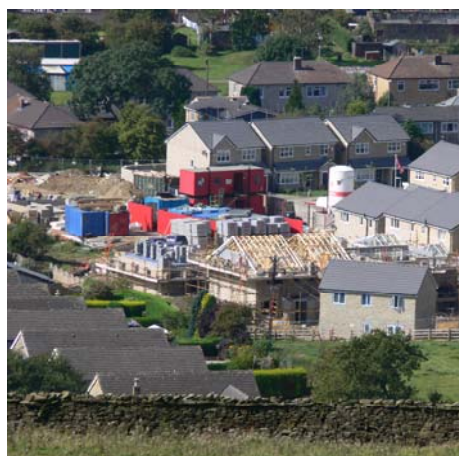


Local Development Framework for Pendle



Core Strategy & Land-use Allocations DPDs



Issues & Options Consultation Summary of Responses

December 2008



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Introduction

- 1.1 For six weeks this summer¹, Pendle Council carried out an extensive public consultation, to help inform the preparation of two key Development Plan Documents (DPDs) for our new Local Development Framework; namely the Core Strategy DPD and the Land-use Allocations DPD.
- 1.2 The *Issues and Options* report, which formed the basis of this consultation, was itself based on over 1,300 responses we received to the earlier *You Choose* consultation. These responses also provided the basis for ***Our Pendle Our Future***, Pendle's Sustainable Community Strategy (SCS), which was adopted in May this year.
- 1.3 Both the Core Strategy and the Land-use Allocations DPDs will help to deliver the key long-term goals of the SCS. Together they will set out how we propose to manage change and future growth in a positive way that meets both Government objectives and the needs of our community.

Purpose of this document

- 1.4 This document provides a summary of the responses we received to the *Issues and Options* consultation. In total 262 individuals or organisations submitted comments for consideration and these are summarised in this report.
- 1.5 Additional commentary helps to indicate whether the preferred option(s) selected is supported by the sustainability appraisal, which accompanied the *Issues and Options* report, or the evidence currently available. It also indicates the direction we intend to take when preparing the report for the consideration of alternatives in Summer 2009.
- 1.6 Individual representations identifying sites, which it was felt had the potential for development, or highlighting sensitive and highly valued areas of the borough where development should be controlled or resisted will be publicised in a separate consultation exercise in March / April 2009.

Summary of Responses

- 1.7 During the six week public consultation on the *Issues and Options* report, held between Friday 4th July 2008 and Monday 18th August 2008, Pendle Council received over 2,500 individual comments. Of these 1,630 came from the 71 visitors to the five exhibitions held at venues throughout Pendle between 5:00pm and 8:30pm² in the evening throughout July (see below).
- 1.8 All venues were chosen for their accessibility, both by public transport and for those with impaired mobility. A full colour advertisement publicising the exhibitions appeared in the *Nelson Leader*, *Colne Times* and *Barnoldswick and Earby Times* on Friday 11th July 2008.

• Colne	Lesser Municipal Hall, Albert Road	Monday 14 th July 2008
• Barrowford	Civic Hall, Maud Street	Tuesday 22 nd July 2008
• Nelson	Wilson Room, Nelson Town Hall	Monday 28 th July 2008
• Barnoldswick	Civic Hall, Station Road	Tuesday 29 th July 2008
• Brierfield	Community Centre, Colne Road	Wednesday 30 th July 2008

¹ The *Issues and Options* consultation ran from Friday 4th July 2008 to Monday 18th August 2008.

² The times chosen for the public exhibitions was based on an analysis of visitor numbers for the public exhibitions held for the earlier *You Choose* public consultation in Summer 2007.

- 1.9 The remaining 1,171 comments were provided by 58 respondents who provided a written or electronic response to the Issues and Options report. Of these responses 50 (86%) were provided electronically either online (14) using the Limehouse Consultation software, or via email (36).
- 1.10 In total 5,037 individuals or organisations were notified directly about the consultation on the Issues and Options report. All 716 consultees included on the Council's LDF database were advised about the consultation, either by email (391) on Friday 4th July 2008, or by letter (325) on Wednesday 2nd July 2008. In addition 1,168 letters were sent to local businesses included on the Economic Development Unit's database and 1,153 members of the Citizens Panel. Emails were also sent to the 805 people registered with the Council's database. Finally an electronic 'Message of the Day' was issued to all staff employed by Pendle Council, Liberata, Pendle Leisure Trust and 49 local councillors. A presentation was also made to the Annual general Meeting Pendle Partnership, the Local Strategic Partnership for Pendle.
- 1.11 Documents were placed on deposit at 15 locations throughout Pendle. In addition posters were displayed in 52 venues (public libraries, Council shops, doctors surgeries, sports centres and entertainment venues) throughout Pendle. Copies were also sent to over 50 educational establishments, but many of these had closed for the summer recess.
- 1.12 In addition, a further 152 submissions were made as part of the LDF Site Search process. The majority of these were submitted in the post (64%), due to the need for the response to be signed and, wherever possible, for a map to be included. However, of these respondents 102 (67%) downloaded their representation forms from the Council's website.

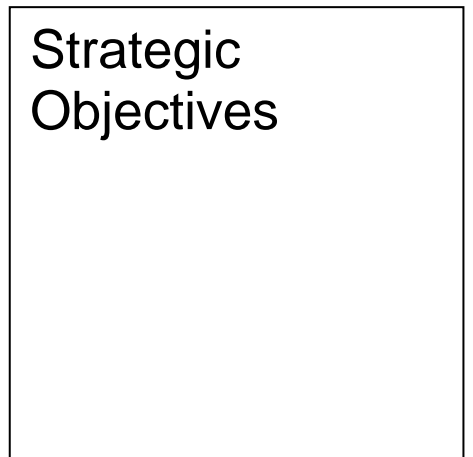
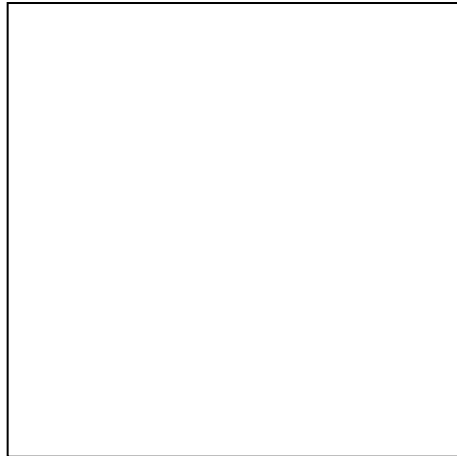
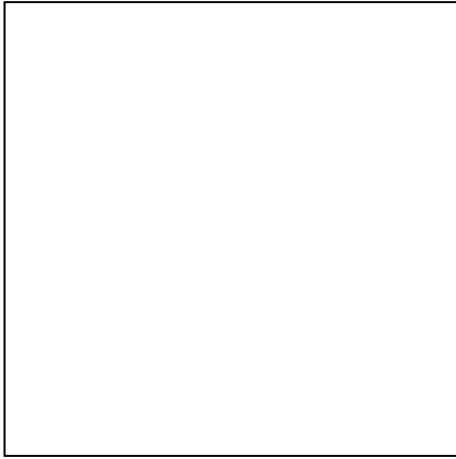
Next stages

- 1.13 At this early stage Pendle Council is not supporting any specific options. Those shown merely reflect the comments put forward to date and the evidence currently available. Further analysis is required to help identify those proposals which offer a realistic solution to the problems we face here in Pendle.

Consideration of Reasonable Alternatives

- 1.14 Careful consideration of the alternative approaches we could take, will be the subject of a further public consultation in Summer 2009. At this time you should be able to make an informed decision on what is best for Pendle, based upon a genuine choice of options.
- 1.15 Following the conclusion of this consultation, Pendle Council will prepare the 'final' version³ of its Core Strategy, which it intends to publish in early 2010 and submit to the Secretary of State for independent examination shortly afterwards.

³ When Pendle Council publishes its Core Strategy, you will have a six week period to consider the document and put forward any comments you wish to make. These will not be considered by Pendle Council, but by the Inspector appointed to undertake an independent examination of the document.



Confident Communities

SO3	Promote high quality design in new developments, our streets and public spaces, to create fully accessible, attractive and safe places to live, learn, work, play or visit.
SO8	Reduce inequalities by ensuring that the provision of community, education and healthcare facilities and their services are fully accessible.
SO9	Protect, enhance and improve access to our green spaces, sports and recreation facilities to promote active and healthier lifestyles.

Option	Comment	%
1	Agree	78
2	Disagree	22

Summary of representations

The majority of respondents (78%) agreed that these three strategic objectives (SO) were sufficient to help us create confident communities. Points for consideration include:

- Comment:** That SO3 should not simply ensure provision of good design in new development but also the protection and enhancement of good design found in the Borough, not only through conservation area and listed building policies but a general approach on a Borough wide scale.

Response: Consider the re-wording of SO3 before the Consideration of reasonable alternatives.
- Comment:** SO3 fails to consider the importance of the heritage in Pendle; it is essential in shaping the future of the Borough that its heritage is respected and enhanced. An action should be added to this effect.

Response: This issue is addressed under 'Caring for the Environment' SO10.
- Comment:** The recognition of the important role that green spaces and outdoor recreation play in improving health and wellbeing was welcomed although it was suggested that this strategic objective could be extended to include 'add to and make the best use of green spaces through multi-use'.

Response: The multi-functional aspect of open spaces is explored through the concept of 'Green Infrastructure'. This is an issue Pendle Council will explore further as it develops alternative approaches for further consideration.
- Comment:** Suggested an additional strategic objective based on the relationship between enjoyment of a quality outdoors contributing to better health and well-being.

Response: SO9 aims to achieve this; however the Council will consider whether extra emphasis is needed on the benefits for health and well-being.
- Comment:** Need to recognise the role biodiversity places in terms of quality of life; suggests using the 'Green Infrastructure' concepts of delivery.

Response: SO10 deals with issues of biodiversity, but does not explicitly discuss its impact on quality of life. Green infrastructure is an issue the Council will be considering further as it develops the approaches to be considered at the Consideration of reasonable alternatives.
- Comment:** Green open spaces should be protected unless they are poor quality or if there is already an over provision in the area.

Response: This is considered under SO9. This is an issue Pendle Council will explore further as it develops alternative approaches for further consideration.
- Comment:** Potentially important dimension being missed: The nature conservation potential of open spaces – people's appreciation of 'green spaces' is greatly enhanced and their experiences of them made more fulfilling when they are managed so as to provide an abundant and diverse mix of flora and fauna.

Response: Consider whether SO9 needs to make reference specifically to the management and conservation of open spaces and the relationship the public has with them.

Sustainable Communities

SO1	Establish a hierarchy of settlements to assist regeneration by directing growth to the most sustainable locations.
SO2	Ensure that the physical and social infrastructure is capable of supporting both new and existing development, thereby helping to create sustainable communities.
SO11	Deliver a safe sustainable transport network that improves both internal and external connectivity, reduces the need to travel by car, supports long-term growth and contributes to an improved environment.

Option	Comment	%
1	Agree	77
2	Disagree	23

Summary of representations

The majority of respondents (77%) agreed that these three strategic objectives are sufficient to help us create sustainable communities. Points for consideration include:

- Comment:** The more sustainable locations may not necessarily be in town or local centres, within rural villages or even be brownfield sites. Consideration should be given to sites based on their individual merits if they are near shops, bus stops or train stations, and/or the benefits said development can provide.

Response: The Sustainable Settlements Study considers the issue of sustainable locations for development and this will help to inform the policies it is proposed to include in the Core Strategy. In general terms, a site is unlikely to be sustainable if it is not located within the defined settlements as identified. However, exceptions have been proposed, for example rural housing exceptions which would allow development outside of the main urban settlements prioritised by a settlement hierarchy, where a local need has been established. This is an issue Pendle Council will explore further as it develops alternative approaches for further consideration.
- Comment:** These strategic objectives are generally supported; however, it is unclear how they pick up the intended (and necessary) intention to ensure that new developments will be required to reduce Pendle's carbon footprint. The first action relates only to location (essential though this is) and the others do not address sustainable construction.

Response: This topic is discussed under SO4.
- Comment:** The Pendle SCS (Sustainable Community Strategy) refers to limiting the use of natural resources, the strategic objectives here could refer to making the best use of existing resources through, for example, the repair and maintenance of existing buildings and their adaptive re-use.

Response: Agree that it is important to maximise the use of existing buildings; The sections on 'A Decent Home for Everyone' and 'Caring for the Environment' both refer to the reuse of existing buildings. This could possibly be emphasised more by including it within a specific strategic objective.
- Comment:** The 'most sustainable locations' should amongst other things mean locations and developments that best conserve and enhance the landscape, biodiversity and other elements of the natural landscape.

Response: The Sustainable Settlements Study looks at the natural environment and the constraints to development, therefore identifying the most sustainable locations for development. This evidence base document will help inform the policies of the Core Strategy.
- Comment:** SO2 should include consideration of the 'Green Infrastructure', including networks of open spaces and means of accessing the countryside.

Response: The Lancashire Green Infrastructure Strategy is nearing completion. This relatively new document will receive further consideration as Pendle Council develops the approaches to be considered

at the Consideration of reasonable alternatives.

- **Comment:** Support direction of development to locations where the environmental capacity, social and physical infrastructure is able to cope. In particular would refer to the water and waste-water utility infrastructure in this regard.
Response: It is considered that all physical and social infrastructures should be given full and equal consideration. There is no need to give specific reference to types of infrastructure here as these are strategic objectives.
- **Comment:** Several comments supported the need for objectives focussed on helping to reduce the need to travel and the encouragement of public transport, walking and cycling, reducing the need to travel by private car.
Response: Support noted. SO11 addresses this topic in more detail.
- **Comment:** Important that transport infrastructure constraints are taken into account and recognise that developments need to be sited in sustainable locations which are accessible for different modes of transport.
Response: All three strategic objectives under the 'Sustainable Communities' heading aim to address this issue. The Sustainable Settlements Study also looks at the accessibility of settlements. This evidence base document will help to inform the policies of the Core Strategy.
- **Comment:** The requirement for onsite parking for new developments should be carefully considered in relation to individual planning applications to ensure there is no disparity between objectives. Example: Why should a new development built to 'respond to issues posed by climate change' and 'where possible exceed, standards for accessibility and energy efficiency, and contribute to reducing Pendle's carbon footprint' need to include provision for onsite car parking?
Response: Parking requirements are one of the issues we have consulted on as part of this Issues and Options consultation (see SO11). The Core Strategy will need to have regard to parking policies in the North West Regional Spatial Strategy (RSS), but can develop its own standards for the development types not covered by the RSS standards. Such standards could have regard to requiring less parking in accessible areas. This is an issue Pendle Council will explore further as it develops alternative approaches for further consideration.
- **Comment:** Stress the need for a clear and flexible telecommunications policy within a LDD (Local Development Document).
Response: To consider whether it is appropriate to include a telecommunications policy within the Core Strategy, or whether this would be addressed within one of the other LDD documents, for example the Development Control Principles Development Plan Document (DPD).

Caring for the Environment

SO10 Ensure new development respects our built heritage and areas of the countryside which are valued for their contribution to landscape character or biodiversity.

SO4 Respond to the causes and potential impacts of climate change through mitigation and adaptation.

Option	Comment	%
1	Agree	46.5
2	Disagree	46.5
3	No Opinion	7.0

Summary of representations

Support for the strategic objectives to help us care for the environment was less clear cut. Points for consideration include:

- Comment:** We broadly support the two strategic objectives, however alongside respect for the built heritage, the objective for new development should be 'to conserve and enhance the character and quality of all landscapes, including townscapes, and to conserve and enhance habitats and biodiversity – whether in the countryside or in towns and villages'.

Response: To consider in future documents whether the proposed alterations are necessary.
- Comment:** We support your stated strategic objectives (page 23) of ensuring that new development respects the natural environment and biodiversity and ensuring that they respond to the causes and impacts of climate change. However, we would like to see this made more robust by stating that irreplaceable habitats such as ancient woodland should be given absolute protection from development.

Response: Consider this too specific for a strategic objective. More appropriate in a policy.
- Comment:** We strongly support the comments 'Natural Environment: What did you say' to the effect that a coherent network of ecological sites needs to be established as well as wildlife corridors and green areas to connect urban areas with the countryside. This would, in our view, have two significant benefits: firstly, in enabling wildlife to adapt to the impact of climate change by moving in response to it; secondly, by giving people in urban areas of Pendle more access to green open space and the many benefits which derive from this such as healthy exercise and contact with nature. We also support the comment in the same section that tree cover in Pendle should be increased and existing woods managed sustainably. Such actions would be very much in line with the policies in the North West Regional Forestry Framework and we hope that you will ensure that they are included in the final version of the Core Strategy.

Response: Support noted.
- Comment:** SO10 is supported. However it should be supplemented by an objective covering the understanding, management, maintenance and enhancement of the historic environment.

Response: To consider in future documents whether the proposed alterations are necessary i.e. whether SO10 should be amended to have reference to these wider functions.
- Comment:** Do not understand the first bullet point under "Our built heritage" - promote the replacement of existing buildings, particularly in rural areas. Do not support this suggestion.

Response: It may be appropriate to accept the replacement of buildings in rural areas, for example where these relate to agriculture. In these instances it is considered preferable to allow the replacement of an existing building on a previously developed site rather than an isolated, green field site. But it should be noted that these are points proposed by the public and therefore put forward for consideration, as opposed to necessarily what the Council is supporting.
- Comment:** Not clear why reference is made to "unstable locations" under a built heritage heading?

Response: The term 'unstable locations' refers to the suitability of the land for building on, for example

the nature of the ground conditions at the site, an important environmental issue to be considering in planning for new development. Perhaps this could be explained more clearly if this section is repeated in future documents, perhaps including this point under a different heading.

