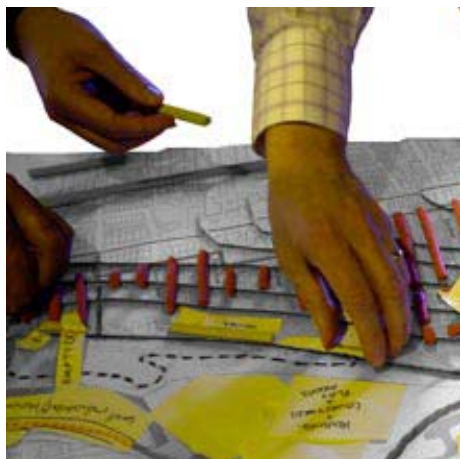


Preparing a Local Plan for Pendle



Core Strategy Consultation Statement

September 2011



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document phone 01282 661330



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Introduction

- 1.1 This statement has been published in support of the *Pendle Core Strategy (Preferred Options Report)*. It has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), which require the publication of a statement setting out the following:
- (i) Which bodies and persons were invited to make representations under Regulation 25.
 - (ii) How those bodies and persons were invited to make such representations.
 - (iii) A summary of the main issues raised by those representations.
 - (iv) How those main issues have been addressed in the Development Plan Document.
- 1.2 On 29th March 2007, Pendle Council adopted its *Statement of Community Involvement* (SCI). This sets out how members of the local community and partner organisations are to be engaged in the preparation of documents for the Pendle Local Development Framework (LDF). Since its adoption public consultation and engagement associated with the preparation of the Core Strategy and other LDF documents has been carried out in accordance with the SCI.

Public Consultation

- 1.3 The Core Strategy has been developed over a number of years and has benefited from a number of rounds of public consultation.
- 1.4 Publication of the *Preferred Options Report* represents the third stage of public consultation, under Regulation 25. The previous stages are described below:

Stage 1: You Choose

- 1.5 A six-week public consultation was carried out between 22nd June and 3rd August 2007 under the banner of *You Choose the Future of Pendle*.
- 1.6 At the close of the consultation period Pendle Council had received a total of 1,323 comments. Of these 903 were comments raised in written representations submitted by 266 individuals or organisations.
- 1.7 This was a joint consultation with Pendle Partnership, the Local Strategic Partnership (LSP) for Pendle. The responses helped to identify the key issues to be addressed in both the *Sustainable Community Strategy* (SCS), adopted in May 2008, and the Core Strategy.

Stage 2: Issues and Options

- 1.8 A six-week public consultation to consider the *Issues and Options Report* was carried out between 4th July and 18th August 2008.
- 1.9 At the close of the consultation period Pendle Council had received a total of 2,801 comments. Of these 1,171 were comments raised in written representations submitted by 58 individuals or organisations.

- 1.10 The consultation statement published alongside the Issues and Options Report:
- Identified those organisations and individuals who were invited to participate in the 'You Choose' campaign.
 - Described the programme of engagement carried out as part of the Issues and Options consultation.
 - Summarised the representations received in response to the consultation.
 - Showed how Pendle Council had identified the issues and options to be addressed in the Core Strategy.
- 1.11 Pendle Council published *Issues & Options Consultation: Summary of Responses* in December 2008. This document illustrated the level of support for each of the alternative approaches that had been considered as part of the consultation.

Stage 3: Preferred Options

- 1.12 The *Preferred Options Report* expands on, and addresses the issues raised, in these earlier consultations. It is to be made available for a six-week public consultation between -- October 2011 and -- December 2011.
- 1.13 This consultation statement will be published alongside the Preferred Options Report. It:
- Provides a summary of the key consultations carried out to date under Regulation 25 (Appendices 1 and 2).
 - Identifies the specific consultees contacted at the Issues and Options Stage (Appendix 2).
 - Describes the programme of engagement carried out as part of the Issues and Options consultation (Appendix 3).
 - Summarises the representations received in response to this consultation (Appendix 4).
 - Shows how the issues raised have, where applicable, been addressed in the Preferred Options Report (Appendix 4).

What happens next?

- 1.14 Following the close of the consultation period, the Council will carefully consider all the representations received. As previously, an officer response will be provided for each representation.
- 1.15 Where appropriate the Preferred Options Report will be amended to reflect the comments received.

Stage 4: Publication

- 1.16 The amended document will represent what Pendle Council considers to be the final version of its strategy.
- 1.17 The statutory six-week public consultation on this document is expected to take place some time before Easter 2012. It will no longer focus on the different approaches that could be taken, but will consider the soundness of the strategy and policies; namely that they are:
- **Positively prepared** – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on the evidence available.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the National Planning Policy Framework (currently provided in the form of Planning Policy Guidance (PPG) and Planning Policy Statements (PPS)).

Stage 5: Examination

- 1.18 Following the close of the consultation period, the Council will collate all the representations received and submit these, together with a copy of the Core Strategy (Publication Version), to the Secretary of State. This represents the start of the Examination process.
- 1.19 The Secretary of State will appoint an independent inspector to conduct the Examination. The purpose is to consider the soundness of the Core Strategy and whether it complies with the requirements of the Planning and Compensation Act 2004, and associated regulations. The presumption is that the document is sound, unless it can be shown otherwise.
- 1.20 The Inspector will carry out a preliminary assessment of the Core Strategy and other submitted material. If there is any concern about the soundness of the document, the Inspector may call an exploratory meeting.
- 1.21 The Pre-Examination Meeting will be held to consider how the examination is to be managed. It should be noted that the Examination will not address every individual representation and written representations will carry exactly the same weight with the Inspector as those pursued by a personal appearance at the examination.
- 1.22 The purpose of the Pre-Examination Meeting is to:
- advise those who have asked to be present and heard at the examination, how their representations will be dealt with (i.e. written representations, formal hearings etc.);
 - consider who else might need to be invited to the examination to help the inspector consider of the soundness of the plan;
 - identify the issues that need to be considered at the examination in order to determine the soundness of the plan;
 - consider how those issues relate to one another and the most logical order for their examination;
 - identify the nature of the evidence to be brought to the examination and to set the timetable for the submission of that evidence; and
 - establish the programme for the examination and the timetable for any hearing sessions.
- 1.23 Shortly after the Pre-Examination Meeting, the Inspector will publish a list of Matters for Examination. This will provide a brief description of the issues to be covered, with the names of those who have asked to be heard in person. It will form the basis of the programme for the hearings or round table sessions led by the Inspector, which will be published at the same time.

- 1.24 Following the end of any hearing or round table sessions the Inspector will retire to produce a report. This may, or may not, recommend changes to the Core Strategy, based on the evidence presented at the examination.
- 1.25 The Examination formally closes when on receipt of the Closure Letter from the Planning Inspectorate, which accompanies the Inspector's Fact Check Report and appendices. Following consideration of the Council's comments on the Fact Check Report, the Inspector will issue a Final Report and appendices.
- 1.26 The Final Report is no longer binding on the Council, but under normal circumstances the Inspectors recommendations will be incorporated into the final version of the Core Strategy which must be adopted by Full Council.

Other Considerations

- 1.27 Public consultation is not the only factor determining what the Core Strategy will eventually look like. Our chosen strategy must also be in general conformity with national planning policy, reflect the strategic priorities of the sustainable community strategy and be based on a robust and credible evidence base.

Published Plans and Strategies

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

Evidence Base

- 1.30 The analysis of published data, the consideration of projections and the production of new empirical research, to address gaps in our knowledge, are all important components of the evidence base behind the Core Strategy.
- 1.31 The key documents, prepared or commissioned by Pendle Council, for the evidence base that underpins the planning policies in our Core Strategy include:
1. Pendle Strategic Flood Risk Assessment (ENTEC, October 2006)
 2. Pendle Retail Capacity Study (Nathanial Lichfield & Partners, May 2007)
 3. Lancashire Sub-Regional Gypsy & Traveller Accommodation and Related Services Assessment (University of Salford, May 2007)
 4. Pendle Employment Land Review (Pendle Borough Council, March 2008)
 5. Burnley & Pendle Strategic Housing Market Assessment (Fordham Research, April 2008)
 6. Pendle Open Space Audit (Pendle Borough Council, November 2008)
 7. Pendle Strategic Housing Land Availability Assessment (Pendle Borough Council, May 2008)
 8. Pendle Sustainable Settlements Study (Pendle Borough Council, November 2008)
 9. Burnley & Pendle Affordable Housing Site Viability Study (Fordham Research, July 2009 and Update: July 2010)
 10. Pendle Biodiversity Audit (Pendle Borough Council, September 2010)
 11. Pendle Infrastructure Study (Pendle Borough Council, September 2011)

12. South Pennine Renewable & Low Carbon Energy Study (Maslen Environmental, December 2010)

- 1.32 All of these documents have been through appropriate levels of public consultation and where appropriate adopted by Pendle Council. This is with the exception of the Pendle Infrastructure Study, which is part of the current consultation alongside the Core Strategy Preferred Options document.

Sustainability Appraisal

- 1.33 Sustainability appraisal is integral to the plan making process. Its purpose is to consider the economic, social and environmental effects of a plan from the outset and performs a key role in providing a sound evidence base for the plan.
- 1.34 Pendle Council determined that, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, that the Core Strategy DPD was likely to have significant environmental effects and that a Strategic Environmental Assessment (SEA) would be required.
- 1.35 ENTEC (now AMEC) was appointed by Pendle Council to carry out sustainability appraisal work on the Core Strategy, incorporating the requirements of the European Directive on Strategic Environmental Assessment (SEA) (Directive 2001/42/EC).
- 1.36 Scoping represents the first stage in the process. Through a process of consultation, literature review and data analysis, it establishes:
- the baseline economic, social and environmental issues;
 - the key sustainability issues and objectives; and
 - the methodology for undertaking the sustainability appraisal.
- 1.37 The baseline provides the basis for the prediction and monitoring of significant environmental or other sustainability effects that may arise from the introduction of the Core Strategy and other documents for the Local Development Framework.
- 1.38 ENTEC published their Scoping Report on 29th September 2006. On 19th October 2006 the members of Pendle Council's Executive agreed that this report should be placed on the Council's website and sent to the three statutory consultation bodies for comment. In accordance with the published guidance on SEA/SA the consultation ran for a period of five weeks between 30th October and 4th December 2006. The final version of the scoping report comprises the submitted scoping report and consultation responses on the submitted report.
- 1.39 ENTEC published their Sustainability Appraisal Toolkit on 20th April 2007. Detailed sustainability appraisal reports, based on this toolkit, have been prepared to consider the implications of proposals contained in the Issues and Options Report and the Preferred Options Report.

Habitat Regulations Assessment

- 1.40 In October 2005 a European Court of Justice ruling directed that land use plans are subject to the provisions of Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive).
- 1.41 The purpose of a Habitats Regulation Assessment (HRA) is to assess the potential impacts of a plan or policy against the conservation objectives of a Natura 2000 site and to determine whether it would adversely affect the integrity of that site, either alone or in combination with other plans and projects. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects.
- 1.42 In the UK the network of Natura 2000 Sites are protected by the following:
- The Habitats Directive (EC Directive 92/43/EEC) protects habitats and non-avian species of European importance and applies to Special Areas of Conservation (SACs).
 - The Birds Directive (EC Directive 79/409/EEC) is concerned with the conservation of wild birds and applies to Special Protection Areas (SPAs).
- 1.43 In addition Government guidance¹ states that globally important wetlands protected under the Ramsar Convention (1971) should be given the same level of protection as SAC and SPA designations.
- 1.44 The current European Commission guidance details a four-stage process for the production of a HRA, although not all stages are necessarily required, depending on the outcome of each stage in the process:
1. Screening: This identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.
 2. Appropriate Assessment: This stage assesses the likely impacts against the conservation objectives of a European Site, in order to identify whether there may be any adverse effects on the integrity of the site or its features. Where adverse impacts are identified, it also includes an assessment of the potential mitigation for those impacts.
 3. Assessment of alternative solutions: Where significant negative effects are identified at the appropriate assessment stage, alternative solutions should be examined to avoid any potential damaging effects to the integrity of a European Site.
 4. Assessment where adverse impacts remain: An assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed. The Secretary of State for Communities and Local Government will inform the European Commission about the compensatory measures adopted.
- 1.45 A HRA has been prepared to consider the implications of proposals contained in both the Issues and Options Report and the Preferred Options Report.

¹ Guidance on Habitats Regulations Assessment (Department of Communities and Local Government, August 2006).

Equalities Impact Assessment

- 1.46 In accordance with the Race Relations Act 1976, Race Relations (Amendment) Act 2000, Disability Discrimination Act 1995 and 2005, Equal Pay Act 1970, Sex Discrimination Act 1975 and Equality Act 2010, Pendle Council has a legal requirement to assess the impact of all its existing and proposed plans and policies.
- 1.47 The Equality Act, which came into force from October 2010, introduced a new public sector equality duty effective from 5th April 2011. It states that local authorities have a public duty to have due regard to:
- eliminating unlawful discrimination;
 - promoting equality of opportunity; and
 - promoting good relations between people of different groups.
- 1.48 The equality duties placed on local authorities previously covered gender, disability and race. Under the Equality Act 2010 these have been extended to cover age (younger and older), faith (religion or belief), sexual orientation, gender reassignment and pregnancy/maternity. Local authorities must also exercise their functions in a way that reduces any inequalities that may arise from socio-economic disadvantage.
- 1.49 Pendle Council's Service Impact Assessment was redesigned in April 2011 to meet these new requirements and has been used to assess the implications that the Core Strategy, and individual policies within it, may have on different groups in the local community. The use of this standard template helps the Council to anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group.
- 1.50 An EqlA has been prepared to consider the implications of proposals contained in the Preferred Options Report.

Land-use Allocations & Development Management Policies DPD

- 1.51 Until now, we have consulted jointly on the Core Strategy and the Land-use Allocations DPDs.
- 1.52 However, it is not possible to identify, or allocate, sites for development before the strategic direction for future growth in Pendle has been established in the Core Strategy.
- 1.53 Our public consultations on potential site allocations, will take place shortly after the Core Strategy has been published in early 2012. The newly merged Land-use Allocations and Development Management Principles DPD will:
- Identify sites to be allocated for future development – i.e. for employment, housing etc.
 - Identify areas to be protected from future development – e.g. SSSI.
 - Identify areas where development will be restricted – e.g. Green Belt.
 - Identify areas where development will be required to meet higher standards of design – e.g. Conservation Areas.
 - Set-out detailed planning policies.

Appendix 1

‘You Choose’ Consultation – Summary

Subject of Consultation

- You Choose the Future of Pendle (Regulation 25)

Dates of consultation

- 22nd June to 3rd August 2007

Number of organisations/individuals contacted

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

Number of organisations/individuals submitting representations

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

Number of representations made

- Written representations 903
- Via LDF working groups 285
- Via SCS working groups 135
- **Total** **1,323**

Summary of issues raised

- Issues & Options Consultation Statement (Pendle Council, 19th June 2008)

How have the main issues been addressed in the DPD?

- Issues & Options Consultation Statement (Pendle Council, 19th June 2008)

Appendix 2

Issues & Options Consultation – Summary

Subject of Consultation

- Issues & Options Report (Regulation 25)

Dates of consultation

- 4th July to 18th August 2008

Number of organisations/individuals contacted

- LDF/LSP databases (specific consultees) 77
- LDF database (other consultees) 672
- Schools and Colleges 44
- Businesses on Pendle Council's company, town centres and tourism databases1,168
- Members of Pendle Citizens Panel 1,153
- People registered with Pendle Council website 805
- Staff at Pendle Council, Pendle Leisure Trust and Liberata 1,020
- Local Councillors 49
- **Total** **4,988**

Number of organisations/individuals submitting representations

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

Number of representations made

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

Summary of issues raised

- Issues & Options Consultation Summary of Responses (Pendle Council, December 2008)
- Appendix 3

How have the main issues been addressed in the DPD?

- Appendix 3

Appendix 3

Issues & Options Consultation – Specific Consultees

Over 4,988 organisations and individuals were notified in advance of the six week public consultation on the Issues and Options Report (see Appendix 2). Below is a list of the Specific Consultation Bodies² that were contacted.

ID	Title	Forename	Surname	Job Title	Organisation
R881	Mr.	Paul	Entwhistle	Regional Planning Officer	4NW (Regional Planning Board)
R895	Mr.	Michael	Gallagher	Director of Planning, Transport & Housing	4NW (Regional Planning Board)
R385	Ms.	Samantha	Turner	Principal Planning Officer	4NW (Regional Planning Board)
R328	Mr.	Matthew	Saunders	Secretary	Ancient Monuments Society
R466	Ms.	Vicky	Thorp	Clerk	Barley-with-Wheatley Booth Parish Council
R024	Mrs.	M	Adams	Clerk	Barnoldswick Town Council
R026	Mr.	Iain	Lord	Clerk	Barrowford Parish Council
R029	Mr.	Anthony	Beckett	Clerk	Blacko Parish Council
R030	Mr.	J.	Hoyle	Chairman	Bracewell & Brogden Parish Meeting
R031	Mr.	Andrew	Marshall	Group Planning Manager	Bradford Metropolitan District Council - Development Plans and Policy
R033	Mrs.	Christine	Carty	Clerk	Briercliffe-with-Extwistle Parish Council
R035	Mr.	John	Grice	Clerk	Brierfield Town Council
R038	Mr.	D.	Wright		British Telecom (BT)
R431	Mr.	Matthew	Ravenscroft	Housing Manager	Burnley Borough Council
R042	Ms.	Margaret	Whewell	Policy & Environment Manager	Burnley Borough Council
R047	Ms.	M.	Goodyer		Cable & Wireless Communications
R048	Mr.	Philip	Ratcliffe	Planning Policy Manager	Calderdale Metropolitan Borough Council
R205				Customer Relations Manager	CE Electric UK
R059	Mr.	K.R.	Beasley	Clerk	Cowling Parish Council
R060	Miss	Fiona	Pudge	Planning Officer	Craven District Council - Planning Policy Services
R061	Mr.	Stephen	Clark	Division Manager, Rail Regional Policy and Deliver	Department for Transport (DfT) - Rail Regional & Passenger Relations
R064	Mrs.	D.	Braithwaite	Clerk	Downham Parish Meeting
R065	Mr.	Barry	Connolly	Project Developer	E.On UK Renewables
R066	Mrs.	L.	Corcoran	Clerk	Earby Parish Council
R045	Mr.	David	Peat	Chief Executive	East Lancashire PCT
R213	Ms.	Judith	Nelson	Regional Planner	English Heritage - Historic Buildings & Monuments Commission for England

² As defined in Part 1, Paragraph 2 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended.

ID	Title	Forename	Surname	Job Title	Organisation
R073	Mr.	Philip	Carter	Planning Liaison Officer	Environment Agency
R197	Ms.	Jane	Evans	Head of Planning and Environment	Ericsson Services Ltd. (Vodafone)
R078	Mrs.	B.	Taylor	Clerk	Foulridge Parish Council
R081	Mrs.	M.S.	Rayner	Clerk	Gisburn Parish Council
R083	Ms.	Carol	Donohoe	Clerk	Goldshaw Booth Parish Council
R084	Mr.	Chris	Bamber		Government Office for the North West (GONW)
R087	Mr.	Glyn D.	Broomhead	Clerk	Haworth Cross Roads & Stanbury Parish Council
R090	Mrs.	Penny	McBurney	Clerk	Higham-with-West Close Booth Parish Council
R091	Mrs.	Lindsay	Alder	Assistant Network Strategy Manager	Highways Agency - Network Strategy Division NW
R094	Mr.	M.	Berry	Clerk	Horton Parish Meeting
R370	Miss	Victoria	McSherry		Hutchison 3G UK Ltd, O2 (UK) Ltd, Orange PCS Ltd, T-Mobile UK Ltd and Vodafone Ltd
R020	Mr.	Marc	Selby	UK Estates Manager	Hutchison 3G UK Ltd.
R095	Mr.	Roger B.	Frost	Clerk	Ightenhill Parish Council
R096	Mr.	Paul	Maskell	Chairman	Kelbrook & Sough Parish Council
R463	Mr.	Peter	Iles	Specialist Adviser (Archaeology)	Lancashire County Council - Environment Directorate
R863	Mrs.	Janet	McDonald	Senior Planning Officer	Lancashire County Council - Environment Directorate
R263	Mr.	Don	McKay	Principal Planning Officer for the AONB	Lancashire County Council - Environment Directorate
R214	Mr.	Philip	Megson		Lancashire County Council - Environment Directorate
R228	Mr.	Neil	Wallace		Lancashire County Council - Environment Directorate
R109	Mr.	Roger	Bucknell	Chairman	Laneshawbridge Parish Council
R115	Mr.	Anthony	Meadows	Clerk	Lothersdale Parish Council
R118	Mr.	D.G.H.	Nelson	Correspondent	Martons Both Parish Meeting
R017				Policy Manager	National Grid
R128	Mr.	Alan	Hubbard	Land Use Planning Adviser (E Midlands & NW)	National Trust
R058	Mr.	Stephen	Hedley	Planning Advisor	Natural England - Regional Advocacy and Partnerships Team (NW)
R880	Mr.	Steven	Broomhead	Chief Executive	North West Development Agency (NWDA)
R132	Mr.	Ian	Wray	Chief Planner	North West Development Agency (NWDA)
R129	Mr.	Neil	Wallace		North Yorkshire County Council
R135	Miss	R.	Hay	Clerk	Old Laund Booth Parish Council
R137	Mrs.	Elaine	Pearson	Clerk	Oxenhope Parish Council

ID	Title	Forename	Surname	Job Title	Organisation
R138	Mrs.	Elizabeth	Bolton	Clerk	Padiham Town Council
R436	Ms.	Helen	Warren		Pinsent Masons
R165	Mrs.	Janet	Bland	Clerk	Reedley Hallows Parish Council
R166	Mr.	Colin	Hirst	Forward Planning Manager	Ribble Valley Borough Council
R167	Mr.	D.T.	King	Clerk	Rimington & Middop Parish Council
R169	Mrs.	Gillian	Fawcett	Clerk	Roughlee Parish Council
R171	Mrs.	A.M.	Whitwell	Clerk	Sabden Parish Council
R173	Mrs.	Alison	Moore	Clerk	Salterforth Parish Council
R175	Mr.	I.R.	Hirst	Clerk	Simonstone Parish Council
R052	Miss	Rachael	Bust	Deputy Head of Planning	The Coal Authority
R190	Mrs.	H.	Hundsdoerfer	Clerk	Thornton-in-Craven Parish Council
R195	Ms.	Adele	Waddington	Clerk	Trawden Forest Parish Council
R218					Twiston Parish Meeting
R196	Mr.	David	Hardman		United Utilities - Asset Protection
R198	Mrs.	A.	McDougall	Clerk	Wadsworth Parish Council
R204	Mr.	Gaye	McCrum	Chair	Worston & Mearley Parish Meeting
R206	Mr.	John	Pilgrim	Sustainable Development Manager - Planning	Yorkshire Forward
R207	Ms.	Judith	Donovan CBE	Chairman	Yorkshire Tourist Board

A large number of General Consultation Bodies were also sent a letter or email on 2nd or 3rd July 2008 advising them of the consultation on the Issues and Options Report. General Consultation Bodies are defined in the Regulations as:

- (a) Voluntary bodies
- (b) A body representing the interests of racial, ethnic or national groups.
- (c) A body representing the interests of different religious groups
- (d) A body representing the interests of disabled persons
- (e) A body representing the interests of businesses

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

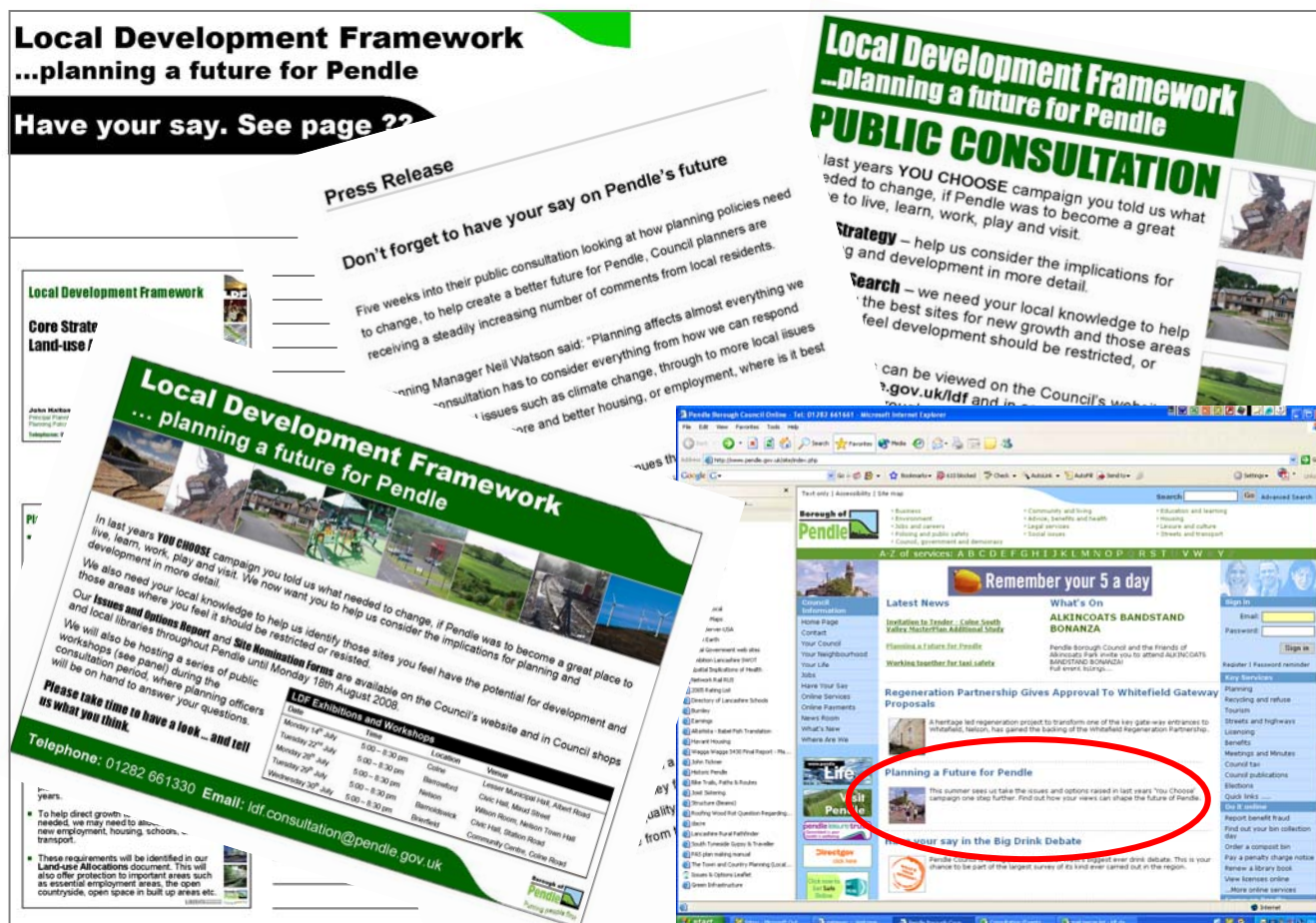
Appendix 4

Issues & Options Consultation – Consultation Events & Publicity

In addition to contacting the specific and general consultation bodies, and people registered on the Council and LSP databases (see Appendix 2), an extensive publicity campaign was launched in the local media and on the Council's website to highlight the six week public consultation on the Issues and Options Report.

