Pendle's population and how these needs can be met. Further detail could be included in a Development Management policy if this is deemed necessary.	
619924	Mr. David Thurstan				
Chapter 4: Vision	871	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	873	Yes		Agreement noted.	N/A
Policy SDP1	874	Yes		Agreement noted.	N/A
Policy SDP2	876	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Juntion 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	879	Yes		Agreement noted.	N/A
Policy SDP4	880	Yes		Agreement noted.	N/A
Policy SDP5	881	Yes		Agreement noted.	N/A
Policy SDP6	882	Yes		Agreement noted.	N/A
Policy ENV1	883	Yes		Agreement noted.	N/A
Policy ENV2	884	Yes		Agreement noted.	N/A
Policy ENV3	885	Yes		Agreement noted.	N/A
Policy ENV4	886	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	887	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV7	888	Yes		Agreement noted.	N/A
Policy LIV1	889	Yes		Agreement noted.	N/A
Policy LIV2	890	Yes		Agreement noted.	N/A
Policy LIV3	891	Yes		Agreement noted.	N/A
Policy LIV4	924	Yes		Agreement noted.	N/A
Policy WRK1	926	Yes		Agreement noted.	N/A
Policy WRK2	929	Yes		Agreement noted.	N/A
Policy WRK3	932	Yes		Agreement noted.	N/A
Policy WRK4	934	Yes		Agreement noted.	N/A
Policy WRK5	937	Yes		Agreement noted.	N/A
Policy SUP1	941	Yes		Agreement noted.	N/A
Policy SUP2	943	Yes		Agreement noted.	N/A
Policy SUP3	944	Yes		Agreement noted.	N/A
Policy SUP4	946	Yes		Agreement noted.	N/A
619842	Mr. James Thurstan				
Chapter 4: Vision	818	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 6: Our Spatial Strategy	825	Yes		Agreement noted.	N/A
Policy SDP1	828	Yes		Agreement noted.	N/A
Policy SDP2	830	No	I am against the building of any more houses in barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Junction 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	832	Yes		Agreement noted.	N/A
Policy SDP4	833	Yes		Agreement noted.	N/A
Policy SDP5	834	Yes		Agreement noted.	N/A
Policy SDP6	835	Yes		Agreement noted.	N/A
Policy ENV1	836	Yes		Agreement noted.	N/A
Policy ENV2	839	Yes		Agreement noted.	N/A
Policy ENV3	841	Yes		Agreement noted.	N/A
Policy ENV4	842	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	844	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	846	Yes		Agreement noted.	N/A
Policy LIV1	847	Yes		Agreement noted.	N/A
Policy LIV2	848	Yes		Agreement noted.	N/A
Policy LIV3	849	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy LIV4	851	Yes		Agreement noted.	N/A
Policy WRK1	853	Yes		Agreement noted.	N/A
Policy WRK2	854	Yes		Agreement noted.	N/A
Policy WRK3	857	Yes		Agreement noted.	N/A
Policy WRK4	859	Yes		Agreement noted.	N/A
Policy WRK5	860	Yes		Agreement noted.	N/A
Policy SUP1	862	Yes		Agreement noted.	N/A
Policy SUP2	864	Yes		Agreement noted.	N/A
Policy SUP3	865	Yes		Agreement noted.	N/A
Policy SUP4	866	Yes		Agreement noted.	N/A
619955	Ms Susan Thurstan				
Chapter 4: Vision	919	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	920	Yes		Agreement noted.	N/A
Policy SDP1	922	Yes		Agreement noted.	N/A
Policy SDP2	923	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			cope with the resultant increase in population. The A682 (Gisburn Road) through Barrowford and Junction 13 of the M65 are already at saturation point during busy periods.	requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	927	Yes		Agreement noted.	N/A
Policy SDP4	928	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP5	931	Yes		Agreement noted.	N/A
Policy SDP6	933	Yes		Agreement noted.	N/A
Policy ENV1	935	Yes		Agreement noted.	N/A
Policy ENV2	936	Yes		Agreement noted.	N/A
Policy ENV3	939	Yes		Agreement noted.	N/A
Policy ENV4	940	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	942	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	945	Yes		Agreement noted.	N/A
Policy LIV1	947	Yes		Agreement noted.	N/A
Policy LIV2	949	Yes		Agreement noted.	N/A
Policy LIV3	950	Yes		Agreement noted.	N/A
Policy LIV4	951	Yes		Agreement noted.	N/A
Policy WRK1	952	Yes		Agreement noted.	N/A
Policy WRK2	953	Yes		Agreement noted.	N/A
Policy WRK3	954			Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK4	955	Yes		Agreement noted.	N/A
Policy WRK5	956	Yes		Agreement noted.	N/A
Policy SUP1	957	Yes		Agreement noted.	N/A
Policy SUP2	958	Yes		Agreement noted.	N/A
Policy SUP3	959	Yes		Agreement noted.	N/A
Policy SUP4	960	Yes		Agreement noted.	N/A
619737	Mrs. Tracy Thurstan				
Chapter 4: Vision	321	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	329	Yes		Agreement noted.	N/A
Policy SDP1	331	Yes		Agreement noted.	N/A
Policy SDP2	333	No	I am against the building of any more houses in Barrowford until such time as sufficient infrastructure is put in place for road improvements, more school places and transport facilities to cope with the resultant increase in population. the A682 (Gisburn Road) through Barrowford and Juntion 13 of the M65 are already at saturation point during busy periods.	The National Planning Policy Framework (NPPF) (paragraph 157) requires Local Plans to plan positively for the development and infrastructure required in the area. It also requires (paragraph 162) Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. The distribution of new housing, as shown in the Core Strategy, was calculated taking into account a number of factors. These included: population and household projections, land capacity, past completions, and housing need. In addition as part of the Core Strategy drafting process consultation was carried out with a range of infrastructure providers to help identify whether there were any infrastructure capacity issues with the proposals. A	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				meeting held with Lancashire County Council (LCC) regarding transport issues indicated that the proposed level and distribution of new housing would not require major new infrastructure. However, in terms of location, it was advised that new housing should avoid areas of existing congestion and where this is not possible, then developments should contribute to mitigation measures. Policy SDP5 of the Core Strategy requires new development to contribute towards the mitigation of any adverse impacts to make development acceptable in planning terms. Policy ENV4 also looks at the sustainable location of new developments - locating residential development closer to employment opportunities and services in order to reduce the need to travel, and encouraging the use of sustainable transport methods. LCC are responsible for the provision of sufficient school places to meet the needs of the local population. Discussions have taken place during the drafting of the Core Strategy to highlight the proposed levels of development to LCC and to ensure that sufficient school places can be provided as a result. They have indicated that the level of development may require the provision of additional places and possibly new facilities to accommodate this increase in population. As part of their forward planning process for schools LCC have to have regard to the likely increases in population - this information has been used in the development of the housing figures and distribution levels in the Core Strategy - so the two should fit together.	
Policy SDP3	335	Yes		Agreement noted.	N/A
Policy SDP4	339	Yes		Agreement noted.	N/A
Policy SDP5	342	Yes		Agreement noted.	N/A
Policy SDP6	343	Yes		Agreement noted.	N/A
Policy ENV1	345	Yes		Agreement noted.	N/A
Policy ENV2	387	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy ENV3	390	Yes		Agreement noted.	N/A
Policy ENV4	392	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	394	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	788	Yes		Agreement noted.	N/A
Policy LIV1	789	Yes		Agreement noted.	N/A
Policy LIV2	790	Yes		Agreement noted.	N/A
Policy LIV3	791	Yes		Agreement noted.	N/A
Policy LIV4	792	Yes		Agreement noted.	N/A
Policy WRK1	793	Yes		Agreement noted.	N/A
Policy WRK2	800	Yes		Agreement noted.	N/A
Policy WRK3	803	Yes		Agreement noted.	N/A
Policy WRK4	804	Yes		Agreement noted.	N/A
Policy WRK5	805	Yes		Agreement noted.	N/A
Policy SUP1	806	Yes		Agreement noted.	N/A
Policy SUP2	807	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SUP3	808	Yes		Agreement noted.	N/A
Policy SUP4	809	Yes		Agreement noted.	N/A
619169 Mr. C.M. Varley					
Document	214		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619171 Mr. Michael Walsh					
Document	218		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	308	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing into a policy that is favouring wind turbines over other renewable sources. - The noise from wind turbines has been blamed for health problems including stress and insomnia - Wind turbines only work at maximum capacity for a third of the time, meaning they have to be backed up by other technologies such as coal nuclear - The inconsistent power generated by wind farms requires the grid to be upgraded to cope with the surges in power - Wind farms are expensive to build and only last up to 25 years - They cost the British taxpayer dearly, as most of the subsidies go to foreign operators Leading environmentalists James Lovelock and Sir Crispin Tickell, argue that wind turbines are inefficient, ruin the countryside and, ultimately, have little impact on Britain's carbon emissions. Lovelock has calculated that you could cover the entire country in wind turbines and it would never meet our energy needs. Sir Martin Holdgate, a former chief scientist to the Department of the Environment who served on a number of government committees on renewable energy, has said: "We shouldn't sacrifice our landscape on our crowded island. Wind doesn't make sense." I would therefore urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A significant lowering of the proportion of renewable energy to be generated from wind turbines following well respected evidence that shows them to be grossly inefficient - A stronger commitment from the Council to examine alternatives such as bio-mass, solar and hydro alternatives as well as an	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			understanding that other areas are better placed to provide the nations renewable energy, such as the potential for a Severn Estuary barrage, which could supply a quarter of this nations energy needs. - No go ahead to be given before a full analysis of the infrastructure requirements of out-of-town wind farm construction and in particular, the effects on rural roads, is delivered.	target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. 5. An accurate assessment of infrastructure requirements can only be done once a specific proposal has been submitted. Such matters would be considered as part of the planning application process.	
619173	Miss Natalie Ward				
Document	220		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379378	Mrs Margaret Watson				
Document	223		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619567	Mr Graham Waugh				
Chapter 4: Vision	661	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Chapter 6: Our Spatial Strategy	662	Yes		Agreement noted.	N/A
Policy SDP1	665	Yes		Agreement noted.	N/A
Policy SDP2	668	Yes		Agreement noted.	N/A
Policy SDP3	670	Yes		Agreement noted.	N/A
Policy SDP4	673	Yes		Agreement noted.	N/A
Policy SDP5	676	Yes		Agreement noted.	N/A
Policy SDP6	678	Yes		Agreement noted.	N/A
Policy ENV1	679	Yes		Agreement noted.	N/A
Policy ENV2	680	Yes		Agreement noted.	N/A
Policy ENV3	681	No	I support Low Carbon Projects. 15.4mw of generation from commercial wind farms is a huge requirement allowing 27% efficiency. This would be 111 turbines 500mw 80mts tall. 111 turbines 2,500mw (as fitted in Burnley) far too many for this borough. a. This would completely change the character of the Pendle landscape. b. Damage tourism. c. Ruin our countryside. d. Policy ENV3 is not achievable unless policy ENV1 and WRK4 are sacrificed.	A current commercial scale wind turbine would be in the height range of 80-120m tall and would have a generating capacity of around 2.5MW. As such, if we were to try to achieve 15MW from large scale wind proposals this would, with current technology, take in the region of 6-24 turbines (depending on the efficiency of the specific equipment; on average current turbines have an estimated efficiency level of around 27%). It is highly unlikely that a 15MW target would be achieved by the use of 100 x 0.5MW turbines because commercial wind operators would not use turbines of this scale in wind farms; instead turbines of this scale are likely to be restricted to individual turbines hosted by individual landowners. There is no significant evidence that tourists are put off returning to an area because of the presence of a wind farm. Some wind farms have actually proved themselves as tourist attractions. The UK's first commercial wind farm at Delabole in Cornwall received	No changes to the document are proposed as a result of this representation.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				350,000 visitor in its first eight years. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
Policy ENV4	688	Yes		Agreement noted.	N/A
Policy ENV5 and Policy ENV6	692	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A
Policy ENV7	694	Yes		Agreement noted.	N/A
Policy LIV1	695	Yes		Agreement noted.	N/A
Policy LIV2	697	Yes		Agreement noted.	N/A
Policy LIV3	699	Yes		Agreement noted.	N/A
Policy LIV4	701	Yes		Agreement noted.	N/A
Policy WRK1	706	Yes		Agreement noted.	N/A
Policy WRK2	708	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy WRK3	709	Yes		Agreement noted.	N/A
Policy WRK4	711	Yes		Agreement noted.	N/A
Policy WRK5	712	Yes		Agreement noted.	N/A
Policy SUP1	713	Yes		Agreement noted.	N/A
Policy SUP2	714	Yes		Agreement noted.	N/A
Policy SUP3	715	Yes		Agreement noted.	N/A
Policy SUP4	716	Yes		Agreement noted.	N/A
619770	Heidi Waugh				
Chapter 4: Vision	756	Yes		Agreement noted.	N/A
Chapter 6: Our Spatial Strategy	757	Yes		Agreement noted.	N/A
Policy SDP1	758	Yes		Agreement noted.	N/A
Policy SDP2	759	Yes		Agreement noted.	N/A
Policy SDP3	760	Yes		Agreement noted.	N/A
Policy SDP4	761	Yes		Agreement noted.	N/A
Policy SDP5	762	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
Policy SDP6	763	Yes		Agreement noted.	N/A
Policy ENV1	764	Yes		Agreement noted.	N/A
Policy ENV2	765	Yes		Agreement noted.	N/A
Policy ENV3	766	No	I agree in principle with the requirement to produce electricity using low carbon energy generation by all possible means provided the policies stated in ENV1 are kept to. I find it difficult to understand how the open countryside will be protected and enhanced with the erection of wind turbines in the quantity required by the target of 15.4MW. The knock-on effects regarding the general appearance and value of our beautiful landscape have not been properly thought through. I am particularly concerned about the enormous damage such schemes will have on tourist industry and wildlife. If it is deemed essential to erect some wind turbines in the borough of Pendle it should be carefully planned and managed as to result in the fewest turbines possible in the remotest unpopulated areas so as to have the least detrimental affect as possible to the landscape and residents of Pendle.	The policy also clearly states that wind farms would only be considered favourably where they would have no detrimental impact on the landscape and visual character of the area. As per national policy, the policy gives greatest priority to protecting designated landscape and wildlife areas. This is to ensure that the best quality landscapes and habitats are protected and the impact on wildlife etc minimised. Inevitably there would be some loss of visual or landscape quality in areas developed for wind farms but it is about finding a balance between protecting the most valuable areas and securing a low carbon energy supply for the UK moving forward. National planning policy would support the allocation of 'preferred areas of search' which could help manage the development of wind turbines and direct developers to the Council's preferred locations. However, national policy does not allow the Council to refuse applications outside of the areas purely on the basis that they are not within the area of search, if they meet the same criteria as the chosen areas. So, this is an option that could be considered as part of the Land Use Allocations process, however, it should be noted that it cannot necessarily be used to block wind turbine developments in particular areas. There could be a potential conflict between trying to locate turbines where they would have the least detrimental impact on landscape and residents. For example, the more remote areas, whilst having the least impact on residents, may have a greater environmental impact on wildlife and biodiversity. As always, it is about finding the correct balance between all these issues and this is what would be done during the consideration of a planning application.	No changes to the document are proposed as a result of this representation.
Policy ENV4	767	Yes		Agreement noted.	N/A
Policy ENV5	768	Yes		Agreement noted (Policies ENV5 & ENV6)	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
and Policy ENV6					
Policy ENV7	769	Yes		Agreement noted.	N/A
Policy LIV1	770	Yes		Agreement noted.	N/A
Policy LIV2	771	Yes		Agreement noted.	N/A
Policy LIV3	772	Yes		Agreement noted.	N/A
Policy LIV4	773	Yes		Agreement noted.	N/A
Policy WRK1	774	Yes		Agreement noted.	N/A
Policy WRK2	775	Yes		Agreement noted.	N/A
Policy WRK3	776	Yes		Agreement noted.	N/A
Policy WRK4	777	Yes		Agreement noted.	N/A
Policy WRK5	778	Yes		Agreement noted.	N/A
Policy SUP1	779	Yes		Agreement noted.	N/A
Policy SUP2	780	Yes		Agreement noted.	N/A
Policy SUP3	781	Yes		Agreement noted.	N/A
Policy SUP4	782	Yes		Agreement noted.	N/A