- **Comment:** The actions are insufficient to meet what it is that the Borough wishes to achieve: SO1 refers only to respecting the environment, not to its protection and the stated desire to enhance it where possible.
Response: Consider how the strategic objective could be rewritten to strengthen the meaning of 'respect' to include protection and enhancement where possible and appropriate.
- **Comment:** SO1 is written in such a way that it only refers to biodiversity in the countryside. Urban locations contain a variety of important refuges for wildlife, and indeed some designed nature conservation areas.
Response: The structure of the strategic objective could also be reconsidered to ensure it is clear that biodiversity is important in both rural and urban areas.
- **Comment:** It should be explicit that reference to 'built heritage' includes the wider setting of designated assets (in accordance with relevant PPGs and Adopted and Draft RSS).
Response: A footnote or glossary could be included within the document to make the term 'built heritage' clearer, without the need to detract from the succinctness of the strategic objectives.
- **Comment:** This section has no information on the heritage of the district. It is suggested additional information is added including reference to the number of scheduled monuments, listed buildings and conservation areas and other historic and archaeological sites.
Response: 'What does the evidence tell us' makes reference to the preservation of listed buildings, features of archaeological interest etc. This reflects the comments put forward by the public. It is not considered the appropriate place to add statistics such as those suggested; such information is already given in the Spatial Portrait section of the document.
- **Comment:** The first bullet point here could be enhanced by slightly re-wording it. The following is suggested: 'Ensure new development respects our natural and man-made heritage (including built and buried remains), as well as those sites which are valued for their contributions to landscape and townscape character, or to biodiversity'
Response: This suggested re-wording changes the distinction from 'built heritage and countryside' to 'natural and man-made' to recognise the fact that much of our countryside and landscape character is in fact man made and not natural, formed by farming, mining etc over time. This suggested amendment extends the reference to built environment to 'man-made' heritage giving reference to both built heritage and buried remains. Proposed to consider whether this amended wording is an improvement on the current wording.
- **Comment:** Generally the report does not adequately focus on landscape character. In recognition of this and of emerging and existing landscape policy, it is recommended that SO10 is modified to accommodate reference to landscape character
Response: SO10 refers specifically to landscape character; perhaps this term can be defined within a glossary or footnote to explain it is not simply a term for landscape or open countryside but acknowledges the different landscape characters and the role of human activities in shaping the landscape.
- **Comment:** Do not consider that the two strategic objectives are sufficient to care for the environment; they are very much reactive and lacking in ambition. Not only should biodiversity resources be protected they need to follow the ethos of conserve, attain favourable condition, restoration and re-establishment. In terms of climate change, there are measures that can positively help to reduce the pace of climate change.
Response: Consider whether the strategic objectives could be strengthened in their wording to be more proactive and ambitious. SO1 could refer not only to respecting biodiversity but also to its conservation, restoration and re-establishment. SO2 by suggesting both mitigation and adaptation is considering the potential impacts we can have to affect the onset of climate change; the strategic objective is therefore considered strong enough in this respect, but maybe a footnote or glossary needs to explain the different concepts of mitigation and adaptation for the public. Possibly the term 'respond' seems to be reactionary and a more proactive term could be used.

- **Comment:** Supports the wording on protection of surface and groundwater, particularly where this supports aquatic ecosystems. This is important for protection of water resources and preventing pollution of the environment.
Response: Support noted.

In conclusion, those people who disagreed with the strategic objectives were in most instances asking for stronger measures to be included within the objectives. This reflects strong support for the general aims of the objectives. Consideration as to whether they need to be strengthened or added to will be given serious consideration as further progress is made in developing the Core Strategy.

A Decent Home for Everyone

SO5 Deliver quality housing that is both appropriate and affordable, contributing to the creation of a balanced housing market.

Option	Comment	%
1	Agree	87
2	Disagree	13

Summary of representations

The majority of respondents (87%) were in agreement that this strategic objective is sufficient to help us create a decent home for everyone. Points for consideration include:

- Comment:** Agrees with the strategic objective but with a commitment to renovate rather than demolish terraced housing, provide affordable homes and so protect/develop sustainable communities.
Response: The creation of a balanced housing market will address issues of affordability and housing types. The Council acknowledges that terraced housing stock plays an important role in the heritage of the Borough and where it can contribute to the housing requirements identified in the areas it should be retained and adapted where feasible. But the Burnley and Pendle Strategic Housing Market Assessment (SHMA) indicates that a high proportion of housing in Pendle is terraced housing. Therefore there is a need to diversify the types of new housing to be built to provide an alternative to the terraced housing and to consider whether the terraced housing can be adapted to contribute to providing a wider range of housing provision.
- Comment:** Appropriate quality housing should be delivered to contribute to a balanced housing market. The SHMA found that in Pendle there is a large oversupply of terraced stock and a shortage of four bedroom family houses (paragraph 11.37).
Response: The strategic objective identifies the need to provide for appropriate housing to contribute to the creation of a balanced housing market. As the respondent identifies, this is informed by the SHMA; any policies adopted as part of the Core Strategy will need to respond to its findings.
- Comment:** There is a surplus of terraced housing and shortages of all other types of home, in particular detached properties and bungalows, in the market sector. A priority weighting should be given to planning applications which respond to this provision.
Response: The strategic objective is to deliver housing to contribute to providing a balanced housing market; this would look to provide the house types needed in the Borough, including detached properties and bungalows, as identified in evidence such as the SHMA.
- Comment:** There is much here that we can support but we query why the text, under 'Development', refers only to 'ensure open space and recreational areas are provided where family housing is provided'. Access to open space and recreational areas is essential for all housing.
Response: Agree that open space is important to all house types, albeit perhaps in different forms. This will be taken forward and the strategic objective may be amended to prior to the next stage in the process which will consider consideration all reasonable alternatives.
- Comment:** While there are no specific proposals for new prison development in your district at present or specific sites identified, in line with Government guidance the National Offenders Management Service (NOMS) requests that you consider the inclusion of criteria based policy to deal with a firm prison proposal should it arise during the plan period.
Response: Within the 'Decent home for everyone' – 'Specialist Provision' section, reference is made to the need to consider acceptable locations for new prison developments. This is an issue Pendle Council will explore further as it develops alternative approaches for further consideration.

A Vibrant Economy

SO6 Strengthen the local economy by facilitating growth that supports economic diversification and rural regeneration.

SO7 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.

Option	Comment	%
1	Agree	64
2	Disagree	36

Comment

A majority of respondents agreed that the proposed strategic objectives were sufficient to help us create a vibrant economy. Some points raised for consideration include:

- Comment:** Support the strategic objectives but with an emphasis on No.1: "Local Economy" - to be sustainable [economically, socially, environmentally], Pendle should aim to be self-sufficient by using our LOAF!: Locally Produced; Organically Grown, Animal Friendly and Fairly-Traded - wherever possible - and, so cut down the need to travel and transport goods in and out of Pendle.

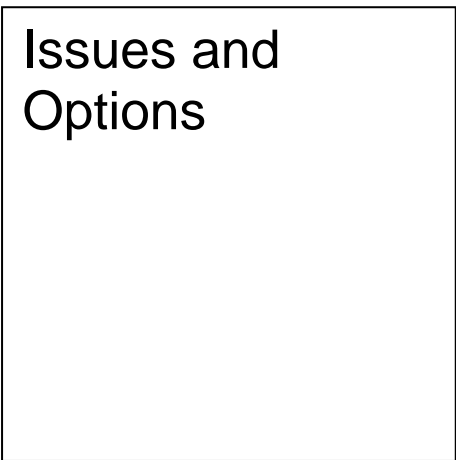
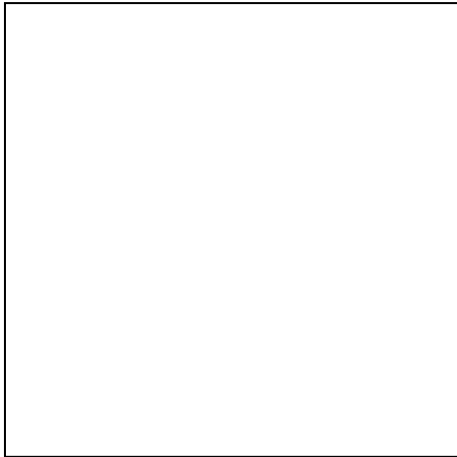
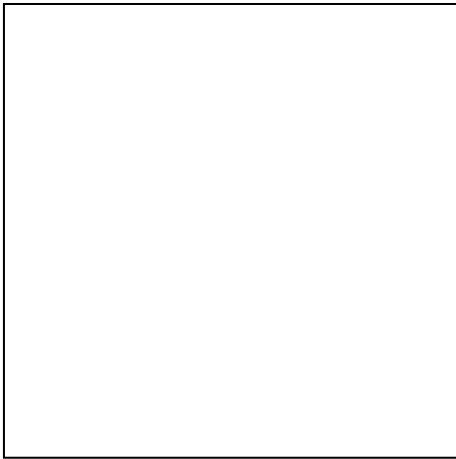
Response: Policy W1 'Strengthening our local economy' of the North West Regional Spatial Strategy (RSS) includes a commitment to encouraging 'sustainable diversification', including promoting links between regional agriculture and production and retail facilities to reduce food miles and support local businesses. The RSS and therefore the Core Strategy would therefore be consistent with this aim to support locally produced produce; Consider whether a specific policy is appropriate to support locally produced, organic food as a form of rural economic diversification.
- Comment:** The objectives do not seem to be aligned to the need to revitalise town centres. Looking to increase the night time economy in town centres would seem aspirational when the day-time economy of the town centres is declining

Response: The strategic objective refers to 'increasing the choice variety and quality of the retail offer'; this specifically addresses the need to improve the retail or 'day-time' economy of the town centres but to compliment this with a vibrant night time economy. Section 2.22 and 2.23 of Planning Policy Statement 6: Planning for Town Centres state that a diversity of uses in centres makes an important contribution to their vitality and viability. Different but complimentary uses during the day and in the evening can reinforce each other. It also states the importance of having clear policies to manage the evening and night time economy. It is therefore considered that SO7 is appropriate for the aim of revitalising the town centres.
- Comment:** The vision to create a vibrant economy in Pendle (pages 27-29) is supported, with an agreement as to the importance placed on the need to encourage economic activity that will increase the range and quality of employment opportunities for local residents; we would recommend that given the importance of retail as an employment provided, specific reference to retail be made.

Response: The comments in general support the so to improve the retail offer within Pendle, as it forms an important part of economic activity in the Borough. More specifically, SO6 asks what type of employment should we be attracting into Pendle and the responses to this question will help inform the development of policies on whether we prioritise attracting a specific type of employment into Pendle.
- Comment:** Given the deficit of suitable employment sites we feel that further emphasis should be placed on identifying and allocating sufficient sites to meet market demand.

Response: SO1 refers to facilitating growth, which would necessarily involve assuring that the sufficient and suitable employments sites were available. Therefore it is considered that the strategic objective does address this issue. It is also worth noting that the role of the Core Strategy is to look at the need and supply of sites but it is the Land-use Allocations DPD which will look at allocating specific sites for specific uses.

- **Comment:** It is generally accepted that good environmental quality is a major prerequisite of healthy economic growth.
Response: Whilst issues regarding the environment and benefits of environmental quality are discussed elsewhere in the document, they are not discussed with specific reference to their impacts on the local economy. Regional guidance on Green Infrastructure suggests that by improving green spaces throughout the Borough we can improve the attractiveness of the area for securing new economic investment. The Lancashire Green Infrastructure Strategy is due to be published shortly (late 2008) and will be considered as we progress the Core Strategy. The provision of attractively built business parks etc can also encourage economic growth; we could consider whether SO6 can be reworded to include providing an attractive environment to help facilitate growth. This is an issue Pendle Council will explore further as it develops alternative approaches for further consideration.

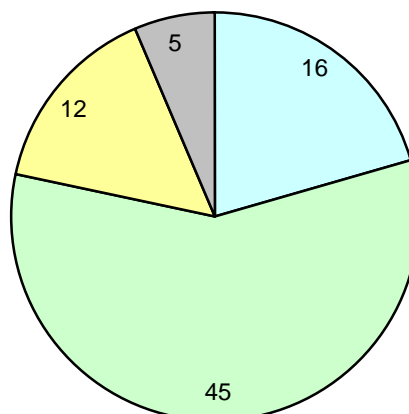


Please note:
The initials SA – when shown alongside the rank – indicate that the option was considered to be the most sustainable option of the group, as assessed in the *Sustainability Appraisal of Core Strategy and Land-Use Allocation DPDs* (Entec UK Ltd., 2nd June 2008).

1a Which settlement hierarchy do you think would help to achieve the most sustainable patterns of growth in Pendle?

Option	Comment	Rank	
1	Focus development on key service centres (4-tier structure)	2	
2	Focus development in identified regeneration areas (4-tier structure)	1	SA
3	Favour equal distribution of development across Pendle (5-tier structure)	3	
4	Other	4	

Summary (number of responses)



Comment

The overall response showed most support for Option 2 with 57%. This option would establish a 4-tier settlement hierarchy, centred on the Key Service Centres of Nelson (including Brierfield) and Colne. It would also focus development on those areas within these settlements that are in greatest need of regeneration, namely the Housing Market Renewal Areas.

The Sustainability Appraisal shows Option 2 to be the most sustainable choice, focussing development on those urban areas where development would bring extra benefits in the way of regeneration. This approach could however stifle development in the north of the borough with Barnoldswick being relegated to the role of a Local Service Centre, the second tier of the hierarchy.

Option 1, which would focus development on the larger settlements, was the most popular choice in the written representations, with 34% of the responses, but ranked second overall. This option would give Barnoldswick the status of a Key Service Centre alongside Nelson and Colne.

The recently adopted Sustainable Settlements Study supports an option closer to Option 3. This would employ a 5-tier structure, by providing a higher tier role for identified Rural Service Centres; larger villages with a larger range of services where some growth could be allowed to help enhance their role as local service providers for remote rural areas. This option ranked third in the overall level of support.

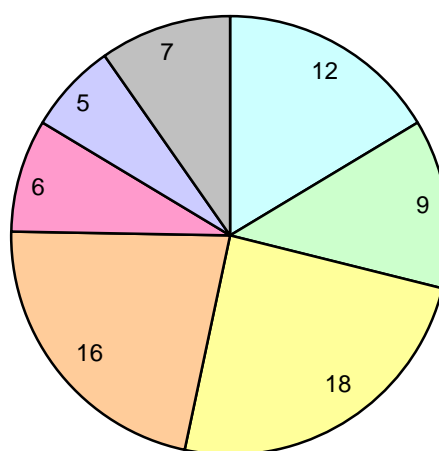
Only 17% of respondents proposed consideration of reasonable alternatives which included:

- Promoting regeneration through focussing development around the canal corridor.
- Ensuring sufficient focus on the West Craven settlements to serve this side of the Borough.
- The need for the adopted hierarchy to include a level of flexibility to react to the role of centres changing over time.

1b How should we distribute new housing across Pendle?

Option	Comment	Rank	
1	Focus development in key service centres	3	
2	Focus development in key, local and rural service centres	4	
3	Focus development in identified regeneration areas	1	SA
4	Focus development in areas of proven need	2	
5	Favour equal distribution of development across Pendle	6	
6	Focus development in areas of strong demand	7	
7	Other	5	

Summary (number of responses)



Comment

The responses are fairly evenly split with no convincing outright leader.

Option 3, the regeneration option, scored highest overall with 24% of the responses. It also scored highest in the Sustainability Appraisal. In contrast it was only backed by 8% of the written representations received, ranking it 5th overall. This is consistent with the response to Option 1a, where the feedback from the local exhibitions placed a higher emphasis on regeneration than stakeholders, who account for the majority of written representations. Such an approach could limit development potential in the north of the borough, placing their future viability at risk.

The second most popular response was Option 4, which is the proposal to distribute housing to areas of proven need. The Strategic Housing Market Assessment looks at the issue of need throughout the housing market area of Pendle and Burnley and would help inform such an approach.

Options 1 and 2 ranked 3rd and 4th respectively. These options both use a settlement hierarchy approach to the distribution of housing. Option 1 focuses on the Key Service Centres, whilst Option 2 introduces a role for Local and Rural Service Centres. These options will ensure that development is restricted to locations well served by existing services and facilities. The RSS supports these approaches to the distribution of housing provision.

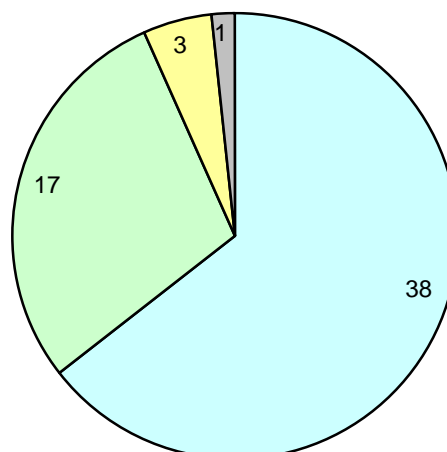
Alternative suggestions included:

- Emphasising the role for bringing existing empty housing back into use.
- The need to consider infrastructure capacity.
- The suggestion that several of the proposed options are combined to focus housing provision on existing centres, but also giving consideration to the need for regeneration and meeting proven identified needs.

1c What type of land should be developed for housing?

Option	Comment	Rank	
1	Only sites within a settlement boundary, prioritised by a sequential test	1	
2	As 1, but consider sites outside the settlement boundary, if necessary	2	SA
3	As 1, but allow development on any type of site to meet identified need	3	
4	Other	4	

Summary (number of responses)



Comment

Option 1, which would concentrate development within the settlement boundaries, received the greatest level of support with 64% of all respondents choosing this option.