A Selection of Publicity Materials

Including Press Release and Advertisements, Event Poster, PowerPoint Presentation and Council Website



Much of this publicity centred on a series of public exhibitions and workshops held at venues throughout the Borough. The five events were attended by a total of 71 people.

In addition seven presentations were made to the Council's five Area Committees, the LSP and its business sub-group (Pendle Vision Board).

All consultation documents and publicity materials were available at local libraries and Council shops throughout Pendle, a total of 15 venues.

In addition posters and leaflets were distributed to local leisure centres, youth and community centres, doctors surgeries, schools and colleges and parish offices / notice boards, representing a further 90 venues.

Appendix 5

Issues & Options Consultation – Representations and Officer Responses

This appendix provides a summary of the representations submitted as part of the six week public consultation on the Issues and Options report, held between 4th July and 18th August 2008. It includes:

1. A copy of the Representation Form
2. A numerical breakdown of the written representations received
3. A summary of the written representations received, together with officer responses indicating how the issues raised have been addressed in the DPD³
4. A sustainability appraisal matrix

Ideally this appendix should be read in conjunction with *Issues & Options Consultation: Summary of Responses* (Pendle Council, December 2008), a report published by Pendle Council in December 2008, to provide feedback on the outcome of the public consultaion.

³ Please note that where a respondent has simply ticked a preference, for an option or choice, the comment is simply noted. Where the respondent has also provided a reasoned justification for their preference, an officer recommendation has been provided, highlighting any changes to be made as a result of this comment.

LOCAL DEVELOPMENT FRAMEWORK

Representation Form



Core Strategy & Land-use Allocations DPDs Issues and Options consultation

This form should be completed alongside the accompanying Issues and Options report.

1. Your details	2. Details of agent or representative (if applicable)
Name _____	Name _____
Organisation (if applicable) _____	Organisation (if applicable) _____
Position (if applicable) _____	Position (if applicable) _____
Address _____ _____ _____	Address _____ _____ _____
Postcode _____	Postcode _____
Telephone _____	Telephone _____
Email _____	Email _____
Contact by: <input type="checkbox"/> Letter <input type="checkbox"/> Email	Contact by: <input type="checkbox"/> Letter <input type="checkbox"/> Email

Signature _____

Date _____

Data Protection Act 1998

Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make all representations available for public inspection. However, your contact details will not be made available online. In compliance with the Data Protection Act 1998, the personal information you provide will only be used by Pendle Council for the purpose of preparing its Local Development Framework.

Completed forms must be received
by Pendle Council no later than:

5:00pm on Monday 18th August 2008

Planning Policy and Conservation,
Town Hall, Market Street,
Nelson, Lancashire BB9 7LG

Fax: 01282 661390

Email: ldf.consultation@pendle.gov.uk

Official use only: Rep No. _____

Supporting documents: ☐ Yes ☐ No



For an alternative format of this
document phone 01282 661330

LIBERATA OUTSOURCING
WHERE WORK FLOWS

Borough of
Pendle
Putting people first

You choose ...

We would like you to indicate your preference against each issue. However, if you do not wish to express an opinion, please feel free to move on to the next issue.

Please note that there are two types of answer you can give. These are:

- ☐ Tick only **one** option. ☐ Multiple choice, tick **all** options that apply.

Except where marked with an asterisk (*), if you answer '**No**' or '**Other**' to a particular question, please provide details of your suggestions, or recommend an alternative approach, on a separate sheet of paper.

You should securely any sheets of paper to the end of your questionnaire. You should include your full name on each sheet and clearly indicate which issue(s) your comments relate to.

Confident communities

Pages 17-19

Are these three strategic objectives sufficient to help us create confident communities?

☐ Yes ☐ No

Sustainable communities

Pages 20 to 21

Are these three strategic objectives sufficient to help us create sustainable communities?

☐ Yes ☐ No

Caring for the environment

Pages 22 to 23

Are these two strategic objectives sufficient to help us care for the environment?

☐ Yes ☐ No

A decent home for everyone

Pages 24 to 26

Is this strategic objective sufficient to help us create a decent home for everyone?

☐ Yes ☐ No

A vibrant economy

Pages 27 to 29

Are these two strategic objectives sufficient to help us create a vibrant economy?

☐ Yes ☐ No

Strategic Objective 1**Pages 32 to 46**

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Issue 1b How should we distribute new housing across Pendle?

Option: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ Other

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Issue 1d How should we distribute new employment* across Pendle?

* Excludes retail, see Issue 1g and Strategic Objective 7

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Issue 1e Which locations are most appropriate for new employment land provision? * Excludes retail, see Issue 1g and Strategic Objective 7

Option: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ Other

Issue 1f What types of employment* sites do we need to provide?

* Excludes retail, see Issue 1g and Strategic Objective 7

Option: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ Other

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Strategic Objective 2**Pages 47 to 49**

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

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

Option: ☐ 1 ☐ 2 ☐ Other

Strategic Objective 3	Pages 50 to 54
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Strategic Objective 3	Pages 50 to 54
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Issue 3a **What factors should we emphasise in order to achieve high standards of design in new developments?**

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ Other

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

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ **Other**

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ Other

Strategic Objective 4	Pages 55 to 63
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Strategic Objective 4	Pages 55 to 63
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Issue 4a **How should we aim to build renewable energy technologies into new developments?**

Option: ☐ 1 ☐ 2 ☐ 3 ☐ **Other**

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

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

Option: ☐ 1 ☐ 2 ☐ Other

Option: ☐ 1 ☐ 2 ☐ Other

Issue 4c								
How can we accommodate stand-alone renewable energy schemes in Pendle?								
Option:	<input type="checkbox"/>	1	<input type="checkbox"/>	2	<input type="checkbox"/>	3	<input type="checkbox"/>	Other

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Issue 4e	How should we influence the use of construction materials?			
Option:	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> Other

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Issue 4f	How should we seek to improve air quality in Pendle?					
Choices:	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> Other

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ Other

Issue 4g **How should we seek to improve the management of water resources and watercourses in Pendle?**

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ Other

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ Other

Strategic Objective 5	Pages 64 to 70
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Strategic Objective 5	Pages 64 to 70
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Issue 5a **How many new houses should we build in Pendle?**

Option:

<input type="checkbox"/>	1	<input type="checkbox"/>	2	<input type="checkbox"/>	3	<input type="checkbox"/>	4	<input type="checkbox"/>	5	<input type="checkbox"/>	Other
--------------------------	---	--------------------------	---	--------------------------	---	--------------------------	---	--------------------------	---	--------------------------	-------

Option: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ Other

Strategic Objective 8**Pages 84 to 87**

Issue 8a **Where should we locate new community facilities to help reduce inequalities and promote social inclusion?**

Option: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ Other

Issue 8b (i) **Do you think there is a need for new community facilities in a particular town or village in Pendle?**

Option: ☐ Yes ☐ No*

If yes,

a) Which town or village?

b) What do you think is needed?

Issue 8b (ii) **Do you think there is a need to provide larger community facilities elsewhere in Pendle?**

Option: ☐ Yes ☐ No*

If yes,

a) Which town or village?

b) What do you think is needed?

Strategic Objective 9**Pages 88 to 92**

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Issue 9b **How can we enhance the quality of, and improve access to, our green open spaces?**

Option: ☐ 1 ☐ 2 ☐ Other

Strategic Objective 10**Pages 93 to 98**

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

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ Other

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

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ Other

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

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

Option: ☐ 1 ☐ 2 ☐ Other

Strategic Objective 11

Pages 99 to 105

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

Option: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ Other

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

Choices: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ Other

Issue 11c What approach should we take to car parking?

Option: ☐ 1 ☐ 2 ☐ 3 ☐ Other

Spatial Vision

Paragraph 5.11, Page 107

Question Do you agree that this provides a realistic approach to identifying a spatial vision for Pendle?

Option: ☐ Yes ☐ No* ☐ Other

LDF Site Search

If you wish to recommend that a particular site should be protected from development, or alternatively put forward a site that you think should be considered for development, please remember to complete the site nomination form included in the LDF Site Search leaflet (available separately).

2. Issues and Options Consultation: Summary of Responses

Section of Issues & Options Report	Agree	No Opinion	Disagree	Total
All Written Representations	821	289	61	1,171
Issues and Options Report	3	6	1	10
Chapter 1	2	2	0	4
Chapter 2	2	1	0	3
Chapter 3	1	4	4	9
Chapter 4	6	2	0	8
You Choose Consultation	1	0	0	1
SCS Vision	1	0	0	1
SCS Priority Goals	1	0	0	1
All Strategic Objectives	1	0	0	1
Confident Communities	3	0	1	4
- Strategic Objective	7	0	2	9
Sustainable Communities	3	1	0	4
- Strategic Objective	10	0	3	13
Caring for the Environment	5	0	1	6
- Strategic Objective	7	1	7	15
A Decent Home for Everyone	3	1	0	4
- Strategic Objective	7	0	1	8
A Vibrant Economy	2	0	0	2
- Strategic Objective	7	0	4	11
Chapter 5	1	0	1	2
Our Spatial Issues and Options	2	1	0	3
Options for Strategic Objective 1	2	1	0	3
Issue 1a: Option 1	10	1	0	11
Issue 1a: Option 2	6	0	1	7
Issue 1a: Option 3	6	0	1	7
Issue 1a: Option other	1	4	0	5
Issue 1b: Option 1	6	0	1	7
Issue 1b: Option 2	5	0	2	7
Issue 1b: Option 3	4	0	0	4
Issue 1b: Option 4	4	0	2	6
Issue 1b: Option 5	0	0	3	3
Issue 1b: Option 6	1	0	3	4
Issue 1b: Option other	1	4	0	5
Issue 1c: Option 1	11	0	0	11
Issue 1c: Option 2	8	0	0	8
Issue 1c: Option 3	2	0	0	2
Issue 1c: Option other	0	1	0	1
Issue 1d: Option 1	4	0	0	4
Issue 1d: Option 2	6	0	0	6
Issue 1d: Option 3	2	0	0	2
Issue 1d: Option other	0	2	0	2
Issue 1e: Option 1	8	0	0	8

Section of Issues & Options Report	Agree	No Opinion	Disagree	Total
Issue 1e: Option 2	2	0	0	2
Issue 1e: Option 3	2	0	0	2
Issue 1e: Option other	0	4	0	4
Issue 1f: Option 1	2	0	0	2
Issue 1f: Option 2	2	0	0	2
Issue 1f: Option 3	2	0	0	2
Issue 1f: Option 4	2	0	0	2
Issue 1f: Option other	1	6	0	7
Issue 1g: Option 1	2	0	0	2
Issue 1g: Option 2	4	0	0	4
Issue 1g: Option 3	6	0	0	6
Issue 1g: Option other	1	3	0	4
Options for Strategic Objective 2	2	1	0	3
Issue 2a: Option 1	12	0	0	12
Issue 2a: Option 2	3	0	1	4
Issue 2a: Option 3	0	0	0	0
Issue 2a: Option other	0	2	0	2
Issue 2b: Option 1	11	0	0	11
Issue 2b: Option 2	4	0	0	4
Issue 2b: Option other	1	5	0	6
Options for Strategic Objective 3	4	0	1	5
Issue 3a: Choice 1	6	0	0	6
Issue 3a: Choice 2	5	0	0	5
Issue 3a: Choice 3	5	0	0	5
Issue 3a: Option other	1	7	1	9
Issue 3b: Choice 1	11	0	0	11
Issue 3b: Choice 2	6	0	0	6
Issue 3b: Choice 3	8	0	0	8
Issue 3b: Choice 4	6	0	0	6
Issue 3b: Choice 5	7	0	0	7
Issue 3b: Choice 6	7	0	0	7
Issue 3b: Choice other	0	4	0	4
Options for Strategic Objective 4	3	1	1	5
Issue 4a: Option 1	6	0	0	6
Issue 4a: Option 2	3	0	0	3
Issue 4a: Option 3	3	0	0	3
Issue 4a: Option other	0	6	1	7
Issue 4b: Option 1	6	0	0	6
Issue 4b: Option 2	6	0	0	6
Issue 4b: Option other	1	2	0	3
Issue 4c: Option 1	5	1	0	6
Issue 4c: Option 2	2	0	0	2
Issue 4c: Option 3	4	0	1	5
Issue 4c: Option other	0	2	0	2

Section of Issues & Options Report	Agree	No Opinion	Disagree	Total
Issue 4d: Option 1	6	0	0	6
Issue 4d: Option 2	0	0	0	0
Issue 4d: Option 3	5	0	0	5
Issue 4d: Option other	0	3	0	3
Issue 4e: Option 1	5	0	0	5
Issue 4e: Option 2	5	0	0	5
Issue 4e: Option 3	4	0	0	4
Issue 4e: Option other	0	2	0	2
Issue 4f: Choice 1	14	0	0	14
Issue 4f: Choice 2	8	0	0	8
Issue 4f: Choice 3	9	0	0	9
Issue 4f: Choice 4	7	0	0	7
Issue 4f: Choice 5	8	0	0	8
Issue 4f: Choice other	1	0	0	1
Issue 4g: Choice 1	8	0	0	8
Issue 4g: Choice 2	8	0	0	8
Issue 4g: Choice 3	8	0	0	8
Issue 4g: Choice 4	7	0	0	7
Issue 4g: Choice other	0	3	0	3
Options for Strategic Objective 5	1	2	0	3
Issue 5a: Option 1	5	0	0	5
Issue 5a: Option 2	3	0	0	3
Issue 5a: Option 3	4	0	0	4
Issue 5a: Option 4	7	0	0	7
Issue 5a: Option 5	0	0	1	1
Issue 5a: Option other	1	1	0	2
Issue 5b: Option 1	11	0	0	11
Issue 5b: Option 2	1	0	0	1
Issue 5b: Option 3	5	0	0	5
Issue 5b: Option other	0	2	0	2
Issue 5c: Option 1	3	0	0	3
Issue 5c: Option 2	0	0	0	0
Issue 5c: Option 3	3	0	0	3
Issue 5c: Option 4	8	0	0	8
Issue 5c: Option other	0	3	0	3
Issue 5d: Choice 1	5	0	0	5
Issue 5d: Choice 2	2	0	0	2
Issue 5d: Choice 3	16	0	0	16
Issue 5d: Choice 4	3	0	0	3
Issue 5d: Choice 5	7	0	0	7
Issue 5d: Choice other	1	0	0	1
Options for Strategic Objective 6	2	1	0	3
Issue 6a: Choice 1	6	0	1	7
Issue 6a: Choice 2	6	0	1	7

Section of Issues & Options Report	Agree	No Opinion	Disagree	Total
Issue 6a: Choice 3	4	0	1	5
Issue 6a: Choice 4	8	0	0	8
Issue 6a: Choice 5	8	0	0	8
Issue 6a: Choice 6	4	0	0	4
Issue 6a: Choice other	1	3	0	4
Issue 6b: Option 1	4	0	0	4
Issue 6b: Option 2	10	0	1	11
Issue 6b: Option 3	1	0	1	2
Issue 6b: Option other	0	6	0	6
Issue 6c: Option 1	1	0	0	1
Issue 6c: Option 2	4	0	0	4
Issue 6c: Option 3	3	0	0	3
Issue 6c: Option 4	7	0	0	7
Issue 6c: Option other	0	1	1	2
Options for Strategic Objective 7	2	0	0	2
Issue 7a: Option 1	2	0	1	3
Issue 7a: Option 2	4	0	0	4
Issue 7a: Option 3	6	0	0	6
Issue 7a: Option other	0	0	0	0
Issue 7a: Option 1	0	0	0	0
Issue 7a: Option 2	6	0	0	6
Issue 7a: Option 3	4	0	0	4
Issue 7a: Option other	0	0	0	0
Issue 7a: Option 1	2	0	0	2
Issue 7a: Option 2	2	0	0	2
Issue 7a: Option 3	8	0	0	8
Issue 7a: Option other	0	1	0	1
Issue 7a: Choice 1	2	0	0	2
Issue 7a: Choice 2	6	0	0	6
Issue 7a: Choice 3	1	0	0	1
Issue 7a: Choice other	1	0	0	1
Options for Strategic Objective 8	3	0	0	3
Issue 8a: Option 1	1	0	0	1
Issue 8a: Option 2	2	0	0	2
Issue 8a: Option 3	7	0	0	7
Issue 8a: Option 4	1	0	0	1
Issue 8a: Option 5	0	0	0	0
Issue 8a: Choice other	0	0	0	0
Issue 8b(i)	4	1	0	5
Issue 8b(ii)	4	2	0	6
Options for Strategic Objective 9	3	2	0	5
Issue 9a: Option 1	6	0	0	6
Issue 9a: Option 2	1	0	0	1
Issue 9a: Option 3	4	0	0	4

Section of Issues & Options Report	Agree	No Opinion	Disagree	Total
Issue 9a: Option other	0	2	1	3
Issue 9b: Option 1	9	0	0	9
Issue 9b: Option 2	3	0	0	3
Issue 9a: Option other	0	1	0	1
Options for Strategic Objective 10	4	3	0	7
Issue 10a: Choice 1	2	0	0	2
Issue 10a: Choice 2	7	0	0	7
Issue 10a: Choice 3	3	0	0	3
Issue 10a: Choice 4	4	0	0	4
Issue 10a: Choice 5	1	0	0	1
Issue 10a: Choice other	0	6	1	7
Issue 10b: Choice 1	7	0	0	7
Issue 10b: Choice 2	6	0	0	6
Issue 10b: Choice 3	12	0	0	12
Issue 10b: Choice other	0	3	0	3
Issue 10c: Option 1	1	0	1	2
Issue 10c: Option 2	7	0	0	7
Issue 10c: Option 3	5	0	0	5
Issue 10c: Option other	0	5	0	5
Issue 10d: Option 1	4	0	0	4
Issue 10d: Option 2	4	0	0	4
Issue 10d: Option other	0	0	1	1
Options for Strategic Objective 11	3	0	0	3
Issue 11a: Option 1	6	0	0	6
Issue 11a: Option 2	1	0	1	2
Issue 11a: Option 3	3	0	1	4
Issue 11a: Option 4	3	0	0	3
Issue 11a: Option other	1	0	0	1
Issue 11b: Choice 1	3	0	0	3
Issue 11b: Choice 2	9	0	0	9
Issue 11b: Choice 3	8	0	0	8
Issue 11b: Choice 4	2	1	0	3
Issue 11b: Choice 5	3	1	0	4
Issue 11b: Choice 6	6	0	0	6
Issue 11b: Choice 7	4	0	0	4
Issue 11b: Choice 8	4	0	0	4
Issue 11b: Choice 9	1	0	2	3
Issue 11b: Choice other	1	0	0	1
Issue 11a: Option 1	6	0	0	6
Issue 11a: Option 2	3	0	0	3
Issue 11a: Option 3	3	0	0	3
Issue 11c: Option other	0	0	0	0
LDF Site Search	0	158	0	158
A Spatial Strategy for Pendle	6	0	1	7