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
619503	Mr & Mrs Paul & Zoe Weller				
Policy ENV3	646		I wish to make comment in relation to section 7 'Our Foundations for a Sustainable Future : Improving The Environment We Live In' of the above report. I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer to this Section for re-consideration with a view to amending the policy so that there is : * A reduction in the Council's quota for renewable energy * A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) * A stronger commitment from the Council to examining alternatives such as bio-mass , solar and hydro alternatives.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy.	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
				National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	
619206	Mrs Gillian Wenger-Hartley				
Document	532		It is with some concern that I have learnt - even here, in far-off Switzerland - of disturbing elements in the above report. As someone who grew up in Pendle and still have family who I visit there with my own family, I would hate to see the countryside threatened. What disturbs us as visitors is the inference in your report that the countryside - and even Greenbelt areas - are not to be given as much protection against developers and that these areas of natural beauty could fall prey to that old predator, 'Urban Sprawl'. This may seem to be over-dramatic but the thin end of any wedge starts with the odd 'exception' or 'special case'. Whilst being totally aware of the overall objectives of the strategy - balancing needs against sustainable development - may I respectfully suggest that all efforts are directed into developing Brownfield sites and empty properties rather than chipping away at your huge asset of the countryside which, once lost, can never be replaced. Here in Switzerland the government is going about the need to increase housing developments by looking into using the full potential areas which are already urbanized while leaving the green areas untouched. We are always delighted to visit the Pendle countryside and would hate to think that this great asset may be under threat.	Policies SDP1 and ENV1 seek to protect the open countryside, by requiring new development to be within an defined settlement boundary. It is, however, recognised that exceptions may be required to support the rural economy or to provide appropriate and affordable housing that will help to promote more sustainable travel patterns. Whilst building at lower densities in our towns is likely to be desirable in specific instances, resulting in the need to develop on greenfield sites within the settlement boundary, the sequential approach set out in Policy SDP6 requires development to be located on brownfield sites in the first instance. Furthermore, Policies LIV1 and LIV3 take account of the relatively high number of empty homes in the borough and promote their re-occupation wherever practicable.	No changes to the document are proposed as a result of this representation.
379309	Mrs. Kathleen Whitaker				
Document	279		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV1	284	No	We have lived in Coniston Grove where our back garden borders the Windermere (Avenue) fields, for sixteen years. We see more wildlife from our patio windows than anywhere we go. The	The policy seeks to protect and enhance natural and historic environments. No sites for development are allocated as part of the strategy. Allocation of sites for development will	No changes to the document are proposed as a result of this representation