Option 2 which follows the same approach, but allows for development on Greenfield land outside the settlement boundary as the final choice in a sequential test, where a proven need is established, was the second choice with 28%. This option scored highest in the Sustainability Assessment, as it helps to support economic objectives, particularly in rural areas of the Borough.

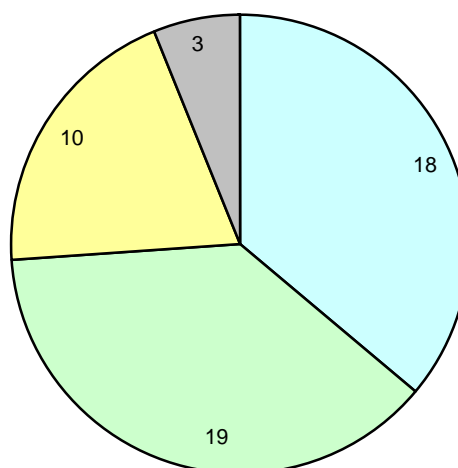
Both these options are consistent with the requirements of Policy DP4 in the North West Regional Spatial Strategy (RSS), which requires a sequential approach to development that prioritises the use of land within existing settlement boundaries, that focuses development on previously developed sites, ahead of other land within the settlement boundary, before finally considering sites on the fringe of the urban areas where a proven need has been established.

Option 3 which would allow development to meet an identified need, but in no sequential order of preference, scored low with only 9% of the respondents supporting such an approach. Such an option would conflict with Policy DP4 in the RSS.

1d How should we distribute new employment across Pendle?

Option	Comment	Rank	
1	Focus development in key service centres	2	SA
2	Focus development in areas of proven need	1	
3	Distribute development on the basis of market attractiveness	3	
4	Other	4	

Summary (number of responses)



Comment

Option 2 had the most support with 38% of respondents choosing this option, which focuses on distributing employment to areas where a proven need has been demonstrated. The Employment Land Review (ELR) would inform where areas of need have been identified.

Option 1 ranked a close second with 36% support. This option is preferred by the Sustainability Appraisal as by focussing employment on the Key Service Centres environmental impacts can be reduced through improved accessibility to employment sites i.e. most people live within the Key Service Centres and would have shorter travel to work journeys and more public transport options.

Both options would result in a heavy emphasis on the M65 corridor. The ELR indicates that this is where the most employment land is needed (Option 2). Focussing development in the Key Service Centres (Option 1) would also focus development in this area. The most noticeable difference between the two options is the potential impact on West Craven. Under Option 2 West Craven would be less likely to secure new employment as the ELR shows a surplus in this area.

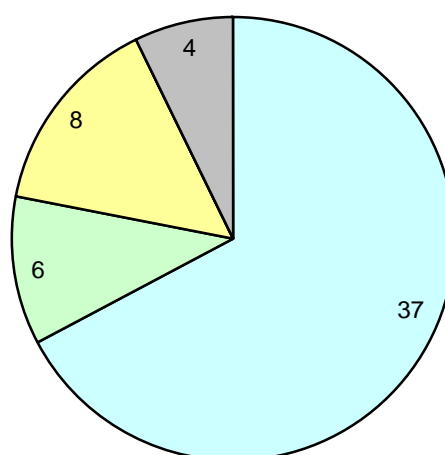
Alternative suggestions:

- A policy should allow for all three options to be addressed i.e. employment sites should be located in Key Service Centres, meet an identified need and consider market attractiveness.
- A combination of Options 1 and 2 would best meet regeneration needs.

1e Which locations are most appropriate for new employment land provision?

Option	Comment	Rank	
1	Use a sequential approach to determine priority locations	1	SA
2	Allow development on Brownfield / Greenfield sites within settlement boundary	3	
3	Allow for urban extensions, where there is a proven need	2	
4	Distribute evenly across the Borough	5	
5	Other	4	

Summary (number of responses)



Comment

Option 1 attracted the most support with 67% of respondents choosing this option. This option suggests adopting a sequential approach to locating employment, prioritising protected employment areas, followed by town centre locations and finally transport hubs or corridors. The Sustainability Appraisal also ranked this option highest as it achieves higher environmental benefits through reducing travel to work journeys etc.

Options 2 and 3 attracted similar levels of support as they both allow for development to meet a proven need. Slightly more support was available for Option 2, which allowed for extensions beyond the existing settlement boundaries where necessary.

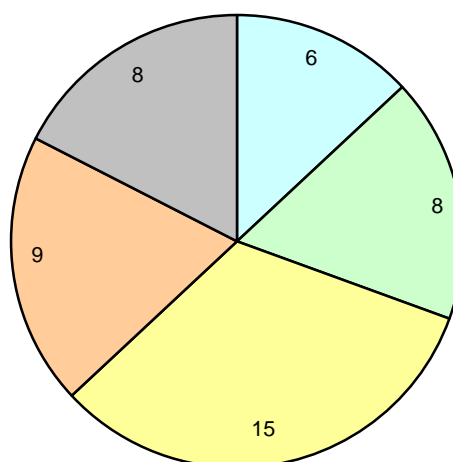
The need to adopt different approaches for different employment uses was suggested.

Stakeholders stressed that it was the role of the Land-use Allocations DPD to allocate sites that reflect spatial policies and that the option to be taken forward should reflect the guidance in Draft PPS4: Planning for Sustainable Economic Development.

1f What type of employment sites do we need to provide?

Option	Comment	Rank	
1	Large strategic site	5	SA
2	Minor expansion of existing employment areas	3	
3	Range of small employment sites throughout Pendle	1	
4	Encourage more intensive use of existing employment land	2	
5	Other	3	

Summary (number of responses)



Comment

Option 3, which proposes to provide a range of small employment sites throughout the Borough, received the greatest level of support. This would favour the provision of smaller start-up units, but may not provide for larger premises, restricting opportunities for the growth of local firms and significant levels of inward investment.

Options 1 and 2 score more highly in the Sustainability Appraisal, as they are more likely to contribute to long-term economic sustainability either through the development of a new strategic site, or the enhancement of existing employment areas. They have not attracted support during this consultation and were the least favoured option at the community exhibitions.

The Employment Land Review supports the need to provide quality sites in a range of sizes. The ELR points out that in September 2005, the Inspector at the Inquiry for the current Replacement Pendle Local Plan (2001-2016) pointed out that there are few larger employment sites within the Borough (over 0.1ha) and that this was an issue which should be addressed as part of the forthcoming LDF process.

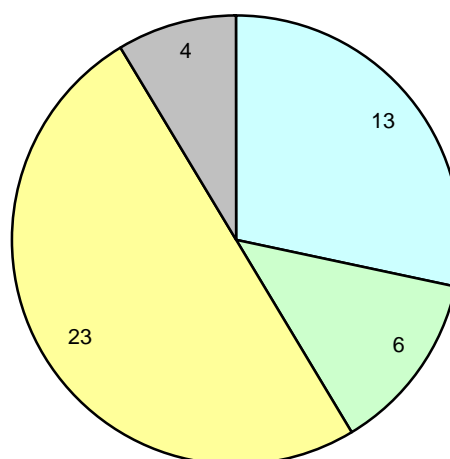
Other issues raised for consideration are:

- The need for a strategy which brings forward a range of sites (in character and size) suitable for different uses.
- Proposals to develop a strategic site, accompanied by smaller sites, in line with demand.
- The need to consider the issues of employment land provision at a sub-regional scale.

1g How should we distribute new retail provision across Pendle?

Option	Comment	Rank	
1	Concentrate in town and district shopping centres	2	
2	As 1, but allow for limited dispersal to local shopping centres	3	
3	Localised provision in town, district, local and rural centres	1	SA
4	Other	4	

Summary (number of responses)



Comment

Option 3 was supported by half of all respondents. All options propose follow a retail hierarchy, but unlike the other options Option 3 allows for the provision of small scale convenience retail provision in rural service centres. This option is also favoured in the Sustainability Appraisal contributing to the provision of local services and reducing the need for people to travel to meet their day to day requirements.

This option is still compatible with national and regional planning guidance as it still uses a hierarchy to direct any major comparison and convenience retail provision towards the main town centres of Nelson, Colne and Barnoldswick.

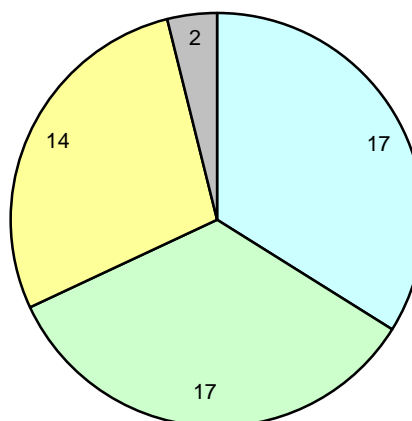
Further issues suggested for consideration:

- Focus on the need to consider the role and impact of the existing edge of centre sites.
- The desire for a strategy with some flexibility led by the tests of PPS6 rather than a rigid policy.
- The consideration of the wider impacts of any policy adopted, particularly as regards provision in the north of the Borough which also serves residents of neighbouring boroughs. The Retail Capacity Study would also suggest policies need to consider the provision in the north of the borough as a shortage of convenience goods shopping was identified.

2a When should we ask for contributions to help maintain existing, or provide new infrastructure, in Pendle?

Option	Comment	Rank	
1	Support improvements to social and physical infrastructure	1	SA
2	Focus contributions on the delivery of physical infrastructure	1	
3	Focus contributions on the delivery of social infrastructure	3	
4	Other	4	

Summary (number of responses)



Comment

The options proposed to address this issue received a mixed response. Options 1 to 3 attracted a similar proportion of responses – between 28-34% each, but a split was experienced between the responses received at the local exhibitions attended by members of the public and the written responses which were largely submitted by stakeholders.

Responses from the public exhibitions showed an almost equal response for focussing contributions on either social or physical infrastructure; these individual choices suggest that sections of the community favour one as more important than the other, but the results even out when considered across the community as a whole. The stakeholder response focussed on Option 1, which proposes support for improvement to all infrastructures, both social and physical. The Sustainability Appraisal also supports Option 1. As it supports improvements to both social and physical infrastructure this addresses all sides of the so called 'sustainability triangle' and therefore scored highest overall.

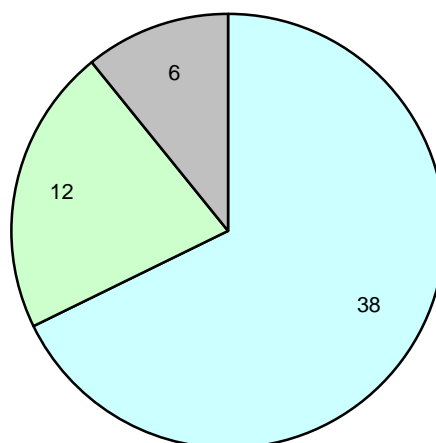
The public responses would suggest that an area by area approach may be needed, requiring a flexible policy, which would allow for social or physical infrastructure provision where particular need or deficit has been identified.

It was also mentioned that any policy regarding contributions must be in accordance with the guidance contained in Circular 05/2005 on Planning Obligations.

2b How should we determine the level of developer contributions?

Option	Comment	Rank
1	Calculate on a site-by-site basis	1
2	Apply a standard calculation to all planning applications	2
3	Other	3

Summary (number of responses)



Comment

Option 1 was preferred by 67% of all respondents. This option proposes a site by site approach to determining levels of developer contributions. It offers the maximum level of flexibility, and allows all factors affecting a particular site to be taken into consideration. It does not, however, give developers any indication of what level of contributions are likely to be requested prior to their submission of an application.

Some respondents suggested a mid-way approach, which comprise of a standard set of calculations that would provide guidance and support to developers, but would also include a degree of flexibility as to how they are applied in each case, in order to take into account local circumstances and issues of viability.

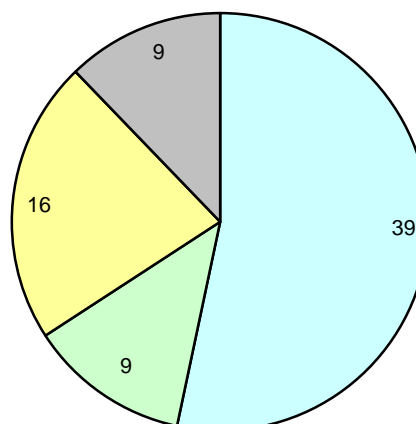
It was also suggested that the Councils response to the new Community Infrastructure Levy, proposed as part of the new Planning Bill, needs to be considered alongside the issue of setting policies regarding developer contributions via the traditional S106 route.

The Sustainability Appraisal was not applicable to this question.

3a What factors should we emphasise in order to achieve high standards of design in new developments?

Choice	Comment	Rank	
1	Remain in keeping with traditional character of the area	1	
2	High quality, but limited need to make reference to the wider setting	3	
3	Focus on accessibility and security	2	SA
4	Other	3	

Summary (number of responses)



Comment

This question was the first to offer respondents the opportunity to support more than one option (i.e. it offered a choice) as opposed to the earlier questions, which required the respondent to select only one option.

The most popular selection was Choice 1 (53%), which promotes the need for design to remain in keeping with the traditional character of the area. This choice was heavily favoured by people attending the community exhibitions.

There was limited support for Choice 2 (21%), particularly from the public exhibitions. This could encourage development to be innovative in design with less rigid requirements for consideration of local character. This would suggest that local people are proud of the areas built heritage and remain traditional in their tastes with regard to architectural style and materials.

In contrast written responses showed almost equal support for all three choices, suggesting a greater acceptance of the role that contemporary architecture can play in enhancing traditional settings. Several comments suggested that the two Choices 1 and 2 should not have been set up against each other and that it is perfectly possible to achieve design which is both modern and innovative, but which also reflects its local context. As it was possible for respondents to select both choices, this is a dilemma that could have been overcome by selecting both options. Nevertheless, support was markedly higher for Choice 1 than Choice 2.

Further responses suggested that

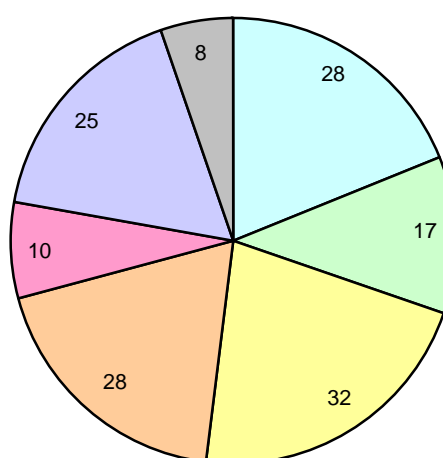
- Policies should be careful not to be too prescriptive and should allow an appropriate response to a specific case rather than seeking to apply a borough-wide solution.
- Policies should encourage designs that give reference to local distinctiveness, rather than simply be prescriptive in materials etc.
- Good design also needs to consider the issues of climate change mitigation.

The Sustainability Appraisal considered Choice 3 to be the most sustainable solution as it provides benefits for equality of access to both buildings and public spaces. It also suggests that consideration needs to be given to the cost implications of requiring higher standards of design and materials and how this may stifle development.

3b Which of these options would make a significant contribution to an improved public realm?

Choice	Comment	Rank	
1	Design out opportunities for crime	2	SA
2	Reduce conflict between pedestrians and traffic (improved connectivity)	5	
3	Increased use of natural surfaces, shrubs and planting	1	
4	Use of traditional materials	2	
5	Increased use of public art	5	
6	Introduce stricter controls on outdoor advertising	4	
7	Other	7	

Summary (number of responses)



Comment

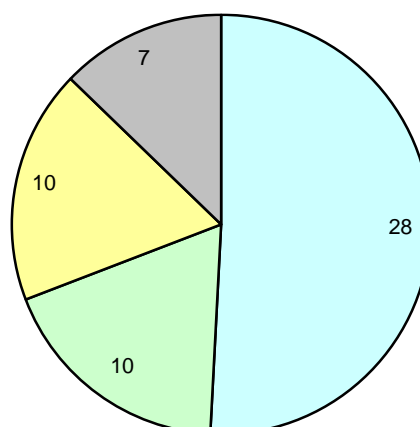
The responses show an even amount of support for several of the choices proposed, with natural surfaces, shrubs and planting (21.6%), designing out crime (18.9%), use of traditional materials (18.9%) and stricter controls on advertising (16.9%) all attracting similar levels of support. This suggests that there are several important interrelated issues to be considered when seeking to improving the quality and appearance of the public realm and that any policy should make reference to them all, rather than trying to address individual issues (i.e. materials) in isolation.

Choice 1 scores highest in the Sustainability Appraisal due to the valuable contribution it makes to improving social sustainability, but the report acknowledges all the choices proposed would have an equal impact on improving the quality of the public realm and the built environment.

4a How should we aim to build renewable energy technologies into new developments?

Option	Comment	Rank	
1	Require provision in all new developments	1	SA
2	Require provision in all new developments above a certain threshold	2	
3	Require a financial contribution towards off-site provision	2	SA
4	Other	4	

Summary (number of responses)



Comment

Option 1 received most support, having been selected by half of all respondents. This option proposes a policy which would require all development to encompass features which contribute to reducing carbon emissions. The consultation document suggested that different scales of contribution could be required for different scales of development, with major schemes being given higher targets to achieve but householder schemes also having a part to play. Any policy would need to clearly set out the different requirements.

The option was also supported by the Sustainability Appraisal, being seen as one of the best ways of promoting energy efficiency and the use of renewable energy in new development; addressing the issue of climate change. All options scored highly in these areas.

Equal support (18%) was received during the consultation for Options 2 and 3 and several comments received raised additional points around the issues put forward in these options.