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Document Comment				
327981 / 451 Dennison	Agree	A re-opened railway would provide a convenient rapid and green link to the Yorkshire Dales, Lake District and the East Coast main line.	Comments Noted	
327456 / 1134 Miss Rachael Bust Deputy Head of Planning The Coal Authority	Agree	At this stage we would like to make a very general comment, as you will be aware, there is coal present within Pendle. This will mean that there are likely to be mining legacy issues which will require appropriate consideration and remediation through the planning process. The Coal Authority is current working on preparing plans which will illustrate resources and legacy areas for release under licence to the Minerals Planning Authorities from next year.	Comments Noted	It is proposed to address this issue through the Development Control Principles DPD
327529 / 939 North West Planning Natural England	No Opinion	Habitats Regulations Assessment We are pleased that you have considered this assessment at an early stage of core strategy development. We provided comments on the draft assessment in our letter of 28 May 2008, which we trust you have found helpful. For the most-part these comments appear to have been taken on board for the revised version of the Assessment. Please note that it is still our view that subsequent documents arising from the Issues and Options Report will require further assessment under the Habitats Regulations. We look forward to further consultation on this.	Agree	This was already acknowledged on page 28 in the Appropriate Assessment Screening Report in the final sentence of the conclusion.
327620 / 1084 Mr. Paul Daly Planning Manager Sport England North West	No Opinion	<p>Developing Policy A sound evidence base underpins Sport England's policy objectives for the protection and provision of opportunities for sport and recreation. Looking ahead to the production of the Core Strategy Preferred Options, this document should include policy-related consideration of:</p> <ul style="list-style-type: none"> - open space provision and protection; - facility provision; access for all/equality of access; - quality of provision; - the needs of specific sports and user groups; and - opportunities for countryside recreation. <p>In all cases, a sound evidence base is required to underpin any policy which is developed to address these issues, as noted above. As a summary of the preceding points, the following checklist should help to ensure that the interests of sport and active recreation (and by association a range of other issues) are properly covered by the Core Strategy. Does the core strategy Objective-setting set out clear objectives for sport and recreation? Reflect community strategy objectives for sport and recreation? Safeguard facilities? Promote accessible facilities? Development of a strategic framework for the provision of sport opportunities? Developing and using the evidence base? Employ a sound evidence base to help inform policy making? Identify a hierarchy of sport and recreation provision? Use policies which anticipate future sport and recreation needs? Connecting policies and plans? Recognise the role of sport in contributing to a wide range of spatial planning issues: regeneration, health promotion, crime reduction, quality of life etc? Establish connections between different policy areas? Promoting sustainability and quality of life issues Promote sustainable design of sports facilities? Promote sustainable resource management/stewardship through the relationship between sport and the natural environment? Promote mixed use schemes such that there is an appropriate presence of sport and recreation as part of a balanced community? Developing spatial planning approaches? Maximise contributions to spatial planning initiatives such as greenspace networks or better use of the urban fringe and the wider countryside? Develop policies which respond to the expressed needs and demands of marginal or controversial sports, with due regard to resource protection and wider sustainability issues? Explore opportunities for sport and recreation to make a</p>	Agree	Several of the Issues (8 and 9) relate to these topics and will be developed into the Core Strategy, after considering the responses to this consultation document.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327823 / 1295 Ms Sarah Burgess Senior Planning Advisor CABE	No Opinion	<p>contribution to unprogrammed development proposals?</p> <p>Unfortunately, due to limited resources, we are unable to make comment on this document. However we would like to make some general comments which you should consider.</p> <ol style="list-style-type: none"> 1. Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time. 2. Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site specific scales. 3. To take aspiration to implementation, local planning authorities' officers and members should champion good design. 4. Treat design as a cross-cutting issue-consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm. 5. Design should reflect understanding of local context, character and aspirations. 6. You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes. 	Agree	Issue 3 looks at promoting high quality design and is in line with the general comments made here regarding the need to develop policies to promote and enable good design.
328002 / 786 Ms Amanda Richardson Strategy and Policy Manager Elevate	No Opinion	<p>We do not feel in a position to make detailed comments at this stage, as we believe that our views must be informed by the strategic review of the Housing Market Assessments undertaken by the Pennine Lancashire Local Authorities (scheduled for October) and the further development of both the Pennine Lancashire Housing and Spatial Strategies.</p>	Comments Noted	Consider Elevate's response at Alternative Options stage.
328011 / 891 Mr Alan Large Spatial Development Manager Government Office North West	Disagree	<p>Even at this early stage, soundness of the plan could be compromised if the consultation process was flawed. A major concern that we have in this regard is that the document produced makes no reference to the several Area Action Plans that the authority is producing and which need to be in conformity with the Core Strategy. It is not clear whether the issues highlighted in this document, and any potential options, are either compromised by, or in synergy with what is proposed in the AAPs. Allied to this, and the tests of soundness, there is little or no mention of the plans and strategies likely to impact upon the scope and choice of options within this document, of key stakeholders such as ELEVATE, Lancashire County Council, the Primary Care Trust etc. In addition, the document needs to demonstrate an awareness of the likely impact of proposals emerging within surrounding authorities, whether this is in relation to their own emerging Core Strategies or agenda such as potential housing growth points. Another concern is that because the planning framework and policy context of the Core Strategy is not clearly explained, it remains unclear to what degree certain options are consistent with both national and regional planning guidance. Although the report is accompanied by a highly detailed sustainability appraisal of the options, there does not appear to be any reference to the SA and its findings in the comments on the options in Chapter 5. A key question with regard to the soundness of a DPD is does the Sustainability Appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start? Other concerns are with the lack of information on how the plan would be delivered and monitored in the future and that there is no glossary of terms and abbreviations to help the general reader. It will be important when the document is submitted, for examination, to show how the plan has developed from Issues and Options to the final version. If the format is confusing, this may militate against being</p>	Comments Noted	<p>The earlier consultation paper considered the impacts of the documents and strategies from key stakeholders. Within the Issues and Options report reference is made to some of these documents under the 'Key Documents' heading of the introduction to each option. The Options presented in this document do not make specific reference to them, partly because any perceived preference for any options from the Council, by indicating that they comply or conflict with other adopted strategies, could influence public response. We understand that in developing the next Alternative Options stage and the final Core Strategy document the strategies and documents of other authorities will need to be considered and their relationship with the proposed options made clear. With specific reference to the Area Action Plans, like several authorities, we have AAPs that are being developed before the Core Strategy. Consideration will need to be given to how the content of these will therefore be reflected in and/or influence the Core Strategy. The Core Strategy will have clear arrangements for managing and monitoring the delivery of the strategy, as per the requirement of PPS 12. The point about a glossary of terms and abbreviations is noted and will be considered as to whether necessary for the final Core Strategy document.</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		able to show a clear audit trail of policy development. We do have concerns as to whether this document has provided the clarity necessary to move on to the next stage. As preparation of the document progresses, you will need to have regard to the Planning Inspectorate guidance on the tests of soundness for the assessment of DPDs and the ramifications of the revised PPS 12 and Regulations. I would also draw your attention to additional guidance available on the Planning Inspectorate's website, specifically a document entitled, Local Development Frameworks: Lessons Learnt Examining Development Plan Documents, and the range of guidance provided by the Planning Advisory Service, notably the soundness self-assessment toolkit and the generation and appraisal of options. Finally, it would have been helpful to indicate how the plan would be delivered and monitored for the future. Omission - need to include a Glossary of Terms and Abbreviations		
328030 / 1136 Mr Jon Palmer Senior Planning Executive Yorkshire Forward	No Opinion	We do not have any comments to make on the document	Comments Noted	
328032 / 1297 Mr Peter Capstick	No Opinion	There are two areas for discussion: 1. The inorganic - building 2. The organic - people Both have a limited shelf life. Now that we are re-building Nelson's buildings (i.e. bus station, one market street etc) we can turn out attention to staffing those buildings. The variables are tremendous limited not just by the folks who apply for jobs but also aided and abetted by those who can be persuaded to serve by calling to mind the vision/strategy/goal attainments necessary for success.	Agree	Issue 1 looks at where to locate employment sites and issue 6 looks at what types of employment we should try to attract to the area. Ensuring we attract the right employment to the right sites should ensure these sites and filled, providing vital employment to the area, and do not sit vacant.
327780 / 224 Mr Ron Smith Circuit Planning Representative Jehovah's Witnesses	Agree	The Pendle Council area is a rich multi-cultural community. Its many religious groups/churches are important influencers of the behavioural stability of the social structure. In order to demonstrate the council's recognition of the varied and changing needs of these groups provision for suitable land for places of worship should be built into Local Plans. It is good to note that Strategic Objective 8 of the Issues & Options of Pendle's Core Strategy does give some recognition to the importance of providing for the religious needs of the community by including cultural/religious buildings as part of the definition of community facilities. It also identifies places of worship (section 8b) as a community facility which needs to be provided as a priority. However, it is considered that this could be strengthened by creating definite provision for suitable land in line with future changing needs. On page 158 of the Government Document Diversity & Equality in Planning Leicester is highlighted as a good example of a council which recognised the importance of making provision for places of worship within planning policy. It says that planning policy was amended to permit the consideration of the development of places of worship on sites that had previously been reserved for employment uses. It is recommended that a similar reference be included within policy of the Pendle Council along the lines of: "The council will in principle regard former community/public buildings and former commercial/industrial premises located outside residential areas as the most appropriate locations for places of worship and associated community facilities, subject to such buildings satisfying the requirements set out in other policies". This suggestion will serve to support the emerging policies of the	Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
<p>Chapter 1</p> <p>327813 / 345 Mr. David Penney</p> <p>327773 / 1087 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council</p> <p>327836 / 1201 Mr Mike Kirby Chief Planning Officer Lancashire County Council</p> <p>328011 / 892 Mr Alan Large Spatial Development Manager Government Office North West</p>				
		core strategy so as to make ongoing provision for places of worship, without the need to make a specific land allocation for such purposes throughout the life of the Local Development Framework.		
	Agree	Because the basis of the Core Strategy broadly reflects the views of the people of Pendle through the democratic process of "You Choose the Future of Pendle" Campaign	Agree	
	No Opinion	There does not appear to be a definition or statement as to what comprises "new development" near the top of the document. It may be that it has been assumed that people will understand this to mean "all possible types of development proposals" but it is certainly possible that some will chose to interpret this to mean "only the construction of completely new buildings" and thus exclude projects such as conversion of existing structures, extensions , waste disposal, etc. A short definition may be useful, perhaps in the "What is Spatial Planning?" section.	Comments Noted	We will consider this suggestion when drafting Alternative Options report.
	Agree	Reference to Ambition Lancashire is supported.	Comment Noted	
	No Opinion	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. Similarly, 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. 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. What remains unclear from the document is the degree to which certain options are consistent with both national and regional planning guidance . Paragraph 1.4 and the "Please note box" need to emphasis the point; that people are encouraged to put forward their own ideas/alternative options 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. 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. 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	Comments Noted	Comments noted about explaining the role and content of the LDF and also its place within the planning framework. Reference is made elsewhere in the document that the Core Strategy must be in line with national and regional guidance but this could be expanded upon in the final document. Section 2.6 explains the strategy would cover a 15 year period. The document outlines that the options and choices proposed were already in line with national and regional documents in 4.12. Comments about the structure and order of the Issues and Options report is noted and the general points will be considered in the context of drafting the Alternative Options report. The comment about the Councils work to date i.e. monitoring, and whether this would indicate that the Core Strategy needs to depart significantly from the current local plan is noted and it will be considered whether there is an appropriate place for this in future documents.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
<p>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 workshops, "evidence base", consideration of policies, strategies and programmes of other organisations with an interest in the Borough.</p>				
Chapter 2				
327813 / 346 Mr. David Penney	Agree	Because Spatial Planning fits in with the other main planning principle of delivering "Sustainable Development".	Comments Noted	
327539 / 1133 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	Sustainability Appraisal We are satisfied that the SA report addresses all the relevant issues from the perspective of the Environment Agency and that all the conclusions of the report are sound.	Comments Noted	
328011 / 893 Mr Alan Large Spatial Development Manager Government Office North West	No Opinion	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. 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. 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. 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.	Comments Noted	They raise, in the main, suggestions about improvements to the structure of the report. This stage of the consultation is now closed and the report will not be amended but the general points are noted and will be considered when drafting later documents.
Chapter 3				
327539 / 321 Mr. Philip Carter Planning Liaison Officer Environment Agency	Disagree	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.	Comments Noted	We will consider making reference to this issue in the spatial portrait in future documents.
327813 / 347 Mr. David Penney	Agree	Because it covers the main components of the Spatial Portrait. In addition, there should be greater emphasis on "Regeneration" and "Sustainable Communities" in addresssing "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.	Comments Noted	The Spatial Portrait sections provides a current snapshot of Pendle and highlights possible issues for the future but does attempt here to suggest how these issues can be addressed. Appreciated of the issues facing the Borough will inform the policies that are needed to deliver appropriate development.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327466 / 723 Mr Andy Pepper Planner (North-West) British Waterways	No Opinion	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.	Agree	Comments noted and will be considered in drafting the spatial portrait in future documents.
327529 / 918 North West Planning Natural England	Disagree	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.	Comments Noted	When drafting the spatial portrait in later reports, effort can be made to consider thoroughness of section.
327620 / 1080 Mr. Paul Daly Planning Manager Sport England North West	Disagree	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.	Comments Noted	Consider whether a section on sports and recreation facilities would be appropriate and useful within the Spatial Portrait section.
327773 / 1088 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	No Opinion	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. 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".	Comments Noted	If section repeated in further reports, consider amending 3.5 to include this reference.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327836 / 1255 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Disagree	<p>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.</p>	Comments Noted	If section repeated in further documents consider whether should be expanded to contain a 'landscape' or 'landscape character' section.
328011 / 894 Mr Alan Large Spatial Development Manager Government Office North West	No Opinion	<p>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:</p> <ul style="list-style-type: none"> - 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. <p>The spatial portrait should also focus on the strengths and opportunities in the Borough as well as the issues or problems;</p> <ul style="list-style-type: none"> - 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 " <p>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</p> <p>Provide clarity and meaningful information; for example o 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 occupied occupiers; o 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 o Paragraph 3.17 what is the national average life expectancy? 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</p>	Disagree.	The spatial portrait is presenting the issues that the borough is facing and hence what the policies in the Core Strategy are faced with tackling. 3.1 explains the purpose of the Spatial Portrait. The report will not be amended and so no action is required of comments relating to its structure.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328021 / 986 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	No Opinion	<p>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.</p> <p>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.</p>	Comment Noted.	If section to be repeated in further documents, consider whether 3.39 needs amending.
Chapter 4				
327817 / 897 Ms Catherine Honeywell Development Planning Partnership (DPP)	Agree	<p>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.</p>	Comments Noted	Regarding the suggestion 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, this is covered under 'A vibrant economy'.
328021 / 987 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	No Opinion	<p>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.</p>	Agree, in part	Note taken of need to reference objectives and targets of BAP delivery. This could be incorporated into further documents where appropriate. The section on the natural environment does not refer to only rural areas but it could be made clearer than biodiversity is as much an urban as rural issue. The need to refer to other important habitats, particularly blanket bogs, is noted and will be considered in drafting future documents.
328011 / 895 Mr Alan Large Spatial Development Manager Government Office North West	No Opinion	<p>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 (see note 4 above Check number) 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</p>	Comments Noted	Comments regarding structure etc taken on board and will be considered if relevant when drafting later documents.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		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		
327828 / 944 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	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'.	Agree	The Council is committed to ensuring a balanced housing market, by ensuring that the correct number of new homes are provided, to ensure a supply of appropriate housing to meet the identified need whilst not exacerbating the existing oversupply. The strategic objective under 'A decent home for everyone' could be expanded to make this clearer; we will consider this in drafting future documents.
327529 / 919 North West Planning Natural England	Agree	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.	Agree	The shared vision and the priority goals are taken from the adopted Sustainable Community Strategy and therefore cannot be amended, as the Core Strategy should 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 and its policies.
327813 / 348 Mr. David Penney	Agree	Because The Vision covers the main issues through the 5 Themes, 8 Goals, 4 Principles and 11 Objectives.	Comments Noted	
327980 / 456 Mr Nick Sandford Regional Policy Officer The Woodland Trust	Agree	We strongly support the comments on page 22 under "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 have expanded on this in our detailed comments on other sections of the Core Strategy. 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. . 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.	Comments Noted	We will consider the comment regarding the 'irreplaceable habitats' when developing the policies in the Core Strategy.
327609 / 910 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	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	Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
You Choose				
327813 / 349 Mr. David Penney	Agree	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. Because the "You Choose" Campaign has led to the Sustainable Community Strategy as a blueprint for Pendle's Future and the Foundation of the Core Strategy, the heart of the Local Development Framework.	Comments Noted	
SCS Vision				
327813 / 350 Mr. David Penney	Agree	Because the Vision embraces the aspirations in the SCS and compliments the County-wide Vision of Lancashire Partnership: "Ambition Lancashire" and its Local Area Agreement.	Comments Noted	The vision is a shared vision taken from the SCS and compliments the County wide vision promoted in Ambition Lancashire and Lancshires Partnership's Local Area Agreement.
SCS Priority Goals				
327813 / 351 Mr. David Penney	Agree	Because the 8 SCS Priority Goals fits in with the 5 Core Strategy Themes, 4 Guiding Principles underlying the SCS and the 11 Strategic Spatial Objectives developed in the Core Strategy. Another way of expressing Sustainable Principles could be to use one's LOAF: Locally Produced; Organically Grown; Animal Friendly; Fairly Traded! These 4 Environmental Principles would emphasise Self-Sufficiency and reduce the need to Transport goods & services in & out of Pendle and cut emissions.	Comments Noted	Representor agrees with priority goals. No action required.
Strategic Objectives				
327813 / 352 Mr. David Penney	Agree	As already indicated in previous comment on SCS Priority Goals [before the website connection was cut off].	Comments Noted	Representor agrees with Strategic Objectives. No action required.
Confident Communities				
327529 / 920 North West Planning Natural England	Agree	We welcome the recognition of the important role that green spaces and outdoor recreation play in improving health and wellbeing, and we strongly support objective 3 to "protect, enhance and improve access to our green spaces, sports and recreation facilities to promote active and healthier lifestyles". This might be extended to include "add to and make the best use of green spaces through multi-use".	Agree	The concept of the multifunctionality of green spaces will be explored as the Core Strategy is progressed.
328023 / 1008 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Disagree		Comment Noted	
328102 / 605 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 353 Mr. David Penney	Agree	But with an emphasis on No.3: "Green Open Spaces".	Disagree	The Strategic Objectives under the Confident Communities banner places much emphasis on the importance of protecting, enhancing an improving access to green open spaces to give residents of Pendle the opportunity to live healthier lifestyles. This is alongside creating better places by promoting high quality design and equality of access to community facilities. All 3 are required to create successful, confident communities.

Confident Communities - Strategic Objectives

327597 / 1137 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 799 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree	In addition to the actions identified there are two key strands that it is considered are missing: Strategic Objective 1- this refers to design quality in 'new development' and fails to consider the importance of the quality of some existing development, in particular the heritage of Pendle in terms of how it is expressed in the organic growth of settlements and their distinctiveness; and the architectural and historic qualities of individual buildings. It is essential in shaping the future of the Borough that its heritage is respected and enhanced. An action should be added relating to the protection and enhancement of the Borough's heritage. Strategic Objective 3 - it is unclear in what sense the term 'green spaces' is being used here. Potentially two important dimensions are being missed, a) the wider countryside and its ability to provide tranquillity, refreshment, exercise, etc and b) the nature conservation potential of open spaces and 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.	Agree, in part.	SO1 - We support the point raised that any policies adopted on good design would need to ensure not only for the provision of good design in new developments but also for the protection and and enhancement of existing examples of good design found in the Borough. These may already be protected through Conservation / Listed Building policies but a general design policy will benefit from addressing this on a Borough wide scale. SO3 - In this strategic objective the issue for discussion is about creating stronger/healthier communities. The role of green spaces in providing nature conservation is addressed under other SOs.
328021 / 988 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Disagree	Whilst the three strategic objectives are laudable there is a need to recognise the role of biodiversity plays in terms of quality of life within certain types of urban and rural green space. In this respect there is a need to use 'Green Infrastructure' concepts for delivery.	Agree	The Lancashire Green Infrastructure Strategy is nearing completion and regard can be given to its philosophies, aims and objectives in drafting our Alternative Options report.
327733 / 728 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	A high quality of design should be promoted in new developments, our streets and public spaces to create fully accessible and attractive places to live, learn, work or visit in accordance with guidance in Planning Policy Statement 1 (PPS1) and Planning Policy Statement 3 (PPS3). Green open spaces should be protected unless they are poor quality or if there is already an over provision in the area.	Comment Noted	The representors comments support the general principles of promoting high quality design in new developments. The Strategic Objective does not make reference to the quality of open space, beyond proposing its improvement. The issue of the best role for poor quality open space or over provision of open space is raised in Qu. 148-154 (Issue 9).
327679 / 657 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327587 / 534 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327976 / 225 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Disagree	Suggest an additional strategic objective based on the relationship between enjoyment of a quality outdoors contributing to better health and well-being: Add:- Promote quiet enjoyment of the countryside to benefit health and wellbeing. Justification: There is a growing body of evidence on how a quality outdoors contributes to better health and well-being. The latest summaries can be found on www.countrysidecreation.org.uk The Public Health White Paper - Healthy Choices, recognised the value of the outdoors in getting people more active.	Comments Noted	Strategic Objective 3 under Confident Communities refers to the contribution of open spaces to promote active and healthier lifestyles. This could be backed up by reference to the research findings mentioned; this can be explored as we progress the Core Strategy.
327797 / 151 Ms. Lorna Metcalfe	Agree		Comments Noted	
327651 / 1259 Ms. Judith Nelson Regional Planner English Heritage	Agree	In addition to promoting high quality design it will be essential to secure it and this should be to create locally distinctive places. In addition confident communities can be encouraged through actively seeking out means of engaging people in planning for the future of their area, Pendle already does this in a number of ways and this could be reflected here as a strategic objective.	Comments Noted	Agree that a way of strengthening the success of Confident Communities is to engage communities in planning for their future. Consideration will be given in reflecting this in a strategic objective in future Core Strategy documents.

Sustainable Communities

327998 / 524 Ms Carolyn Wilson Mobile Operators Association	No Opinion	We do not have any specific issues or options for inclusion in the Councils Core Strategy, however we would take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Framework. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through PPG8, which provides clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework, siting and design issues, levels of consultation and issues surrounding electromagnetic fields (EMFs). Clear guidance is also given regarding what should be included within local plan (now LDD) policy. This guidance states that local plans (LDDs) should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. PPG8 also makes clear that "Criteria should be flexible enough to allow for the efficient development of the network and the demands imposed by the technology ". Since the revision of PPG8 in 2001, the Office of the Deputy Prime Minister (ODPM) has produced, in conjunction with the industry, a Code of Best Practice. This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process. As indicated above the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being PPG8. On this basis we would suggest that within the Local Development Framework there should be a concise and flexible telecommunications policy contained within one of the Council's statutory Local Development Document. We recognise that this is likely to be contained within a Development Control/Management DPD rather than the Core Strategy which is of a strategic nature. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads: Proposals for telecommunications development will be permitted provided the following criteria are met:- (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. (ii) If on a building,	Comments Noted	Agree that it is important for the LDF to contain a strong telecommunications policy to control this element of important but often controversial development. The most appropriate place within the LDF may not be the Core Strategy but this will be considered on taking the issues and options forward to the Alternative Options stage.
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		<p>apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building. (iii) If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology. It will of course depend on your Local Development Scheme as to which documents are produced, which documents have a statutory role in development control and which would be considered as material considerations. We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate LDD or what is currently termed Supplementary Planning Guidance (SPG). This could then be read with PPG8, the Code of Best Practice to give a comprehensive background to any proposed development. We would then consider it appropriate to introduce the policy and we would suggest the following: Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document In summary we recognise the early stages of LDDs and the early stage of the consultation process at which we are being asked for comment. We are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the Councils policy aims. We have suggested text for both above. In keeping with the aims and objectives of the new legislation any background information should be contained within a separate LDD which would not need to go through the same consultation process.</p>		
327813 / 354 Mr. David Penney	Agree	But with an emphasis on No.3: "Sustainable Transport Network" including rail to improve Connectivity, Accessibility and Regeneration.	Disagree	Agree that creating a sustainable transport network is important to creating successful, sustainable communities but believe that all 3 objectives are equally important.
327500 / 785 Mrs. Lindsay Alder Assistant Network Strategy Manager Highways Agency	Agree	The Agency welcomes some of the objectives set out in the core strategy, particularly those focussed on helping to reduce the need to travel. It is important to ensure that where development is identified in the plan, the implications on transport infrastructure is considered. Indeed transport infrastructure constraints are one of the material considerations that need to be taken into account in deciding how land should be allocated and should form part of the evidence base. It also recognises the need to ensure developments are sited in sustainable locations and can be accessible for different modes of transport.	Comments Noted	Agree with representors comments and feel they reflect the Strategic Objectives proposed in the Issues and Options report.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327529 / 921 North West Planning Natural England	Agree	<p>We do, of course, very much support the objectives for sustainable communities, including objective 3 to " deliver a safe, sustainable transport network" that "reduces the need to travel" and "supports an improved environment". In particular, we would wish to see an encouragement of public transport, walking and cycling, reducing the need to travel by private car.</p> <p>Objective 1 in this section seeks to direct growth to the "most sustainable locations". This, amongst other things, should mean locations and development that best conserve and enhance the landscape, biodiversity and other elements of the natural landscape in the borough. In relation to Objective 2 in this section, it is important to recognise explicitly the need to ensure that the green infrastructure is in place for any new development, including the networks of open spaces and means of accessing the countryside. We have set out more on green infrastructure requirements and benefits later in our letter.</p>	Comments Noted	<p>Objective 1 - The need for development that 'best conserves and enhances the landscape, biodiversity and other elements of the natural landscape' is reflected in the section 'Caring for the Environment' where we state that we should 'protect and enhance areas that are of importance because of the habitats they, their geological interest or their contribution to the landscape'. Together all the strategic objectives work towards developing a framework for sustainable development in the Borough.</p> <p>Objective 2 - The issue of enabling the creation of a network of Green Infrastructure throughout the borough and wider Lancashire area will be considered. The Lancashire Green Infrastructure Strategy is nearing completion and its philosophies, aims and objectives will be considered in drafting future documents for example the Alternative Options document.</p>

Sustainable Communities - Strategic Objectives

327597 / 1138 Mrs. Pam Slater	Agree		No Comment	
327797 / 152 Ms. Lorna Metcalfe	Disagree	<p>The integrated approach to transport that reduces the need to travel by car should also be considered on an individual basis in relation to new developments to ensure there is no disparity between the objectives of infrastructure, transport, design and location of new development. A positive approach which assumes all objectives will be met should be adopted. Therefore if ... 43% of residents believe it is important to encourage people to use public transport rather than the car. ... the use of cars is to be reduced to respond to issues posed by climate change ... the infrastructure is to successfully encourage walking and other sustainable modes of transport and in directing new development to the most appropriate locations. The requirement for onsite parking for new developments should therefore 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. With the above in mind the term "Fully Accessible" in relation to new development requires a clearer definition.</p>	Agree, in part	<p>Regional parking standards contained within the NW RSS and the Pendle Local Plan are maximum standards and do include the provision for the parking requirements to be reduced in highly accessible areas, where people will have the greatest access to public transport networks and are therefore be most likely to be persuaded or to be able to change their transport habits and give up private car ownership. It is important therefore to ensure that new development is located in sustainable locations which have good access to public transport. It is also important that highway safety implications of car parking provision are considered to ensure that indiscriminate parking on public highways to the detriment of the safety of others does not happen because of ill conceived developments. The new NW RSS also encourages the use of 'Smarter choices' - including company, school and personal travel plans, safer routes to school, travel awareness campaigns such as TravelWise, car pooling, car sharing schemes, car clubs and park and ride schemes. Any policy in the Core Strategy aimed at reducing dependence on the private car could set requirements for the adoption of such strategies to encourage a reduction in private car ownership. If the Core Strategy aims to ensure that developments are located in sustainable locations with good access to public transport networks and we encourage developments to incorporate 'smarter choices' and similar measures, then developments could be created with less or no car parking and the desired climate change mitigation would be achieved.</p>
327976 / 226 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327976 / 231 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327587 / 535 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327679 / 658 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327733 / 729 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	A hierarchy of settlements should be established to assist regeneration. 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. All sustainable sites should be considered for development if they can meet a recognised need for development in the area.	Disagree	The Strategic Objectives propose the establishment of a hierarchy of settlements to ensure growth is directed to the most sustainable locations. If such a hierarchy is pursued it would result in most development being located following the hierarchy of settlements and identified needs within the settlements, with a special case needing to be made for the development of individual sites which do not fit within the hierarchy.
328102 / 606 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Disagree		Comments Noted	
327423 / 1314 Mr. David Hardman Local Development Framework Lead United Utilities	Agree	United Utilities supports direction of development to locations where the environmental capacity, social and physical infrastructure is able to cope. In particular we would refer to the Water and Wastewater utility infrastructure in this regard.	Agree, in part.	This comment in main supports the objective but calls for specific reference to Water and Wastewater infrastructure; It is considered that all physical and social infrastructure should be given full and equal consideration.
327651 / 1260 Ms. Judith Nelson Regional Planner English Heritage	Agree	The Pendle SCS 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.	Agree, in part.	Agree that it is important to maximise the use of existing buildings; The spatial issues sections on 'A decent home for everyone' and 'Caring for the Environment' both refer to the reuse of existing buildings. It is considered it is not necessary to explicitly refer to this in a strategic objective but proposed that Core Strategy policies will address this issue.
328021 / 989 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Disagree	Again 'Green Infrastructure' is fundamental to the aims in sustainable communities and urban design.	Comments Noted	The Lancashire Green Infrastructure Strategy is nearing completion and regard can be given to its philosophies, aims and objectives in drafting our Alternative Options report.
328023 / 1009 Mr. Juan Murray Planning (LDF) Consultant Lancashire	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
CPRE				
327370 / 800 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree	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. It is suggested that an additional action is added along the lines of: "All new development, including conversions, will be expected to reduce Pendle's carbon footprint by being sustainably located, reducing the need to travel, minimising energy requirements, incorporating renewable energy technologies, minimising and re-cycling water and waste, and minimising the requirement to use natural resources"	Disagree	The issues regarding the issue of sustainable construction and climate change are tackled in the section 'Caring for the Environment' and therefore will be addressed in the Core Strategy.
Caring for the Environment				
327813 / 355 Mr. David Penney	Agree	But with an emphasis on No.2: "Impacts of Climate Change", which should include commitment to reduce Greenhouse Gases [CO2 Emissions] by 80% to 1990 Levels.	Disagree	Disagree that one of the objectives should have an emphasis over the other; it is considered both address important environmental issues and should be given full and equal attention.
327813 / 356 Mr. David Penney	Agree	But with an emphasis on No.2: "Impacts of Climate Change", which should include commitment to reduce Greenhouse Gases [CO2 Emissions] by 80% to 1990 Levels.	Disagree	Disagree that one of the objectives should have an emphasis over the other; it is considered both address important environmental issues and should be given full and equal attention.
327587 / 536 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327529 / 922 North West Planning Natural England	Agree	We broadly support the two strategic objectives here, which include Objective 2 to reduce the contribution to and make adaptation to deal with climate change. However, we consider that Objective 1 should be rephrased and should go much further. As presently drafted the text refers to respecting only "our built heritage and areas of the countryside which are valued for their contribution to landscape character, or biodiversity". 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".	Comments Noted	The strategic objective does support the need for development to protect the countryside for its contribution to landscape character and biodiversity; in drafting future documents it will be considered whether the proposed elaborations suggested to Strategic Objective 1 are necessary.
327651 / 1261 Ms. Judith Nelson Regional Planner English Heritage	Disagree	On a point of clarity I do not understand the first bullet point under "Our built heritage" - promote the replacement of existing buildings, particularly in rural areas. English Heritage could not support this suggestion. Also I am not clear why reference is made to "unstable locations" under a built heritage heading. The first strategic objective is supported. However it should be supplemented by an objective covering the understanding, management, maintenance and enhancement of the historic environment.	Comments Noted	The two points under the section 'our built heritage' - regarding the 'replacement of existing buildings in rural locations' and the reference to 'unstable locations' - reflect the views of the public put forward in our earlier 'You Choose' consultation; these do not necessarily reflect the views of the Council but have been interpreted into the suggested Strategic Objectives. Nevertheless, in response to the two issues questioned: -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. -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. The SO1 refers to respecting the built heritage; perhaps this could be elaborated - to include reference to its

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328023 / 1010 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	management, maintenance and enhancement of the historic environment - in later documents, such as the Alternative Options document.