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			sheep and lambs, families of pheasants, squirrels and their young, bats flying at dusk, a great variety of birds from the large crows to the tiny wrens, all coming into our garden to feed. It gives us great pleasure to watch them. Our countryside is always changing. Our demands for more food, more roads, more housing can lead to unacceptable development, and loss of finite resources, spoiling the landscape, and bad for wildlife. We need to retain our countryside for future generations to enjoy.	be considered as part of the Land Use Allocations DPD.	
379402	Ms. Elizabeth B.D. Whittaker				
Document	229		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
619184	Mr. S.G. Whittaker				
Document	234		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379400	Mr & Mrs Christopher J. and Judith Whitwam				
Document	238		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189
379390	Mr & Mrs Colin M & Sue Williams				
Document	242		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	297	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives. Wind turbines on Noyna Hill, you cannot be serious.	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			A rare area of beauty would be spoilt forever degraded in my view, if this counts these days.	borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors. This document does not propose any specific sites (e.g. Noyna Hill) for wind developments, it simply sets out the Council's general approach to renewable energy developments. The suitability of any specific site would need to be assessed if and when a planning application is submitted. This would include an assessment of the landscape and visual impact of the proposal, as required by this policy.	

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
379388	Mrs. Janet E. Williams				
Document	243		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
379365	Mr. & Mrs. Peter & Lillian Wilson				
Document	244		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
473530	Mr & Mrs Wood				
Chapter 10: Living	658		3000 homes by 2026, 6% in Earby = 180 homes. I note that the strategy stresses Brownfield sites and upgrading existing empty / derelict properties to achieve the above. I hope this is the case. However, I wish to place on record my opposition to building on 'Open Countryside' land in this vicinity. I am chairman of Earby Walking Group, in the New Rd Community Centre User Group and have links to St Peters Methodist Church. I talk to people and listen. Not one person spoken to disagrees with the above views. They also want any new housing on the Brownfield sites to blend with the stone build terraces which are the core of this small town.	Together, policies SDP2 and LIV1 indicate that a minimum of 180 new dwellings should be provided in Earby over the 15 years of the plan. Together with Policy SDP6 these policies aim to locate this development in the most sustainable places whilst meeting the needs of the community. The Core Strategy does not consider allocations of land. However, Policy SDP1 requires that development should be within a settlement boundary, although certain exceptions do allow for some development in the open countryside e.g. farm diversification, agricultural development. Policy ENV2 requires that development should seek to deliver the highest possible standard of design and that this should be informed by and reflect the history and development of a place.	No changes to the document are proposed as a result of this representation.
379385	Mr. John J. Wood				
Document	245		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189.	See officer recommendation to Comments 183, 185, 186, 187, and 189.
Policy ENV3	299	No	I am delighted that the Council is moving towards developing policy in relation to renewable and sustainable energy sources. I am, however, exceedingly concerned that the Council is rushing headlong with a policy that is favouring wind turbines over other renewable sources. I think it is fair to say that the case for wind turbines is not as strong as proponents would have us believe and I fear that serious damage could be done to areas of the Borough that currently are considered by many residents and visitors to be jewels of beauty. I would urge the Council to refer this Section for re-consideration with a view to amending the policy so that there is: - A reduction in the Council's quota for renewable energy - A lowering of the proportion of renewable energy to be generated from wind turbines (which are grossly	1. The Council is not favouring wind turbines over other RLC technologies. The tables at 7.85 in the document are taken from an evidence base document (the South Pennine Renewable and Low Carbon Energy Study, Maslen Environmental, 2010). They do not show the Councils chosen strategy or requirement for each technology they simply show the identified potential from each technology by considering the technical resource, the limitations of the current technology, the constraints to development etc. They do show that, at present, the majority of the capacity for RLC generation in Pendle is found within large scale wind turbines. This table was included in the Core Strategy purely for information and to put the proposed targets into context	PROPOSED ACTION: It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements. PROPOSED ACTION: It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to

Policy	ID	Agree ?	Consultee Comment	Officer Response	Officer Recommendation
			inefficient) - A stronger commitment from the Council to examining alternatives such as bio-mass, solar and hydro alternatives.	as to how they would likely be achieved, with the use of current technologies. As technologies improve other types may be able to contribute a larger proportion of the borough's energy requirement and as stated in 7.89, the Council will support the use of the all technologies as appropriate. 2. The current draft policy wording reflects the findings of evidence base reports and as such includes several specific references to wind turbines, as these have been identified as having the most potential generation capacity. This appears to have been interpreted as giving turbines a preferred technology status, which is not the case. The policy simply seeks to set out the specific considerations to be applied to proposed wind farm developments, particularly as these developments can potentially have more impact than other technologies. 3. In drafting the Core Strategy it was felt that by including a target for borough wide RLC generation we could promote its development, in line with national policy, and also put any developments into the context of local energy demand and requirements i.e. the targets were based on applying the UK 2020 reduction targets to the boroughs energy usage. 4. It is not for this document to debate the financial or technical pros and cons of a technology. Wind power is accepted as a legitimate form of renewable energy development which, due to the large wind resource in this country, can contribute towards meeting UK renewable energy targets. The Government supports the development of wind farms in the UK through national policy statements such as the new National Policy Statements on Energy. National Planning Policy also requires all local authority areas to adopt a positive position with regards to renewable energy development; it is not an option for Pendle Borough to say that RLC generation should happen elsewhere. Local evidence base reports show that Pendle has the potential to accommodate some levels of RLC generation in the borough. Therefore, the role of the Core Strategy is to best manage such potential developments in Pendle by ensuring that we can support suitable developments in line with national policy, whilst protecting our most valuable landscapes and the amenities of our residents and visitors.	undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.
474718	Mr & Mrs G.M. & S.M. Wright				
Document	247		See Lidgett & Beyond Group response (Comments 183, 185, 186, 187 and 189).	See officer response to Comments 183, 185, 186, 187, and 189	See officer recommendation to Comments 183, 185, 186, 187, and 189