The written responses from stakeholders suggested that renewable energy technologies should not be required for all developments, but should only be required where it is viable. Reference was made to PPS22: Renewable Energy, which states that the use of renewable technologies should be required 'where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily' (page 7). The more recently published PPS1: Climate Change supplement takes a more positive presumption that planning authorities should 'expect a proportion of the energy supply of new developments to be secured from decentralised and renewable or low-carbon sources' (paragraph 20). It goes on to say that such policies should be 'evidence-based and viable' (paragraph 33). The Council is looking to commission a Renewable Energy Study to help inform such policies.

Several respondents also felt that some flexibility is required as to whether the requirement should be made on, or off site, particularly in the case of sensitive locations such as around historic buildings and structures.

The North West Regional Spatial Strategy (RSS) currently requires that in the absence of local policies, all new non-residential developments over 1,000m² and residential developments of 10 units or more should secure at least 10% of their predicted energy requirements from decentralised and renewable or low carbon sources, unless it can be demonstrated by the applicant, having regard to the type of development and its design, that this is not feasible or viable.

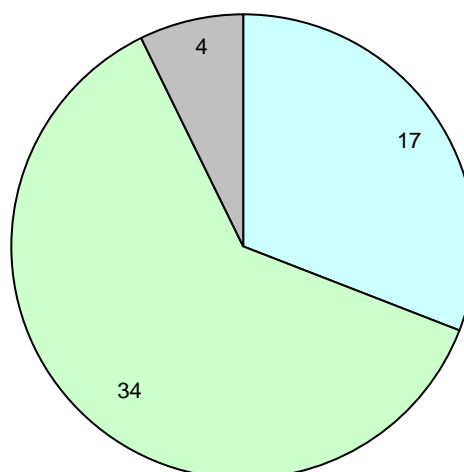
It states that in setting local targets in Development Plan Documents local authorities should base targets in appropriate evidence and viability assessments. The proposed Renewable Energy Study will look at this but

any proposed target is likely to need to be set at least the 10% currently required by RSS. Any policy would also have to address whether the target applies to all development or sets thresholds for when it applies; it could be that householder extensions for example are not required to meet the 10% contribution but has a different requirement in terms of reaching energy efficiency levels (but the policy should be careful not to repeat legislation elsewhere, such as building regulations).

4b How supportive should we be towards the development of renewable energy sources?

Option	Comment	No.	
1	Broadly supportive	2	
2	Very supportive	1	SA
3	Other	3	

Summary (number of responses)



Comment

With around one-third of the responses Option 2 (61.8%) received the greatest level of support. This option favours supporting the use of renewable technologies to generate power. This is likely to require a policy framework that will set aspirational targets for the generation of electricity from renewable sources, raising Pendle's profile as a leading authority in 'green' issues.

The Land-use Allocations DPD would need to promote potential areas of search for large scale renewable projects, or identify sites where such schemes could be developed.

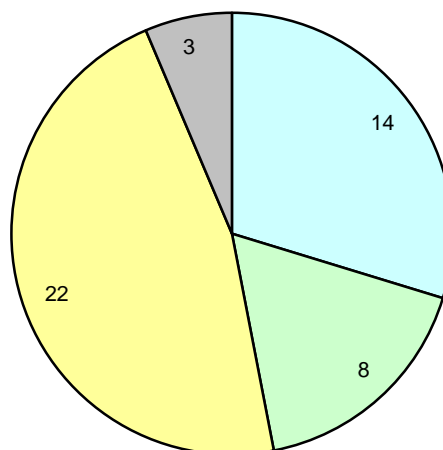
Evidence needs to be available to support the viability of setting targets for the generation of renewable energy. The North West Sustainable Energy Strategy states that by 2010 at least 10% (rising to at least 15% by 2015 and at least 20% by 2020) of the electricity which is supplied within the region should be provided from renewable energy sources. The North West Regional Spatial Strategy (RSS) states that in order to achieve this local authorities should work with stakeholders in the preparation of sub regional studies which will in turn inform the establishment of local strategies for dealing with renewable resources. Pendle Council is looking to commission a Renewable Energy Study to help inform such policies.

Option 2 also scores highest in the Sustainability Appraisal as its not only helps to promote the take-up of renewable energy, but also helps to address the issue of climate change.

4c How can we accommodate stand-alone renewable energy schemes in Pendle?

Option	Comment	No.	
1	Introduce a criteria based policy to identify where schemes may be acceptable	2	
2	Identify specific areas of search for different renewable energy technologies	3	
3	Support the provision of specific renewable energy technologies	1	SA
4	Other	4	

Summary (number of responses)



Comment

Option 3 received the most support (40.9%). This recommends a proactive approach that would put in place a supportive policy framework setting out potential areas of search for those renewable technologies that have been identified as being the most appropriate for Pendle. This option would also offer greater levels of protection to valued and historic landscapes and protect environmental quality. As such it was favoured by the Sustainability Appraisal.

The Land-use Allocations DPD would need to promote potential areas of search for large scale renewable projects, or identify sites where such schemes could be developed.

The second most popular option was Option 1. In contrast, this is a reactive approach relying on a criteria based policy to help identify the circumstances where the development of renewable technologies is deemed to be acceptable. This offers a wider scope than Option 3, as it would not rule out any specific areas or technologies, but would consider them on a site-by-site basis against set criteria.

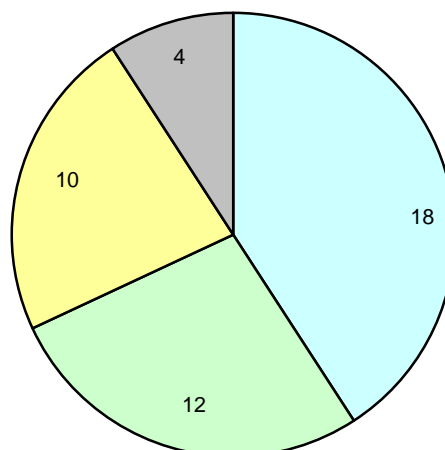
Option 1 is more in line with Policy EM17 of the North West Regional Spatial Strategy (RSS), which states that plans and policies should seek to promote and encourage rather than restrict the use of renewable energy sources and presents a list of criteria which it states should be taken into account, but not used to rule out specific types of renewable technologies. This is also the guidance in PPS1 Climate Change supplement. As such Option 3 may be found to be inconsistent with both national and regional policy.

In breaking down the responses further, Option 3 was favoured by attendees at the local public exhibitions, whereas Option 1 was most supported in written representations.

4d How can we seek to improve energy conservation and efficiency in new housing?

Option	Comment	Rank	
1	Comply with Government targets by 2016 (minimum requirement)	1	
2	Establish an interim target in 2012	2	SA
3	Establish annual targets to encourage steady progress	3	SA
4	Other	4	

Summary (number of responses)



Comment

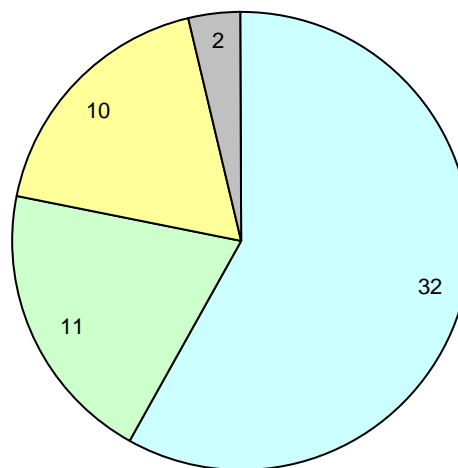
Option 1 (40%) was the most popular. This reflects the Government target to ensure all new homes built by 2016 are carbon neutral. It does not propose any interim targets in the period up to 2016, meaning that any homes built prior to 2016 would not need to meet these higher environmental standards. Although this option reflects both national Government policy and policy EM16 of the North West Regional Spatial Strategy (RSS), it represents an immediate rather than a gradual change. In the longer term it is also likely to result in fewer Pendle homes meeting the higher environmental standards.

Options 2 and 3 each received approximately one-quarter of all responses. These proposed setting different interim targets that house builders in Pendle would be required to meet, prior to the national targets coming into effect in 2016. These options scored slightly higher than Option 1 in the Sustainability Appraisal, as they would introduce the environmental benefits from the Code for Sustainable Homes at an earlier stage. They would allow Pendle to become an exemplar in striving for greater environmental benefits, but in the current depressed housing market would lead to reduced profit margins for developers, who as a result may look elsewhere, potentially reducing levels of investment in the Borough.

4e How should we influence the use of construction materials?

Option	Comment	Rank	
1	Require use of recycled/sustainable materials in all developments	1	SA
2	Only require use of recycled/sustainable materials in major developments	2	
3	No requirement for use of recycled/sustainable materials	3	
4	Other	4	

Summary (number of responses)



Comment

Option 1 (58%) was the most supported option. It would require all new developments to use a set proportion of recycled or sustainable materials. This would secure the highest environmental benefits and also scored highest in the Sustainability Appraisal.

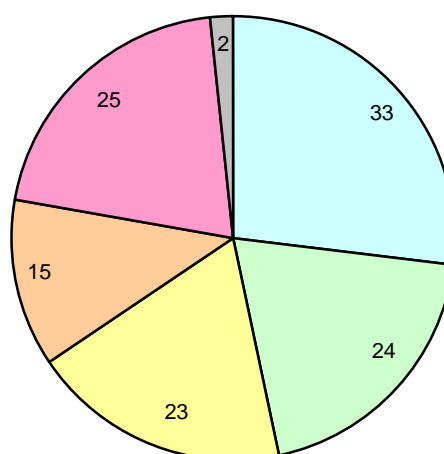
Options 2 and 3 received a similar level of response (18-20%) indicating that any policy which did take a universal stance on this issue would need to clearly set out why this approach was not considered to be viable.

Several stakeholders pointed out in written responses that the Lancashire Minerals and Waste Local Development Framework Policy CS2 of 'Managing our Waste and Natural Resources – Submission Draft Core Strategy' addresses the issue of the use of recycled and secondary materials in new development. As this document forms part of the Statutory Development Plan for Pendle, if an additional more detailed policy stance is felt to be necessary, it should clearly reference this policy.

4f How should we seek to improve air quality in Pendle?

Choice	Comment	No.	
1	Encourage non-polluting forms of transport i.e. cycling, walking	1	SA
2	Encourage non-polluting forms of energy generation	3	
3	Require developers to submit Air Quality Assessments	4	
4	Require developers to minimise dust from building works	2	
5	Encourage better vehicle utilisation on new development projects	5	
6	Other	6	

Summary (number of responses)



Comment

Each of the choices available received some measure of support ranging from 27.5% (Choice 1) to 12.5% (Choice 4).

The most popular choice would encourage sustainable (i.e. non-polluting) forms of transport. Unsurprisingly this approach is also favoured by the Sustainability Appraisal as it has the greatest environmental and social benefits.

Choice 2, which encourages non-polluting forms of energy generation had the third highest level of support and also scored highly in the Sustainability Appraisal.

Choice 5, which supports better vehicle utilisation although smaller in scope, as it is only capable of being applied only to new developments rather than to the wider population of the Borough, also received significant support.

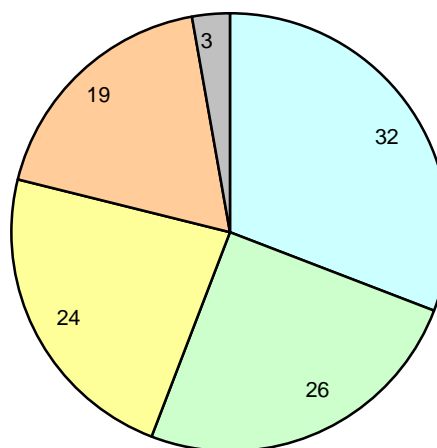
Choices 3 and 4 although beneficial would have a limited impact on sustainability objectives and could, particularly in the case of Option 4, be controlled through the use of planning conditions rather than require a separate planning policy. However, a policy could help to set out when such conditions are likely to be required, thereby helping to provide certainty to developers at the earliest opportunity.

4g

How should we seek to improve the management of water resources and watercourses in Pendle?

Choice	Comment	Rank
1	Encourage better water conservation in new developments	1
2	Encourage the naturalisation of watercourses	2
3	Encourage the installation and reinstatement of natural landscaping	3
4	Require developers to submit Drainage Impact Assessments	4
5	Other	5

Summary (number of responses)



Comment

Choice 1 received the highest level of support (30%), but Choices 2-4 all achieved scores of between 18 and 25%, showing that the respondents feel the Council needs to take a wide ranging approach when addressing the issue of water usage and protection of resources within the Borough.

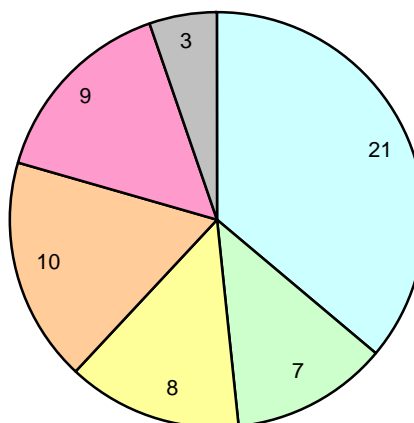
All the choices score fairly equally in the Sustainability Appraisal and as they are not mutually exclusive. Clearly developing a range of specific policies that support the achievement of the overall strategic objective would appear to offer the greatest benefit.

This issue is also concerned with issues of flood risk and water management. National guidance in PPS25 Development and Flood Risk contains guidance on such issues. As such there is no need for detailed local policies that simply repeat this guidance in the Pendle LDF.

5a How many new houses should we build in Pendle?

Option	Comment	Rank	
1	Only deliver housing sufficient to meet the RSS target	1	
2	Deliver housing in excess of the RSS target to meet the figure in the SHMA	5	SA
3	Meet RSS target and consider development in areas of regeneration need	4	
4	Meet SHMA target and consider development in areas of regeneration need	2	SA
5	Deliver housing in accordance with market demand	3	
6	Other	6	

Summary (number of responses)



Comment

The option with the most support (36%), particularly from members of the public attending the local exhibitions, was Option 1. This would only deliver sufficient housing to meet the North West Regional Spatial Strategy (RSS) requirement of 190 dwellings per annum.

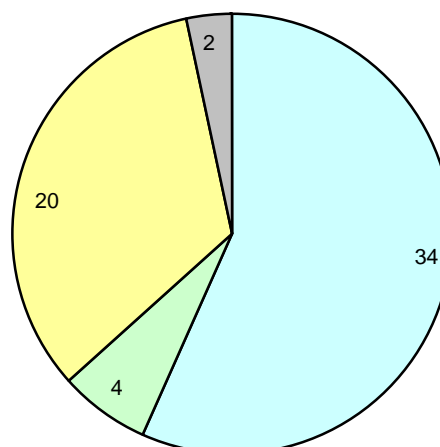
Written (stakeholder) responses showed a slightly higher preference for Option 4, which proposes to meet the higher targets from the Burnley and Pendle Strategic Housing Market Assessment of 275 dwellings per annum, but also considering higher levels of provision in areas with an identified regeneration need. This would help support activity in the Housing Market Renewal areas of Nelson, Colne and Brierfield, but could equally apply to other areas in the Borough.

The Sustainability Appraisal showed Options 2 and 4 to score equally highly with regards to being able to meet the housing needs of the whole community.

5b What type, size and tenure of housing should we build?

Option	Comment	Rank	
1	Only deliver housing that meets specific local needs	1	SA
2	Distribute housing across the Borough, regardless of specific local needs	3	
3	Do not specify type of housing required, let the market decide	2	
4	Other	4	

Summary (number of responses)



Comment

Option 1 (56%) accounted for over half of all responses. This proposes to encourage new housing that specifically delivers the type, size and tenure of housing required in each area of the Borough. PPS3 requires Local Authorities to plan for a mix of housing as may be required over time; the Pendle Strategic Housing Market Assessment gives a clear indication of what is required and highlights the areas (wards) where there is the highest need. This option also scores highest in the Sustainability Appraisal as it provides the best solution for meeting the housing needs of the whole community and reducing health inequalities, whilst also contributing to rural/urban renaissance and cultural diversity.

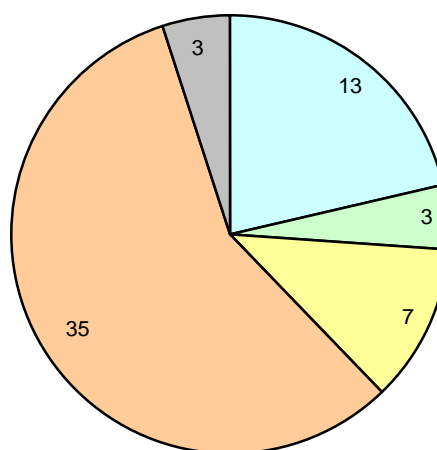
Option 2 (33%) does not stipulate a housing mix, but instead lets the market decide what will be built. Although the second most popular response, it scores lowest in the Sustainability Appraisal as the option would do little to proactively address housing requirements, shortages or inequalities across the Borough. This option could, however, help to facilitate the highest levels of development.

One stakeholder raised concerns that an overly prescriptive policy, would not allow flexibility for the developer to take into account of issues such as local need and market demand. If it was felt to be necessary, careful wording should help to create a flexible policy that would take account of both local need (Option 1) and market demand (Option 3).

5c How much affordable housing should we deliver?

Option	Comment	Rank	
1	Set a target of 45% across Pendle in accordance with the SHMA	2	
2	Set a lower target of 30% across Pendle	4	
3	Set an even lower target of less than 30% across Pendle	3	
4	Set different affordable housing targets based on an assessment of local need	1	SA
5	Other	4	

Summary (number of responses)



Comment

Option 4, which suggests that the level of affordable housing to be delivered should be determined on the basis of an assessment of local needs and viability, received the greatest level of support (57%). This would provide affordable housing at a level appropriate to the location in which the new housing development was taking place, as opposed to having a Borough wide target. This option also scored highest in the Sustainability Appraisal.