Caring for the Environment - Strategic Objectives

327370 / 801 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree	The actions are insufficient to meet what it is that the Borough wishes to achieve: Strategic Objective 1 refers only to respecting the environment, not to its protection and the stated desire to enhance it where possible. The words "and where possible enhance" should be added to Strategic Objective 1. It should also be explicit that reference to 'built heritage' includes the wider setting of designated assets (in accordance with relevant PPGs and Adopted and Draft RSS). Strategic Objective 1 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. It is recommended that Strategic Objective 1 is re-written as follows: "Ensure new development protects, and where possible enhances, both our built heritage, including the wider setting of designated features; and open spaces, including the countryside, areas which are valued for their contribution to landscape character, and sites of nature conservation value".	Agree	Consider how the SO could be rewritten to strengthen the meaning of 'respect' to include protection and enhancement where possible and appropriate and to ensure it is clear that biodiversity is important in both rural and urban areas.
327836 / 1256 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Disagree	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. In recognition of the above and of emerging and existing landscape policy, it is recommended that Strategic Objective 1 is modified to accommodate the landscape character requirements of PPS1, PPS 7 and RSS Policy EM1. A modified and more 'holistic' objective could be worded as follows: 1. Ensure new development respects our landscape character, built heritage and areas which are important for their contribution to biodiversity.	Agree, in part	SO 1 refers specifically to Landscape Character; perhaps this term can be defined 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.
327797 / 153 Ms. Lorna Metcalfe	Agree		Comments Noted	
327773 / 1089 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	No Opinion	This section has no information on the heritage of the district. It is suggested that the following information is added: Scheduled Monuments - 11, ranging from an Iron Age fort to an 18th century pack-horse bridge. Listed Buildings - 3 Grade I and 19 Grade II* buildings of the very highest quality, as well as 299 Grade II buildings of national importance. 26 Conservation Areas totalling nearly 5,000 hectares. 1,157 other known historic and archaeological sites, ranging from prehistoric find spots to WWII pillboxes, and from manor houses to textile mills. The above information is derived from data held by English Heritage and the Lancashire Historic Environment Record (formerly known as the Sites and Monuments Record). If there is a formal list of locally important buildings, then a statistic for these sites should also be added. Caring for the environment - What do we need to do? The first bullet point here could be enhanced by slightly re-wording it. The following is suggested: Ensure new	Agreed in part.	Comments noted and will be considered in redrafting this section, if it is to appear in future documents: 'what does the evidence tell us' - this section could be expanded to refer to important elements of the built heritage i.e. scheduled monuments, listed buildings etc 'what do we need to do' - Consider whether the aims of SO1 could be explained more clearly by reference to 'natural and man-made' heritage rather than 'natural and built environment' ? What is considered as open countryside can be man-made in the sense of shaped by farming and so the distinction may become blurred and confusing to the public; built heritage and countryside is probably clearer ?

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327423 / 1315 Mr. David Hardman Local Development Framework Lead United Utilities	Agree	<p>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</p> <p>United Utilities 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.</p>	Comments Noted	
328102 / 607 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Disagree		Comments Noted	
327733 / 730 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
327679 / 659 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327977 / 289 Mr Tim Coyne	Disagree	The strategic objectives are too vague and do not give any idea of what a 'good job' would look like. One person's idea of 'respecting our built heritage and areas of the countryside' will be very different to another person's idea.	Disagree	The Strategic Objectives identify the key issues that need to be addressed by the Core Strategy and they form the framework or broad direction for the detailed policies to follow in the Core Strategy. It is not their role to give detailed policy or guidance.
327539 / 322 Mr. Philip Carter Planning Liaison Officer Environment Agency	Disagree	Strategic Objective 4 (respond to the causes and potential impacts of climate change through a process of mitigation and adaption) assumes mitigation will be possible on any site, for any impact of climate change. In relation to flood risk, we disagree with this statement as mitigation is not a means to enable development, but to manage residual risks. In accordance with paragraph D5 of PPS25, planners should seek to avoid inappropriate development in areas at risk of flooding. Where this is not possible and it can be demonstrated that a site satisfies the Sequential and Exception Tests in PPS25, flooding of the site should be prevented through appropriate control mechanisms. Mitigation is only appropriate to reduce the residual risk of flooding. Taking this into account, we recommend that this objective is reworded, possibly as follows: 'Respond to the causes and potential impacts of climate change through a process of avoidance, adaption and mitigation as appropriate'.	Agree	Accept that SO4 could be better worded to reflect the need to avoid development in areas such as flood zones. However, use of the word prevention is preferred to avoidance as suggested by the respondent.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327976 / 232 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Disagree	Need to add: To deliver Pendle Council's Statutory responsibilities for Pendle Hill and its surroundings that are designated an Area of Outstanding Natural Beauty through active membership and joint working with the AONB Joint Committee.	Disagree	Whilst the Core Strategy policies will embrace the protection and management of the AONB it is not considered appropriate that this level of detail is added into the Strategic Objectives.
328021 / 990 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Disagree	I do not consider that the two strategic objectives are sufficient to care for the environment; they are very much reactive and lacking in ambition. Strategic objectives, whilst being realistic, need to aspire and require improvement. Not only should biodiversity resources be protected they need to follow the ethos of conserve, attain favourable condition, restoration and re-establishment. This needs to be done within an overall strategic ecological framework and network. In terms of climate change, there are measures that can positively help to reduce the pace of climate change. In this respect, whilst many see tree planting as the major measure, more effective, by several orders of magnitude, is the protection and restoration (re-wetting) of upland peat resources on our moorland as a means of CO2 sequestration. Again the process of mitigation and adaptation are far too passive.	Agree, in part	Consider whether the SOs could be strengthened in their wording to be more proactive and ambitious: SO1 could refer not only to respecting biodiversity but also their conservation, restoration and re-establishment. SO2 by suggesting both mitigation and adaption is considering the potential impacts we can have to affect the onset of climate change; the SO 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 ?
327797 / 154 Ms. Lorna Metcalfe	Disagree	1) Protecting green spaces from development and improving opportunities for sport, recreation and leisure will give us the opportunity to live healthier lifestyles 2) Address the need to develop on previously undeveloped (Greenfield) sites in our urban areas, the Green Belt or land in the open countryside. The two objectives appear diametrically opposed. Potential conflict of views ... reduce opportunity for subjective interpretation by clarifying how the two objectives can be balanced to achieve the most positive outcome.	Comments Noted	The 2 sentences quoted above are not both 'objectives'; 1) is a reflection of public comments gathered during the earlier 'You Choose' campaign, and is not necessarily an approach the Council is taking forward, whereas 2) is one of the Council's Strategic Objectives. However, we acknowledge that there could be possible tensions between the delivery of different objectives and the Core Strategy will strive to address such issues during the policy development stage.
327597 / 1139 Mrs. Pam Slater	Agree		Comments Noted	
327976 / 227 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	

A Decent Home for Everyone

328029 / 1135 Ms Allie Savage Planning Consultant Atkins Global	No Opinion	PPS12 ' Local Development Frameworks ' notes that the core strategy development plan document should set out broad locations for delivering the housing and other strategic development needs such as essential public services. Paragraph 4.1 encourages early involvement of government agencies in the preparation of LDFs while paragraph B3 requires local planning authorities to develop a strategic approach to infrastructure provision (including community facilities) when preparing local development documents. Circular 3/98 'Planning for Future Prison Development' highlights the continuing overcrowding within the prison estate and the need to replace outdated and inadequate facilities. Specifically there is a need to identify more sites for new prisons. The Secretary of State expects that local planning authorities will work together with the Prison Service to identify land for new prisons through the development plan process. The Circular advises that in order to enable authorities to make provision for prisons within their development plans the Prison Service will consult with authorities about likely areas of future need (paragraph 7). Circular 3/98 recognises at Paragraph 2 that there should be guidance in development plans on community facilities and infrastructure requirements and also that they should take account of the	Comments Noted.	Within the 'what did you say' of the 'Decent home for everyone' section, reference is made to the need to consider acceptable locations for new prison developments. This will be considered as the Core Strategy is taken forward.
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		<p>need for new prison developments, which should be identified through the planning system. The Circular notes that in identifying potential prison sites, the Prison Service has to take account of local and regional requirements for additional prison places, the court catchment areas served and the relationship of the site to nearby population centres. It goes on to specify a number of other site development considerations and also recognises that the objectives of sustainable development and in particular the need to reduce unnecessary travel should apply to site selection. Prisons should not be located too far from the centres of population they serve and there should be reasonably good accessibility to public transport services. The Circular also recognises that new prisons have potential for a substantial and beneficial impact on the economy of a local area. New jobs are created on site (both during construction and permanent jobs), goods and services are purchased in the community and extra local income is generated as a result of the disposable income of prison staff. In recent years there has been a significant increase in the prison population. In the 1970's the prison population in England and Wales was in the order of 40,000; in July 2005 that figure had risen to 76,538. The prison estate is experiencing serious overcrowding. NOMS is doing everything it can to maximise capacity at existing prisons by bringing buildings back into use through refurbishment, new house blocks, temporary units and 'ready to use' units. However, many prisons are already operating at capacity and there is limited potential to significantly increase the number of places at existing prisons. The prison system is therefore heavily dependent on new prisons to provide the additional places. While there are no specific proposals for new prison development in your district at present nor specific sites identified, in line with Government guidance NOMS requests that you consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. I would be pleased to propose a detailed policy for inclusion in your Development Plan Document and would welcome your views on how this proposal should be taken forward.</p>		
327813 / 357 Mr. David Penney	Agree	<p>But with a commitment to renovate rather than demolish terraced housing, provide affordable homes and so protect/develop Sustainable Communities.</p>	Comments Noted	<p>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, it should be retained and adapted where feasible. This will be pursued through Core Strategy policies.</p>
327529 / 923 North West Planning Natural England	Agree	<p>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, of course, essential for all housing. The Issues and Options report itself recognises early in the text the importance of access to green space in promoting health and wellbeing, as well as contributing to amenity, biodiversity and other benefits. This should, of course, be carried forward to the Preferred Options and policies.</p>	Comments Noted	<p>The comment quoted is a comment made by the public during the earlier 'You Choose' campaign, as opposed to the Council's proposed approach. Agree that open space is important to all house types, albeit perhaps in different forms. Consider this issue when taking forward the SO to the Alternative Options phase.</p>
327733 / 731 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	<p>Appropriate quality housing should be delivered to contribute to a balanced housing market. The Burnley and Pendle 2008 Strategic Housing Market Assessment (SHMA) found that in Pendle there is a large oversupply of terraced stock and a shortage of four bedroom family houses (paragraph 11.37).</p>	Comments Noted	<p>The SO 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 Strategic Housing Market Assessment; any policies adopted as part of the Core Strategy will need to take the findings of this report into account and respond to its findings.</p>

A Decent Home for Everyone - Strategic Objections

327587 / 537	Agree		Comments Noted
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr. Tony Sowerbutts Managing Director LBS Group				
328023 / 1011 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327797 / 155 Ms. Lorna Metcalfe	Agree	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 the provision of detached propererties and bungalows	Comments Noted	The SO is to deliver housing to contribute to providing a balanced housing market; this would look to provide the house types needed in the Borough as identified in evidence such as the Burnley and Pendle Strategic Housing Market Assessment. Policies within the Core Strategy will need to set out the approach to delivering a range of housing types to meet identified local needs.
327976 / 228 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327976 / 233 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327679 / 660 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328102 / 608 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Disagree		Comments Noted	
327597 / 1140 Mrs. Pam Slater	Agree		Comments Noted	

A Vibrant Economy

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 358 Mr. David Penney	Agree	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.	Comments Noted	Policy W1 'Strengthening our local economy' of the NW 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. This aim would therefore be supported by the Core Strategy, either explicitly through a specific policy or by reference to the RSS.
328023 / 1012 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

A Vibrant Economy - Strategic Objectives

327976 / 234 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327977 / 290 Mr Tim Coyne	Disagree	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	Disagree	The SO 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 complement this with a vibrant night time economy.
327587 / 538 Mr. Tony Sowerbutts Managing Director LBS Group	Disagree	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.	Disagree	SO1 refers to facilitating growth, which would necessarily involve assuring that the sufficient and suitable employment sites were available. Therefore it is considered that the SO does address this issue.
328021 / 991 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Disagree	It is generally accepted that good environmental quality is a major prerequisite of healthy economic growth.	Comments Noted	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). This issue will therefore be considered in more detail as we develop the Core Strategy and the Alternative Options document.
327733 / 732 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
327817 / 898 Ms Catherine Honeywell Development Planning Partnership (DPP)	Agree	The vision to create a vibrant economy in Pendle (p27-29) 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. In line with the guidance provided by the consultation part on new PPS4: Planning for Sustainable Development, retail developments both in town centres and elsewhere are considered forms of	Comments Noted	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. Issues 1 and 7 within this Issues and Options document specifically consults the public on both where this retail offer and what types and levels of retailing we should be seeking to attract. On location, this proposed a number of options which include the option for locating retail

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		<p>economic development and as such we would recommend that given the importance of retail as an employment provided, specific reference to retail be made. It is therefore important that the Local Authority respects the fact that retail development has an important role in boosting the economy and creation of a skilled workforce. Agree with the vision to improve the retail offer available in town centres. However, it is recommended that there is a need for the vision to recognise the importance of qualitative need as well as quantitative need. In areas such as Pendle, residents may often have to travel considerable distances to access modern main food shopping facilities. Consideration should be given to providing a variety of food shopping facilities proximate to where people live, including main food shopping, thus reducing the need to travel by car to reach such provision. Additionally, it should be acknowledged that it will not always be possible for improved retail offer to be provided within town centres, where this is the case a sequential approach should be taken with suitable sites identified on the edge of centres or out-of-centre.</p>		<p>provision in local and rural centres, thereby providing provision local to where people live. We will therefore consider the results of this consultation plus having regard to other national and regional policy when considering the most suitable locations for new retail development.</p>
327976 / 229 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327597 / 1141 Mrs. Pam Slater	Agree		Comments Noted	
327679 / 661 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328102 / 609 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Disagree		Comments Noted	
327797 / 156 Ms. Lorna Metcalfe	Agree		Comments Noted	
Chapter 5 328011 / 890 Mr Alan Large Spatial Development Manager Government Office North West	Disagree	<p>The discussion of the issues and options is on a thematic basis rather than focussing on the different towns, villages and areas that make up the Borough. In other words, the report is not 'place based' and as such, loses the spatial dimension. The document would have been more effective if it had followed the advice in the revised PPS 12 (paragraph 4.1-4.5).</p>	Comments Noted	<p>The issues and options were developed from the previous 'You Choose' public consultation event. They reflect the issues raised by the public. They have in some instances been converted into spatial questions, for example, the questions which seek responses on where certain types of development should be located. The next stage of the Core Strategy process is to develop an Alternative Options report. Here there will be the opportunity to develop more focussed spatial policies which will be developed into the final Core Strategy document. The Issues and Options</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
				paper was drafted before the new PPS12 was published and as such may not totally reflect the new changes proposed in it. It can be assured that the next stage - Alternative Options - will fully comply with PPS12.
327813 / 359 Mr. David Penney	Agree	Because the Options and Choices contained in the 11 Strategic Objectives/Issues seem to cover what is required. I have added comments to some of the specific Objectives/Issues in the following sections.	Comments Noted	
Our Spatial Issues and Options				
328011 / 896 Mr Alan Large Spatial Development Manager Government Office North West	No Opinion	The note highlighted under paragraph 5.3 would have more impact if it was at the beginning of the document to explain the role of the document and its planning context (see notes 4 and 5 above) The highlighted note under paragraph 4.14 states that the eleven strategic objectives identified have not been finalised and that at the end of each section the reader will be prompted to add, alter or amend. However, this does not seem to be the case? The options put forward need to be checked for consistency with national guidance, for example, the latest version of PPS 6, PPS 12 and emerging advice regarding the Community Infrastructure Levy; regional guidance in the form of emerging Regional Spatial Strategy; other plans and strategies; and the Planning Advisory Service guidance on the generation and assessment of reasonable alternatives. The presentation of the issues, policy context (what are we already required to do) and the options is very confusing and does not make for easy reading. As mentioned in our earlier comments, there are some inconsistencies in presentation of the issues. Other matters , which are perhaps more a question of presentation, include: ' Explaining why the strategic objectives are dealt with in a different from the order in which they emerge in the preceding chapter. The impression is that the first objective in chapter 5 is the priority, but then each objective is described as a priority for Pendle; ' The options should be accompanied with maps and diagrams where appropriate. Where maps/diagrams are provide, these need to be referred to in the text; ' Need for definitions, qualification and clarity of wording ' for example what is the difference between key services centres, Local Service Centres, rural villages and rural service centres, proven need (and how is this determined?), 'market attractiveness', 'a large locally strategic site', 'good quality open space'? ' No mention is made of the findings of the Sustainability Appraisal of each option ' Similarly, it is not clear how the options tie in with the plans, programmes, and strategies of other organisations etc; ' It is not clear whether infrastructure provision is an issue for some of the options; ' Options are not place specific ' where are the 'areas of regeneration need', the 'deprived neighbourhoods', 'existing employment areas'?	Comments Noted	This document will not be reproduced and as such the comments on the structure and presentation of the document require no action; where appropriate any comments will be taken onboard when developing later documents. The options put forward have been developed to be consistent with national and regional guidance. The impact of new emerging documents such as the no adopted NW RSS will be considered in developing the Alternative Options stage to ensure the policies developed remain consistent with this other guidance.
328027 / 1102 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Generally we feel that the most of the options presented are broadly in line with the objectives and main development principles of Draft RSS, and more recently, they reflect the Proposed Changes.	Comments Noted	The options were developed to reflect national and regional guidance. At the next stage of developing the Alternative Options document, consistency with new or emerging documents for example the NW RSS will be ensured.
327813 / 360 Mr. David Penney	Agree	As already indicated in the previous comment, the Spatial Issues and Options/Choices address the Strategic Objectives.	Comments Noted	
Options for Strategic Objective 1				
327813 / 361 Mr. David Penney	Agree	Issue 1a, Option 2; 1b Option 3; 1c, Option 1; 1d, Option 1; 1e, Option 1; 1f, Option 2; 1g, Option 3.	Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327529 / 924 North West Planning Natural England	Agree	The conservation and enhancement of the natural and semi-natural environment (including landscape character and quality, biodiversity and geodiversity) is a crucial part of sustainable development and should be a key influence in deciding on the patterns of development in the borough.	Comments Noted	Agree that the conservation and enhancement of the natural and semi-natural environment is important but feel that this topic is addressed in other Issues (e.g. Issue 9). There is also protection regarding biodiversity for example through national planning policy (PPS9) and other legislation (Wildlife and Countryside Act 1981). This Strategic Objective addresses the specific issue of the location of developments with regards to settlement hierarchys and issues of need and demand, the term 'sustainable development' being used here in its narrower sense with regards to the accessibility of development, its relationship with existing infrastructure etc. The environmental 'strand' of sustainability is another criteria that a development would also have to meet to be found acceptable but with regards to this document is considered elsewhere.
327773 / 1090 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	No Opinion	Parts of these issues deal with the redevelopment of brownfield land or the conversion and re-use of existing buildings, e.g. option 1c. These all need to consider the natural and man-made heritage value of these sites and structures. This is not necessarily a significant hindrance to development or the other aims of the council, but their relative importance needs to be taken into account when reaching decisions. By retaining existing built structures the 'story' that is told of their construction, use and adaptation over time can be retained. In addition the present environmental capital investment in building materials, etc, can be maintained and requirements for waste disposal or demolition material minimised. Where a structure or site of significance is to be affected by development, then these works need to be adequately justified and the landscape, townscape or historic value incorporated in the development proposals by careful design. If permitted then it is likely that some form of recording in advance of development will be required and that a scheme of impact mitigation will be necessary.	Comments Noted	It is important to consider the natural and man-made heritage values of sites and structures; these issues are addressed under SO 10. It is important to consider existing buildings and structures in terms of their contribution to the heritage of the B
Issue 1a: Option 1				
327797 / 157 Ms. Lorna Metcalfe	Agree		Comments Noted	
327976 / 230 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327976 / 235 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327449 / 272 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	The other options make Salterforth more remote.	Disagree	Disagree. In each of the 3 options Salterforth remains classified as a Rural Village. Whilst Option 3 introduces new tier of Rural Service Centres above this, this in effect recognises the larger and more varied range of services these settlements provide and therefore their larger capacity for expansion. This does not change the definition of a Rural Villiage and the role it is considered to play in a settlement hierarchy which is defined in the Sustainable Settlement Study i.e. development limited to specific identified needs with no planned growth of the settlements. Therefore the introduction of the Rural Service Centre tier promotes the role of these 4 settlements but does not diminish the role of Salterforth or the other Rural