Appendix 7

Preferred Options Report – Sustainability Appraisal Matrix

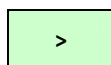
		Sustainability Objective																	
		H1	H2	E1	E2	E3	E4	C1	C2	C3	C4	C5	P1	P2	P3	P4	P5	P6	P7
Core Strategy Policy Publication	SD1	>	?	>	>	?	?	?	?		<		?	<	<	?		?	?
	SDP1								>		>		>	>		>			
	SDP2	>>	?			?			>				>	>					
	SDP3			>	>>		?						>	>					
	SDP4				>	>	>		>				>	>					
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	ENV 1		>	>			>			>>	>	>	<	>		>>		>	>>
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	ENV3			>	>		>					?	>>	>>					<
	ENV4				>	>>	>		>		>	>	>	>		<			<
	ENV5		>								>>			>		>			>
	ENV6		>	>	>	>							>	>	>>				
	ENV7													>			>>	>	>
	LIV1	>	?				>									>>			
	LIV2	>>	>>									>							
	LIV3	>	>				?					>				>			
	LIV4	>>	>>				>	>	>	?	>	>	>	>>	>			>	>
	WRK1	>	>	>>	>>	>	>					>		>		>			
	WRK2			>>	>>	>	>>			>	>	>	>>	>		>>			>>
	WRK3	>		>>	>>	>	>>		>		>	>>	>>	>		>>			
	WRK4			>>	>>	>	>>			>>	>>	>>	>>	>		>>			
	WRK5				>	>	>>	>>	>	>>	>	>>	>	>		>>			>
	SUP1			>		>	>>	>	>			>>	>						
	SUP2	>	>>		>				>		>	>	>						
	SUP3			>	>>	>			>			>	>						
	SUP4		>	>			>	>>		>>	>	>>	>	>	>			>	>



Move away significantly



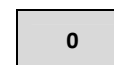
Move away marginally



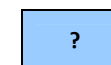
Move towards marginally



Move towards significantly



No Impact



Uncertain or mixed impact

Appendix 8

Preferred Options Report – Summary of Proposed Actions

Core Strategy: Preferred Options – Consultation Comments Proposed Actions

Document

Change No.	Reason (Comment No.)	Proposed Action
C001	9	Revise the Core Strategy to take account of the implications of the Localism Act and the National Planning Policy Framework (NPPF).
C002	103, 121, 136, 143	Include an additional section at the beginning of the Core Strategy that sets out the relationship between it and the Land-use Allocations document. In this section reference should be made to a review of existing Local Plan designations including the Protected Area sites.

Chapter 1: Introduction

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Chapter 2: About the Core Strategy

Change No.	Reason (Comment No.)	Proposed Action
C003	443	Amend the diagram in 'Section 2: About the Core Strategy' and include further explanation of how the Core Strategy and the Lancashire Minerals and Waste Development Framework work together.
C004	443	Include a new section in Chapter 2 About the Core Strategy to explain its relationship with Pendle Local Plan Part 2 - Site Allocations and Development Policies. Make reference to the Mineral Safeguarding Areas within this additional text.

Chapter 3: Our Spatial Issues: Pendle Today (Spatial Portrait)

Change No.	Reason (Comment No.)	Proposed Action
C005	9	Add further reference into the Spatial Portrait to emphasise the importance of Pendle's Mill heritage.
C006	17	After paragraph 3.72 add: Sports facilities allow people to participate in a wide range of activities that help to support healthy lifestyles. The Pendle Open Space Audit records a total of 82 outdoor sports facilities in Pendle, covering 256 hectares, almost one-quarter of all open space provision in the Borough. Pendle Council maintains 28 football pitches, 7 rugby pitches, 7

Core Strategy: Preferred Options – Consultation Comments Proposed Actions

Change No.	Reason (Comment No.)	Proposed Action
		cricket wickets, 15 tennis courts and 10 bowling greens across the borough. In 2011 almost three-quarters (71.5%) of the respondents to the Customer Satisfaction Survey felt that the Council's outdoor sports and recreation facilities were good or excellent. Community use of the sports facilities at two new 'super schools' at Pendle Vale in Nelson and Marsden Heights in Brierfield has improved the quality of sports and recreation provision and helped to increase levels of participation in two towns where health issues amongst young people are of greatest concern. Of the four golf courses in Pendle, one is in public ownership. Marsden Park Golf Course, and four sports centres in Nelson, Colne and Barnoldswick are operated by Pendle Leisure Trust. Three centres include a public swimming pool, with the Wavelengths Leisure Pool in Nelson also benefitting from a modern health spa and gymnasium.
C007	19	• Include a reference in the Spatial Portrait which sets out the current levels of sporting activity in the borough etc.
C008	323, 353	• Amend paragraph 3.71 to read: The high quality of the landscape, and the importance of the habitats and species found within, is recognised by a wide range of environmental designations that offer some form of protection to over half the open countryside in the Borough. A total of 18 UK BAP key habitats and 39 key species (of which 29 are UK Priority Species) have been identified in Pendle. Three landscape character areas are to be found in Pendle. Their boundaries are defined by those for the Natural Areas and National Character Areas, which are almost co-existent: Forest of Bowland (NA12) / Bowland Fringe and Pendle Hill (JCA33) Lancashire Plain and Valleys (NA13) /Lancashire Valleys (JCA35) South Pennines (NA14 and JCA36) Much of the area around Pendle Hill lies within the Forest of Bowland Area of Outstanding Natural Beauty (AONB). Its essential landscape character is one of grandeur and isolation, where deeply incised gritstone fells with summits above 550 metres and vast tracts of heather-covered peat moorland are dissected by steep-sided valleys, which open out into rich green lowlands. The South Pennines is one of the largest unenclosed moorland areas in the country. The peat moorland and Atlantic blanket bogs along the fringes of Boulsworth Hill are recognised internationally for their importance in supporting upland bird and plant communities and are consequently designated as both Special Protection Area (SPA) and Special Area of Conservation (SAC). Covering a total area of 1,542 hectares, this is the only Site of Special Scientific Interest in Pendle. In contrast the Lancashire Valleys are an intensively farmed landscape, where agricultural intensification and urban development over the past two hundred years has seen the majority of wildlife habitats - notably species rich grasslands [Footnote: Thirty examples of species rich neutral grassland are protected by BHS status] and lowland heath - reduced to fragmented remnants of a once extensive resource. Sites of biodiversity value are protected by a wide variety of statutory and local designations. In addition to the South Pennine Moors SSSI referred to above, Pendle also has four Local Nature Reserves (LNR) offering statutory protection to 15.3 hectares. Locally designated sites account for a further 1,427 hectares in the form of 62 Biological Heritage Sites (BHS); seven Sites of Local Natural Importance (LNI) and eleven Special Biodiversity Verges. Areas of particular geological interest can be found at three locations in the borough. These have Local Geodiversity Site (LGS) status and offer protection to an additional 6.0 hectares. These sites form the basis for the creation of an Ecological

Core Strategy: Preferred Options – Consultation Comments Proposed Actions

Change No.	Reason (Comment No.)	Proposed Action
		Network that will protect, enhance and connect sites of biodiversity value necessary for flora and fauna to adapt to the effects of climate change. Further information can be found in the Pendle Biodiversity Audit (Pendle Council, September 2010).
C009	326	Amend paragraph 3.141: Final bullet point to read 'Protect and enhance our valuable natural and built heritage.'
C010	353	Include additional bullet points (paragraph 3.141): - Reduce fragmentation and/or isolation of habitats. - Seek to establish green corridors and 'stepping stones' within built-up areas.
C011	437, 438, 439	Revise the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 4) and Spatial Strategy (Chapter 6) to include a stronger commitment to protecting and enhancing biodiversity.

Chapter 4: Our Spatial Vision: Pendle Tomorrow

Change No.	Reason (Comment No.)	Proposed Action
C012	10	Amend paragraph 4.11 to include a reference to the importance of protecting and enhancing Pendle's historic environment.
C013	249	Amend the Spatial Vision to include more general reference to the importance of the natural and historic environments in Pendle.
C014	344, 349	Include a reference to the importance of biodiversity to the future sustainable development of the borough in the Spatial Vision.
C015	437, 438, 439	Revise the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 4) and Spatial Strategy (Chapter 6) to include a stronger commitment to protecting and enhancing biodiversity.
C016	476	Amend the second sentence of the Vision (paragraph 4.14) to read: "The revival, and where appropriate, the diversification of traditional agricultural practices..."

Chapter 5: Our Strategic Objectives: What We Need To Do

Change No.	Reason (Comment No.)	Proposed Action
C017	20	Amend SO9: Insert the word 'may' between 'they' and 'make'.
C018	251	Amend SO9 - After biodiversity add 'landscape, the local economy and carbon reduction.