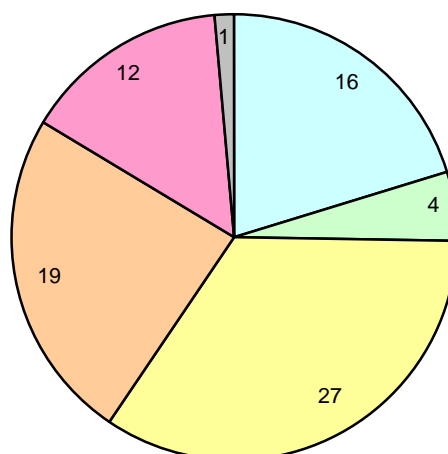
Option 1, which proposes a target of 45% affordable housing, in accordance with the Strategic Housing Market Assessment, received support from 21% of all respondents. Option 3, which proposes a lower target of below 30% was favoured by 11% of people.

This would imply that there is support for establishing a clear target of some kind to help inform developers of the Borough's requirements. However, some stakeholders have raised concerns that too high a target for affordable housing may affect the attractiveness of the Borough to developers and that a policy needs to address how best to deliver affordable housing without affecting the deliverability of market housing. It may be that a flexible approach may be required. The evidence base is the key to the targets set in any policy and both the Strategic Housing Market Assessment and the Viability work will need to inform any policies on affordable housing.

5d How can we deliver affordable housing?

Choice	Comment	Rank	
1	Require all developers to make on-site provision	3	SA
2	Require all developers to make a financial contribution towards off-site provision	5	
3	Adopt a flexible approach that combines 1 and 2 above	1	
4	Allocate sites in areas where there is an identified need for affordable housing	2	
5	Identify rural exception sites for affordable housing provision	4	
6	Other	6	

Summary (number of responses)



Comment

Choice 3 (34%), which proposed a flexible approach that would allow developers to either make an on-site provision of affordable housing, or make a financial contribution to off-site provision, received the most support. It was heavily favoured in the written responses, but also received considerable local support at the area exhibitions.

Choice 4, which ranked second overall (24%) would allocate sites for affordable housing in areas where there is an identified need. Whilst it received a high level of local support at the area exhibitions (particularly in Barrowford), it received little support in the written responses many of which came from stakeholders.

Choices 1 and 5 received 15%-20% of the overall response illustrating that there is no overall consensus on adopting a single approach when seeking to tackle the issue of affordable housing provision.

Choice 1 scored most highly in the Sustainability Appraisal as it would help to establish mixed tenure communities, which are considered to offer the maximum social benefits.

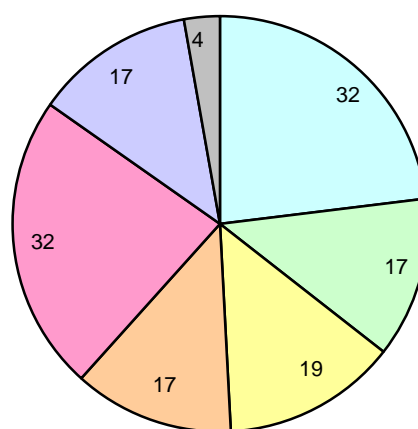
All the choices comply with the guidance in the North West Regional Spatial Strategy (RSS) on delivering affordable housing.

Several stakeholders pointed out that Option 5 which regards the issue of rural exception sites should be considered separately to the general issue of how to provide affordable housing Borough wide.

6a Which of the following types of employment do we need to attract into Pendle, as a priority?

Choice	Comment	Rank
1	Manufacturing	1
2	Distribution and warehousing	4
3	Retailing	3
4	Service sector	4
5	Tourism	1
6	Renewable energy provision	4
7	Other	7

Summary (number of responses)



Comment

The two most popular selections were Choice 1 (manufacturing) and Choice 5 (tourism), both of which received a 23% share of the responses.

Retailing (13.8%), distribution and warehousing (12.3%), service sector (12.3%) and renewable energy provision (12.3%) also received significant levels of support.

All the options ranked equally in the Sustainability Appraisal as they would all contribute to economic and social sustainability, helping to attract new employment into the Borough.

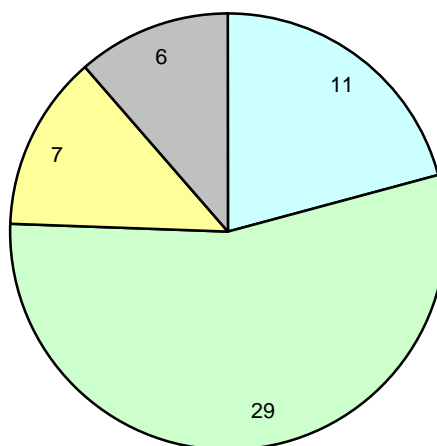
Additional comments included:

- A mix of different employment types should be promoted, offering choice and flexibility.
- Pendle should seek to attract high tech and other growth industries to diversify the local economy.
- Land is a scarce commodity; Pendle should seek to attract intensive, high value sectors.

6b Should we offer protection to existing employment areas?

Option	Comment	Rank	
1	Yes, do not allow inappropriate development in such areas	2	
2	Yes, but consider the redevelopment of vacant sites to meet regeneration needs	1	SA
3	No, let the market decide	3	
4	Other	4	

Summary (number of responses)



Comment

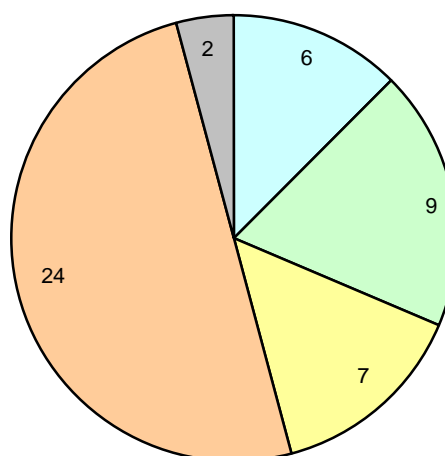
Option 2 (54%) received the greatest level of support. This recommends that protection should be offered to key employment sites, but that the redevelopment of vacant sites within these areas should be considered where it can be shown that they meet the Borough's stated regeneration objectives. This option is also considered to be the most sustainable, as it offers the most flexible approach as it reduces the chance of vacant sites remaining empty when they are no longer considered to be suitable for modern employment uses.

The Pendle Employment Land Review demonstrates the need to retain the existing Protected Employment Areas as a valuable source of employment land. If the Core Strategy is to consider the reallocation of unsuitable sites, it may need to allocate new employment sites to ensure that there is sufficient employment land available.

6c Which of the following locations should be the focus for new developments in the tourism, cultural, or hospitality sectors?

Option	Comment	Rank	
1	Any rural location, provided development is at an appropriate scale	4	
2	Only accessible rural locations	2	
3	Town centre locations	3	
4	Former mill sites alongside the Leeds and Liverpool Canal	1	SA
5	Other	5	

Summary (number of responses)



Comment

Half of all respondents felt that former mill sites alongside the Leeds and Liverpool Canal should be the primary focus for new developments in the tourism, cultural and hospitality sectors (Option 4). This approach would help to develop brownfield sites (previously developed land) and support a renaissance of our waterways. The Sustainability Appraisal also ranked this option in first place due to its potential to help regenerate degraded sites and reduce the pressure for development on greenfield sites.

Option 2 (18%), which suggested that there is potential for tourism development in accessible rural locations (i.e. in larger villages rather than the open countryside) was a distant second choice.

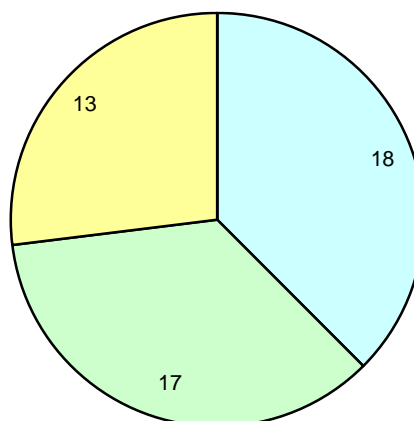
Third choice (Option 3) would help support town centre regeneration and offered the most accessible option in terms of public transport.

It was suggested that these options are not necessarily alternatives and that a strategy could be developed which promoted the offer in town centre locations, but also allowed for careful development in rural areas to aid farm diversification.

7a What level of new retailing should we seek to attract into Pendle?

Option	Comment	Rank	
1	Allow provision of retail floor space to exceed forecast growth in expenditure	1	
2	Only allow sufficient retail floor space to meet forecast growth	2	SA
3	Do not provide sufficient retail floor space to meet forecast growth	3	
4	Other	4	

Summary (number of responses)



Comment

All three options received similar levels of support, suggesting that there is no consensus about the levels of new retailing required in the Borough. Option 1 (37.5%) was only just ahead of Option 2 (35.4%), with Option 3 (27.1%) still receiving a significant level of support.

The Sustainability Appraisal identifies Option 2 as the most sustainable choice, slightly ahead of Option 1. However, Option 3 is considered to have a negative effect on the health of the economic and social sustainability of the Borough by restricting access to jobs and services.

Policy W5 in the North West Regional Spatial Strategy (RSS) states that local authorities should produce retail needs assessment to help inform the Local Development Framework. The Pendle Retail Capacity Study provides an assessment of existing facilities, future needs and the capacity to meet demand.

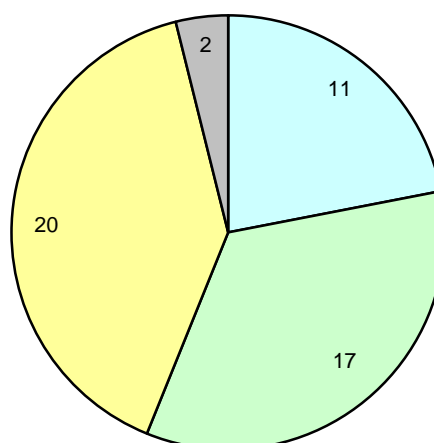
The representation submitted by neighbouring authority Burnley Borough Council states that they do not support any of the options that would allow new retail floor space in excess of forecast growth, as this could potentially undermine Burnley's position as a retail and service centre for Pennine Lancashire.

Policy W5 of the RSS states that there is a need to support the regional retail hierarchy and 'to promote investment that assists the regeneration and economic growth of the North West's town centres', but that 'any investment should be consistent with the scale and function of the centre, should not undermine the vitality and viability of any other centre or result in the creation of unsustainable shopping patterns'. The policy identifies established retail centres where comparison retailing should be focussed. In East Lancashire, these are the towns of Blackburn and Burnley. Section 6.22 states that these towns should be the main focus of development but goes on to say that this does not preclude investment in other centres where this will assist in the regeneration of the centre and wider area. Therefore it may be possible to allow provision to exceed forecast growth as set out in Option 1 where there is a strong regeneration focus.

7b Should we seek to accommodate large national multiples (non-food retailers) in Pendle?

Option	Comment	Rank	
1	Yes, irrespective of their vocational requirements	3	
2	Yes, to anchor new town centre or edge of centre developments	2	SA
3	No, do not attract large multiples	1	
4	Other	4	

Summary (number of responses)



Comment

Option 3 (41.7%) was the most popular. This would support a policy that did not seek to attract large multiple retailers to Pendle. This is in accordance with the retail hierarchy as set out in Policy W5 of the North West Regional Spatial Strategy (RSS).

The Sustainability Appraisal highlights Option 2 as the most sustainable option, as it reflects a 'middle ground' option that attracts new employment to the area, but does not have a detrimental impact on existing core retail areas, which arise from if Option 1 was pursued. Option 2 received 35% of the support in the consultations, placing it in second place. It could, however, lead to a policy that was contrary to the established retail hierarchy as set out in the RSS.

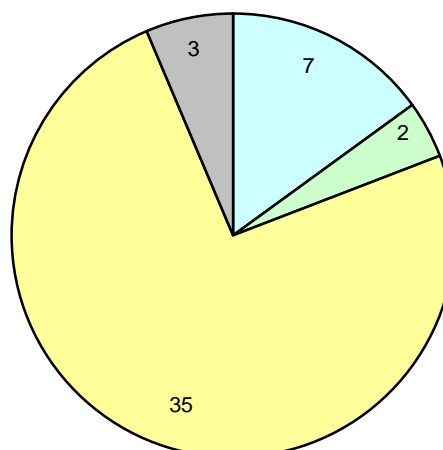
Comments from Burnley Borough Council noted the need to perform within the scope of the retail hierarchy identified in the RSS (discussed under Issue 7a above). There is support from Lancashire County Council for pursuing an approach as proposed in Option 2, so long as the scale of the development is in accordance with the status of that particular centre, therefore not conflicting with Policy W5 of the RSS.

7c

What measures should we use to help increase the vitality and viability of our town centres?

Option	Comment	Rank	
1	Extend town centre boundaries (expansion)	2	
2	Redefine town centre boundaries (contraction)	4	SA
3	Identify and protect premises in primary retail areas	1	SA
4	Other	3	

Summary (number of responses)



Comment

Option 3 received the most support in the consultation with 71% of respondents selecting this as their preferred option. This would concentrate shopping uses in the centre of our towns by establishing town centre boundaries and identifying primary retail areas and frontages within them.

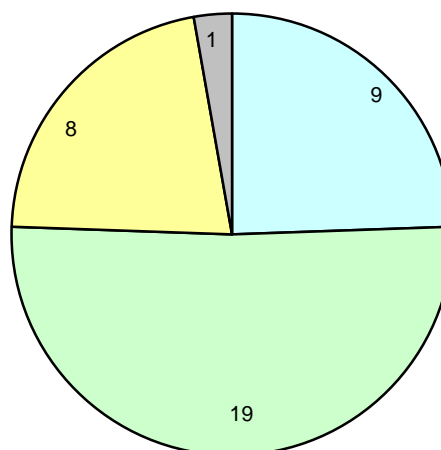
This scored equal first in the Sustainability Appraisal primarily due to the contribution this strategy would make towards achieving the stated economic objectives. Option 2, which would redefine town centre boundaries, in order to concentrate retail activity in a smaller area, thereby helping to reduce vacancy rates, increase vitality and hopefully viability, scored well in the Sustainability Appraisal, but was placed last in the consultation.

One consultee remarked that the options focus primarily on retail provision and that PPS6 proposes a wider range of uses in town centre locations. Any policy would need to accommodate the full range of appropriate uses.

7d How can we establish and support a night time economy in Nelson and/or Colne town centres?

Option	Comment	Rank	
1	Remove existing restrictions from protected retail frontage	2	
2	Allocate town centre sites for leisure/cultural uses	1	SA
3	Allocate edge of centre sites for leisure/cultural uses	3	SA
4	Other	4	

Summary (number of responses)



Comment

Option 2 (51%) received most support. This proposes to allocate specific sites for leisure and cultural uses within Nelson and/or Colne town centres. In effect this would create defined 'leisure quarters' thereby avoiding conflict with other town centre uses. This option also scored highest in the Sustainability Appraisal.

The Retail Capacity Study identifies the town centres of Nelson and Colne as the main centres in the Pendle and states (paragraph 13.26) that 'as such they should embrace a wide range of activities, acting as the main destination not just for comparison shopping but also for leisure, entertainment and cultural activities'. This would also support Option 2. It also states (paragraph 10.67) that there could be potential for a small cinema but not a multiplex, bowling facility etc as the catchment population is too small; The report concludes that the implementation of small town centre opportunities in the short to medium term (to 2016) should be the priority, rather than large edge-of-centre or out-of-centre opportunities. This would also support smaller town centre developments as proposed in Option 2, rather than the larger edge of centre developments that would be facilitated by Option 3.

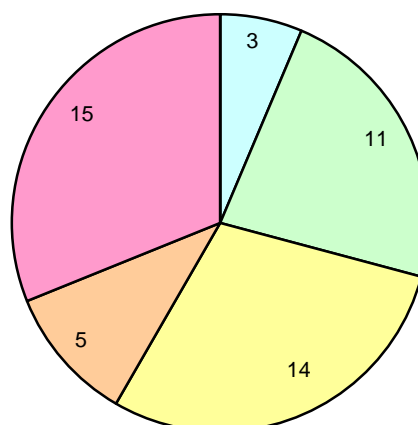
Option 1 was the received the second highest level of support in the consultation (24.3%), but scored less well in the Sustainability Appraisal as it could establish a vibrant night time economy at the expense of existing retail provision.

8a

Where should we locate new community facilities to help reduce inequalities and promote social inclusion?

Option	Comment	Rank	
1	Provide large centralised facilities where population is concentrated	5	
2	Provide facilities in locations accessible by public transport	3	
3	Target new facilities at areas where there is an identified need	2	SA
4	Target new facilities at deprived areas	4	
5	Seek to distribute facilities equally across Pendle	1	
6	Other	6	

Summary (number of responses)



Comment

Option 5 (31%) gained the most support. This proposes that new community facilities be distributed evenly across the Borough. However, this option did not score particularly well in the Sustainability Appraisal as it fails to take into account need and existing inequalities.

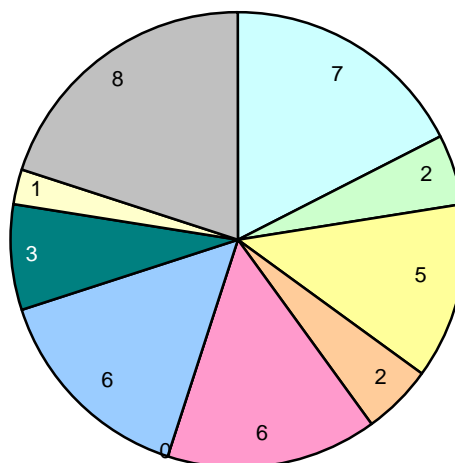
Option 3 ranked a close second (29%) and received the most favourable score in the Sustainability Appraisal, as it provides greater overall benefit by targeting areas where there is an identified need.