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327979 / 342 Mrs Sarah Worthington Wm Morrison Supermarkets plc	Agree	Wm Morrison Supermarkets plc consider that Option 1 Concentration offers the most appropriate pattern of growth in Pendle. This will help to strengthen the town centres of Nelson, Colne and Barnoldswick and ensure that residents of the area have easy access to retail facilities.	Comments Noted	Villages or make it more remote. All three options adopt a hierarchical pattern which would strengthen the town centres, although Option 2 removes Barnoldswick from the upper tier of Key Service Centres, prioritising Nelson and Colne due to the greater regeneration need of these centres. All 3 options are consistent with the requirements of the NW RSS policy RDF2 to identify a network of Key Service Centres and Local Service Centres to help achieve suitable and sustainable levels of development in these settlements. Option 3 gives a more structured approach to development in the rural villages and therefore may be preferable to Option 1 in terms of rural regeneration. The Sustainable Settlements Study has identified this as the preferable option.
327587 / 539 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327999 / 527 Mr Robert Ingham K & R Ingham	Agree		Comments Noted	
327370 / 807 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328003 / 787 Ms Nicola Sewell Senior Planner Indigo Planning	Agree	Support Option 1 which seeks to concentrate growth in the Key Service Centres of Nelson, Colne and Barnoldswick; and Local Service Centres. Option 1 identifies Barnoldswick as a Key Service Centre, however, Option 2 relegates Barnoldswick to a Local Service Centre. Barnoldswick should be a Key Service Centre as it is one of the largest towns in Pendle. PPS6 defines Key Service Centres as centres performing a local function and providing a limited range of services as set out below:"Typically local service centres might include a small supermarket, a newsagents, a sub post office and pharmacy. Other facilities could include a hot food takeaway and laundrette. In rural areas, large villages may perform the role of a local centre"The North West RSS Submission Draft published in January 2006 sets out the settlement hierarchy for the region. Within the Central Lancashire City region, it lists Blackburn, Blackpool, Burnley and Preston as the regional towns and cities and identifies a number of Key Service Centres, including Barnoldswick. Whilst it is acknowledged that the recently published RSS Proposed Changes (March 2008) considers that the Local Planning Authorities should identify Key Service Centres and has removed the list of identified key service centres, the RSS Submission Draft Policy RDF2 defines Key Service Centres and states that such centres should have:" The potential to act as service centres for the surrounding villages and rural areas, providing a range of services which should include retail, leisure, community, civic, health and education facilities and financial and professional services". Clearly, Barnoldswick performs a wider role than solely meeting local needs which is recognised in the CSIO. The CSIO states that Barnoldswick is relatively well served by roads and public transport and already has a significant function in	Comments Noted	All three options adopt a hierarchical pattern which would prioritise the main town centres, although Option 2 removes Barnoldswick from the upper tier of Key Service Centres, prioritising Nelson and Colne due to the greater regeneration need of these centres. All 3 options are consistent with the requirements of the NW RSS policy RDF2 to identify a network of Key Service Centres and Local Service Centres to help achieve suitable and sustainable levels of development in these settlements. Option 3 gives a more structured approach to development in the rural villages and therefore may be preferable to Option 1 in terms of rural regeneration. The Sustainable Settlements Study has identified this as the preferable option.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		providing employment, retail and other services for a wide geographical area. The Pendle Settlement and Sustainable rural Settlements DPD (May 2008) states that the settlements of Nelson, Colne and Barnoldswick have been previously identified in the adopted RSS, Joint Structure Plan and emerging RSS as Key Service Centres. The document states that they are clearly the main towns within Pendle and on this basis it is considered that they should remain designated as Key Service Centres. In summary, development should be concentrated within the main centres: Barnoldswick, Colne and Nelson in order to meet sustainability objectives set by Central Government.		
328023 / 1013 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 1a: Option 2				
327982 / 453 Mr Malcolm Armstrong GL Hearn	Agree	We support option 2, urban regeneration.	Comments Noted	Option 2, Urban Regeneration, was shown in the sustainability appraisal to be the most sustainable option due to the extra benefits it would bring in terms of regeneration. This approach, however, could stifle development in the north of the Borough with Barnoldswick being relegated to the role of a Local Service Centre, the second tier in the hierarchy.
328102 / 610 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327797 / 158 Ms. Lorna Metcalfe	Disagree		Comments Noted	
327813 / 362 Mr. David Penney	Agree		Comments Noted	
328001 / 754 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In accordance with national guidance which seeks to direct new development to existing towns and to maximise accessibility to existing services and infrastructure the principle of focussing development to the key service centres of Nelson and Colne is supported. The regeneration of these Key Service Centres should be seen as a priority and thus Option 2 is supported where most development would be directed towards the M65 corridor and the towns of Nelson and Colne.	Comments Noted	Option 2, Urban Regeneration, was shown in the sustainability appraisal to be the most sustainable option due to the extra benefits it would bring in terms of regeneration. This approach, however, could stifle development in the north of the Borough with Barnoldswick being relegated to the role of a Local Service Centre, the second tier in the hierarchy.
327651 / 1262 Ms. Judith Nelson Regional Planner English Heritage	Agree	I refer you to my previous letter concerning the Settlements Study concerning the lack of information on environmental sustainability in the methodology. Basing an option on this study may therefore be flawed. English Heritage supports the regeneration of the Borough's HMRA through the repair, re-use and maintenance of the Borough's traditional housing stock which contributes to its distinctive identity. Option 2 gives most focus here, though in addition the specific role for the market town of Barnoldswick may need to be reconsidered in order to safeguard its vitality and viability.	Comments Noted	Option 2, Urban Regeneration, was shown in the sustainability appraisal to be the most sustainable option due to the extra benefits it would bring in terms of regeneration. This approach, however, could stifle development in the north of the Borough with Barnoldswick being relegated to the role of a Local Service Centre, the second tier in the hierarchy. Regarding the comments on the lack of information on environmental sustainability in the methodology, this was an issue raised at consultation on the draft study and was addressed in the final study by including constraints information on environmental constraints such as flood risk, nature conservation and

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327846 / 486 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In accordance with national guidance which seeks to direct new development to existing towns to help maximise accessibility to existing services and infrastructure the principle of focusing development to the key service centres of Nelson and Colne is supported. The regeneration of these Key Service Centres should be seen as a priority and thus Options 2 is supported where most development would be directed towards the M65 corridor and the towns of Nelson and Colne.	Comments Noted	built heritage designations plus an environmental objective was added to the list of objectives. The Sustainable Settlements Study is therefore considered a robust evidence base document and has been used to develop Option 3 of this Issue.
Issue 1a: Option 3				
327797 / 159 Ms. Lorna Metcalfe	Disagree		Comments Noted	
327836 / 1202 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 3 is supported. The Land Use Consultants, Rural Innovation and Jacqui Blenkinship Report "The North West Key Service Centres" Roles and Functions Main Report for the North West Regional Assembly (now 4NW) (September 2006) identifies Nelson, Colne and Barnoldswick as Key Service Centres.	Comments Noted	Option 3 considers the more important role Barnoldswick plays over Local Service Centres, particularly the important role it plays in the Boroughs economy. The Sustainable Settlement Study identifies that Barnoldswick meets fewer of the services and facilities criteria than Nelson (inc. Brierfield) and Colne but still considers it a Key Service Centre due to the wide range of services it provides to fulfill the needs of a large community. This was also the conclusion of the former Regional Spatial Strategy and the Joint Lancashire Structure Plan (The new RSS does not identify key service centres but leaves it to the Core Strategy to do). The Land Use Consultants Report mentioned is also identified in the RSS as a source of guidance and it will be considered alongside other evidence base documents when developing our preferred option.
327828 / 945 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Would support such an approach which focuses development on those areas in greatest regeneration need (i.e. the Housing Market Renewal Areas). All three of the options outlined identify Nelson and Colne as Key Service Centres and would therefore satisfy this requirement. We are, however, unclear why Option 1 treats Brierfield as a separate, lower order centre, rather than part of Nelson and Colne as in Options 2 and 3. Brierfield forms part of the contiguous urban area between Burnley and Colne and is designated as a Housing Renewal Area; on this basis we would favour Options 2 and 3 over Option 1. Option 3 differs from option 2 by treating Barnoldswick as a Key Service Centre (alongside Nelson and Colne) and has a more refined two-tier hierarchy of rural settlements. Barnoldswick is one of the settlements to have benefitted under the NWDAs Market Towns Initiative (part of the 'Rural Renaissance' agenda). Whilst it acts as a service centre for the surrounding rural area, it plays an important role in Pendle's economy in particular the Rolls-Royce facility which manufactures a range of specialised aero-engine components. By treating Nelson, Colne and Barnoldswick as a Key Service Centres, Option 3 would be more consistent with the approach in the Joint Lancashire Structure Plan. The Agency would support such an approach, however, we have no specific views on the classification of smaller service centres and rural villages under Option 3.	Comments Noted	Support for Option 3 due to the recognition it gives the higher role of Barnoldswick (compared to Option 2) and the position it gives Brierfield as part of a Key Service Centre with Nelson (compared to Option 1). Option 3 considers the more important role Barnoldswick plays over Local Service Centres, particularly the important role it plays in the Boroughs economy. The Sustainable Settlement Study identifies that Barnoldswick meets fewer of the services and facilities criteria than Nelson (inc. Brierfield) and Colne but still considers it a Key Service Centre due to the wide range of services it provides to fulfill the needs of a large community. This was also the conclusion of the former Regional Spatial Strategy and the Joint Lancashire Structure Plan (The new RSS does not identify key service centres but leaves it to the Core Strategy to do). Option 1 considers Brierfield as a separate settlement as it is recognised that whilst having close links with Nelson it also operates as a distinct settlement in its own right with its own local shopping centre etc. Considering Nelson and Brierfield as one joint Key Service Centre whilst recognising the housing market problems the two areas share could potentially have a detrimental effect on Brierfield by not considering its needs in its own right.
327597 / 1142 Mrs. Pam Slater	Agree		Comments Noted	
327997 / 514 Mr Peter Vernon	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Vernon & Co				
327733 / 733 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	This option identifies a specific role for individual settlements within each tier. Most growth should be focussed on settlements in Tiers 1 and 2 (Nelson and Colne, including Brierfield and Barnoldswick). Within these settlements it may not be the case the most appropriate sites are in or on the edge of the key service centres. Individual sites, still within the settlement boundary, should be considered for development, particularly if this meets a specific need.	Agree, in part	Agree that most growth should be focussed on settlements in Tiers 1 and 2 and all the options proposed, as hierarchys, would do this. Option 3 is different from the other 2 options, in that it also gives extra development opportunities for the 4 settlements identified as Rural Service Centres (Trawden, Foulridge, Fence & Kelbrook) but this is still within a hierarchy pattern which prioritises the Key Service Centres and Local Service Centres above this. For clarity, the settlement boundary is the key service centre boundary and so the scenario which is raised in the comments, that a site could be within the settlement boundary but not within the key service centre could not occur.
327679 / 662 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	

Issue 1a: Option other

328025 / 1097 Mr Carl Bunnage Projects and Sustainable Development Team Leader North Yorkshire County Council	No Opinion	No specific comments to make upon the document at this time other than to suggest that Option 1 (concentration) and Option 2 (Urban regeneration) are clearly the preferable ones in overall policy terms. In relation to these two would further suggest that facilitating a suitable proportion of new development to ensure the sustainability and health of the main West Craven settlements (Option 1) whilst striking a balance to not undermine regeneration objectives elsewhere would seem sensible.	Comments Noted	The support for Option 1 over 2, due to the consideration it gives to the role of Barnoldswick. Whilst Option 3 is discarded it is considered that this provides the best opportunities for controlled rural expansion to provide needed services and facilities. It may be that a combination of Options 1 and 3 is considered appropriate.
327817 / 899 Ms Catherine Honeywell Development Planning Partnership (DPP)	No Opinion	Whilst do not object to the establishment of a hierarchy of settlements in the Borough of Pendle in order to assist in regeneration by directing growth to the most sustainable locations, it is our view that the hierarchy should not take as rigid a format as provided by the Options described in the document, which include concentration, urban regeneration and dispersal (p 35-37). In line with the guidance provided by PPS6, it must be recognised that centres change over time, often function as part of a network and are not static. Consequently, there must be flexibility in the advocated hierarchy for centres to move and change. Option 3 - Dispersal does provide some positive attributes, due to the ability given to settlements lower down the hierarchy to grow to a certain extent. However, we advise that a greater level of flexibility is still necessary.	Disagree	The reference to PPS6 that 'centres change over time, often function as part of a network and are not static' refers to town centres and shopping centres whereas this issue refers to settlements. However the comments in support of Option 3 and the flexibility this gives for lower rural centres to grow is noted.
327466 / 725 Mr Andy Pepper Planner (North-West) British Waterways	No Opinion	In terms of the distribution of new development within Pendle, British Waterways would suggest that the Leeds and Liverpool Canal corridor through the urban areas of Brierfield and Nelson could represent a focus for urban regeneration and brownfield development, including the re-use or re-development of existing canalside mills and industrial buildings.	Comments Noted	Option 2 which is described as an 'Urban Regeneration' option focuses on the HMR areas. In Nelson, the HMR area includes all the Canal Corridor and in Brierfield, whilst all the Canal Corridor does not fall within the HMR priority area it is included within the ADF and there is a adopted SDP for the area. Therefore we would consider Option 2 provides the focus the consultee is asking for.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327852 / 336 Ms. Roberta Cameron Walsingham Planning	Agree	The settlement hierarchy needs to adopt a flexible approach to development in regards to the land that is available. For example it is not sustainable to develop the large area of land at Salterforth (former Silent Night site) as B1, B2 or B8 uses. Although in the main small-scale infill development can be the most sustainable, developing a large brownfield site as residential will extend the settlement and is also a viable and sustainable option which will support the infrastructure of the existing village.	Comments Noted	The Settlement Hierarchy does not attempt to establish uses for individual sites or areas of land; it seeks to determine an order of priority for development of the existing settlements to understand their ability to accommodate further growth. But, all of the proposed options would potentially allow for the development of a brownfield site within the settlement boundary (as per the afore mentioned Silentnight site) subject to the proposed development meeting an identified local need and not harming the regeneration efforts in Nelson, Colne or Brierfield.
328027 / 1103 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	4NW would be reasonably supportive of all three options regarding the settlement hierarchy. However there are elements of each that stand out as the preferred way forward. We would agree with the designation of Nelson and Colne as Key Service Centres, and also Barnoldswick. The designation of Barnoldswick would provide a centre for those based primarily in the West Craven area of the district, negating the need to travel all the way to Nelson and Colne, thereby promoting sustainable shopping patterns. We recognise the acute need for urban regeneration within the district, as outlined within Option 2, and would encourage close partnership with renewal programmes such as Elevate East Lancs. Within this context, there should be the scope to within regional policy to allow for development to meet local needs in the smaller settlements, where this would be sensitive design, meet local needs, enhance their vitality and viability and promote more sustainable shopping patterns (Policy W4 in Secretary of State's Proposed Changes to RSS).	Comments Noted	Comments and support for elements of all 3 options noted. It may be that a hybrid of the proposed options is considered to be taken forward to the next stage.

Issue 1b: Option 1

327797 / 161 Ms. Lorna Metcalfe	Disagree		Comments Noted	
327836 / 1203 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Pendle's housing provision figure in the Secretary of State's Proposed Changes to Regional Spatial Strategy is no longer a maximum. Option 1 is supported. Most development should be directed to the Key Service Centres. This is likely to be the most sustainable option. This option would not preclude development in Local Service Centres and the lower tiers of the settlement hierarchy where there is an identified need.	Comments Noted	National and Regional planning policy would support this option. Prioritising new housing development in the Key Service Centres but not precluding development lower down the settlement hierarchy where there is an identified need.
327449 / 273 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	Provided that by the very nature of edge-of-town development, new developments do not in themselves then become remote from services, particularly through poor public transport provision.	Comments Noted	Issue 1b deals with the strategic location of new housing development but does not specifically look at the types of sites to be developed. Issue 1c looks at the type of land e.g. previously developed, greenfield etc. Directing new housing development to the Key Service Centres may mean that some 'edge-of-town' sites are developed, however this Option is not promoting the expansion of the existing towns. In terms of public transport provision to 'edge-of-town' site, Key Service Centres are the favoured locations for public transport hubs and services are more likely to exist / be feasible to be created for new developments in KSC. Public transport provision to new developments will be a key consideration but this is dealt with more specifically under Issue 11b.
327587 / 540 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327846 / 487 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In accordance with national and regional guidance we would support Option 1 in so far that the focus for new housing development should be in the Key Service Centres of Nelson and Colne where the widest range of services and facilities can be found. This approach would assist in the creation of sustainable communities which would foster sustainable relationships between homes, workplaces and other regularly used services.	Comments Noted	National and Regional guidance does direct new development to Key Service Centres as a priority. It should be noted that the Key Service Centres in Pendle will be determined through the options considered under Issue 1a. Although it is likely that the KSC will include Nelson and Colne they may also include Barnoldswick and Brierfield. The purpose of Option 1 under Issue 1b is to determine whether the KSC are the most appropriate strategic locations for new housing in the Borough.
328001 / 755 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In accordance with national and regional guidance we would support option 1 in so far that the focus for new housing development should be in the Key Service Centres of Nelson and Colne where the widest range of services and facilities can be found. This approach would assist in the creation of sustainable communities which would foster sustainable relationships between homes, workplaces and other regularly used services.	Comments Noted	National and Regional guidance does direct new development to Key Service Centres as a priority. It should be noted that the Key Service Centres in Pendle will be determined through the options considered under Issue 1a. Although it is likely that the KSC will include Nelson and Colne they may also include Barnoldswick and Brierfield. The purpose of Option 1 under Issue 1b is to determine whether the KSC are the most appropriate strategic locations for new housing in the Borough.
327797 / 160 Ms. Lorna Metcalfe	Agree		No Comments	
Issue 1b: Option 2				
327797 / 162 Ms. Lorna Metcalfe	Disagree		Comments Noted	
327449 / 274 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	In principle okay, however, Earby has poor public transport links compared with other village/economic centres. There is also a danger of producing an Earby-Kelbrook settlement if focussed in this way - or even an Earby-Colne corridor.	Comments Noted	This Option would allow for a slightly larger amount of the district's housing requirement to be delivered in Local Service Centres and Rural Service Centres in comparison to Option 1. However, it is not proposing that significant expansion of these settlement should be pursued. New developments will be required to look at the infrastructure provision of the area and the improvement of public transport services may be a consideration. It should be noted that this consultee has agreed to Option 1 under this issue as well as agreeing to this Option (Option 2).
327679 / 663 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327999 / 528 Mr Robert Ingham K & R Ingham	Agree		Comments Noted	
327828 / 948 Mr Steven Broomhead Chief Executive North West Development Agency	Disagree	Appears to advocate a concentration of new housing across all centres in the settlement hierarchy without offering any indication of the relative balance between different settlement types.	Comments Noted	This option would concentrate housing in the Key Service Centres, Local Service Centres and Rural Service Centres. Although perhaps not clear, the intention of this option would be for the amount of housing in these different locations to be proportionate to their size and be in line with the settlement hierarchy proposed under Issue 1a. It would not allow the same amount of housing in a Key Service Centre and in say a Rural Service Centre.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328003 / 788 Ms Nicola Sewell Senior Planner Indigo Planning	Agree	Supports Option 2 which states that new housing development should be located in Key Service Centres, Local Service Centres and Rural Service Centres. Whilst new housing development should be permitted within all three locations, Key Service Centres should be the first priority, followed by Local Service Centres and finally, in Rural Service Centres. The amount of development permitted within these locations should be proportionate to the scale of the centres. PPS3 (paragraph 36) states that houses should be provided in suitable locations and in order to achieve the Government's objectives, policies should ensure that housing is located in close proximity to a range of community facilities with good access to jobs, key services and infrastructure. Key Service Centres provide a wide range of services and facilities and by focussing new housing development in these areas will help to reinforce the existing level of service provision and help to reduce the need for people to travel. Consequently this will again assist in meeting the Central Government's Sustainability objectives.	Comments Noted	This option would direct housing development to those locations that are well served by existing services and facilities. As the consultee explains this option would be supported by PPS3 and the RSS. However, it may not necessarily aid the regeneration of those areas in need or ensure that housing development occurs where it is needed.
327976 / 236 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
Issue 1b: Option 3				
328102 / 611 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327813 / 363 Mr. David Penney	Agree		Comments Noted	
327449 / 275 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	This is the most sustainable option.	Comments Noted	This option would help to regenerate the urban areas of Nelson, Colne and Brierfield by directing new housing development to these locations. However, it would restrict new housing in areas of West Craven such as Barnoldswick.
327797 / 163 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 1b: Option 4				
327449 / 276 Mr. Steve Wormwell Clerk Salterforth Parish Council	Disagree	What is the definition of proven need, is this based on house prices making an area popular, requests from residents or projected population forecasts?	Comments Noted	Planning Policy Statement 3 (Housing) defines housing need as 'the quantity of housing required for households who are unable to access suitable housing without financial assistance.' Whilst it may not have been made clear, for the purposes of this option in the Core Strategy, the Strategic Housing Market Assessment (SHMA) helps to show which wards have a higher or lower level of housing needs (both market and affordable). Therefore proven need is where a certain area can be shown to have unsuitable housing for the type of household living in that area.
328023 / 1014	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE				
327597 / 1143 Mrs. Pam Slater	Agree		Comments Noted	
327733 / 734 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	Housing should be directed to areas where there is proven need. Brierfield is one of the larger settlements within Pendle, and although there is a net surplus of accommodation in Pendle's market sector housing (according to the SHMA), there are 'significant shortages of one and four bedroom homes' (Paragraph 11.37).	Comments Noted	This option would allow smaller settlements to take a proportion of the housing allocation where there is evidence that there is a need for new housing in those areas.
327797 / 164 Ms. Lorna Metcalfe	Disagree		Comments Noted	
327370 / 808 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
Issue 1b: Option 5				
327797 / 165 Ms. Lorna Metcalfe	Disagree		Comments Noted	
327449 / 277 Mr. Steve Wormwell Clerk Salterforth Parish Council	Disagree	On this basis Salterforth would receive the same or higher level of extra housing as Kelbrook, but without facilities. This does not take into account the two-centred spatial pattern of residency in Salterforth, due to half the Parish's population being located away from the village centre, with better links to Barnoldswick than Salterforth.	Disagree	This option looks at providing new housing in all existing settlements across the borough. The amount of new housing in each settlement would be proportionate to the settlement's current size. This option does not provide details about the associated service provision which may or may not be provided with this distribution of new housing. Other issues and options within the Core Strategy would need to ensure the right level of services and associated infrastructure are provided if this option is chosen as the preferred approach.
327828 / 947 Mr Steven Broomhead Chief Executive North West Development Agency	Disagree	Advocates an even distribution across the Borough, does not seem realistic for the following reasons: It appears incompatible with the settlement hierarchy advanced under Option 1a; and the requirement to build at least 65% of new homes on previously developed land target implies a need to focus on the urban areas.	Agree, in part	This option may not be compatible with Option 1 under Issue 1a, however, no decision has been made as to the settlement hierarchy approach which is to be progressed. It is acknowledged that if Option 1 under issue 1a is chosen as the preferred approach then a different approach to housing distribution may need to be employed. With regard to the requirement to build at least 65% of new homes on previously developed land although this type of land is likely to be more concentrated it does not necessarily mean that there is no PDL in the rural settlements. Furthermore this option allows for the provision of new housing in each existing settlement proportionate to the current size of the settlement. Therefore the majority of new housing will be in the larger urban areas.
Issue 1b: Option 6				
327797 / 166	Disagree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Ms. Lorna Metcalfe				
327828 / 946 Mr Steven Broomhead Chief Executive North West Development Agency	Disagree	Essentially advocates a market-led rather than a plan-led approach to new housing provision. We see such an approach as being incompatible with the requirements of PPS3.	Comments Noted	This option would allow the market to decide where new housing should be built. This may mean that a larger proportion of the housing would be provided in more desirable locations however this may not be a sustainable option. This option would not take account of the different housing needs of the population.
327977 / 291 Mr Tim Coyne	Agree		Comments Noted	
327449 / 278 Mr. Steve Wormwell Clerk Salterforth Parish Council	Disagree	This approach is led by profit and not need.	Comments Noted	This option would allow the market to decide where new housing should be built. This may mean that a larger proportion of the housing would be provided in more desirable locations however this may not be a sustainable option. This option would not take account of the different housing needs of the population.