Chapter 6: Our Spatial Strategy: Where and How We Will Deliver

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Spatial Strategy

Change No.	Reason (Comment No.)	Proposed Action
C019	166	Reword the final sentence of the second paragraph under the strategy for the West Craven Towns to read: "Existing employment sites may offer redevelopment potential for a variety of uses. A limited amount of new housing will be provided to support the growth in population."
C020	252	Include the following paragraph after the first paragraph of the Spatial Strategy: "Pendle's natural and historic assets make a significant contribution to the overall attractiveness of the area and help to promote local distinctiveness. Identifying additional assets and securing their protection and enhancement, will allow biodiversity to thrive, help to foster civic pride, facilitate tourism and encourage investment."
C021	437, 438, 439	Revise the Spatial Portrait (Chapter 3), Spatial Vision (Chapter 4) and Spatial Strategy (Chapter 6) to include a stronger commitment to protecting and enhancing biodiversity.

Policy SDP1: Spatial Development Principles

Change No.	Reason (Comment No.)	Proposed Action
C022	194	Insert a footnote to explain that the settlement boundaries defined on the Proposals Map may be changed during a review of the plan.
C023	194	Amend the Policy to provide additional details regarding the types of development that can be allowed outside of the settlement boundaries.
C024	462	Amend Policy SDP1 to clarify the exceptions allowed outside the Settlement Boundary.

Policy SDP2: Housing Distribution

Change No.	Reason (Comment No.)	Proposed Action
C025	29, 207	Amend footnotes 103 and 104 - relating to the distribution of new housing in Rural Service Centres and Rural Villages- the new footnotes should indicate that the housing allocation should be distributed according to the individual needs of each

Core Strategy: Preferred Options – Consultation Comments Proposed Actions

		settlement and the capacity for each settlement to accommodate the required level of growth.
C026	126, 127	Include additional wording in Policies SDP2 and SDP3 to explain that the percentage figures are for guidance rather than strict targets.
C027	169	Amend the Housing Technical Paper to include additional factors in order to provide a more extensive assessment of the distribution of new housing. Where the findings of this new assessment significantly change the existing proposed distribution consider amending Policy SDP2 to reflect this.
C028	169	Amend Policy SDP2 to provide clarity in terms of the flexibility of the policy - the percentages are targets for the plan period but are considered as a flexible guide rather than rigid, restrictive figures. These changes will bring it in line with Policy LIV1 in terms of the flexibility applied to the housing requirement figures.
C029	248	Policy SDP2: Identify Spen Brook in the second footnote to the policy as a village where the capacity of the WWTW may alter the proposed distribution in the first five years of the plan period.
C030	448, 449, 450	Explain in the justification text of Policies SDP2 and LIV1 how the consideration of infrastructure has been taken into account when determining the level and location of new housing.

Policy SDP3: Employment Distribution

Change No.	Reason (Comment No.)	Proposed Action
C031	126, 127	Include additional wording in Policies SDP2 and SDP3 to explain that the percentage figures are for guidance rather than strict targets.

Policy SDP4: Retail Distribution

Change No.	Reason (Comment No.)	Proposed Action
C032	50, 484, 1004	Include a reference within Policy SDP4 stating that it must be read in conjunction with Policy WRK3

Policy SDP5: Future Infrastructure Requirements

Change No.	Reason (Comment No.)	Proposed Action
C033	21	Amend the references to 'sports pitches' and 'traditional sports centre facilities' to read 'outdoor sports pitches' and 'sports/leisure centres' to help improve the distinction between the two comments on leisure and culture.
C034	180	Amend the entry for education, in Column 2 of the table in the supporting text (Page 57), to accord with the revised wording in the representation.

Core Strategy: Preferred Options – Consultation Comments Proposed Actions

C035	196	• Include references in the key linkages to: Pendle Biodiversity Audit (Policy SDP5), Pendle Infrastructure Study (Policy ENV1).
C036	225	• Re-word first sentence to include reference to buffer zones around Utilities Plant and Infrastructure.
C037	248	• Amend the Pendle Infrastructure Study by identifying capacity issues at Spen Brook WWTW in relation to additional housing provision and increased capacity requirements identified for the 2015-20 period.
C038	248	• Policy SDP5: Identify capacity issues at Spen Brook WWTW in relation to additional housing provision and increased capacity requirements identified for the 2015-20 period, under Energy and Utilities in the Table on Page 55.

Policy SDP6: Sequential Approach to Development

Change No.	Reason (Comment No.)	Proposed Action
C039	11	• Amend the first bullet point to read "reuse of vacant buildings and previously developed land within a defined settlement boundary".
C040	38	• Amend the supporting text to include a reference to the remediation of contaminated land.
C041	47	• Revise bullet point 3 to explain that development outside of settlement boundaries will only be permitted for appropriate rural uses. Where necessary provide links to other policies / documents to set out what constitutes appropriate rural uses.
C042	176	• Replace third bullet point and final paragraph with the following wording: Land outside of a defined settlement boundary for appropriate rural uses.
C043	185, 269	• Delete paragraph 6.58.
C044	185, 269	• Reword paragraph 6.59 to read: "New development will be expected to re-use vacant buildings and previously developed land within a defined settlement boundary as the first priority, in order to help recycle land and make a positive contribution to regeneration in the borough. The second priority for development will be other land (Greenfield) within a settlement boundary. However, in order to not unduly restrict development, and ensure that the levels of growth proposed in the Core Strategy are achieved, it is recognised that the release of some of these greenfield sites may be necessary in advance of development on previously developed land. This flexible approach will only be supported where such sites are shown to be economically viable and in a sustainable location. It is important to achieve a balance between the sustainable development of sites whilst not compromising development that may bring employment and housing opportunities to the borough. The development of land outside a defined settlement boundary will be limited to appropriate rural uses. Qualifying uses are identified in the NPPF (paragraphs 28 and 55) and other policies in the Core Strategy. They may also be defined in subsequent local plan documents.
C045	185, 269	• Include an additional paragraph in the strategy after paragraph 6.59 which reads: "In line with the NPPF the allocation of sites should prefer land of lesser environmental value and should follow the sequential approach".
C046	185, 269	• Revise the third bullet point and final paragraph of the policy to read: "Land outside of a defined settlement boundary for

Core Strategy: Preferred Options – Consultation Comments Proposed Actions

Change No.	Reason (Comment No.)	Proposed Action
		appropriate rural uses ¹ ” Footnote to read: “1 Appropriate rural uses are defined in the National Planning Policy Framework (NPPF) and other policies in the Core Strategy. The Pendle Local Plan Part 2: Site Allocations and Development Policies will provide further, specific details of appropriate rural uses.”
C047	185, 269	• Include a final paragraph at the end of the policy which reads: “The allocation of land for development in Local Plan Part 2: Site Allocations and Development Policies should follow the sequential approach and prefer land of lesser environmental value.”
C048	239	• Include a reference in paragraph 6.59 to the regeneration benefits of redeveloping Brownfield sites.
C049	442, 443, 444	• Amend the wording of the policy text to read "In order to ensure the best use of resources, the location of new development will also be considered in accordance with the following sequential approach (in order of priority):"

Chapter 7: Our Foundations For a Sustainable Future: Improving the Environment We Live In

Change No.	Reason (Comment No.)	Proposed Action
-	-	• No changes proposed.

Policy ENV1: Protecting and Enhancing Our Natural and Historic Environments

Change No.	Reason (Comment No.)	Proposed Action
C050	22	• Reword footnote 118 to read "As defined on the proposals map or in the Council's Open Space Audit."
C051	22	• Add additional footnote after "Existing Open Spaces" to read "Open spaces are defined as the following: Parks, Woodland, Natural Greenspaces, Green Corridors, Outdoor Sports, Amenity Greenspaces, Play Areas, Equipped Areas for Play, Allotments, Cemeteries, Civic Spaces. Policy SUP2 Health and Well-Being covers aspects relating to Built Sport and Recreation Facilities".
C052	22	• Replace footnote 119 with "These exceptional circumstances are set out in the National Planning Policy Framework, paragraph 74".
C053	39	• Insert at end of paragraph 7.35 "The incorporation of features such as balancing ponds, or the removal of culverts can also have much wider benefits such as the reduction of flood risk. Policy ENV7 considers wider water management issues"
C054	39	• After 'adaption to climate change.' Insert "It is acknowledged that other habitats are also important in such respects, for instance peat bogs play a significant role in carbon capture and storage whilst the re-wetting of upland and lowland peat soils helps to reduce levels of CO₂ through the creation suitable conditions for a layer of living plants which absorb CO₂ from the