Option 2 also attracted considerable support in the consultation (22%) reflecting a desire for facilities to be easily accessible by public transport.

8b What types of community facility do we need to provide as a priority in Pendle?

Option	Comment	Rank	
1	Informal Open Space	2	
2	Formal Open Space	7	
3	Recreation	5	
4	Sport	7	
5	Health	3	
6	Education	9	
7	Culture & Tourism	3	
8	Community	6	
9	Shops	8	
10	Other	1	

Summary (number of responses)



Comment

This issue asked people what types of community facilities are needed in the towns and villages of Pendle. A wide range of responses were received, with most support for providing informal open space (17.5%). Specific reference was made to the need to create green spaces within the urban areas of Nelson, Colne and Brierfield. Recreational facilities represented a further 12.5% of all responses. The Open Space Audit provides information of areas where a shortage of open space has been identified. A policy on the creation of new open space would be informed by this report, together with the Outdoor Recreation Strategy which specifically looks at the need and demand for recreational spaces.

Another widely supported option was the creation of additional health facilities (Option 5 – 15%). Decisions of this nature would be informed by the draft Health Inequalities Strategy, published in 2004. In addition the proposed Infrastructure Study would also look at health facilities and the Primary Care Trust have also been consulted as part of this process.

The creation of culture and tourism facilities was also supported (Option 7 – 15%) and this has also been covered under Issues 6c & 7d above.

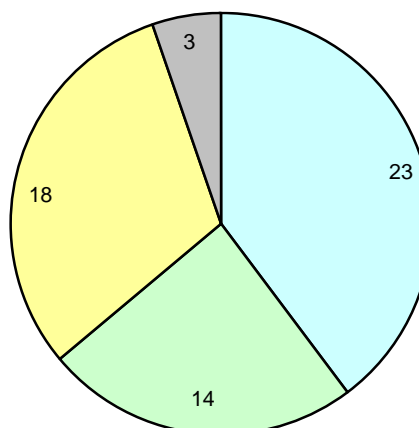
Policy L1 of the North West Regional Spatial Strategy (RSS) states that local authorities should ensure that there is provision for all members of the community. It goes on to note that priority should be given to improving access to, and addressing spatial disparities in, services and facilities in areas that have the greatest need or are poorly served. The Sustainable Settlement Study can help to identify those areas which lack specific services or facilities.

The Sustainability Appraisal was not applicable to this question.

9a How should we protect our existing green open spaces?

Option	Comment	Rank	
1	Protect all existing areas of open space	1	SA
2	Protect areas of open space only in areas where there is an identified deficiency	3	
3	Only protect good quality open space	2	
4	Other	4	

Summary (number of responses)



Comment

Option 1 (39%), which proposes to protect all existing areas of open space followed, received the most support. Option 3 (31%) which would only protect good quality open space and Option 2 (24.1%), which proposes to protect open space only in areas where there is an identified deficiency also received significant levels of support.

The Sustainability Appraisal indicates that Option 1 is the most sustainable option in terms of the social, health and environmental benefits that it would bring.

PPS17 Planning for Open Space, Sport and Recreation states that open space should be protected unless an assessment shows that the land is surplus to requirements. The Pendle Open Space Audit will be used to support decisions regarding this issue.

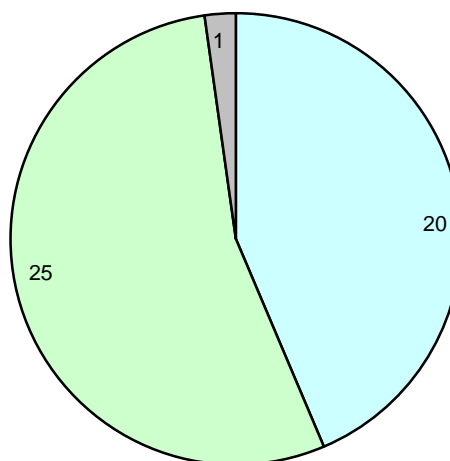
The North West Regional Spatial Strategy (RSS) addresses open space provision as part of an overall green infrastructure approach and here the presumption is for the protection of open space due to its multiple social, economic and environmental benefits (Policy EM3). The RSS also states that as well as providing for new open space, work should include the retention, enhancement and adaptation and existing sites; the RSS would therefore seem to support Option 1. Any policy should be clear about the multiple benefits that open space can offer and should encourage not just its protection, but its enhancement and adaptation to better uses.

9b

How can we enhance the quality of, and improve access to, our green open spaces?

Option	Comment	Rank	
1	Only require on-site provision, or a financial contribution, in areas of deficiency	2	SA
2	Require all new developments to make an on-site or financial contribution	1	SA
3	Other	3	

Summary (number of responses)



Comment

Option 2 (54%) received most support. This proposes that all new developments should make a contribution towards improving the quality of, and access to, green open spaces. Option 1 (43%) also attracted a high level of support. The Sustainability Appraisal scores both options equally.

Currently contributions would need to be in accordance with Circular 05/2005. The circular sets out five 'tests' that all planning obligations should meet, namely that they are:

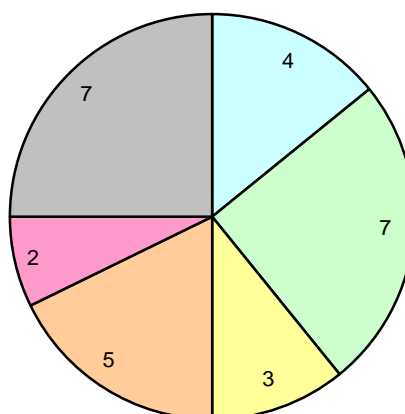
1. Relevant to planning
2. Necessary to make the development acceptable in planning terms
3. Directly related to the proposed development
4. Fairly and reasonably related in scale and kind to the proposed development, and
5. Reasonable in all other respects.

The Community Infrastructure Levy (CIL), being proposed as part of the current Planning Bill, may allow for a different approach. The CIL, the provisions for which are currently going through Parliament, will be a new charge which local authorities in England and Wales will be empowered, but not required, to charge on most types of new development in their area. CIL charges will be based on simple formulae which relate the size of the charge to the size and character of the development paying it. The proceeds of the levy will be spent on local and sub-regional infrastructure to support the growth and development of the area.

10a How can we help to protect and enhance our built heritage?

Choice	Comment	Rank	
1	Require higher standards of design throughout Pendle	4	SA
2	Require higher standards of design in designated areas	1	
3	Establish detailed design criteria for Conservation Areas	5	
4	Establish detailed design criteria for development near a listed building	3	
5	Increase the use of Article 4 directions in Conservation Areas	6	
6	Other	1	

Summary (number of responses)



Comment

Choice 2 attracted the most support (25%); it proposes that we should require higher standards of design within designated areas of the borough. Choice 4 also received significant support (17%). This would establish detailed design criteria for development, which is in the immediate vicinity of listed or locally important building. Option 1 polled 14% of the responses and would promote higher design standards throughout Pendle.

The Pendle Conservation Areas Design and Development Guidance Supplementary Planning Document, adopted in August 2008 guides development in these designated areas and will help to influence policies in the Core Strategy. PPS15 Planning and the Historic Environment also provides appropriate guidance.

The Sustainability Appraisal suggests Choice 1 is the most sustainable choice, although all the choices scored highly against the objectives to protect and enhance our built heritage. As such a combination of choices and approaches may be the most appropriate solution.

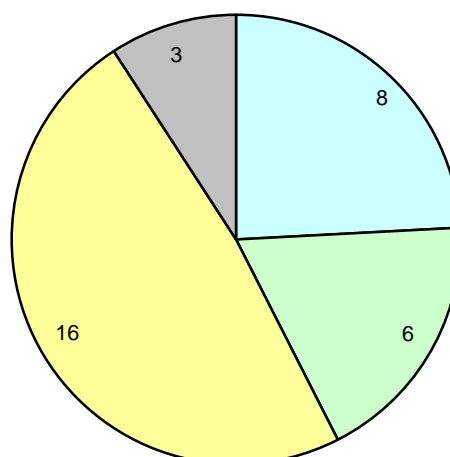
Other comments include:

- The need to consider the wider setting of designated features, if necessary defining the extent of what the wider setting is.
- There is no reference made in the choices to the work of proactive enhancement schemes such as the Townscape Heritage Initiative (THI) and Partnership Scheme in Conservation Area (PSICA) projects.
- As well as a policy to 'protect, preserve and enhance' designated areas, we should also have a policy which encourages developers to take a more proactive approach to the management and improvement of areas of historic importance and local distinctiveness.
- Any policy also needs to address the preparation of Conservation Area Appraisals, the need to review and potentially designate new conservation areas and the preparation of lists of locally importance assets and assets at risk.

10b How can we help to protect and enhance our natural heritage?

Choice	Comment	Rank	
1	Focus on building-in beneficial features	2	SA
2	Identify buffer zones around designated sites	3	SA
3	Require mitigation measures, where development may produce adverse effects	1	
4	Other	4	

Summary (number of responses)



Comment

The highest level of support (48%) was for the weakest of the choices available, which is to require mitigation measures where the development may produce adverse effects (Choice 3). The choice is derived from the requirements of PPS9 Biodiversity and Geological Conservation, but offers limited protection to natural assets and as such scores least favourably in the Sustainability Appraisal. The more recently published North West Regional Spatial Strategy (RSS) states that mitigation and 'no net loss' should be a minimum requirement.

Choice 1 (24%) received the second highest level of support. This proposes a more proactive approach, requiring not simply conservation and a 'no net loss' approach but requiring developers to build in beneficial features such as wildlife ponds, open space etc.

Choices 1 and 2 are favoured by the Sustainability Appraisal as they offer a stronger stance with regard to protection.

Additional comments received on this issue :

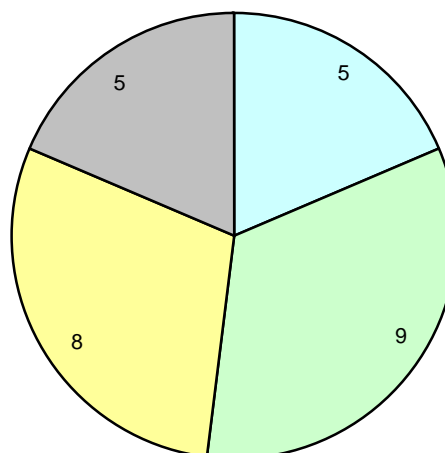
- policy needs to include the protection and enhancement of existing wildlife corridors and the creation of new ones.
- any policy needs to include a combination of the choices outlined above to offer a full response to the issue.

It is proposed to prepare a Biodiversity Study for the Pendle LDF evidence base. This will help to inform the policies to be included in the Core Strategy. The study will undertake an assessment of current information and carry out new survey work to identify UK Priority Habitats present within the Borough and those considered important in a regional or local context. It will also look to identifying new habitats which could support protected species and look to identify areas which would provide key linkages between these habitats, providing new wildlife corridors. It will also consider the vulnerability of habitats, identifying key threats e.g. climate change and assess the habitats ability to adapt to these threats.

10c How can we protect and enhance our open countryside?

Option	Comment	Rank	
1	Only permit agriculture and forestry developments in the open countryside	3	
2	Only permit development that meets identified local need	1	SA
3	Restrict development, but permit that related to tourism, rural enterprise etc.	2	
4	Other	3	

Summary (number of responses)



Comment

Option 2 received the most support (33%). This would restrict development in the Open Countryside except where it is to meet an identified local need for homes, jobs and community facilities. It is the option preferred by the Sustainability Appraisal, as it provides development to meet locally identified needs and therefore contributes to the creation of sustainable communities.

Option 3 is the second most supported option (29%) which proposes to generally restrict development in the Open Countryside except where relating to tourism, renewable energy and innovative rural enterprises. This option relates less to community needs and more to wider economic and employment opportunities, as well as the emerging requirements of meeting the challenge of climate change.

With Options 2 and 3 both receiving higher levels of support than Option 1 it would appear that there is some consensus that the role of rural areas is changing and that there is a need to support farm diversification, tourism and other innovative rural enterprises. As such a mixed or flexible policy approach may be appropriate.

Policy RDF2 of the North West Regional Spatial Strategy (RSS) states that in areas outside the service centres (e.g. open countryside) 'more innovative and flexible solutions' should be implemented and targeted towards achieving more equitable access to housing, services, education, healthcare and employment and a more diverse economic base whilst maintaining support for agriculture and tourism. Both Options 2 and 3 would therefore be consistent with the RSS.

Option 1 would offer the greatest level of protection to the countryside, but would restrict development in those rural areas with identified needs. This option attracted the least support (18.5%) and also scored lowest in the Sustainability Appraisal.

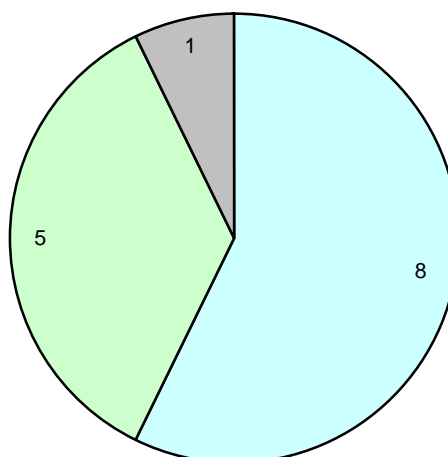
Additional options included:

- need to consider reviewing settlement and Green Belt boundaries (Note: the latter is largely beyond outside the scope of the LDF process).
- development in the open countryside should reflect the identified needs in the area but also seek to conserve and enhance the character and quality of the landscape and its biodiversity.
- new development can harm the open countryside, so the adaptation of existing buildings to new uses should be supported / emphasised.

10d Do we need to designate Sites of Settlement Character?

Option	Comment	Rank	
1	Retain this site designation	1	SA
2	Reassess the role of these sites	2	
3	Other	3	

Summary (number of responses)



Comment

Most support (57%) was given to Option 1, which proposes to retain this site designation, which may be peculiar to Pendle. This would continue the approach of Policy 12 in the current Replacement Pendle Local Plan (2001-2016). This option also scores the highest in the Sustainability Appraisal due to its objectives of environmental protection and preserving visual amenity.

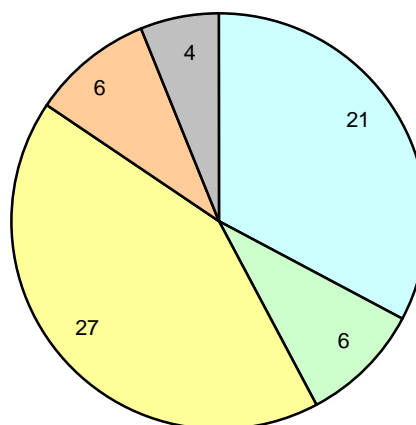
Option 2 proposes to re-assess the need for this designation on a site-by-site basis, but that where their protection remains justified an alternative approach to their protection be considered i.e. allocating as open space, or developing a new policy such as green wedges, which are in use elsewhere. This option was supported by 35% of all respondents, but scored lower on the Sustainability Appraisal as the outcome of such an action is unknown at this time.

One respondent commented that 'Sites of Settlement Character' are not a common planning designation and that sites would be better protected by other means e.g. Conservation Areas, Green Belt etc.

11a How can we improve our physical connections with adjacent areas, particularly our transport links into Yorkshire?

Option	Comment	Rank	
1	Protect the former Colne-Skipton railway line for transport use	2	
2	Protect the former Colne-Skipton railway line for a bypass	3	
3	Protect the former Colne-Skipton railway line for a railway	1	
4	Protect the former Colne-Skipton railway line for cycling, horse riding, walking	3	SA
5	Other	5	

Summary (number of responses)



Comment

Option 3 (42%), which proposes to protect the former Colne-Skipton railway line for railway use, received the greatest level of support. This option also scores highly in the Sustainability Appraisal for its contribution to economic and environmental objectives. There was considerably more support for the railway than for the protection of the route for a bypass (Option 2 – 9%). Deliverability of the railway in the short to medium term may be an issue, but would be consistent with Government objectives to increase the use of public transport and reduce the reliance on the private car.

The Lancashire Local Transport Plan 2006-2010 states that Lancashire County Council supports the re-opening of the Colne to Skipton railway in principle, but notes that this may have significant cost implications for the delivery of the A56 Village Bypasses. The Network Rail Route Utilisation Strategy 2008 acknowledges that a study, commissioned on behalf of local stakeholders, has identified a potentially high level case for reinstatement of the line and services between Skipton and Colne, but that the most significant issue now is to address how the scheme could be funded. They conclude by recommending that the route is protected to give stakeholders time to identify potential sources of funding and commission a more detailed feasibility study.

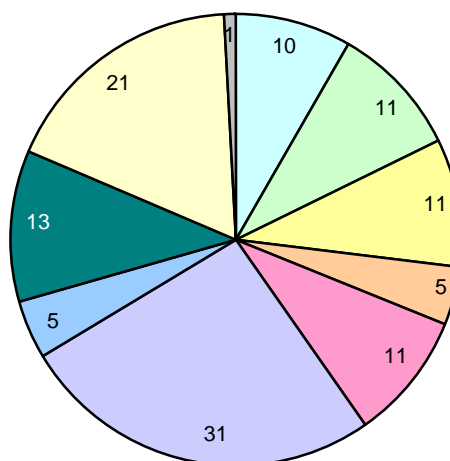
One respondent drew attention to Policy INF5 in the draft Core Strategy of Craven District Council. This policy promotes the safeguarding of the former railway line for the use of 'other sustainable transport options e.g. footpath or cycling and/or where appropriate consider the realignment of stretches of the A56'. The reintroduction of the railway itself is not proposed by the policy.

The apparent conflict between the policies put forward by Craven District Council and the support for Option 3 requires further negotiation and investigation.

11b How can we best address our current reliance on the car for personal travel?