Issue 1b: Option other

327423 / 1316 Mr. David Hardman Local Development Framework Lead United Utilities	No Opinion	It is not for United Utilities to decide where housing should be placed. However, we would comment that the re-use of previously developed land has more potential for the utility infrastructure capacity being present and hence being more sustainable.	Comments Noted	The type of land used for new housing is considered under Issue 1c. However, the location of previously developed land is likely to be in the main urban areas and this could influence how new housing could be distributed across the borough.
327852 / 337 Ms. Roberta Cameron Walsingham Planning	Agree	The Pendle Settlement Hierarchy and Sustainable Rural Settlements Study should consider a mix of development options - based on existing brownfield sites. This could lead to the expansion of Salterforth which will / may allow the expansion of local services.	Comments Noted	The Pendle Sustainable Settlements Study provides information about the availability of sites in each of the rural settlements. This information helps to show the possibilities for the provision of new housing in different locations. It does not specifically consider a mix of development options across the borough. Option 4 would allow for development within villages.
327828 / 949 Mr Steven Broomhead Chief Executive North West Development Agency	No Opinion	Option 3 looks to concentrate new housing development in the Housing Market Renewal Areas of Nelson, Colne and Brierfield in support of the Elevate programme. Clearly, it is essential that the LDF Core Strategy fully supports HMR activity in these areas. However, there is clearly a need to ensure an appropriate balance between provision in these still relatively fragile housing markets and the other parts of the Borough. This would include those parts of the Key Service Centres outside the HMR areas (as per option 1) and in the smaller settlements where this would meet local needs and help support local services (as per option 4). We would therefore advocate an approach to new housing distribution which combines elements of Options 1, 3 and 4.	Comments Noted	This combined approach to the distribution of housing across Pendle will allow the key elements from a number of the options to be brought together to ensure the most sustainable approach and to ensure the needs of the population can be met.
328027 / 1104 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	In terms of the housing options, we would support a mixture of Options 1, 2 and 3. In line with Policy L3 in the emerging RSS, the delivery of new build should be managed with regard to the impact on the existing stock, particularly in the Housing Market Renewal Pathfinder Areas, including Pendle.	Comments Noted	This combined approach would allow key elements from a number of the options to be brought together. However, this combined approach of options 1, 2 and 3 should also consider elements contained in option 4 as it is a requirement to address the housing needs of the population. A combined approach looking in the first instance at a settlement hierarchy and including the housing and regeneration needs of the area should provide a sustainable way forward.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327651 / 1263 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Reducing the need to travel and securing the future of HMRA's is a prime consideration, therefore a combination of Option 1 and 3 is suggested. As regards the provision of housing the important role of reducing vacancy rates and bringing existing housing back into use should be highlighted.	Comments Noted	This combined approach would allow key elements from a number of the options to be brought together. However, this combined approach of options 1 and 3 should also consider elements contained in option 4 as it is a requirement to address the housing needs of the population. The approach to the provision and distribution of new housing will need to take account of the existing stock as highlighted in Policy L3 of the RSS. Careful consideration of the impact of the distribution of new housing on the existing stock will need to be taken when deciding on the policy approach.
Issue 1c: Option 1				
327813 / 364 Mr. David Penney	Agree		Comments Noted	
327797 / 167 Ms. Lorna Metcalfe	Agree		Comments Noted	
327449 / 279 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	This is the only sustainable suggestion. The others undermine the settlement boundary as a policy.	Comments Noted	This option would keep development within the existing settlement boundaries with no possibility of expansion. This option only partly complies to Policy DP4 in the RSS which sets out the following sequential approach: - first, using existing buildings (including conversion) within settlements, and previously developed land within settlements; - second, using other suitable infill opportunities within settlements, where compatible with other RSS policies; - third, the development of other land where this is well located in relation to housing, jobs, other services and infrastructure and which complies with the other principles in policies DP1-9. This third point in the sequential approach could allow development on greenfield sites adjacent to existing settlements provided they met the additional criteria.
327587 / 541 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327852 / 338 Ms. Roberta Cameron Walsingham Planning	Agree		Comments Noted	
328001 / 756 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In terms of the type of land which should be developed for housing Option 1 is that which correctly provides for the direction in order of preference to previously developed land and vacant buildings, within existing settlements, and other land, including greenfield land, within the settlement boundary.	Comments Noted	This option would make the development of previously developed land and buildings the priority. It would keep development within the existing settlement boundaries with no possibility of expansion. This option only partly complies to Policy DP4 in the RSS which sets out the following sequential approach: - first, using existing buildings (including conversion) within settlements, and previously developed land within settlements; - second, using other suitable infill opportunities within settlements, where compatible with other RSS policies; - third, the development of other land where this is well located in relation to housing, jobs, other services and infrastructure and which complies with the other principles in policies DP1-9. This third point in the sequential approach could allow development on greenfield sites adjacent to existing settlements provided they met the additional criteria. The option which is taken forward will need to consider how it will comply with the RSS sequential approach.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327370 / 820 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1144 Mrs. Pam Slater	Agree		Comments Noted	
327651 / 1264 Ms. Judith Nelson Regional Planner English Heritage	Agree	Supported and the conversion of buildings to residential uses has a role to play. It is not clear which former mill sites are referred to and whether or not any buildings remains in these sites. It will be important for any development to be informed by a thorough appraisal of the historic interest of such sites.	Comments Noted	The option is not specifying any particular mill buildings, merely acknowledging that giving priority to the conversion of existing buildings and the development of previously developed land will help to regenerate those redundant and vacant sites. Although this option does not specifically accord with Policy DP4 of the RSS, DP4 does recognise that there are old industrial buildings of historic interest and great character in need of new uses. Any option taken forward under this issue would need to have regard to historic nature of potential development sites in line with Policy DP4.
327846 / 488 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In terms of the type of land which should be developed for housing Option 1 is that which correctly provides for the direction in order of preference to previously developed land and vacant buildings, within existing settlements, and other land within the settlement boundary. In terms of identifying previously developed brownfield land it is important that the Council thoroughly assess the existing supply of employment land and where necessary reallocates land which is more suited to residential development. Such assessments and reallocations are crucial to the Council meeting their strategic housing land requirements, and ensuring the most efficient use of land.	Comments Noted	This option would make the development of previously developed land and buildings the priority. It would keep development within the existing settlement boundaries with no possibility of expansion. This option only partly complies to Policy DP4 in the RSS which sets out the following sequential approach: - first, using existing buildings (including conversion) within settlements, and previously developed land within settlements; - second, using other suitable infill opportunities within settlements, where compatible with other RSS policies; - third, the development of other land where this is well located in relation to housing, jobs, other services and infrastructure and which complies with the other principles in policies DP1-9. This third point in the sequential approach could allow development on greenfield sites adjacent to existing settlements provided they met the additional criteria. The option which is taken forward will need to consider how it will comply with the RSS sequential approach.
327977 / 292 Mr Tim Coyne	Agree		Comments Noted	
Issue 1c: Option 2				
328102 / 612 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327976 / 237 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327797 / 168	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Ms. Lorna Metcalfe				
327836 / 1204 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	I consider that Option 2 best reflects the sequential approach in Policy DP4 of the Secretary of State's Proposed Changes to Regional Spatial Strategy.	Comments Noted	This option would be the option most closely aligned to the sequential approach set out in Policy DP4 of the RSS.
328003 / 789 Ms Nicola Sewell Senior Planner Indigo Planning	Agree	Support option 2 of the CSIO which seeks to direct development to firstly previously developed land and vacant buildings, within settlements; other land within the settlement boundary; and greenfield land outside the settlement limit (urban fringe sites) where there is a proven need. PPS3 states that one of the Government's objective is to provide a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community. In order to achieve this objective there needs to be a wide variety of suitable sites. PPS3 states that previously developed land (PDL) is the preferred option for new housing development, but is permissive of development of greenfield sites where it can be demonstrated that PDL is not available and is well connected by public transport and key facilities. Thereby, the Core Strategy should allow the development of greenfield sites for housing, which are well served and located near to jobs, services and infrastructure.	Comments Noted	This option accords most closely to the sequential approach detailed in Policy DP4 of the RSS. It does potentially allow for the development of greenfield sites outside the existing settlement limits however any proposals intending to pursue this route would need to clearly demonstrate that the site is well located to jobs, services and infrastructure. Sites would normally be adjacent to existing settlement boundaries rather than in the open countryside.
327999 / 529 Mr Robert Ingham K & R Ingham	Agree		Comments Noted	
327679 / 664 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328027 / 1106 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Within section 1c, Option 2 is most closely aligned with DP4.	Comments Noted	This option would be the option most closely aligned to the sequential approach set out in Policy DP4 of the RSS.
Issue 1c: Option 3				
328023 / 1015 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327733 / 735 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	New housing development should be directed to areas where there is an identified need to allow the most suitable sites to be developed.	Comments Noted	This option does not strictly comply with the sequential approach detailed in Policy DP4 of the RSS. It also does not comply with PPS3 which requires that the priority for development should be previously developed land.
Issue 1c: Option other				
327828 / 950 Mr Steven Broomhead Chief Executive North West Development Agency	No Opinion	None of the three options put forward are entirely consistent with the Draft RSS Policy DP4, which sets out a sequential approach to development. This will for part of the Pendle's development plan when RSS is issued in its final form.	Disagree	Option 2 under Issue 1c would accord with, and in essence, follows the sequential approach as detailed in Policy DP4 of the RSS. This otion would promote development on previously developed land and buildings.
Issue 1d: Option 1				
327370 / 821 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327836 / 1205 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 1 is supported. There is a large degree of overlap with Options 2 and 3 in terms of focussing employment sites and jobs in the M65 corridor.	Comments Noted	The Pendle Employment Land Review (Pendle Council, 2008) indicates that with an over-supply of sites in the West Craven area, and the highest levels of demand and regeneration need in the M65 corridor, it is the latter location where new employment land should be focussed. This approach would also accord with RSS Policy RDF1; Spatial Principles, which seeks to focus new development in the Housing Market Renewal (HMR) areas of East Lancashire. In Pendle, these HMR areas are in the towns of Brierfield, Nelson and Colne. It would also be consistent with Action 87 in the Regional Economic Strategy which aims to set HMR within a strong economic context. The Sustainable Settlements Study (Pendle Council, 2008) also suggests that these three settlements are the Key Service Centre's in the south of Pendle, whilst recognising that Barnoldswick serves a similar function in the north of the borough.
327977 / 293 Mr Tim Coyne	Agree	The identified surplus of employment land in West Craven should be used prior to any other areas.	Disagree	It is important to have a supply of employment land readily available to satisfy demand in the West Craven area. It is also equally important to have the majority of employment land available in, or close to, areas of high demand to satisfy the locational requirements of businesses. The ability to direct employment to locations where it can assist wider regeneration initiatives, is also desirebale. The approach suggested by the respondent could potentially put some of these objectives at risk. (1) The available supply of employment land in West Craven would be exhausted earlier than projected, requiring additional employment sites to be identified earlier than anticipated. (2) The employment directed to the area may fail to address the needs of the West Craven. (3) Employment will be directed away from those areas where it is most needed - i.e. fail to meet regeneration needs in other parts of the Borough. (4) Businesses would be directed to a predominantly rural area, with relatively poor transportation links, even though their operations may not be suited to such a location. (5) Following on from (4) potential investment is likely to be lost, limiting

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
				<p>Pendle's chances of securing new inward investment, which is needed to help to diversify and strengthen a local economy that continues to be over-dependent on manufacturing. The Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. This approach would also accord with RSS Policy RDF1; Spatial Principles, which seeks to focus new development in the Housing Market Renewal (HMR) areas of East Lancashire. In Pendle, these HMR areas are in the towns of Brierfield, Nelson and Colne. It would also be consistent with Action 87 in the Regional Economic Strategy which aims to set HMR within a strong economic context. The Sustainable Settlements Study (Pendle Council, 2008) also suggests that these three settlements are the Key Service Centre's in the south of Pendle, whilst recognising that Barnoldswick serves a similar function in the north of the borough.</p>
327813 / 365 Mr. David Penney	Agree		Comments Noted	
Issue 1d: Option 2				
327449 / 280 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	There is no point in creating employment centres which are unsuitable for the needs of firms/employers. However, this needs to be sustainable and not to the detriment of what has attracted an employer to the area in the first place or to the residents and custodians of the area.	Comments Noted	<p>The pendle Employment Land Review (Pendle Council, 2008) identifies the M65 Corridor as the area of Pendle where additional employment land is required. Sites are needed in this location to: (1) Help address the identified shortfall in both Pendle and the M65 Corridor (2) Support regeneration initiatives in the Housing Market Renewal area (3) Address demand from both inward moving and indigenous businesses Focusing new employment in the M65 Corridor would also accord with RSS Policy RDF1; Spatial Principles, which seeks to focus new development in the Housing Market Renewal (HMR) areas of East Lancashire. In Pendle, these HMR areas are in the towns of Brierfield, Nelson and Colne. It would also be consistent with Action 87 in the Regional Economic Strategy which aims to set HMR within a strong economic context. The Sustainable Settlements Study (Pendle Council, 2008) also suggests that these three settlements are the Key Service Centre's in the south of Pendle, whilst recognising that Barnoldswick serves a similar function in the north of the borough.</p>
327828 / 951 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Of the three options put forward, would support option 2. This would distribute employment sites throughout the Borough (with a focus on Nelson, Colne and Brierfield) based on evidence provided by the Council's recent Employment Land Review. This would be consistent with Action 87 in the Regional Economic Strategy which aims to set HMR within a strong economic context.	Comments Noted	<p>The Employment Land Review (Pendle Council, 2008) identifies the M65 Corridor as the area of Pendle where additional employment land is required. Sites are needed in this location to: (1) Help address the identified shortfall in both Pendle and the M65 Corridor (2) Support regeneration initiatives in the Housing Market Renewal area (3) Address demand and meet the needs of both inward moving and indigenous businesses This approach would also accord with RSS Policy RDF1; Spatial Principles, which seeks to focus new development in the Housing Market Renewal (HMR) areas of East Lancashire. In Pendle, these HMR areas are in the towns of Brierfield, Nelson and Colne. It would also be consistent with Action 87 in the Regional Economic Strategy which aims to set HMR within a strong economic context. The Sustainable Settlements Study (Pendle Council, 2008) also suggests that these three settlements are the Key Service Centre's in the south of Pendle, whilst recognising that Barnoldswick serves a similar function in the north of the borough.</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327797 / 169 Ms. Lorna Metcalfe	Agree		Comments Noted	
328102 / 613 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327976 / 238 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327597 / 1145 Mrs. Pam Slater	Agree		Comments Noted	
Issue 1d: Option 3				
327587 / 543 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327679 / 665 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 1d: Option other				
327997 / 515 Mr Peter Vernon Vernon & Co	No Opinion	Following the approach set out in PPS4, we agree with elements of all three options in that sites should be located according to market attractiveness, need, and there should also be emphasis on key service centres in the M65 corridor.	Comments Noted	The Employment Land Review (Pendle Council, 2008) identifies the M65 Corridor as the area of Pendle where additional employment land is required. Sites are needed in this location to: (1) Help address the identified shortfall in both Pendle and the M65 Corridor (2) Support regeneration initiatives in the Housing Market Renewal area (3) Address demand and meet the needs of both inward moving and indigenous businesses This approach would also accord with RSS Policy RDF1; Spatial Principles, which seeks to focus new development on the Housing Market Renewal areas in East Lancashire. In Pendle, these are in the towns of Brierfield, Nelson and Colne. The Sustainable Settlements Study (Pendle Council, 2008) also suggests that these three settlements act as the Key Service Centre's in the south of Pendle, with Barnoldswick having a similar role in the north of the borough.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327651 / 1265 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Option 2 refers to the delivery of regeneration initiatives though this would be the same for option one, no preference is stated at the present time. We will comment further when details of the actual sites are available.	Comments Noted	There is overlap between all three options available. Option 1 would focus new employment development in the M65 corridor, but also allow for provision in and around Barnoldswick. Option 2 would increase the focus on areas of need, which at the present time are in the M65 corridor where: (1) The Pendle Employment Land Review (Pendle Council, 2008) shows that there is an identified shortfall of land (2) The Housing Market Renewal (HMR) programme suggests that regeneration needs are paramount. (3) The demand for land from both indigenous and inward moving businesses is highest (Lancashire Economic Partnership, 2008).

Issue 1e: Option 1

327651 / 1266 Ms. Judith Nelson Regional Planner English Heritage	Agree	English Heritage supports in principle reducing the need to travel and Option 1 proposes a sequential approach. Potential difficulties with land assembly should not be used to dismiss such an approach. The development of Greenfield sites either within or without settlement boundaries should not be prioritised.	Comments Noted	The ELR indicates that the M65 Corridor should be the preferred location for new employment land provision. This would help to address the overall shortfall in both Pendle and the M65 Corridor; support regeneration initiatives in the Housing Market Renewal area and address the locational requirements of the majority of inward moving and indigenous businesses. Over two-thirds of the population lives in the M65 corridor, so there is every likelihood that the need for people to travel to their place of work will be reduced.
327597 / 1146 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 822 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327813 / 366 Mr. David Penney	Agree		Comments Noted	
327449 / 281 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	Provision needs to be accessible and sustainable (economically as well as environmentally).	Comments Noted	Policy 2 in the RSS indicates that strategic employment sites should be located close to the Central Lancashire City Region. However, with a shortfall of 7.125 ha identified in the Pendle Employment Land Review (Pendle Council, 2008) there may be a need to provide a 'locally strategic site'. The ELR indicates that the M65 Corridor should be the preferred location for such a site. This would help to address the overall shortfall in both Pendle and the M65 Corridor; support regeneration initiatives in the Housing Market Renewal area and address the locational requirements of the majority of inward moving and indigenous businesses.
327813 / 367 Mr. David Penney	Agree		Comments Noted	
327679 / 666 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327977 / 294 Mr Tim Coyne	Agree	The fact that assembling large sites may be costly and time consuming should not be a deterrent to doing so. Early investment in this way supports various other strategic objectives in terms of respecting our built heritage and areas of the countryside. These ae supposed to be medium to long term plans so significant decisions should not be made on the basis of 'quickest and cheapest solution'.	Comments Noted	Policy 2 in the RSS indicates that strategic employment sites should be located close to the Central Lancashire City Region. However, with a shortfall of 7.125 ha identified in the Pendle Employment Land Review (Pendle Council, 2008) there may be a need to provide a 'locally strategic site'. The ELR indicates that the M65 Corridor should be the preferred location for such a site. This would help to address the overall shortfall in both Pendle and the M65 Corridor; support regeneration initiatives in the Housing Market Renewal area and address the locational requirements of the majority of inward moving and indigenous businesses.
Issue 1e: Option 2				
327797 / 170 Ms. Lorna Metcalfe	Agree		Comments Noted	
327976 / 239 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
Issue 1e: Option 3				
327587 / 546 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
328102 / 614 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
Issue 1e: Option other				
327836 / 1206 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	I do not think that any of the options fully reflects the guidance in Paragraph 18 of Draft PPS4.	Comments Noted	In short Paragraph 18 of Draft PPS4 'Planning for Sustainable Economic Development' requires local planning authorities to use a wide evidence base to understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. As part of the process of preparing our Core Strategy evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennnine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327997 / 516 Mr Peter Vernon Vernon & Co	No Opinion	We agree with the approach set out in both options 1 and 3. The sequential approach as set out in option 1 if appropriate for office development. There is also a need for urban extensions as set out in option 3 where there is a clear need and near to transport hubs within a sustainable location.	Comments Noted	<p>should ideally be provided in the M65 corridor.</p> <p>The need for an urban extension will be assessed in the preparation of the Core Strategy and Land-use DPDs. Clearly the sequential test indicates that this would be a last resort and as stated in Option 3 only permissible where a suitable need can be demonstrated. Current evidence in the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor, which, has the most extensive transport network.</p>
328027 / 1110 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	With regards to Sections 1d and 1e, In terms of Employment Land provision, we would encourage any strategy taken forward to be supported by a comprehensive employment land assessment and review, set within the context of the regional framework provided for in policies W3 and W4 of emerging RSS.	Comments Noted	<p>RSS Policies W3 'Supply of Employment Land' and W4 'Release of Allocated Employment Land' seek to guide employment provision to sustainable locations that meet both strategic and local needs. Pendle Council undertook a comprehensive assessment of employment land in 2007/2008. The Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. It is intended that the ELR is updated every three years. This approach would also accord with RSS Policy RDF1; Spatial Principles, which seeks to focus new development in the Housing Market Renewal (HMR) areas of East Lancashire. In Pendle, these HMR areas are in the towns of Brierfield, Nelson and Colne. It would also be consistent with Action 87 in the Regional Economic Strategy which aims to set HMR within a strong economic context. The Sustainable Settlements Study (Pendle Council, 2008) also suggests that these three settlements are the Key Service Centre's in the south of Pendle, whilst recognising that Barnoldswick serves a similar function in the north of the borough.</p>
327828 / 952 Mr Steven Broomhead Chief Executive North West Development Agency	No Opinion	The LDF Core Strategy and Land Use Allocations DPD should provide a choice of sites and locations for employment development. This should be guided by RSS Policy DP4 (when finalised and apportioned to district level) and the Council's Employment Land Review.	Comments Noted	<p>RSS Policy DP4 seeks to make the best use of existing resources and infrastructure. The retention of Protected Employment Areas, the redevelopment of brownfield and windfall sites should help to provide a choice of employment sites, in terms of both size and quality, in accessible locations throughout the borough. The use of a sequential test (Option 1) seeks to direct new provision to sustainable locations and limit the need to take-up Greenfield land in urban fringe locations. Current evidence in the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor, which, has the most extensive transport network.</p>

Issue 1f: Option 1

327679 / 667 Ms. Louise Morrissey	Agree		Comments Noted	
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Head of Land and Planning Peel Investments (North) Ltd.				
327797 / 171 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 1f: Option 2				
327813 / 368 Mr. David Penney	Agree		Comments Noted	
327370 / 823 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
Issue 1f: Option 3				
328102 / 615 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327976 / 240 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
Issue 1f: Option 4				
327977 / 295 Mr Tim Coyne	Agree		Comments Noted	
327597 / 1148 Mrs. Pam Slater	Agree		Comments Noted	
Issue 1f: Option other				
327828 / 953 Mr Steven Broomhead Chief Executive North West Development Agency	No Opinion	The LDF Core Strategy and Land Use Allocations DPD should provide a choice of sites and locations for employment development. This should be guided by RSS Policy DP4 (when finalised and apportioned to district level) and the Council's Employment Land Review.	Comments Noted	Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. RSS Policy DP4 seeks to make the best use of existing resources and infrastructure. The retention of Protected Employment Areas, the redevelopment of brownfield and windfall sites should help to provide a choice of employment sites, in terms of both size and quality, in accessible locations throughout the borough. In addition the

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327651 / 1267 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	The need for and provision of strategic sites should be examined as sub regional level. The development of large green field sites is likely to have adverse impacts upon the historic environment; further comments will be made when site details are available.	Comments Noted	<p>use of a sequential test would help to direct new provision to sustainable locations and limit the need to take-up Greenfield land in urban fringe locations. Evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular DP4, RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. The final decision on the size and location of sites in Pendle will be based on the evidence in these and any subsequent documents that address employment land requirements in the north west, together with the findings of the Sustainability Appraisal undertaken for sites put forward during the preparation of both the Core Strategy and Land-use Allocations DPDs.</p> <p>Policies W1, W2 and CLCR2 indicate that strategic sites in East Lancashire should ideally be close to the Central Lancashire City Region. Locally smaller sites should serve the needs of key service centres and local service centres, which will be defined in the Core Strategy. In addition development should seek to underpin regeneration activity in Housing Market Renewal areas. In 2007/2008 Pendle Council undertook a comprehensive assessment of employment land in its area. The Pendle Employment Land Review (Pendle Council, 2008) indicates that the M65 Corridor should be the preferred location for new employment land provision. This would help to address the overall shortfall in both Pendle and the M65 Corridor; support regeneration initiatives in the Housing Market Renewal area and address the locational requirements of the majority of inward moving and indigenous businesses. Over two-thirds of the population lives in the M65 corridor, so there is every likelihood that the need for people to travel to their place of work will be reduced. Any potential impact on the historic environment will be carefully assessed in the Sustainability Appraisal reports which will accompany both the Core Strategy and Land-use Allocations DPDs.</p>
327997 / 517 Mr Peter Vernon Vernon & Co	No Opinion	We support a range of sites for a range of uses i.e B1, B2 and B8 of varying sizes to provide choice and flexibility. One strategic site dedicated to employment use is not appropriate.	Comments Noted	<p>Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. As part of the process of preparing our Core Strategy evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular DP4, RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327587 / 547 Mr. Tony Sowerbutts Managing Director LBS Group	No Opinion	The scarcity of employment land in Pendle requires a mixed approach to ensure suitable sites of various sizes and character are available. The Borough lacks a strategic site and the allocation of one would go some way towards improving the current offer. However this should be supplemented by smaller sites elsewhere to provide a mix of suitable employment sites in line with market demand.	Comments Noted	<p>should ideally be provided in the M65 corridor. The final decision on the size and location of sites in Pendle will be based on the evidence in these and any subsequent documents that address employment land requirements in the north west, together with the findings of the Sustainability Appraisal undertaken for sites put forward during the preparation of both the Core Strategy and Land-use Allocations DPDs.</p> <p>Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. As part of the process of preparing our Core Strategy evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. The final decision on the size and location of sites in Pendle will be based on the evidence in these and any subsequent documents that address employment land requirements in the north west, together with the findings of the Sustainability Appraisal undertaken for sites put forward during the preparation of both the Core Strategy and Land-use Allocations DPDs.</p>
327449 / 282 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	Provision will be dependent on the type of industries being encouraged into Pendle. A more diverse economic base would be more sustainable with sme large sites, some start-up clusters and some professional service /office space provision.	Comments Noted	<p>Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. As part of the process of preparing our Core Strategy evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular DP4, RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor.</p>
328027 / 1111 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	With regards to Sections 1d and 1e, In terms of Employment Land provision, we would encourage any strategy taken forward to be supported by a comprehensive employment land assessment and review, set within the context of the regional framework provided for in policies W3 and W4 of emerging RSS.	Comments Noted	<p>RSS Policies W3 'Supply of Employment Land' and W4 'Release of Allocated Employment Land' seek to guide employment provision to sustainable locations that meet both strategic and local needs. Pendle Council undertook a comprehensive assessment of employment land in 2007/2008. The Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor)</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
<p>327836 / 1207 Mr Mike Kirby Chief Planning Officer Lancashire County Council</p>	No Opinion	I do not think that any of the options fully reflects the guidance in paragraph 24 draft PPS4.	Comments Noted	<p>and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. It is intended that the ELR is updated every three years. Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. Evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular DP4, RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. The final decision on the size and location of sites in Pendle will be based on the evidence in these and any subsequent documents that address employment land requirements in the north west, together with the findings of the Sustainability Appraisal undertaken for sites put forward during the preparation of both the Core Strategy and Land-use Allocations DPDs.</p> <p>In short Paragraph 18 of Draft PPS4 'Planning for Sustainable Economic Development' requires local planning authorities to use a wide evidence base to understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. As part of the process of preparing our Core Strategy evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor.</p>
Issue 1g: Option 1				
<p>327370 / 824 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust</p>	Agree		Comments Noted	
<p>327797 / 172 Ms. Lorna Metcalfe</p>	Agree		Comments Noted	

Issue 1g: Option 2

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327979 / 343 Mrs Sarah Worthington Wm Morrison Supermarkets plc	Agree	Wm Morrison Supermarkets consider that the most appropriate location for new retail provision across Pendle is Option 2. This recognises the important role of Barnoldswick, and acknowledges that it can assist in providing new retail floorspace so that residents within the northern part of the District have easy access to shops and other associated services.	Comments Noted	This option conflicts with the retail hierarchy of the Retail Capacity Study as it elevates Barnoldswick to a town centre role alongside Nelson and Colne. But to ensure sustainable development patterns and access to facilities and services there is a need to ensure adequate access to services in the north of the Borough; this option provides a way of achieving this.
327679 / 668 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327651 / 1268 Ms. Judith Nelson Regional Planner English Heritage	Agree	It is important that the vitality and viability of existing town centres is not undermined by the provision of new retail development. Option 2 also addressed the need to improve the viability of certain places. It also refers to edge of centre sites these would have to be carefully scrutinised in order to understand, avoid or reduce adverse impact upon historic centres.	Comments Noted	This option is consistent with the desire expressed to see retail development directed to existing town centres. The suitability of existing and proposed edge of centre sites will be considered in the Land Use Allocations DPD.
327977 / 296 Mr Tim Coyne	Agree		Comments Noted	
Issue 1g: Option 3				
327836 / 1208 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	The retail hierarchy should reflect the settlement hierarchy. Option 3 is therefore supported.	Comments Noted	Comment is noted that the retail hierarchy and settlement hierarchy should reflect each other. In this light this option would be appropriate if we pursued the dispersal option (Option 3) for the settlement hierarchy.
327813 / 369 Mr. David Penney	Agree		Comments Noted	
327976 / 241 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
328102 / 616 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327597 / 1149 Mrs. Pam Slater	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328023 / 1017 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Issue 1g: Option other

327449 / 283 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	None of these models recognise that the retail pattern on the edge of Colne and Nelson and Brierfield have a stronger attraction than the town centres. It is possible that the retail map of Pendle is out-of-date with the existing provision. The town and village centres provide specialised shopping, but the pull of supermarkets does not automatically bring shoppers into town centres. The retail policy or priorities for Pendle need to identified before a spatial heirarchy can be developed.	Comments Noted	Pendles retail policy will be shaped by National (PPS6) and Regional (RSS) policy which both aim to concentrate development in town centres. The 3 options proposed therefore reflect this whilst allowing differing levels of smaller convenience shopping in more local service centres. There is a role for existing edge of centre sites to play but new development should be concentrated in town centres. Issue 7 looks closer at the retail policies for Pendle and it is correct that this issue will need to be consistent with the policies proposed in regards to those issues.
328015 / 941 Mr James Ellis Planning Officer Craven DC	No Opinion	With regard to question 1g (p.45) consideration should be given to the fact that some Craven residents living close to the Craven / Pendle border may use Barnoldswick and Earby for retail purposes. This could result in reduced journeys to retail premises with benefits from a sustainability point of view.	Comments Noted	Agreed it is important to consider cross-boundary issues which may affect retail provision and capacity. Options 2 or 3 therefore seem most likely to meet the needs of bordering Craven residents as it would provide for opportunities in Barnoldswick.
327817 / 900 Ms Catherine Honeywell Development Planning Partnership (DPP)	No Opinion	When providing a framework for the distribution of new retail provision witin Pendle, it is recommended that a degree of flexibility is needed. We believe Option 3 - Localised provision (p 45) does allow some flexibility as the importance of town centres, local shopping centres and rural service centres is detailed in meeting consumer needs. The keys tests contained within PPS6 should be the guide to the location of retail development with development being permitted where these tests are satisfied.	Comments Noted	Any retail distribution policy will need to be consistent with the requirements of PPS6 but there is a need for Pendle to provide its own framework to guide future development. It is agreed that Option 3 gives the most flexibility for convenience shopping, allowing some small scale local provision, but comparison shopping will still need to be located in the key service centres as per PPS6 and the RSS.
328027 / 1113 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	We could lend support to either option as the Council see fit, or a mixture of different elements from each option. Barnoldswick was recognised as a Key Service Centre within Draft RSS, and so Option 2 would be supported, and there is also the scope to allow development in the smaller settlements following the policy framework outlined above.	Comments Noted	Comments noted that Options 2 and 3 are considered in line with RSS requirements, despite allowing more dispersal of provision than Option 1.