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Change No.	Reason (Comment No.)	Proposed Action
		atmosphere."
C055	39	At the end of paragraph 7.27 add "Policy SUP2 Health and Well-being acknowledges links between access to open spaces and health".
C056	39	In paragraph 7.32 "It is important to ensure that there are connections between the core biodiversity sites and habitats, to allow species to move freely between them in order to feed, disperse, migrate or reproduce. This is seen as a key in providing future resilience to the potential impacts of climate change"
C057	39, 231	After the 5 purposes of green infrastructure state: "Examples of Green Infrastructure can include, amongst others; parks, open spaces, woodlands, rivers, ponds, swales and wetlands."
C058	39, 255, 477, 479, 480	Delete the two key reasons for Green Infrastructure in paragraph 7.42 and replace with Natural England's six social, environmental and economic benefits of Green Infrastructure as follows " Green Infrastructure can provide many social, economic and environmental benefits including: Places for outdoor recreation and play; Space and habitat for wildlife with access to nature; Climate change adaptation; Environmental education; Local food production; Improved health and wellbeing" http://naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx
C059	39, 332	Insert at beginning of paragraph 7.17 " Of concern to all biodiversity assets is the impact of climate change. There is significant evidence [1] that climate change adversely affects biodiversity, indeed it is likely to become one of the most significant drivers of biodiversity loss by the end of the century. Climate change is already forcing biodiversity to adapt either through shifting habitat, changing life cycles, or the development of new physical traits. Conversely biodiversity can help to reduce the negative effects of climate change. At the end of the paragraph add "Other habitats are also important in this respect. Upland peat bogs play a significant role in carbon capture and storage. Their conservation and restoration through the re-wetting of upland and lowland peat soils helps to create suitable conditions for a layer of living plants which absorb CO₂ from the atmosphere."
C060	39, 359, 361, 457, 459, 460, 463, 467, 469	At the beginning of paragraph 7.15 insert "In addition there are 18 UK Biodiversity Action Plan (BAP) key habitats known to be present in Pendle. These cover a mixture of habitat types including Grassland, Boundary, Heathland, Woodland, Inland Rock, Wetland and Freshwater".
C061	184	Amend the footnote to explain that the Open Space Audit will be reviewed periodically to reflect changes in amounts, levels and types of provision.
C062	193	Amend Policy ENV1 and Policy SUP2 to include reference to the benefits of being in contact with the natural environment and identify how access to the natural environment can be improved.
C063	255	Make reference in the policy to the setting of heritage assets.
C064	332, 477, 479,	Add to paragraph 7.32 after 'across the borough' "It is important to ensure that there are connections between the core

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Change No.	Reason (Comment No.)	Proposed Action
	480	biodiversity sites and habitats, to allow species to move freely between them in order to feed, disperse, migrate or reproduce. This is seen as a key in providing future resilience to the potential impacts of climate change. Such connections do not have to be continuous linear habitat, but can be a series of smaller isolated sites which species can use as stepping stones between the core areas. It is this network of core sites connected by buffer zones, wildlife corridors and stepping stones which is known as an ecological network (Lawton et al)."
C065	359, 361	Amend paragraph 7.14 to read "...Pendle has a large number of sites, habitat and species which are recognised and/or designated as being of international, national, regional and/or locally significant for biodiversity".
C066	359, 361	Include additional bullet point in paragraph 7.14: -Habitats and Species of Principal Importance.
C067	359, 361	Delete the three key objectives in paragraph 7.11 and replace with " The National Planning Policy Framework (paragraph 109) identifies the following requirements for the planning system in respect of biodiversity: -Recognise the wider benefits of ecosystem services; - Minimise impacts on biodiversity and provide net gains in biodiversity, where possible, to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".
C068	426	Policy ENV1 to be amended to include details on the prior extraction of mineral resources (including coal) in order to prevent sterilisation by new development (see response to Comment 440).
C069	428, 429, 430, 431	Amend Policies ENV1 and ENV5 to include references to the mineral and coal mining resources, and land instability issues.
C070	440	Amend Policy ENV1 to include reference to the prior extraction of minerals.
C071	473, 474, 475	Reference to the strategic review of Green Belt in paragraph 7.41 will be removed.
C072	488	Reword the fourth paragraph of ENV1 to read "The Council will work with its partners, where appropriate, to help establish coherent ecological networks across for the borough, by identifying gaps between habitats and promoting opportunities to provide links for species migration, including across administrative boundaries"

Policy ENV2: Achieving Quality in Design and Conservation

Change No.	Reason (Comment No.)	Proposed Action
C073	256	Amend bullet point 3 of the policy text to read: "Proposals should ensure the significance of heritage assets and their settings is not harmed or lost"

Policy ENV3: Renewable and Low Carbon Energy Generation

Change No.	Reason (Comment No.)	Proposed Action
C074	4, 5	To ensure there is no confusion to users of the document, it is proposed the table at 7.85 is removed and the readers directed to the evidence base report from where it was taken should they seek such information.
C075	4, 5, 6, 465, 657, 720, 731	It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board.
C076	6	With regards to the 10% on-site renewables target, it has been demonstrated both nationally and locally that a requirement for on-site renewables to meet 10% of the buildings energy generation has been an achievable target for many years and will become even easier to meet as technologies become more efficient and cost effective. However, the policy makes an exception for where such a requirement is not financially viable. The policy will be amended to show that where it can be proved that 10% is not viable the Council will enter into negotiations to ensure a lower viable amount. It is also proposed to re-prioritise the position of district heating/energy networks in this policy requirement as at the correct scale these can be more efficient than the use of building scale individual technologies.
C077	14	Make the following addition to the context section: "Pendle has a large stock of traditionally constructed stone buildings. There are many ways that the energy efficiency of these buildings can be improved sympathetically (e.g. loft insulation, or the improvement of traditional windows) and English Heritage offer further guidance on these issues.
C078	64	Expand the wording of this policy to make clearer the type of assessments that would be expected to accompany a renewable energy planning application, including environmental assessments.
C079	253, 286, 288, 290, 292, 293, 297, 299, 300, 302, 304, 306, 308, 545, 589, 604, 608, 630, 631, 632, 633, 634, 635, 639, 644, 645, 646, 647, 649, 730, 749, 785, 970, 980, 997, 1113	It is proposed to remove the table from the document to stop this being incorrectly interpreted as technology specific targets or requirements.
C080	253, 286, 288, 290, 292, 293,	It is proposed to revisit wording of policy and make it clearer that all appropriate Low Carbon and Renewable Technologies are supported and that the policy is therefore balanced across the board. Maintain a positive position as regards RLC

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Change No.	Reason (Comment No.)	Proposed Action
	297, 299, 300, 302, 304, 306, 308, 545, 589, 604, 608, 630, 631, 632, 633, 634, 635, 639, 644, 645, 646, 647, 649, 980, 997, 1113	proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.
C081	627, 730	Maintain a positive position as regards RLC proposals but include more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.
C082	902	More guidance about implementation is required, including more detail in the policy as regards what assessments developers will need to undertake to ensure that impacts of a scheme can be thoroughly assessed and only acceptable developments approved.
C083	1130	To remove restriction on community energy schemes.

Policy ENV4: Transport and Accessibility

Change No.	Reason (Comment No.)	Proposed Action
C084	7, 552	At the beginning of paragraph 7.109 include the following wording: "Lancashire County Council is involved in working with various stakeholders to improve the local railway environment, and sustainability of the railways lines in Lancashire."
C085	148	Include additional wording in the supporting text to make clear that by focusing new development in the M65 Corridor this may require additional transport infrastructure to be put in place and that this could be useful for improving links eastwards across the borough.
C086	154	Amend Policy ENV4 and the supporting text to take account of the adoption of LTP3 and its implementation plan.
C087	386	Amend the supporting text to acknowledge that the delivery of the railway and/or the bypass is funding dependent and that although they have been identified as long term projects the policy will not restrict these schemes coming forward should funding become available.
C088	495	Amend the policy to require a traffic/transport impact assessment in the first instance and a travel plan (including green

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Change No.	Reason (Comment No.)	Proposed Action
		travel options) where the assessment shows a need to mitigate against the impact.
C089	1125	Include a statement in the policy / supporting text outlining that the Council will work with partners to lobby for improvements to the strategic transport network.