Choice	Comment	Rank	
1	Require travel impact statements for all developments	7	
2	Only require travel impact statements above a certain threshold	4	
3	Require large developments to submit a Green Travel Plan	4	
4	Only require developers to address the impact of their development	8	
5	Developers to contribute to transport improvements in areas of deficiency	4	
6	Support measures to improve public transport	1	
7	Reduce the number of long-stay car parking spaces in town centres	8	
8	Promote high density residential development in areas with good public transport	3	SA
9	Accept that travel by car is inevitable for the immediate future	2	
10	Other	10	

Summary (number of responses)



Comment

Choice 6 (26%), which would support measures to improve public transport received the most support. Option 8 proposes to promote high density residential development in areas with good public transport. This received the third highest level of public support, but was the most favoured choice in the Sustainability Appraisal due to its environmental and strategic economic benefits. It would also comply with Policy RT2 of the North West Regional Spatial Strategy (RSS), which states that new major developments should be sited where there is good access to public transport.

Measures requiring developers to address transport issues, including the need to provide travel impact statements, green travel plans and make financial contributions to transport improvements were all supported (9% each). Only requiring developers to address the potential impacts of their own development received less support, although this option is in line with Government guidance (Circular 05/2005) on planning contributions. It was also suggested that the approaches proposed in Choices 4 and 5 would depend partly on the Council's decision with regards the proposed Community Infrastructure Levy (see commentary under Issue 9b).

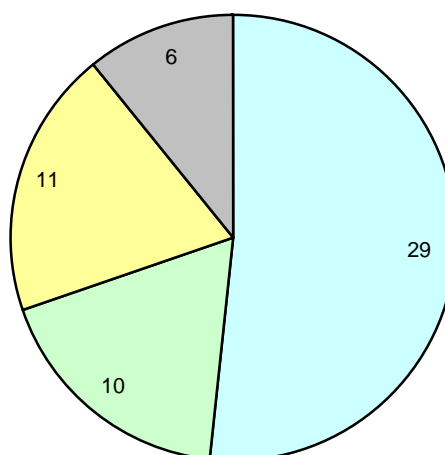
A reduction in the number of long stay car parking spaces in town centres received very little support (4%), which would appear to conflict with the support given to proposals that would encourage the use of public transport.

Choice 9 states that we should accept that travel by car is inevitable for the immediate future. This received a high level of support, but would be contrary to the RSS, which proposes that we reduce car use through the introduction of 'smarter choices' (e.g. work/school travel plans, car pooling, part and ride scheme etc.) and other incentives that change public behaviour. These need to be developed alongside improvements to public transport, cycling and pedestrian network improvements.

11c What approach should we take to car parking?

Option	Comment	Rank	
1	Relax existing requirements – allow developers to provide more car parking	1	
2	Continue with existing requirements – promotes public transport usage	3	
3	Introduce more restrictive standards and reduce on-street car parking	2	SA
4	Other	4	

Summary (number of responses)



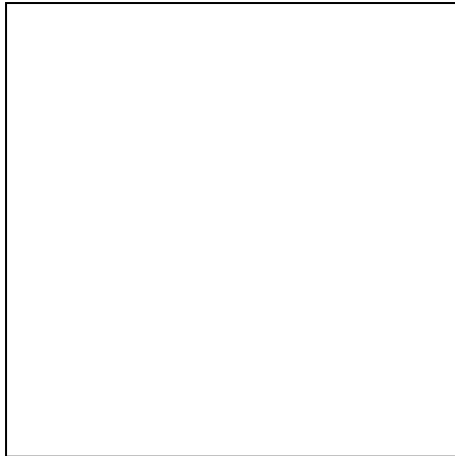
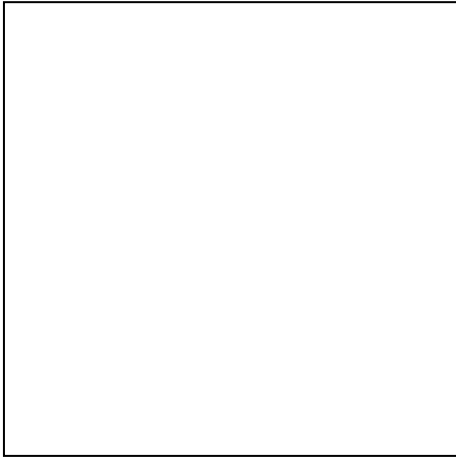
Comment

The overwhelming choice, particularly with the public at the local exhibitions, was Option 1 (51%). This proposes to relax the existing parking requirements and allow developers to provide more car parking.

This would mean that Pendle would adopt the new parking standards of the North West Regional Spatial Strategy (RSS), which when applied to Pendle represent a relaxation from our existing position, and not seek to introduce a more detailed local interpretation for particular circumstances. The RSS still uses a maximum standard for different types of development. As such car parking would continue to be controlled, at a level that has been judged to meet the needs of the development whilst still acting as an incentive to for people to use public transport, car share etc. As the most relaxed of the options proposed here this option scores lowest in the Sustainability Appraisal due to its limited environmental and health benefits.

Option 3, the most restrictive policy, as it would define standards for additional land-use categories not addressed by the RSS, was the preferred choice of the Sustainability Appraisal.

The Partial Review of the RSS, which is already underway is to revisit the issue of car parking standards. Its findings will need to be given due consideration in the preparation of the Core Strategy.



Other Comments

Other Comments

- 2.1 In addition to receiving comments on the strategic objectives and the issues and options, several respondents also commented on the following aspects of the Issues and Options report:
- The overall content of the report and individual chapters therein.
 - Our proposed approach to establishing a spatial strategy (Chapter 5, Paragraphs 5.11 and 5.12).
- 2.2 The relatively small number of responses to most of these topics means that the results cannot be regarded as statistically significant, but they are reported here for completeness.

Chapter 1 – Introduction

- **Comment:** There does not appear to be a definition or statement as to what comprises 'new development' near the top of the document. A short definition may be useful, perhaps in the 'What is Spatial Planning?' section.

Response: Comment noted. Consider whether a definition of development is required either within the text, or glossary, of future documentation.
- **Comment:** The linkage made with the Sustainable Community Strategy (SCS) in paragraph 1.2 is good and this provided an opportunity to explain the role of both the SCS and the Local Development Framework in terms of spatial planning, namely, that the SCS should provide the overarching vision for the borough with the LDF being its key delivery vehicle.

Response: Comment noted.
- **Comment:** Reference to Ambition Lancashire is supported.

Response: Comment noted.
- **Comment:** Whilst in paragraph 2.6 the time horizon of the SCS is defined, there is nothing to indicate to the reader that the Core Strategy is designed to set out the borough's strategic planning policy for at least the next 15 years.

Response: Disagree. Paragraph 2.6 clearly indicates that the Core Strategy covers a period of 15 years and paragraph 2.7 to the fact that it will set out the overall direction of planning policy. However, consider amending text to make this clearer in future documentation.
- **Comment:** It would have been helpful to set out here the role and content of the LDF in terms of the additional AAPs etc., and, more importantly, to describe the planning framework, both in terms of national and regional guidance, within which the LDF and the Core Strategy would sit.

Response: Agree. Additional text placing the Core Strategy and the LDF in context will be included in the introductory chapters of future reports.
- **Comment:** What remains unclear from the document is the degree to which certain options are consistent with both national and regional planning guidance.

Response: Partially agree. The document explains that in drafting the options and choices consideration was given to Government legislation (paragraph 4.13). Also under each of the eleven strategic objectives a section entitled 'What are we already required to do' outlines relevant national and regional legislation. However, we will seek to improve reference to the linkages between issues, options and relevant government and regional legislation in future documentation.

- **Comment:** Paragraph 1.4 and the 'Please note' box – need to emphasise the point; that people are encouraged to put forward their own ideas/consideration of reasonable alternatives for future development of Pendle. This is not mentioned until paragraph 5.2 could add that they need to be aware of the planning policy context and the need for the Core Strategy to be in general conformity with RSS and consistent with national planning policies; and add cross reference to where this information may be found within the report.

Response: Partially agree. It has already been noted that additional text placing the Core Strategy and the LDF in context will be included in the introductory chapters of future reports. The need for further cross-referencing will also be considered.

- **Comment:** This section of the report does not say how people may go about making their comments. This is not explained until Section 5 of the document. There should be a brief explanation of the method of consultation and a link to Section 5.

Response: Partially agree. It is a matter of personal preference whether this information is included in the introduction. Both Section 5 and the representation form, which accompanied the Issues and Options report, included comprehensive information on how people could put forward their comments. However, the need to include this information in the introduction will be considered when drafting future documentation.

- **Comment:** Paragraph 1.4 also mentions that the consultation exercise is aimed in part at identifying the degree to which the Council's work to date has identified the spatial planning issues that are of the greatest importance to Pendle. However, there is no mention of what exactly that work to date has comprised. For example, the Council have published three Annual Monitoring Reports to date, each has contained a spatial portrait of the borough and each has identified a number of issues facing the borough. In addition, each should have monitored, to a greater or a lesser degree, the effectiveness of policies within the Local Plan. However, this has not been touched upon so it is not possible for the reader to judge the degree to which planning policy within the borough needs to depart significantly from that set out in the Local Plan. Reference could also be made to the sources mentioned in paragraph 4.12 (stakeholder exhibitions, 'evidence base', consideration of policies, strategies and programmes of other organisations with an interest in the Borough.

Response: Comment noted. We have tried to avoid references to the existing Local Plan wherever possible, in an attempt to make it easier to draw up new spatial policies, as required by the new planning system. However, we will consider whether it is appropriate to include such information in future documentation. It is worth noting that the Consultation Statement, which accompanied the Issues and Options report, included a well documented section on the review of existing strategies and evidence base documents.

Chapter 2 – What is Spatial Planning?

- **Comment:** Paragraph 2.4 – could add that planning may specify the conditions for development to take place that will contribute towards sustainability. This may also be a useful point at which to introduce the Sustainability Appraisal and how this provides a framework for assessing the economic, social and environmental content of the Core Strategy in terms of its sustainability.

Response: Comment noted. This stage of the consultation is now closed therefore the report cannot be amended. The point will be considered when drafting future documentation.

- **Comment:** Paragraph 2.5 'Spatial Planning' – for greater clarity the explanation could include examples of the 'other agencies'. References to social, environmental and economic factors should make the link to the Sustainability Appraisal.

Response: Comment noted. This stage of the consultation is now closed therefore the report cannot be amended. The point will be considered when drafting future documentation.

- **Comment:** Paragraph 2.7 correctly states that the Core Strategy cannot allocate or protect specific sites. However, it is now possible for strategic sites to be allocated within the Core Strategy, the test being whether those sites are considered central to the achievement of the strategy.

Response: Comment noted. The report was drawn up before PPS13 Local Spatial Planning was published in June 2008. As such it does not reflect the amended guidance. This stage of the consultation is now closed therefore the report cannot be amended. The point will be considered when drafting future documentation.

- **Comment:** The final insert after paragraph 2.7 deals with the issue of Sustainability Appraisal, however, it does not make clear that this is a pre-requisite of a sound plan or the fact that this process will encompass compliance with the Habitats Regulations Directive.

Response: Comment noted. This stage of the consultation is now closed therefore the report cannot be amended. The point will be considered when drafting future documentation.

Chapter 3 – A Spatial Portrait for Pendle

- **Comment:** In relation to paragraphs 3.42 and 3.43, an existing issue that has not been mentioned is the physical modification of watercourses within the borough. In particular, culverts not only represent a flood risk, but they can also indirectly contribute to poor chemical and biological water quality.

Response: Comment noted. Inclusion of this information in the Spatial Portrait is probably not appropriate, but it will be considered in the preparation of future documentation.

- **Comment:** In addition, there should be greater emphasis on "Regeneration" and "Sustainable Communities" in addressing "Deprivation". In respect of Regeneration, "Tourism, Travel and Transport" should have a greater significance in planning services. In order to deliver Sustainable Development, there is an urgent need to tackle

"Environmental Issues", particularly Climate Change - reduce CO2 Emissions by 80% to 1990 Levels.

Response: Comment noted. The Spatial Portrait seeks to provide a snapshot of Pendle and highlight the main spatial issues that need to be addressed. This section of the report does not attempt to look at how these issues can be addressed. A full appreciation of the issues facing the Borough helps to inform the policies that are needed to deliver appropriate development.

- **Comment:** British Waterways is pleased to note that the Spatial Portrait diagram indicates the line of the Leeds and Liverpool Canal and its feeder reservoirs. However, the written text in this section should make reference to the significance of the canal in influencing the historical development of the Borough. Reference should also be made to the modern role of the canal in terms of leisure and tourism, as a sustainable transport route for boaters, pedestrians and cyclists, as a catalyst for regeneration and as an environmental, ecological and educational resource. British Waterways would therefore suggest that reference should be made to the importance of the canal in the Spatial Portrait section under the headings of Tourism, Travel and Transport and Environment.

Response: Comment noted and will be considered when drafting future documentation.

- **Comment:** In some respects this is a useful section, but much more thought needs to be given to the structure of the report, the purpose of the spatial portrait and where people can read about the issues that the Core Strategy should be tackling.

Ideally the spatial portrait should describe the area and draw out the main spatial issues. It should describe the various places within the district and set out their characteristics, the issues they face and their relationship to other parts of the Borough. A place based approach in the spatial portrait rather than a thematic one will help identify the spatial issues that the Core Strategy needs to address.

In terms of the report's structure, you need to decide whether the spatial portrait is a brief scene setting introduction to a more detailed discussion of the issues. As it stands the issues are discussed in the spatial portrait and then chapters 4 and 5 rather than as a coherent whole

The spatial portrait could be improved by:

- Being more place-based and indicating whether issues are Borough-wide or are subject to variations and that some locations fare better or worse than others.
- The opening paragraph (3.2) refers to Pendle being an 'exciting' place to live, work, learn or visit, which is then followed by a catalogue of the Borough's ills – poor housing, deprivation, crime, lower than national average life expectancy etc. The spatial portrait should also focus on the strengths and opportunities in the Borough as well as the issues or problems;
- Set out the regional and sub-regional context of the Borough and in particular what is happening in adjoining areas that may have an impact on Pendle's future – such as growth point bids
- As a spatial portrait it should say more about the issues and activities of stakeholders - other agencies and organisations with an interest in the Borough – for example proposals for new health facilities, transport infrastructure; etc
- Provide clarity and meaningful information; for example
 - Paragraph 3.11 refers to housing issues (problems), but it is not clear whether older terraced housing and vacancies are the issues or above the regional % of owner –occupiers;

- Paragraph 3.15 is concerned with deprivation indices – although a fuller explanation could be provided in a glossary, you do need to provide some examples of what these indicators measure
- Paragraph 3.17 – what is the national average life expectancy?
- o Identify any environmental constraints – AONB areas, green belt, flood risk areas etc

There is no discussion of the likely implications that the information on the issues, as presented either in the spatial portrait or in Chapters 4 and 5, will have on Pendle or within different parts of the Borough and the 'so what' question is left unanswered. This makes it difficult to determine whether the vision, objectives reflect the real issues and in turn the options.

In addition, it is clear from Section 4 of the document that for each of the themes there are additional statistics which have either not been mentioned, or are apt to confuse because they reflect more up to date figures. For example, in paragraph 3.22, it states that 15% of working age people have no qualifications. This is attributed to ONS figures from 2005-6. In section 4 at page 18, bullet point four states that 36% of the working age population have no qualifications and attributes this to ONS figures from 2003.

It would have been extremely helpful, given what follows, if, after paragraph 3.46, there could have been a summary, perhaps in bullet point form, of all the issues facing the borough which had emerged from the preceding spatial portrait synopsis.

Response: Perhaps ironically, given these comments, a place-based spatial portrait was replaced by this thematic version in order to keep the report to a more manageable size. Clearly this will be reinstated in future reports. Section 3.1 explains the purpose of the Spatial Portrait, which is to provide a snapshot of the key facts/issues. As such there will always be additional statistics that are referred to elsewhere in the document, where a more detailed analysis of a particular issue is undertaken. This stage of the consultation is now closed therefore the report cannot be amended. The point will be considered when drafting future documentation.

- **Comment:** In the Spatial Portrait, we consider that the section on Environment does not fully reflect the natural environment, even accepting it is a brief summary, and this part of the evidence base should be expanded into a more comprehensive portrait that brings out the full picture of Pendle's environmental assets. We have set out some particular points below.

While the text (paragraph 3.39) 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.

Paragraph 3.39 refers 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.

Para 3.40 mentions woodlands, which are important, but does not mention other national or Lancashire Biodiversity Habitats. A brief text is also needed on species.

While paragraph 3.41 briefly summarises some statistics on greenspace, more should be said about green space, which is said to constitute 88% of the borough's land area.

Lastly, in relation to this section, climate change is rightly identified as an issue and challenge, but the short paragraph mentions only waste and composting in this context.

Clearly, there is a need for a summary of how it is affecting or may affect the borough, and the challenge to reduce the contribution to climate change and adapt to, or mitigate, its impacts.

Para 3.39; It should be noted that under PPS9 the name used for non-statutory wildlife and geological sites is 'Local Sites'. It is considered in Lancashire, that this term encompasses Biological Heritage Sites, Geological Heritage Sites/RIGS as sites of at least county/sub-regional significance, as well as sites of District importance.

Response: Comment noted and will be considered when drafting future documentation.

- **Comment:** The absence of reference to built sport and recreation facilities is a surprise. Reference to these is important both to give a properly rounded impression of the accessibility and quality of the Borough's community infrastructure and because it should set the context for the subsequent development of spatial options and policies.

Response: Comment noted and will be considered when drafting future documentation.

- **Comment:** A short paragraph could be added at the start of this section (e.g. after 3.2) that notes that whilst much of the district is part of the historic county of Lancashire, a significant section was part of the West Riding of Yorkshire until 1974 and that it still maintains cultural links in this direction.