Options for Strategic Objective 2

327813 / 370 Mr. David Penney	Agree	Issue 2a, Option 2; 2b, Option 1;	Comments Noted	
327466 / 727 Mr Andy Pepper Planner (North-West) British Waterways	No Opinion	It is essential that canalside development makes a positive contribution to the waterway environment and that financial contributions are secured in order to mitigate for any additional burden on the canal as a result of increased use of the towpath or the expectations of new residents or occupiers overlooking the canal. British Waterways receives no specific central grant funding to invest in and maintain towpaths. It is therefore crucial to improve the pedestrian networks along the canal corridor by encouraging financial contributions from developers in order to improve towpath surfacing and access improvements and to contribute towards the maintenance of the towpath and waterway. Such developer contributions are essential in order to fully unlock the potential of our waterways as attractive, sustainable and accessible transport routes for walking, jogging and cycling. The whole of the canal towpath within	Comments Noted	It will be important to ensure that the canal tow path is maintained. The tow path could be considered as part of the green infrastructure network within the borough. Developer contributions could be used, where appropriate and relevant to planning, to help with the maintainence of the canal tow path. The issues considered under Strategic Objective 2 are 1) when should we ask for contributions to help maintain existing or provide new infrastructure and 2) how should we determine the level of developer contributions. The canal tow path can be considered as infrastructure.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		Pendle has been resurfaced in stages over approximately the last 5 years. In order to sustain the benefits to the local community it is therefore essential that funding is made available to carry out improved maintenance, weed killing and litter collection on the towpath and the canal itself in the vicinity of new development. Within the next 5 to 10 years some sections of the towpath will need repair and resurfacing work if it experiences increase use, and in addition it is an ongoing priority of British Waterways to improve existing access points onto the towpath and to provide new accesses wherever the opportunity arises.		
327423 / 1317 Mr. David Hardman Local Development Framework Lead United Utilities	Agree	United Utilities supports the statement that infrastructure is vital to ensuring that we help to create sustainable communities across Pendle. The presence of suitable drainage, sewerage, water, gas, electricity and communications are critical for successful development and in particular to its phasing. Pendle Borough Council has involved United Utilities in the formulation of the Local Development Framework including invitations to workshops and we look forward to continued involvement in the process.	Comments Noted	Support for the importance of infrastructure and joint working with the Council. The development of an infrastructure study for Pendle will help to continue the work undertaken together so far.
Issue 2a: Option 1				
327976 / 242 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comment Noted	
327977 / 297 Mr Tim Coyne	Agree		Comment Noted	
327370 / 825 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327733 / 736 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	There should be a balanced approach to seeking developer contributions to provide both physical and social infrastructure. This will ensure it is focussed where it is needed most. All contributions sought must meet the tests of Circular 05/2005: Planning Obligations.	Comments Noted	Option 1 under Issue 2a allows for both physical and social infrastructure to be provided through associated developer contributions. This approach would allow the Council to negotiate with developers to get the most appropriate infrastructure for each area depending on the needs of that area.
327609 / 911 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	It is important that the need for developer contributions for the infrastructure of future community and cultural activities is identified and you may want to broaden this out in the form of a supplementary planning document which should develop detailed policies setting out what achievements are expected from section 106 agreements and address cultural provision. Investing time and resources in such a document will set down clearly what is required of the developer and other funding partners.	Comments Noted	Option 1 under Issue 2a would allow flexibility in terms of the physical or social infrastructure requirements needed in a particular area. Any policy on contributions would need to set out the specific requirements which could be requested from developers by the Council. In terms of cultural provision, contributions would depend on the needs of a particular area. The policy could set out the differing needs in each area e.g. one area may need physical infrastructure more than social infrastructure and visa versa. The elements of physical and social infrastructure could be broken down in to their component parts e.g. under physical infrastructure there may be gas, electric, water etc. Under social infrastructure there may be open space, health, education, culture).

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327651 / 1269 Ms. Judith Nelson Regional Planner English Heritage	Agree	Physical and social infrastructure should include green infrastructure and the enhancement of the historic environment. Option 1 would cover all potential matters.	Comments Noted	Option 1 under Issue 2a would allow flexibility in terms of the physical or social infrastructure requirements needed in a particular area. In terms of hertiage and the historic environment, contributions would depend on the needs of a particular area and they would need to be relevant to planning. The policy could set out the differing needs in each area e.g. one area may need physical infrastructure more than social infrastructure and visa versa. The elements of physical and social infrastructure could be broken down in to their component parts e.g. under physical infrastructure there may be gas, electric, water etc. Under social infrastructure there may be open space, health, education, heritage).
327836 / 1209 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 1 is supported.	Comments Noted	Option 1 under Issue 2a would allow flexibility in terms of the physical or social infrastructure requirements needed in a particular area.
328021 / 992 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree	Developer contribution should be well balanced and appropriate to the specific development. Biodiversity should be the subject of contributions, including the processing of data arising from mitigation and/or compensation measures.	Comments Noted	Option 1 under Issue 2a allows for both physical and social infrastructure to be provided through associated developer contributions. This approach would allow the Council to neogitate with developers to get the most appropriate infrastructure for each area depending on the needs of that area. Contributions for protecting and/or enhancing biodiversity will be dependent on whether there is a specific need on the development site. The contributions sought will need to be relevant to planning. Contributions on biodiversity may be part of an open space contribution.
328023 / 1018 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327679 / 669 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comment Noted	
327597 / 1150 Mrs. Pam Slater	Agree		Comments Noted	
327797 / 173 Ms. Lorna Metcalfe	Agree		Comment Noted	
Issue 2a: Option 2				
327852 / 339 Ms. Roberta Cameron Walsingham Planning	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328102 / 617 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327813 / 371 Mr. David Penney	Agree		Comments Noted	
327529 / 925 North West Planning Natural England	Disagree	The importance of green infrastructure (which has many benefits for recreation, health, biodiversity and amenity, amongst others) should be explicitly recognised. We would therefore not favour option 2 in Issue 2a, since this seems to underplay the importance of green infrastructure and favour utilities and transport to a disproportionate extent. We would favour an option which recognises the need to provide green infrastructure (and enhance it and improve access to it) alongside other community needs.	Comments Noted	Option 2 under Issue 2a would focus developer contributions on providing physical infrastructure as part of new developments. Physical infrastructure would mainly include utilities such as gas, electricity and water along with transport improvements. Green infrastructure could be classified as social infrastructure and therefore would not be specifically targeted for contributions. Option 1 under Issue 2a would provide a better balance between the provision of physical and social infrastructure.
Issue 2a: Option other				
327846 / 490 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	In accordance with Circular 05/2005 'Planning Obligations' contributions from developers should only be sought which are relevant to planning, necessary to the proposed development, fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects. Any approach by the Council to secure contributions should be in accordance with the above.	Comments Noted	The 'what are we already required to do?' section before Issue 2a indicates that if the Council choose to use planning obligations (section 106 agreements) to acquire money for infrastructure improvements they will have to do so in accordance with ODPM Circular 05/2005. Therefore any policy approach in the Core Strategy will have to comply with this circular.
328001 / 757 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	In accordance with Circular 05/2005 'Planning Obligations' contributions from developers should only be sought which are relevant to planning, necessary to the proposed development, fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects. Any approach by the Council to secure contributions should be in accordance with the above.	Comments Noted	The 'what are we already required to do?' section before Issue 2a indicates that if the Council choose to use planning obligations (section 106 agreements) to acquire money for infrastructure improvements they will have to do so in accordance with ODPM Circular 05/2005. Therefore any policy approach in the Core Strategy will have to comply with this circular.
Issue 2b: Option 1				
327813 / 372 Mr. David Penney	Agree		Comments Noted	
328021 / 993 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree		Comments Noted	
328003 / 795 Ms Nicola Sewell Senior Planner Indigo Planning	Agree	Most appropriate option, which states that developer contributions should be agreed on a case by case basis after considering the particular circumstances of each application. Circular 05/2005 sets out in paragraph B3 that planning obligations are: "intended to make acceptable development which would otherwise be unacceptable in planning terms" and they may be used, amongst other matters, "to mitigate a client's impact (e.g. through increased public transport provision)"Paragraph B5 of the Circular states that planning obligations should only be sought where they meet all of the following tests i.e. that a planning obligation must be 1. Relevant to planning 2. Necessary to make the proposed development acceptable in planning terms. 3. Directly	Comments Noted	Option 1 under Issue 2b would provide flexibility in determining the necessity and level of contribution from the developer. The need for contributions would be determined on a site by site basis. Any policy requiring contributions must do so in line with Circular ODPM 05/2005.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		related to the proposed development 4. Fairly and reasonable related in scale and kind to the proposed development 5. Reasonable in all other respects Paragraphs B8 and B9 provide further clarification on the application of these tests. For instance, it is stated (paragraph B8) that "there should be a functional or geographical link between the development and the item being provided as part of the developers contribution". Furthermore, it is stated (paragraph B9) that "planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision or to secure contributions to the achievement of wider planning objectives that are not necessary to allow consent to be given for a particular development". This latter sentence from paragraph B9 of the guidance is of particular relevance to consideration of the approach adopted by the Core Strategy.		
327817 / 902 Ms Catherine Honeywell Development Planning Partnership (DPP)	Agree	In relation to the need for developer contributions to help maintain existing or provide new infrastructure in Pendle (pg 49), to specify the level of contribution in the development plan is to prescriptive, as any necessary contribution will be dependent on the particular project and would need to meet the relevant tests. To implement a policy where certain contributions are compulsory may restrict development.	Comments Noted	Option 1 under Issue 2b would allow for flexibility in determining the need for and level of contributions from a developer. Any policy would need to specify the circumstances when contributions would be required. However, although it may be too prescript to set a specific level for contributions it may be appropriate to give an indication of the range of costs that may be applicable. The policy will also need to comply with ODPM Circular 05/2005.
327597 / 1152 Mrs. Pam Slater	Agree		Comments Noted	
327679 / 670 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327587 / 548 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327976 / 243 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327852 / 340 Ms. Roberta Cameron Walsingham Planning	Agree		Comments Noted	
328030 / 1151 Mr Jon Palmer Senior Planning Executive Yorkshire Forward	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328023 / 1019 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 2b: Option 2				
327797 / 174 Ms. Lorna Metcalfe	Agree		Comments Noted	
327370 / 826 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 618 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327609 / 912 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	We support a policy in the Core Strategy for a general approach to Planning Obligations with appropriate references to strategic sites and clear links to the details set out in a supplementary planning document.	Comments Noted	Option 2 under Issue 2b would require that a standard calculation be applied to developments where contributions were required. This approach would allow less flexibility in negotiating with developers. Any policy in the Core Strategy on contributions would take a general approach and would have to comply with ODPM Circular 05/2005. It is unlikely that a supplementary planning document will be produced to provide specific details on contributions.
Issue 2b: Option other				
327846 / 491 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	The level of developer contributions should be determined on a site by site basis and be in accordance with Circular 05/2005. In such circumstances when a contribution is appropriate the Council should adopt a flexible approach to determine the level of developer contributions. A standard calculation to assist developers would be supported, however, each site should be considered on its own merits and as such the Council should maintain a degree of flexibility in enforcing the standard calculation to ensure that the particular circumstances and the viability of each case is considered for each application.	Comments Noted	Any policy would need to comply with ODPM Circular 05/2005. Option 1 under Issue 2b considers the need for contributions on a site by site basis. Option 2 under Issue 2b looks at applying a standard calculation to developments where contributions are required. A combined approach could allow flexibility in negotiations with developers but also provide some certainty in terms of the range (costs) of contributions that will be required.
327733 / 737 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	In order for applicants to have some comfort in knowing what the level of contribution is likely to be, there should be a calculation. There should be different calculations for different types or scales of development as there should be some flexibility to allow for the varying nature of sites or proposals. This will then allow contributions to be appropriate to the development, and also for the contributions to be utilised in an effective way to deliver physical and social infrastructure where needed. All contributions must meet the test of	Comments Noted	Any policy would need to comply with ODPM Circular 05/2005. Option 1 under Issue 2b considers the need for contributions on a site by site basis. Option 2 under Issue 2b looks at applying a standard calculation to developments where contributions are required. A combined approach could allow flexibility in negotiations with developers but also provide some certainty in terms of the range (costs) of contributions that will be required.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327529 / 926 North West Planning Natural England	No Opinion	Circular 05/2005. In relation to Issue 2b, we favour neither Option 1 nor 2, but consider that there should be a policy framework which sets out the infrastructure needs for which developersâ€™ contributions should be sought, and contains guidance on what is expected. This should include contributions to all forms of green space, footpaths, cycleways and bridleways where appropriate. This policy framework can then be applied site by site, taking account of any special circumstances.	Comments Noted	Any policy would need to comply with ODPM Circular 05/2005. Option 1 under Issue 2b considers the need for contributions on a site by site basis. Option 2 under Issue 2b looks at applying a standard calculation to developments where contributions are required. A combined approach could allow flexibility in negotiations with developers but also provide some certainty in terms of the range (costs) of contributions that will be required. Any policy would need to set out the circumstances in which contributions would be requested. This could include contributions for infrastructure including green spaces, footpaths, cycleways and bridleways as appropriate.
327651 / 1270 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	No preference is expressed.	Comments Noted	It is likely that a combined approach will be considered to allow for flexibility for negotiations to take place but also giving some certainty to developers about approximate costs of contributions.
328001 / 758 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The level of developer contributions should be determined on a site by site basis and be in accordance with Circular 05/2005. In such circumstances when a contribution is appropriate the Council should adopt a flexible approach to determine the level of developer contributions. A standard calculation to assist developers would be supported in principle. However, each site should be considered on its own merits and as such the Council should maintain a degree of flexibility in enforcing the standard calculation to ensure that the particular circumstances and the viability of each case is considered for each application.	Comments Noted	Any policy would need to comply with ODPM Circular 05/2005. Option 1 under Issue 2b considers the need for contributions on a site by site basis. Option 2 under Issue 2b looks at applying a standard calculation to developments where contributions are required. A combined approach could allow flexibility in negotiations with developers but also provide some certainty in terms of the range (costs) of contributions that will be required.
327836 / 1210 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	The selected option depends on what is in the Governmentâ€™s Community Infrastructure Levy proposals and your Councilâ€™s response to it.	Comments Noted	It has not yet been determined as to whether the Council will include the Community Infrastructure Levy in its policies in the Core Strategy. The requirement for contributions will still exist whether the CIL is taken forward or not. Issue 2b is primarily concerned with how the level of contributions should be developed. The options include a site by site basis or a standard calculation approach. It is likely that a combined approach would be the most amicable approach allowing for the flexibility of negotiation on a site by site basis but also applying a calculation to provide some certainty as the likely cost to developers.

Options for Strategic Objective 3

327813 / 373 Mr. David Penney	Agree	Issue 3a, Choice 2 [First], Choice 1[Second]; Issue 3b, Choice 2 [First], Choice 5 [Second], Choice 3 [Third], Choice 4 [Fourth], Choice 6 [Fifth], Choice 1 [Sixth].	Comments Noted	
327529 / 927 North West Planning Natural England	Agree	We very much support policies which promote high quality design, and particularly sustainable design and construction.	Comments Noted	Support for policies which promote high quality design noted. The preferred policy approach in the Core Strategy will take account of these comments.
327620 / 1081 Mr. Paul Daly Planning Manager Sport England North West	Agree	Recognition of the importance of high quality design is welcomed. In the interests of sport and recreation and encouraging a more active population generally, this can be secured through a range of design measures. Sport England have a particular interest in the creation of healthy and liveable neighbourhoods.	Comments Noted	Support for high quality design noted. Issue 3b considers what elements can be used to help improve the quality of the public realm in Pendle. Inclusion of these elements in the preferred policy approach will help to improve the standard of public spaces in the Borough.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327836 / 1254 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Disagree	Conserving, enhancing or restoring landscape character should be a key consideration in determining the appropriate options for Strategic Objective 3. The three options put forward to achieve high standards of design overly focus on buildings, without recognising that new developments create new landscapes. In addition, it should be noted that existing landscape character is not an inhibitor of innovation and creative design.	Agree	Consideration will need to be given to the existing townscape and landscape in developing the Core Strategy design policies.
328027 / 1115 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	We would be very supportive of encouraging the highest standards of design.	Comments Noted	
Issue 3a: Choice 1				
327587 / 549 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
328023 / 1020 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327679 / 671 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327977 / 298 Mr Tim Coyne	Agree		Comments Noted	
327813 / 374 Mr. David Penney	Agree	No 2 Choice	Comments Noted	
327597 / 1153 Mrs. Pam Slater	Agree		Comments Noted	
Issue 3a: Choice 2				
327679 / 672 Ms. Louise Morrissey Head of Land and Planning Peel	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Investments (North) Ltd.				
328023 / 1021 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
328102 / 619 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327797 / 175 Ms. Lorna Metcalfe	Agree	Previous Representation decided upon "Seek high standards of design; encouraging modern, innovative development where appropriate". Option 2 offers the flexibility to achieve the above.	Comments Noted	Choice 2 would allow for innovative designs to come forward. Any policy developed under this issue may combine all three choices to provide a balance between ensuring the integrity of the character of the area but allowing high quality contemporary designs which fulfil specific design criteria to come forward.
327597 / 1154 Mrs. Pam Slater	Agree		Comments Noted	
Issue 3a: Choice 3				
327813 / 375 Mr. David Penney	Agree	Ist Choice	Comments Noted	
327852 / 341 Ms. Roberta Cameron Walsingham Planning	Agree		Comments Noted	
327679 / 673 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328102 / 620 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
328023 / 1022	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE				
Issue 3a: Choice other				
328023 / 1023 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
328001 / 759 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	To ensure high quality inclusive design it is considered that the range of choices put forward within the Issues and Options paper will need to be considered as a whole. The location of the site and the character of the surrounding area will all contribute to the type of design which is appropriate to each location and as such no particular emphasis should be given Borough wide. Guidance within CABE document 'By Design: Urban Design in the Planning System: Towards Better Practice' details that good design is the coherent approach which concerns the connections between people, places, movement and urban form, nature and the built fabric. Policy within the LDF should therefore allow for the appropriate response to the local context.	Comments Noted	The consultation allowed people to choose more than one choice under this issue. This meant that more than one approach could be followed. It is likely that the policy approach under this issue will take forward elements from each choice. It may be necessary to have different design standards in different parts of the Borough. Any approach could allow for both innovative and contemporary design in appropriate areas as well as ensuring the inherent character of other locations is preserved. The emphasis on different design factors in different locations will help to achieve high standards of design in new developments which are appropriate to their surroundings.
327529 / 928 North West Planning Natural England	No Opinion	With regard to the choices for 3a, page 52, all developments should seek to conserve and enhance the character and quality of the landscape, including townscape, and conserve and enhance biodiversity and other elements of the natural environment. Design and construction should also make provision for managing and minimising waste. We therefore favour Choice 1, but we do not agree that this is a choice between development 'in character' (Choice 1) and development which is innovative (Choice 2). Development can respect, conserve and enhance the distinctive character of the landscape or townscape but also be innovative 'and there are fine examples of contemporary architecture in historic landscapes and surroundings, respecting the character of their setting.	Comments Noted	The consultation allowed for more than one choice to be selected under Issue 3a. The purpose of the choices were to see if there was one particular factor that should be emphasised in a design policy approach or whether a number of factors should be incorporated together. Any policy approach is likely to incorporate aspects from all the choices under Issue 3a. It is fully acknowledged that development can respect and enhance the character of an area and also be innovative. The policy approach will allow flexibility for developments to respond to their surroundings but also be respectful of the character of the area. There does not have to be a conflict between innovation and development 'in character'. General and broad design principles should be set out to help guide the design of new developments.
327817 / 904 Ms Catherine Honeywell Development Planning Partnership (DPP)	No Opinion	Advocates the use of high standards of design in new developments, as set out in section 3 of the document (pg 52). However, it is suggested that to emphasis particular factors such as the use of traditional materials or innovative materials is too prescriptive. Applications for new development will need to demonstrate that they provide an appropriate design response to the specific situation of the development, it may be appropriate for this response to be either modern or traditional.	Comments Noted	The design of new developments should be appropriate to their surroundings and any policy approach should be based on this principle. The choices outlined under Issue 3a look at the factors which can help to achieve high standards of design. The policy approach would incorporate these factors and help to direct the design on new developments to have regard to their setting. There may be a case for having different design approaches in different areas. This will be especially important for Conservation Areas. The policy approach should be flexible enough to allow individual developments to respond to their surroundings while also giving some general prescriptive guidance of what is appropriate in the Borough as a whole.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327846 / 492 Ms Katie Fluhner Lambert Smith Hampton	No Opinion	To ensure high quality inclusive design it is considered that the range of choices put forward within the Issues and Options paper will need to be considered as a whole. The location of the site and the character of the surrounding area will all contribute to the type of design which is appropriate to each location and as such no particular emphasis should be given Borough wide. Guidance within CABE document 'By Design: Urban Design in the Planning System: Towards Better Practice' details that good design is the coherent approach which concerns the connections between people, places, movement and urban form, nature and the built fabric. Policy within the LDF should therefore allow for the appropriate response to the local context.	Comments Noted	The consultation allowed people to choose more than one choice under this issue. This meant that more than one approach could be followed. It is likely that the policy approach under this issue will take forward elements from each choice. It may be necessary to have different design standards in different parts of the Borough. Any approach could allow for both innovative and contemporary design in appropriate areas as well as ensuring the inherent character of other locations is preserved. The emphasis on different design factors in different locations will help to achieve high standards of design in new developments which are appropriate to their surroundings.
327651 / 1271 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	The English Heritage CABE publication Building in Context shows how high standards of design can be achieved in historically sensitive contexts. It is entirely wrong to set up choices 1 and 2 in opposition to each other. I recommend that the policy in this area should reflect the approach set out in the above document which highlights the need for an informed character appraisal as a starting point for new development and sets out a number of key considerations for achieving a successful project.	Comments Noted	The consultation under Issue 3a allowed for more than one choice to be chosen. The choices are not seen as being mutually exclusive and the aim of the consultation was to identify whether there was a preference to put emphasis on one of the choices more than another. Any policy approach is likely to incorporate aspects from all the choices. It is fully acknowledged that development can respect and enhance the character of an area and also be innovative. The policy approach will allow flexibility for developments to respond to their surroundings but also be respectful of the character of the area. General and broad design principles should be set out to help guide the design of new developments. It may be appropriate to have different design approaches in different areas, particularly those with a historic significance such as Conservation Areas.
327976 / 244 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Disagree	New development should reflect and interpret the inherent character of the area in which it is located respecting traditional character and local materials of construction.	Comments Noted	Choice 1 under Issue 3a would ensure that appropriate materials are used that are in keeping with the character of the area. This choice would help to ensure new development respects the character of local area and restrict more bold development coming forward. However, it is likely that a combined approach of all three choices will be the preferred choice. Different restrictions could apply in different areas. A combined approach would allow for some high quality, innovative and contemporary designs to come forward in appropriate locations.
327370 / 828 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	No Opinion	The choices outlined should be more ambitious in terms of ensuring an appropriate response to climate change issues in respect of matters such as orientation; minimising energy requirements, water use and waste production; and requiring the use of renewable technologies, including micro-generation. Development should also be expected to be informed by, and thereby reinforce, local distinctiveness - this is more than a matter of materials, issues such as siting, scale, massing and design are relevant and in particular new development needs to respond to the historic environment and ensure that designated features and their wider settings are protected and enhanced.		The choices detailed under Issue 3a look at generic and broad aspects of design. Certain elements such as siting, layout, scale and massing could be incorporated into the policy approach at a general level. However, specific details may be more appropriately contained in the Development Control Principles DPD or a subsequent Design Principles SPD. With regards to incorporating issue of climate change into design, Strategic Objective 4 specifically deals with options to combat climate change and looks at the ways new developments can be constructed to minimise energy usage. It is clear that the design of new developments should include appropriate ways of helping to tackle climate change and these will need to be built into a policy approach either a design policy or a specific climate change policy.
327733 / 738 Mr Saadat Khan Managing Director Comfortable Living Ltd	No Opinion	It should be possible for new development to consider the established character of the area whilst achieving safe and accessible buildings of a new and innovative design. The visual appearance should not be secondary to the usability of buildings if the Council is aiming to achieve high standards of design and in each case should be considered on its own merits.	Comments Noted	The consultation allowed people to choose more than one choice under this issue. This meant that more than one approach could be followed. It is likely that the policy approach under this issue will take forward elements from each choice. It may be necessary to have different design standards in different parts of the Borough. Any approach could allow for both innovative and contemporary design in appropriate areas as well as ensuring the inherent character of other locations is preserved. The emphasis on different design factors in different locations will help to achieve high standards of design in new developments which are appropriate to their surroundings. The preamble to the Strategic Objective on design clearly indicates that good design goes beyond the appearance of a building and its functionality it should also help to create successful