Policy ENV5: Pollution and Policy ENV6: Waste Management

Change No.	Reason (Comment No.)	Proposed Action
C090	65	Include the following targets: Reduce the amount of waste sent to landfill.
C091	426	Policy ENV5 is to be renamed and amended to address issues of land stability and include a specific reference to the issues arising from the local mining legacy (see response to Comment 441).
C092	428, 429, 430, 431	Amend Policies ENV1 and ENV5 to include references to the mineral and coal mining resources, and land instability issues.
C093	441	Re-name the Policy: The Policy title should be amended to read 'Pollution, contaminated Land and Unstable Land' to better reflect its expanded content.
C094	441	Include additional supporting text: Include reference to the coal mining legacy in the southern part of the Borough, and note that this is where the spatial strategy is looking to focus future development.
C095	441	Include an amendment to the Policy text: Pendle Council will work with its partners to minimise air, water, noise and light pollution and to address the risks arising from contaminated land, unstable land and hazardous substances. In particular, new development will be required to: improve air quality by minimising pollutant emissions and public exposure to pollution, both during and after construction, particularly in any areas identified as having poor air quality. Criteria for assessing applications will be set out in the Development Management Principles DPD. Area Action Plans will consider how pollution can be reduced or successfully mitigated against at a local level; ensure that water quality is not compromised and, where appropriate, secure improvements to water quality (see Policy ENV7); ensure that the potential for noise and light pollution is minimised; address the risks arising from contaminated land or unstable land, including that arising from mining legacy, through remediation work that makes the site suitable for the proposed end use. In the case of contaminated land sustainable and green technologies should be employed wherever possible. Proposals on, or in the vicinity of, contaminated land (including landfill sites) or unstable land will be assessed according to criteria set out in the Development Management Principles DPD; and assess and minimise the risks associated with the use or storage of hazardous materials, and consider the implications when siting new development in the vicinity of such establishments.

Policy ENV7: Water Management

Change No.	Reason (Comment No.)	Proposed Action
C096	65	Include the following additional text within Policy ENV7: Developers should ensure that water quality is not compromised and ... seek improvements to the aquatic environment in order to help achieve the objectives set out in the European Water Framework Directive and the River Basin Management Plan for the Ribble.
C097	68	Reword the Supporting Text (paragraph 7.169): (2) In terms of water quality, there are 16 water bodies in Pendle, which fall under the European Water Framework Directive (WFD). Of these half are at less than good status. Water bodies need to reach good status by 2015, or in some cases 2027. Three of these failing water bodies have been prioritised as high priority water bodies, namely: 1. Colne Water, which is failing for: phosphate (continuous sewage discharge and intermittent sewage discharge), ammonia (Annex 8, phys-chem), hydrology, and phytobenthos. 2. Wycoller Beck, which is failing for: copper (expected to improve by 2015). 3. Stock Beck, which is failing for: fish, invertebrates, phosphate (diffuse source and point source).
C098	68	Include additional wording in the Supporting Text (paragraph 7.179): In the final sentence, after "and a requirement to install infiltration systems ..." insert "and other necessary mitigation measures." See response to Comment 215.
C099	68	Amend the Policy Text: Replace "within designated flood zones" to read "within Flood Zone 3."
C100	68	Include additional wording in the Policy Text: Within Flood Zone 2 proposals should have regard to the sequential and exception tests in PPS25. (1 & 6)
C101	68	Include additional indicators: Include indicator(s) that align with the Environment Agency monitoring strategy to aid consistency in monitoring the WFD status of watercourses in Pendle.
C102	219	Include additional wording in the Supporting text (before paragraph 7.180): In all new developments surface water should be managed at source rather than transferred. Part H of the Building Regulations requires that the first choice of surface water disposal should be to discharge to infiltration systems where practicable. Infiltration techniques should therefore be applied wherever they are appropriate.
C103	219	Amend the wording of the Supporting text (paragraph 7.180): Amend the opening sentence to read: The use of Sustainable Drainage Systems (SuDS) will be encouraged. SuDS seek to mimic the drainage of Greenfield sites and their use will help to reduce the rate and quantity of surface water runoff. They also help to improve the quality of water discharged back into the land, or to a watercourse, by providing passive treatment through filtering and infiltration, thereby increasing the amenity value of surface water in the urban environment.
C104	219	Include additional wording in the Policy Text: Additional paragraphs to be inserted before "Developments should ensure." Surface water should drain on a separate system, and only be connected to the combined/foul sewerage network as a last resort when all other options have been discounted. In order, the priority for the management of surface water discharges

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Change No.	Reason (Comment No.)	Proposed Action
		are: (a) Continue or mimic the current natural discharge process (b) Store for later use (c) Discharge into infiltration systems located in porous sub soils (d) Attenuate flows into green engineering solutions such as ponds, swales or other open water features for gradual release to a watercourse (e) Attenuate by storing in tanks or sealed systems for gradual release to a watercourse (f) Direct discharge to a surface water sewer (g) Controlled discharge into the combined sewerage network.
C105	219	Include additional wording in the Context: National guidance requires flood risk to be reduced wherever possible by limiting peak surface water discharge, but is not consistent with regard to the expected scale of reduction. Recommendations vary from no detriment to a preference that Brownfield solutions provide similar run-off characteristics to Greenfield development.
C106	219	Include additional wording in the Policy text: Drainage proposals for development on Brownfield sites will be measured against the existing performance of the site, although it is preferable for solutions to provide runoff characteristics, which are similar to Greenfield behaviour. All new development will be required to include the implementation of Sustainable Drainage Systems (SUDS) unless it can be demonstrated that this is not technically feasible, or viable. More specifically: All Brownfield development will be required to demonstrate that there will be a reduction of at least 30% in existing runoff rates, rising to a minimum of 50% in critical drainage areas (Footnote - The Town and Country Planning (General Development Procedure) (Amendment) (No. 2) (England) Order 2006 introduces the concept of critical drainage areas as "an area within Flood Zone 1 which has critical drainage problems and which has been notified... [to]...the local planning authority by the Environment Agency".] Any proposal for development on a Greenfield site, must demonstrate no alteration to runoff rates upon completion. Peak discharge should be restricted to five litres per second per hectare, this also being the requirement for sites of less than one hectare. Any additional volume of runoff must be taken into account by providing storage capacity within the surface water drainage system. Retrofitting for flood prevention and SuDS within the existing built environment must be explored where it would not damage environmental assets.

Chapter 8: What is the Key Diagram?

Change No.	Reason (Comment No.)	Proposed Action
C107	158	Add an additional arrow to show the broad route of the A56 bypass and the Colne-Skipton railway.
C108	260	Add the AONB and SSSI designations to the Key Diagram.
C109	897	The use and placement of symbols on the Key Diagram should be reviewed and a disclaimer provided to help avoid confusion.

Chapter 9: Place Shaping

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Chapter 10: Living Creating a Vibrant Housing Market

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Policy LIV1: Housing Provision, Phasing and Delivery

Change No.	Reason (Comment No.)	Proposed Action
C110	8	Make reference in the supporting text to the NPPF in relation to the reuse of empty homes.
C111	136, 181	Increase the overall housing requirement figure to take account of the current levels of under delivery.
C112	178, 181	The policy will be revised to clarify that the phasing approach is a minimum expected delivery approach and not a restrictive mechanism.
C113	181	The policy will be clarified to explain that the overall housing target is a minimum and that where evidence of further need and demand exists additional housing will be provided.
C114	210	Obtain updated information from United Utilities regarding the infrastructure capacity issues in the borough.
C115	213	The policy will be revised to remove the term phasing and to clarify that the phasing approach is a minimum expected delivery approach and not a restrictive mechanism. It will be linked to the housing trajectory and five year supply requirement. The policy will also be revised to explain the requirements for granting planning permission.
C116	445, 446, 447, 464	Update the figures relating to empty homes and clarify the difference between the overall vacancy level and the long-term (over 6 months) vacancy level.
C117	448, 449, 450	Explain in the justification text of Policies SDP2 and LIV1 how the consideration of infrastructure has been taken into account when determining the level and location of new housing.
C118	531	Remove the term phasing from the policy and explain that it is a minimum expected delivery rate which is linked to the housing trajectory and five year supply requirement.
C119	531	Include the word "net" in front of the overall housing figure within the first sentence of the policy.
C120	531	Change the dates of the minimum expected delivery approach and plan period.

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Change No.	Reason (Comment No.)	Proposed Action
C121	548	Include additional wording in Policy LIV1 relating housing demand and providing for aspirational housing.
C122	565	The policy will be amended to clarify the requirements of applicants.

Policy LIV2: Housing Needs

Change No.	Reason (Comment No.)	Proposed Action
C123	2	Revise Policy LIV2 to include criteria for the selection of sites for the Gypsy and Traveller community. Amend the policy to explain that where evidence of a need arises pitches will be provided to meet that need.
C124	527	Make reference to agricultural workers dwellings in LIV2.