Response: Disagree. Paragraph 3.5 explains this point.

- **Comment:** Paragraph 3.45 needs to be slightly altered to emphasise the actual size of the district's heritage resource. It is suggested that the sentence is changed to read "... 321 Listed Buildings, 11 Scheduled Monuments and over 1,100 other known historical and archaeological sites."

Response: Comment noted. Further information would be required to support the inclusion of a phrase stating '1,100 other known ... sites'.

- **Comment:** Generally the report does not adequately focus on landscape character. The 'environment' is presented as a combination of the "natural environment" and "built heritage", which is restrictive and fails to acknowledge the role of human activities in shaping and defining the landscape. Sections "A spatial portrait of Pendle" and "Caring for the environment" need to clearly identify landscape character and provide an overview of its relevance and significance as a landscape resource.

Response: Comment noted and will be considered when drafting future documentation.

Chapter 4 – Our vision for Pendle

- **Comment:** The part of this section dealing with the overall vision for the borough and contained within the SCS would have been more effective if it had been earlier in the document and aligned to the role of the Council's LDF

Table 4.1 sets out the eight priority goals of the SCS and sets out how these will be achieved under the five themes of the Core Strategy. Paragraph 4.11 then sets out four guiding principles of the SCS. The document then states that the following pages will summarise the key spatial issues grouped under the five Core Strategy themes. However, paragraph 4.14 then refers to eleven strategic objectives which have been identified (but it does not say by whom or by what and whether these are the subject of the consultation exercise or are to be taken as a given) The result is confusion and a lack

of clarity in terms of either links to the SCS or synergy with the SCS. It would have been much clearer if the eleven objectives of the Core Strategy had been linked to the eight priority goals underpinning the SCS, if necessary translated into eight themes of the Core Strategy.

Within the section there are additional statistics under various themes which would have been more effective if they had been included in the appropriate section of the spatial portrait. As stated, there are also inconsistencies between the figures in the two sections (see note 9 above).

Because the issues and their possible implications have not been fully discussed before this stage, then it is difficult to follow your approach. Also because the issues (in the spatial portrait, as set out in this chapter and in later iterations in Chapter 5) are not placed base, then neither are the strategic objectives

Response: Agree, in part. The accompanying Consultation Statement clearly sets out how the Strategic Objectives and the various Issues and Options have been derived from earlier rounds of public consultation, the available evidence (including an analysis of the strategies and action plans of relevant partners) and both government and regional planning legislation.

It was felt that the spatial nature of the various issues and options would only become apparent after further analysis of the responses received during these early stages of the Regulation 25 consultation. These would then be cross-checked by consulting with the Council's Area Committees, as detailed in paragraphs 5.11 and 5.12. As such, rightly or wrongly, it was not intended consider different spatial approaches until this further analysis had been completed. This would then allow us to prepare different spatial approaches for further debate at the next stage of the Regulation 25 stage – the consideration of all reasonable alternatives.

This stage of the consultation is now closed therefore the report cannot be amended. However, the point will be considered when drafting future documentation.

- **Comment:** Welcome the vision for Pendle, in particular the aim to create sustainable communities through reducing the need for people to travel, as set out in page 21 of the Core Strategy and the Land-use Allocations document. It is agreed that through ensuring accessibility to services the viability of the Borough will be improved resulting in the creation of socially inclusive communities. It is recommended that specific reference is made to retail provision, with a focus on the need for a network of centres within the Borough in order to provide easily accessible shopping to meet people's day to day and weekly shopping needs. The additional focus would be in line with advice provided in PPS6.

Response: Comment noted. The need for a network of centres within the Borough to provide easily accessible shopping to meet people's day to day and weekly shopping needs is addressed in the section 'A vibrant economy'.

- **Comment:** We have noted and support one of the Objectives on page 10 of your Community Strategy (2008-2018) to increase participation in cultural, art and heritage opportunities. We also support the statement on page 9 of the same document. We recognise the positive role arts, leisure, sport and heritage can play in creating strong, confident communities.

With these aspirations in mind we support the general content of this document which clearly sets out all the elements required for a thoughtful and forward looking framework for the future cultural and leisure needs of the Borough of Pendle. Good quality

community and cultural facilities are essential components in the development of sustainable communities. It is important to protect and promote your cultural facilities for their leading role in the quality of cultural life and for their valuable contribution to the character and function of the main towns.

Response: Agree.

- **Comment:** There is much in this section which we would support, but the vision and strategic objectives for and affecting the natural environment need to be strengthened, and in some cases expanded, as set out below, and the strengthened environmental objectives carried forward to the Preferred Options. We support, of course, the Sustainable Community Strategy goal to 'deepen our understanding and respect for the environment' but suggest that this needs to be supplemented by 'work to conserve and enhance the environment, including the natural environment' in line with the commitment in some of the other objectives.

Response: Comment noted. The shared vision and the priority goals are taken from the adopted Sustainable Community Strategy (SCS) and cannot be amended, as the Core Strategy must be consistent with the SCS.

We agree with the need to 'work to conserve and enhance the environment, including the natural environment' and these are aims we would seek to pursue through the Core Strategy, its strategic objectives and its policies.

- **Comment:** Largely content with the strategic objectives, as drafted. These largely cover the range of issues which the LDF Core Strategy will need to address. Our only comment concerns the strategic objective relating to housing as set out on page 26. Whilst this refers to the delivery of quality housing, we considered that it should also reflect the need to provide new housing in sufficient quantity. We therefore suggest it is amended to read 'Deliver an adequate supply of quality housing that is both appropriate and affordable, contributing to the creation of a balanced housing market'.

Response: Comment noted. The Council is committed to delivering a balanced housing market by ensuring the correct numbers of new housing is provided, to provide a supply of appropriate housing to meet the identified need whilst not exacerbated the existing oversupply. The strategic objective under 'A decent home for everyone' could be expanded to make this clearer. The North West Regional Spatial Strategy (RSS) provides housing requirements with some flexibility built in but the Council will still need to have regard to these 'targets' to ensure the effective management of housing provision in the borough.

- **Comment:** The need to protect and enhance areas of importance is supported as is the need for ecological Networks; however, there is a need to acknowledge objectives and targets for BAP delivery.

It is also important to recognise that biodiversity is as much an urban issue as a rural. In addition many former developed sites can have greater biodiversity value than intensively managed 'green field' farm land.

The need to increase the cover and promote the sustainable management of existing woodland needs also to relate to other important habitats. Of major importance is blanket bog and its peat accumulations, this is not only important in terms of biodiversity but for its capacity to be a major contributor to carbon dioxide sequestration. This needs to be reflected in management of climate change, without re-wetting, the release of stored carbon from our moorlands could cancel out all other measure to reduce our carbon footprints.

Response: Comment noted. The need to reference objectives and targets of BAP delivery will be incorporated into further documents where appropriate. The section on the natural environment does not refer solely to rural areas, but it could be made clearer that biodiversity is as much an urban issue as a rural one. The need to refer to other important habitats, particularly blanket bogs, is noted and will be considered in drafting future documentation.

Chapter 5 – Spatial Strategy for Pendle

The report sets out our approach for developing a ‘spatial vision’ for Pendle. We have acknowledged that the problems that need to be addressed in one part of Pendle are unlikely to be exactly the same as those facing another part of the borough. We therefore propose to build a spatial vision for Pendle from individual visions for each of the five areas covered by the Council’s Area committees. In this way it is hoped that we will be able to secure local ownership of the spatial vision and the political support to ensure it is both realistic and deliverable.

Seven people responded to the final question which asked ‘Do you agree that the spatial vision provides a realistic approach to identifying a spatial vision for Pendle’. Six people expressed their support for the vision, whilst one disagreed.

- **Comment:** The respondent who disagreed made the following comment:
‘The spatial vision for Pendle, on the whole, represents a sustainable and realistic vision for the Borough. However the vision for economic development should acknowledge the present deficit of employment land within the Borough and provide a more effective response to this issue’.

Response: The issue of employment land needs detailed consideration and cannot be adequately incorporated into an overall spatial vision, which by its very nature cannot specifically address each issue we need to address. The Pendle Employment Land Review indicates that there is a deficiency in employment land provision in the M65 corridor and this will be addressed as we prepare future documentation for the Core Strategy.

SO Issue	Option	H1	H2	E1	E2	E3	E4	C1	C2	C3	C4	C5	P1	P2	P3	P4	P5	P6	P7
1 a Settlement hierarchy	1 Focus development on key service centres																		
	2 Focus on urban regeneration																		
	3 Dispersal																		
1 b Distribution of housing	1 Focus on key service centres																		
	2 Focus on key, local and rural service centres																		
	3 Focus on regeneration areas																		
	4 Focus on areas of proven need																		
	5 Distribute evenly																		
	6 Focus on areas of strong demand																		
1 c Type of housing land	1 Sequential test within settlement boundary																		
	2 Sequential test, then outside SB if necessary																		
	3 No preference																		
1 d Distribution of employment	1 Focus on key service centres																		
	2 Focus on areas of proven need																		
	3 Focus on areas of strong demand																		
1 e Location of employment land	1 Sequential approach																		
	2 All sites within settlement boundaries																		
	3 Allow urban extensions, where there is a proven need																		
	4 Distribute evenly																		
1 f Type of employment land	1 Provide a locally strategic site																		
	2 Allow minor expansion of existing employment areas																		
	3 Provide a range of smaller sites throughout Pendle																		
	4 Make more intensive use of employment land																		
1 g Distribution of retail	1 Concentration																		
	2 Limited dispersal																		
	3 Localised provision																		
2 a Developer contributions	1 Support improvements to social <u>and</u> physical infrastructure																		
	2 Focus contributions on delivery of physical infrastructure																		
	3 Focus contributions on delivery of social infrastructure																		
2 b Level of developer contributions	1 Calculate on a site-by site basis																		
	2 Apply a standard calculation to all planning applications																		
3 a Design in new development	1 In keeping with traditional character																		
	2 High quality, but limited reference to wider setting																		
	3 Accessible and secure																		
3 b Improvements to the public realm	1 Design out crime																		
	2 Improved connectivity																		
	3 Use of natural surfaces																		
	4 Increased use of traditional surfaces																		
	5 Increased use of public art																		
	6 Controls on advertising																		
4 a Encourage use of renewable energy	1 Require on all new developments																		
	2 Require on all new residential developments + threshold																		
	3 Require a financial contribution																		
4 b Support for renewable energy	1 Broadly supportive																		
	2 Very supportive																		
4 c Large-scale renewable energy schemes	1 Introduce a criteria based policy																		
	2 Identify specific areas of search																		
	3 Support specific technologies																		

Key

Projected impact of option

→	Moves significantly away from sustainability objectives
-	Moves marginally away from sustainability objectives
0	Neutral effect - positive elements 'balance-out' negative elements
+	Moves marginally towards sustainability objectives
++	Moves significantly towards sustainability objectives
?	Effects on sustainability are uncertain at this early stage
	No relationship

LDF objectives (Pendle SA Toolkit, ENTEC, April 2007)

H1	Helps to meet the housing needs of <u>whole</u> community
H2	Helps to improve health and reduce health inequalities
E1	Contributes to the appropriate location of businesses
E2	Helps to secure economic inclusion
E3	Contributes to the development of strategic infrastructure
E4	Helps to deliver urban <u>and/or</u> rural renaissance
C1	Contributes to the reduction of crime <u>and</u> the fear of crime
C2	Helps to improve access to basic goods and services
C3	Helps to protect landscapes <u>and</u> buildings of historic value
C4	Helps to improve and protect environmental quality
C5	Has a positive impact on cultural diversity
P1	Helps to promote energy efficiency and the use of renewable energy
P2	Helps to address climate change
P3	Helps to promote the sustainable management of resources
P4	Helps to regenerate degraded sites and reduce greenfield development
P5	Helps to improve water quality
P6	Helps to reduce the risk of flooding
P7	Helps to protect and enhance biodiversity

SO	Issue	Option	H1	H2	E1	E2	E3	E4	C1	C2	C3	C4	C5	P1	P2	P3	P4	P5	P6	P7		
4	d	Energy conservation in housing	1	Comply with Government requirements by 2016																		
		2	Identify an interim target																			
		3	Establish a steady requirement for progress																			
4	e	Construction materials	1	Require use of recycled/sustainable materials in all developments																		
		2	Only require use of recycled/sustainable materials in major developments																			
		3	No requirement																			
4	f	Improve air quality	1	Transport																		
		2	Energy generation																			
		3	Requirement for Air Quality Assessments																			
		4	Minimise dust from building works																			
		5	Vehicle utilisation at new developments																			
4	g	Improve water quality and watercourses	1	Water conservation																		
		2	Naturalisation of watercourses																			
		3	Reinstatement of natural landscaping																			
		4	Requirement for Drainage Impact Assessments																			
5	a	Amount of new housing	1	Meet RSS target																		
		2	Exceed RSS target, meet SHMA figure																			
		3	Meet RSS target, plus development in areas of regeneration need																			
		4	Meet SHMA figure, plus development in areas of regeneration need																			
		5	Meet market demands																			
5	b	Type, size and tenure of housing	1	To meet identified needs by area																		
		2	Distribute evenly																			
		3	No specified requirements																			
5	c	Amount of affordable housing	1	Target of 45% across Pendle (SHMA)																		
		2	Target of 30% across Pendle (RSS)																			
		3	Target of less than 30% across Pendle																			
		4	To meet identified needs by area																			
5	d	Delivery of affordable housing	1	Require all developers to provide on-site																		
		2	Require all developers to make a contribution for off-site provision																			
		3	Flexible approach (mix of 1 and 2)																			
		4	Allocate affordable housing sites																			
		5	Identify rural exception sites																			
6	a	Inward investment	1	Manufacturing																		
		2	Distribution and warehousing																			
		3	Retailing																			
		4	Service sector																			
		5	Tourism																			
		6	Renewable energy																			
6	b	Protect existing employment areas	1	Yes, no development allowed																		
		2	Yes, consider redevelopment of vacant sites																			
		3	No, let the market dictate																			
6	c	Location of tourist and leisure	1	Any rural location, provided that it is appropriate																		
		2	Only in accessible rural locations																			
		3	Town centres																			
		4	Former mill sites alongside the Leeds and Liverpool Canal																			
7	a	Level of new retailing	1	In excess of forecast growth																		
		2	Meet forecast growth																			
		3	Fail to meet forecast growth																			

SO Issue	Option	H1	H2	E1	E2	E3	E4	C1	C2	C3	C4	C5	P1	P2	P3	P4	P5	P6	P7
7 b Need to attract national multiples	1 Yes, irrespective of locational requirements																		
	2 Yes, to anchor town centres or designated sites																		
	3 No																		
7 c Increase vitality and viability of town centres	1 Extend town centre boundary (expansion)																		
	2 Redefine town centre boundary (contraction)																		
	3 Identify and protect premises in primary retail areas																		
7 d Establish/support night-time economy	1 Reduce restrictions in protected retail frontages																		
	2 Allocate town centre sites for leisure/cultural uses																		
	3 Allocate edge-of-centre sites for leisure/cultural uses																		
8 a Location of new community facilities	1 Provide large centralised facilities																		
	2 Provide in accessible locations																		
	3 Target at areas where there is an identified need																		
	4 Focus in deprived areas																		
	5 Distribute evenly																		
8 b Types of community facility	- Cannot be appraised at this stage																		
9 a Protection for open space	1 Protect all areas																		
	2 Only protect in areas where there is an identified deficiency																		
	3 Only protect good quality open space																		
9 b Improving access to open space	1 Require additional provision only in areas of deficiency																		
	2 Require additional provision regardless of existing provision																		
10 a Protect and enhance our built heritage	1 Require higher standards of design throughout Pendle																		
	2 Require higher standards of design in designated areas																		
	3 Require higher standards of design in Conservation Areas																		
	4 Require higher standards of design in vicinity of important buildings																		
	5 Increase use of Article 4 directions in Conservation Areas																		
10 b Protect and enhance our natural heritage	1 Build-in beneficial features																		
	2 Include buffer zones around protected areas																		
	3 Require mitigation measures, where adverse impacts are possible																		
10 c Protect and enhance the open countryside	1 Only permit agriculture and forestry																		
	2 Permit development to meet identified local needs																		
	3 Permit development related to tourism, renewable energy, rural enterprise etc.																		
10 d Sites of Settlement Character	1 Retain site designation																		
	2 Reassess role of sites																		
11 a Physical connections with adjacent areas	1 Protect former Colne-Skipton railway line for transport use																		
	2 Protect former Colne-Skipton railway line for bypass																		
	3 Protect former Colne-Skipton railway line for railway																		
	4 Protect former Colne-Skipton railway line for cycling, horse riding and walking																		
11 b Address use of the car for personal transit	1 Require transport assessments/travel impact statements for all developments																		
	2 Require transport assessments/travel impact statements above a specified threshold																		
	3 Require large developments to submit a Green Travel Plan																		
	4 Only require developers to address the impact of their development																		
	5 Require developers to contribute to transport improvements, in areas of deficiency																		
	6 Support measures to improve public transport																		
	7 Reduce long-stay car parking spaces in town centres																		
	8 Promote higher density residential development in areas with good public transport																		
	9 Accept that travel by car is inevitable for the immediate future																		
11 c Parking	1 Relax existing requirements																		
	2 Continue with existing																		
	3 Introduce more restrictive standards and reduce on-street parking																		

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اگر آپ اس دستاویز کو بڑے پرنٹ، بریلی، آڈیو کیسٹ پر یا کسی دوسری زبان میں لینا چاہیں تو براہ مہربانی ہم سے رابطہ قائم کریں، اور جہاں بھی ممکن ہو ہم آپ کے لئے ایسا انتظام کرتے ہوئے خوشی محسوس کریں گے۔



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