Policy LIV3: Affordable Housing

Change No.	Reason (Comment No.)	Proposed Action
C125	187, 271	Amend the Policy and Justification Text to ensure compliance with the National Planning Policy Framework (NPPF). The justification text should explain why rural exception sites may be needed and when market housing on such a site could be acceptable to deliver the affordable housing.
C126	188	Amend the policy and justification text to clarify the proportions of the different tenures of affordable housing that are required in the borough.
C127	188	Amend the footnote relating to the definition of the different tenures of affordable housing.
C128	689	In the interests of clarity - the layout of the policy should be amended to make clearer the distinction between rural and urban affordable housing provision.
C129	827	Amend the Policy and Justification text to clarify that where work has not commenced within two years schemes will be retested for their viability and may be required to provide additional affordable housing.

Policy LIV4: Designing Better Places to Live

Change No.	Reason (Comment No.)	Proposed Action
C130	451, 452, 453	Amend the policy to clarify the approach taken to the density of new housing developments in each spatial area and in the borough as a whole.
C131	470	Amend Policy LIV4 to include a section on combining properties.

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C132	845	Include a section in Policy LIV4 relating to the demolition of housing and the reuse of materials to build new housing.

Chapter 11: Working: Creating a Dynamic and Competitive Local Economy

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Policy WRK1: Strengthening the Local Economy

Change No.	Reason (Comment No.)	Proposed Action
C133	468	Include a bullet point within the policy indicating support for projects that will help to deliver better connectivity for businesses, in particular improvements to broadband within the rural areas.

Policy WRK2: Employment Land Supply

Change No.	Reason (Comment No.)	Proposed Action
C134	257	Include a bullet point within the policy, under Rural Pendle, indicating support for projects that "make a positive contribution to the protection, enhancement, conservation or interpretation of the landscape, natural assets, biodiversity and built heritage."
C135	741	Include an additional paragraph after Para 11.31 briefly setting out how the employment land requirement in Policy WRK2 has been calculated, based on the methodology set out in Table 2.4 of the Employment Technical Paper.

Policy WRK3: Retailing and Town Centres

Change No.	Reason (Comment No.)	Proposed Action
C136	241	Amend Policy text at paragraph 3: "Applications for retail or other town centre uses, not located within a defined town or local shopping centre, should address the sequential test and be located in the following order of priority:"
C137	241	Amend Policy text at paragraph 7: There is no identified requirement in quantitative terms to provide additional floorspace for convenience retail during the plan period. However, there may be a qualitative need to deliver greater consumer choice and enhance the vitality and viability of existing centres. Where possible, any new convenience retail development should re-use existing sites within a Town Centre or Local Shopping Centre.

Policy WRK4: Tourism, Leisure and Culture

Change No.	Reason (Comment No.)	Proposed Action
C138	307	Amend Policy text at paragraph 1: Proposals associated with the provision of new or improved facilities for tourism, leisure and cultural activities, including accommodation for visitors, will be supported where they:
C139	307	Amend Policy text at paragraph 3: To encourage socially inclusive tourism, leisure and cultural uses that help to improve the vitality and viability of Nelson and Colne Town Centres in the early evening and into the night proposals should also have regard to Policies WRK3, SUP1 and SUP4, as appropriate.

Policy WRK5: Designing Better Places to Work

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Chapter 12: Supporting: Creating Healthy and Confident Communities

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Policy SUP1: Community Facility Provision

Change No.	Reason (Comment No.)	Proposed Action
C140	99	Amend the third sub-bullet point of the second bullet point under the General Principles section of Policy SUP1 to read: "it can be proven the property has been vacant and actively marketed for a community use for over one year".

Policy SUP2: Health and Well-Being

Change No.	Reason (Comment No.)	Proposed Action
C141	39	Amend policy SUP2, paragraph 12.32 to broaden the scope to reference the benefits to health and well being of the natural environment.
C142	193	Amend Policy ENV1 and Policy SUP2 to include reference to the benefits of being in contact with the natural environment and identify how access to the natural environment can be improved.

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C143	423	Amend the third sentence of paragraph 12.29 to read: "Policy SUP2 sets out how we will work with partners, such as the NHS, to support the development of such facilities..."
C144	1023	Add the following bullet point to the policy: - Support and develop healthy ways to travel (also see Policy ENV4).

Policy SUP3: Education and Training

Change No.	Reason (Comment No.)	Proposed Action
C145	182	Re-word the Supporting text: 12.38 There are a number of Children's Centres in Pendle, the latest being a purpose built facility in Colne town centre. 12.44 Pendle Council will work closely with public and private sector organisations to ensure that service provision for children and young people continues to meet the needs of communities across the Borough. Where appropriate this will include the provision of new facilities to meet an identified need set out in the Pendle Infrastructure Study, or partners' plans. 12.45 The Primary Capital Programme and Building Schools for the Future Programme (Secondary Schools) have both been discontinued. Whilst the latter helped to transform secondary education in Pendle, via the building of two new schools, several secondary schools did not benefit from the programme. Policy SUP3 will support further developments where these bring about improved educational facilities, to help raise educational attainment levels in the borough. 12.46 Lancashire County Council (LCC) is responsible for planning the provision of school places. In doing so they take account of information on the birth rate, new and proposed housing developments, inward and outward migration and population changes. An increase in Pendle's birth rate over the last few years has seen LCC increase capacity at infant and junior schools in Nelson. Further projected increases have indicated a need for additional places in Brierfield, Nelson and Barnoldswick. At the time of writing (2012), consultation is underway on the provision of these additional places. The reduction in capital funding being made available to LCC means that the need to seek contributions from housing developers, where the development is expected to impact upon school places, may increase. An additional issue for LCC is the lack of suitable sites available for the provision of additional school places. Pendle Council will work closely with LCC to identify suitable sites through the Land-use Allocations process. Whilst the growth in pupils is currently impacting on the primary school sector, this growth will move into the secondary sector around 2017. Further information on the planning of school places in Pendle can be found in Lancashire's annual 'Strategy for the Provision of School Places and School's Capital Investment'. 12.47 Further education (FE) has been centralised with the relocation of Nelson and Colne College to a single site on the Nelson -Barrowford boundary. As such there is currently no immediate requirement for FE provision in the borough. Pendle Council will support proposals which propose to introduce specialist provision, particularly that which builds on local business specialisms, or provides HE provision not currently available in the Borough. 12.48 Schools can play a part in providing wider community benefits by making their facilities available for wider community use. Such uses and wider co-location initiatives will be supported where they do not impact upon a school's ability to provide places for pupils of statutory school age in that area.

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Change No.	Reason (Comment No.)	Proposed Action
C146	182	Make the following addition to the Key Linkages box: Strategy for the Provision of School Places and School's Capital Investment.

Policy SUP4: Design Better Public Places

Change No.	Reason (Comment No.)	Proposed Action
C147	16	Include additional wording to the Supporting text after paragraph 12.55: The factors that shape quality of place can be organised under four broad headings. - The range and mix of homes, services and amenities. - Design and upkeep of buildings and spaces. - Provision of green space and green infrastructure. - Treatment of historic buildings and places.
C148	16, 259	Include additional wording in the Policy text under 'Public Buildings': Re-using historic buildings, where appropriate, or by incorporating design elements in new developments that respond sympathetically to the built heritage, public spaces and key infrastructure elements, within the historic environment in which they are located
C149	16, 259	Include additional wording in the Policy text under 'Public Realm': Enhancing the setting of any historic buildings or infrastructure in the immediate vicinity.

Chapter 13: Monitoring and Delivery

Change No.	Reason (Comment No.)	Proposed Action
-	-	No changes proposed.

Appendices

Change No.	Reason (Comment No.)	Proposed Action
C150	188	Amend the Glossary to provide an updated definition of what constitutes affordable housing in planning terms.
C151	527, 578	Include at the end of second the bullet point in paragraph 2.12: - such as a detailed in the Pendle Local Plan Part 2: Site Allocations and Development Policies.
C152	527, 578	At the end of paragraph 2.13 include: Some of the more detailed policies will be included in the Pendle Local Plan Part 2: Site Allocations and Development Policies as mentioned above.
C153	527, 578	In appendix B indicate which policies will be included in the Pendle Local Plan Part 2: Site Allocations and Development Policies. Add a column to the appendix showing where Local Plan Part 2 policies will be relevant.

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آپ کے لئے زیادہ مفید ہو تو برائے مہربانی ہمیں ٹیلیفون کریں۔



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