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 3b: Choice 1				places. This statement highlights that new developments should not only be designed to be of a high visual quality and well designed for the proposed use but they should also consider how they fit in with their surroundings. Any policy approach should address appearance, functionality and surroundings - they are all integral to good design and good planning.
328102 / 621 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
328023 / 1024 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327370 / 830 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327679 / 674 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327977 / 299 Mr Tim Coyne	Agree		Comments Noted	
327976 / 245 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 376 Mr. David Penney	Agree	6th Choice	Comments Noted	The consultation under Issue 3b allowed for more than one choice to be selected. The purpose of this approach was to see which aspects of design of the public realm were the most important to people. Any policy approach is likely to incorporate all or a number of the design factors listed under Issue 3b. This consultee considers designing out crime to be the sixth priority in the design of the public realm.
327797 / 177 Ms. Lorna Metcalfe	Agree		Comments Noted	
327797 / 176 Ms. Lorna Metcalfe	Agree		Comments Noted	
327597 / 1155 Mrs. Pam Slater	Agree		Comments Noted	
327797 / 180 Ms. Lorna Metcalfe	Agree	But some flexibility to encouraging modern, innovative development should be an option.	Comments Noted	Modern and innovative design can be key in the battle to cutting crime and antisocial behaviour in public spaces. Any policy approach would seek to encourage innovative design which would help to reduce the opportunity for crime to take place. Modern and innovative design should also respond positively to its setting.
Issue 3b: Choice 2				
327813 / 377 Mr. David Penney	Agree	1st Choice	Comments Noted	The consultation under Issue 3b allowed for more than one choice to be selected. The purpose of this approach was to see which aspects of design of the public realm were the most important to people. Any policy approach is likely to incorporate all or a number of the design factors listed under Issue 3b. This consultee considers that improved connectivity is the most important aspect in the design of the public realm. Movement within and between spaces is important to help improve the sustainability of the area and encourage the use of the Borough's public spaces.
328023 / 1025 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327370 / 831 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327976 / 246 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327797 / 178	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Ms. Lorna Metcalfe				
327679 / 675 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 3b: Choice 3				
328023 / 1026 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327797 / 179 Ms. Lorna Metcalfe	Agree		Comments Noted	
327539 / 323 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	This option would have a positive effect on the quantity and quality of surface water run-off, and could also lead to an enhanced aquatic habitat.	Comments Noted	This choice would have a number of positive environmental impacts. The increased use of planting should be included in any policy approach on the design of the public realm.
327813 / 378 Mr. David Penney	Agree	3rd Choice	Comments Noted	The consultation under Issue 3b allowed for more than one choice to be selected. The purpose of this approach was to see which aspects of design of the public realm were the most important to people. Any policy approach is likely to incorporate all or a number of the design factors listed under Issue 3b. This consultee considers that the increased use of planting to be the third most important aspect in the design of the public realm.
327976 / 247 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327679 / 676 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327370 / 832 Mr. Alan Hubbard Land Use Planning	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Adviser (E Midlands & NW) National Trust				
327423 / 1318 Mr. David Hardman Local Development Framework Lead United Utilities	Agree	The comments in Choice 3 about the use of natural surfaces and planting can reduce surface water run-off flow rates and make a contribution towards overcoming the problems associated with climate change.	Comments Noted	This choice would have a number of positive environmental impacts. The increased use of planting should be included in any policy approach on the design of the public realm.
Issue 3b: Choice 4				
327813 / 379 Mr. David Penney	Agree	4th Choice	Comments Noted	The consultation under Issue 3b allowed for more than one choice to be selected. The purpose of this approach was to see which aspects of design of the public realm were the most important to people. Any policy approach is likely to incorporate all or a number of the design factors listed under Issue 3b. This consultee considers the use of appropriate materials to be the fourth priority in the design of the public realm.
327976 / 248 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
328102 / 622 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327370 / 833 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1156 Mrs. Pam Slater	Agree		Comments Noted	
327679 / 677 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 3b: Choice 5				
327797 / 181 Ms. Lorna Metcalfe	Agree	The community should be consulted about the costs and benefits relating to major public art projects prior to implementation.	Comments Noted	Consultation should be a key part of any public realm redevelopment, including where there is new public art proposed. However, this issue is specifically about which design factors can make a significant contribution to an improved public realm.
327813 / 380 Mr. David Penney	Agree	2nd Choice	Comments Noted	The consultation under Issue 3b allowed for more than one choice to be selected. The purpose of this approach was to see which aspects of design of the public realm were the most important to people. Any policy approach is likely to incorporate all or a number of the design factors listed under Issue 3b. This consultee considers the use of public art to be the second most important aspect in the design of the public realm.
327976 / 249 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327679 / 678 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328102 / 623 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327370 / 834 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328023 / 1027 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Issue 3b: Choice 6

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 381 Mr. David Penney	Agree	5th Choice	Comments Noted	The consultation under Issue 3b allowed for more than one choice to be selected. The purpose of this approach was to see which aspects of design of the public realm were the most important to people. Any policy approach is likely to incorporate all or a number of the design factors listed under Issue 3b. This consultee considers the control of outdoor advertising to be the fifth most important aspect of improving the public realm.
328023 / 1028 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327651 / 1272 Ms. Judith Nelson Regional Planner English Heritage	Agree	All these choices apply and in addition the need for a character appraisal to inform public realm proposals is paramount. The need for durable materials is supported but this must be coupled with sensitive repair and maintenance regimes and a skilled workforce.	Comments Noted	The consultation under Issue 3b allowed consultees to select more than one choice depending on which ones they felt were the most important in addressing the issue. Any policy approach is likely to include all these factors in order to ensure the genuine improvement of the public realm. The additional aspects of the use of durable materials and sensitive repair and maintenance regimes will be considered. These elements may form part of a more broader design policy.
327370 / 835 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327976 / 250 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327679 / 679 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree			
327797 / 182 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 3b: Choice other				
327846 / 493 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	The principle of improving the public realm is supported; however, it is considered that consideration of the full range of choices given would be required to provide such an objective. A coherent approach is one which should be progressed through the LDF to allow the appropriate response to the local context.	Comments Noted	The consultation under Issue 3b allowed consultees to select more than one choice depending on which ones they felt were the most important in addressing the issue. Any policy approach is likely to include all these factors in order to ensure the holistic and genuine improvement of the public realm.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328001 / 760 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The principle of improving the public realm is supported; however, it is considered that consideration of the full range of choices given would be required to provide such an objective. A coherent approach is one which should be progressed through the LDF to allow the appropriate response to the local context.	Comments Noted	The consultation under Issue 3b allowed consultees to select more than one choice depending on which ones they felt were the most important in addressing the issue. Any policy approach is likely to include all these factors in order to ensure the holistic and genuine improvement of the public realm
327733 / 739 Mr Saadat Khan Managing Director Comfortable Living Ltd	No Opinion	The options that would make a significant contribution to an improved public realm should be decided on a site by site basis. It may not be an appropriate location to install public art for example or the use natural surfaces. It could be the case any of the options would improve public realm depedning on the location and the uses present in the area.	Agree, in part	Any policy would aim to ensure a holistic approach to the improvement of the public realm. As such all the choices presented under Issue 3b could be incorporated into the policy. However, it is recognised that each site will have different requirements and the policy should be flexible to allow designs to be responsive and appropriate to each site's surroundings.
327529 / 929 North West Planning Natural England	No Opinion	Turning to Issue 3b, â€Public Realmâ€™™, we favour a combination of Options 3 and 4 which would create and improve green spaces, including natural green space, and also require the use of materials in hard areas which are appropriate to the character of the street or area.	Comments Noted	The consultation under Issue 3b allowed consultees to select more than one choice depending on which ones they felt were the most important in addressing the issue. Any policy is likely to incorporate all the choices under Issue 3b in order to ensure a holistic approach to the improvement of the public realm.

Options for Strategic Objective 4

327813 / 382 Mr. David Penney	Agree	Issue 4a, Option 1; 4b, 2; 4c, 3; 4d, 3; 4e, 1; Issue 4f, Choice 1 [First], 4 [Second], 3 [Third], 2 [Fourth]; Issue 4g, Choice 1 [First], 2 [Fourth], 3 [Third], 4 [Second]	Comments Noted	
327423 / 1319 Mr. David Hardman Local Development Framework Lead United Utilities	No Opinion	Whilst there is no shortage of potable water supply in the North West at the moment, environmental protection legislation, predictions on climate change and an increase in the number of households means that we cannot be complacent. To minimize the impact on the environment, United Utilities would therefore support all new homes being built with high levels of water efficiency in mind. Also, as stated in an earlier comment, the fate of surface water is crucial. Design of development should mimic nature as near as possible by keeping permeable surfaces, SUDS type processes. Relatively clean surface water should not be discharged to foul/combined sewers where it will require pumping and treatment and may cause increased risk of flooding and pollution of the environment along the sewerage network.	Comments Noted	It will be the aim of the preferred option to encourage such higher standards of efficiency in new builds, although the overlap with Building Regulations on energy efficiency will have to be considered to avoid duplication. Policies will also aim to include requirements on permeable drainage/SUDS etc; this will be considered as we develop our preferred options.
328027 / 1117 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Policies L4, EM5, EM15 and EM17 of the Submitted Draft RSS continue the policy approach of Adopted RSS, promoting sustainable water use, sustainable construction, energy efficiency measures, use of renewable energy sources and combined heat and power (CHP). EM17 also requires major developments to incorporate renewable energy production of at least 10% requirements. The NWRA has published the North West Best Practice Design Guide . The document provides broad advice on design issues with more specific guidance on topics such as, Biodiversity, Design and Security, EcoHomes, Energy Efficiency, Use of Renewable Energy, Sustainable Drainage and Modern Methods of Construction. We would be supportive of measures to adapt to and mitigate climate change. In terms of renewable energy, figure 11.2 in Draft RSS outlines the Energy Hierarchy and the framework is provided by policies EM16 and EM17.	Comments Noted	As part of the development plan, the policies of the RSS will be considered in the forming of our preferred options.
327539 / 324 Mr. Philip Carter Planning Liaison Officer Environment Agency	Disagree	In the section "what are we already required to do?", the requirements of PPS25 are not identified, and it is not clear why this is the case.	Comments Noted	The Issues and Options document does not cover the topic of flooding at all, since it was not considered that there were 'options' to do anything but comply with the requirements of PPS25. However, the Core Strategy will include reference to the requirements of PPS25 were felt necessary, in the context that local planning policy is not supposed to repeat national guidance.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327529 / 930 North West Planning Natural England	Agree	We support, of course, development of renewable energy where appropriate to the environment, increased energy efficiency and conservation in new development (and existing development), and more sustainable construction, for example, using a greater proportion of recycled materials and minimising waste.	Comments Noted	
Issue 4a: Option 1				
327539 / 325 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	This represents the most sustainable option, and will ensure all new development makes a contribution to CO2 reduction.	Comments Noted	Agreed that this is the most sustainable option as all development would be required to make a contribution to CO2 reduction. Yet this option is flexible enough to allow for differing degrees of contribution depending on the scale of the development i.e. major application or householder extension. PPS1 Supplement on Climate Change advises that such policies should be viable based on evidence and and such Pendle is commissioning a Renewable Energy Study to identify the potential for developments to incorporate renewable energy technologies; this study will help inform the policies.
327813 / 383 Mr. David Penney	Agree		Comments Noted	
327977 / 300 Mr Tim Coyne	Agree		Comments Noted	
327370 / 836 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1157 Mrs. Pam Slater	Agree		Comments Noted	
328021 / 994 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree	With a particular emphasis on all new developments incorporating solar panels or similar into all developments. However, the possibility of making a contribution (of an equal level) to initiatives aimed at reducing carbon footprint should be included.	Agree in part	PPS1 Supplement advises that local authorities should not be prescriptive in requiring the use of a particular technology and should be flexible on how carbon savings are to be secured. Therefore it is not considered appropriate for a policy to emphasise the use of solar panels over other technologies or energy efficiency savings. The suggestion of accepting contributions to off-site renewable energy or low carbon schemes is noted and will be considered (Option 3).
Issue 4a: Option 2				
327797 / 183 Ms. Lorna Metcalfe	Agree		Comments Noted	
327733 / 740 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	There should be a specified threshold for new developments to incorporate renewable energy technologies to contribute to the reduction of CO2 emissions. It is agreed that it may not be practical or viable for small scheme to install the key technologies in new dwellings.	Comments Noted	As a large percentage of development is householder extensions, not requiring a contribution from such developments will limit the potential for carbon reduction across the Borough. The PPS1 Supplement requires LPAs to set targets and thresholds. As such this approach would be consistent with national policy. Targets have to be evidence based and as such Pendle is comissining a study to look at the potential for renewable energy technologies in new developments. This study will help inform the

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327976 / 251 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	proposed policy and targets.
Issue 4a: Option 3				
327587 / 550 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327679 / 680 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328102 / 624 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
Issue 4a: Option 4				
327846 / 494 Ms Katie Fluhner Lambert Smith Hampton	No Opinion	The principle of building renewable energy technologies into new developments is supported. However, not all developments should be expected to incorporate renewable energy technologies, rather renewable energy requirements should only be required where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily (PPS9). An appropriate threshold for residential developments and non residential developments should be agreed for those sites when provision is viable. Only viable developments beyond the threshold should be expected to contribute. However, the Council should maintain a degree of flexibility and where on site provision is not feasible only in appropriate circumstances should developers be required to make a contribution to initiatives aimed at reducing the areas carbon footprint.	Comments Noted	The advice in PPS22 Renewable Energy (not PPS9 as stated) has been superseded to some extent by that in the Climate Change Supplement to PPS1. This advises that LAs should expect a proportion of the energy supply for new developments to be secured from decentralised and renewable or low carbon energy sources. However, the PPS1 Supplement also states that the requirements should be viable and based on evidence. As such a study will be commissioned to look at the local viability of requiring the use of renewable energy technologies.
327980 / 457 Mr Nick Sandford Regional Policy Officer The Woodland Trust	Disagree	We would like to suggest some items which have been omitted from this section of the strategy. In section 4b Building renewable energy technologies into new development, and in section 4c Stand alone renewable energy schemes. We believe this is particularly beneficial where a supply of timber is available close to the site of energy generation and provided that the wood from which the timber comes is managed sustainably, and certified as such under a recognised scheme such as that of the Forest Stewardship Council. In section 4e Use of construction materials. Referring back to the reference to building ecological networks and corridors in the Vision for Pendle section	Comments Noted	PPS1 Supplement advises that local authorities should not be prescriptive in requiring the use of a particular technology and should be flexible on how carbon savings are to be secured. Therefore it is not considered appropriate for a policy to emphasise the use of wood fuel over other technologies or energy efficiency savings. However, there is uncertainty about the amount of woodland in Pendle that could act as a source of wood fuel. The comment states that wood fuel is most sustainable when available in the vicinity, but acknowledges that there is a shortage of woodland in Pendle. Therefore in deciding whether wood fuel is an

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		(see our comments above), we were disappointed not to find any mention of this in the section of the report on adapting to climate change. Given the small amount and fragmented nature of the ancient woodland in Pendle, we believe that it is important to buffer and extend these and other remaining fragments of semi-natural habitat and to link them to create ecological networks and help make the entire landscape, both urban and rural, more permeable to wildlife. This will give protection to wildlife in the face of external threats such as climate change, for example by enabling species which are able to move through the landscape.		appropriate choice as a low carbon fuel source, will need to be explored further. Pendle is to commission a study on renewable energy and will consider this issue amongst others. Issue 4e addresses materials and explores the options for use of materials from sustainable sources; the use of renewable materials such as wood will be considered here.
328001 / 761 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The principle of building renewable energy technologies into new developments is supported. However, not all developments should be expected to incorporate renewable energy technologies, rather renewable energy requirements should only be required where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily (PPS9). An appropriate threshold for residential developments and non residential developments should be agreed for those sites when provision is viable. Only viable developments beyond the threshold should be expected to contribute. However, the Council should maintain a degree of flexibility and where on site provision is not feasible only in appropriate circumstances should developers be required to make a contribution to initiatives aimed at reducing the carbon footprint of the development.	Comments Noted	The advice in PPS22 Renewable Energy (not PPS9 as stated) has been superseded to some extent by that in the Climate Change Supplement to PPS1. This advises that LAs should expect a proportion of the energy supply of new developments to be secured from decentralised and renewable or low carbon energy sources. However, the PPS1 Supplement also states that the requirements should be viable and based on evidence and as such a study will be commissioned to look at the local viability of requiring the use of renewable energy technologies.
327651 / 1273 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Option 1 is supported however there may be locations, such as historically sensitive sites, where this is not appropriate. Therefore Option 3 would apply as well.	Agree	The Conservation Area Design & Development Guidance SPD already provides some guidance on this matter, and the issue will be considered further when forming the policies for the Core Strategy.
327773 / 1094 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	No Opinion	Option 4a needs to consider the particular needs and requirements of historic structures, sites and their settings.	Agree	The Conservation Area Design & Development Guidance SPD already provides some guidance on this matter, and the issue will be considered further when forming the policies for the Core Strategy.
327836 / 1211 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	A combination of Option 2 and Option 3 would be supported. This would require schemes falling below the thresholds in Option 2 to make a contribution to initiatives aimed at reducing the area's carbon footprint.	Comments Noted	PPS1 Supplement requires LPAs to set targets and thresholds, therefore this approach would be consistent with national policy. But, by not requiring a contribution from all kinds of development the potential reduction in CO2 across the Borough would be reduced. Any thresholds and targets will have to be evidence based. As such Pendle is commissioning a study to look at the potential for setting renewable energy technologies in new developments. This study will help inform the proposed policy and targets.
327836 / 1212 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	A combination of Option 2 and Option 3 would be supported. This would require schemes falling below the thresholds in Option 2 to make a contribution to initiatives aimed at reducing the area's carbon footprint.	Comments Noted	PPS1 Supplement requires LPAs to set targets and thresholds, therefore this approach would be consistent with national policy. But, by not requiring a contribution from all kinds of development the potential reduction in CO2 across the Borough is reduced. Any thresholds and targets have to be evidence based and as such Pendle is commissioning a study to look at the potential for renewable energy technologies in new developments. This study will help inform the proposed policy and targets.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 4a: Option other				
327679 / 681 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328102 / 625 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327976 / 252 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327797 / 184 Ms. Lorna Metcalfe	Agree		Comments Noted	
327370 / 837 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327587 / 551 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
Issue 4b: Option 2				
327651 / 1274 Ms. Judith Nelson Regional Planner English Heritage	Agree	Option 2 is supported though potential adverse impact upon the historic environment would need to be addressed.	Comments Noted	The Conservation Area Design & Development Guidance SPD already provides some guidance on this matter, and the issue will be considered further when forming the policies for the Core Strategy.
327836 / 1213 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 2 is supported.	Comments Noted	Comments noted.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327597 / 1158 Mrs. Pam Slater	Agree		Comments Noted	
327733 / 741 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	Support should be given to the development of renewable energy sources and the incorporation of such sources in developments over a specified threshold.	Comments Noted	The issue of thresholds and targets is discussed in Issue 4a.
327977 / 301 Mr Tim Coyne	Agree		Comments Noted	
327813 / 384 Mr. David Penney	Agree		Comments Noted	
Issue 4b: Option other				
327846 / 495 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	The principle of supporting the development of renewable energy sources within the Borough is supported. However in accordance with PPS9 only where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily.	Comments Noted	The advice in PPS22 Renewable Energy (not PPS9 as stated) has been superseded to some extent by that in the Climate Change Supplement to PPS1. This advises that LAs should expect a proportion of the energy supply of new developments to be secured from decentralised and renewable or low carbon energy sources. However, the PPS1 Supplement also states that the requirements should be viable and based on evidence. As such a study will be commissioned to look at the local viability of requiring the use of renewable energy technologies.
328001 / 762 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The principle of supporting the development of renewable energy sources within the Borough is supported. However in accordance with PPS9 only where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily.	Comments Noted	The advice in PPS22 Renewable Energy (not PPS9 as stated) has been superseded to some extent by that in the Climate Change Supplement to PPS1. This advises that LAs should expect a proportion of the energy supply of new developments to be secured from decentralised and renewable or low carbon energy sources. However, the PPS1 Supplement also states that the requirements should be viable and based on evidence. As such a study will be commissioned to look at the local viability of requiring the use of renewable energy technologies.
327539 / 326 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	This represents the most sustainable option, and will ensure all new development makes a contribution to CO2 reduction.	Comments Noted	Should this comment belisted against Issue 4b Option 2?
Issue 4c: Option 1				
328021 / 995 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	No Opinion	It may be necessary to incorporate all three. It needs to be made clear where certain types of renewables are inappropriate. For example, it has been argued that wind turbines built on deep peat cause the release of nearly as much carbon dioxide as they save. Bogs store large amounts of carbon in their peat and active bogs (through re-wetting) have the capability of locking-up significant quantities of atmospheric carbon dioxide. They are probably one of Lancashire's most affective measures to reduce our carbon footprint.	Comments Noted	The proposed renewable and low carbon energy study will look to provide evidence to the best way for Pendle to meet its renewable energy targets, which may require a policy incorporating elements from the three policy options identified.
328102 / 626 Mr Andrew Leyssens Senior Planner United	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Utilities Property Services				
327828 / 954 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Would favour Option 1. i.e. a criteria based approach against which planning applications can be determined. This would be consistent with PPS22 (paragraph 7).	Agree	The PPS1 Supplement (which supersedes PPS22 in many respects) also supports this approach.
327651 / 1275 Ms. Judith Nelson Regional Planner English Heritage	Agree	Option 1 is supported as this would allow criteria to be developed which would address impacts upon the historic environment.	Comments Noted	Comment noted.
327836 / 1214 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 1 is supported.	Comments Noted	Comment noted.
327370 / 838 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
Issue 4c: Option 2				
327679 / 682 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327733 / 742 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
Issue 4c: Option 2				
327813 / 385 Mr. David Penney	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327976 / 253 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327977 / 302 Mr Tim Coyne	Agree		Comments Noted	
327597 / 1159 Mrs. Pam Slater	Agree		Comments Noted	
327828 / 955 Mr Steven Broomhead Chief Executive North West Development Agency	Disagree	Although the council will need to consider which technologies are likely to be most appropriate to Pendle, we do not consider it appropriate to encourage some technologies in preference to others as this may stifle innovation.	Agree	PPS1 Climate Change Supplement advises that LAs should not be prescriptive over technologies therefore Option 3 would be considered contrary to this national guidance.

Issue 4c: Option other

328001 / 763 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The principle of accommodating stand alone renewable energy schemes in Pendle is supported. In accordance with PPS9 the local planning authorities should not use a sequential approach in the consideration of renewable energy projects (for example by giving priority to the re-use of previously developed land for renewable energy developments). However, in preparing local development documents and in discussions with developers, planning authorities should recognise that some previously developed sites, whilst being unsustainable in terms of other land uses (e.g. a site in a remote location unsuitable for housing) may offer opportunities for developing some forms of renewable energy projects. Many types of renewable energy developments are capable of being accommodated in urban as well as rural areas. The LDF should therefore ensure that criteria included in regional spatial strategies and local development documents is appropriate for, and cover the specific requirements of, both urban and rural areas.	Agree	The comment appears refers to PPS9 (sic) rather than PPS22 Renewable Energy. The Core Strategy should look to develop policies which consider the most appropriate locations for stand along renewable schemes and this may involve brownfield or greenfield, urban or rural sites.
327846 / 496 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	The principle of accommodating stand alone renewable energy schemes in Pendle is supported. In accordance with PPS9 the local planning authorities should not use a sequential approach in the consideration of renewable energy projects (for example by giving priority to the re-use of previously developed land for renewable energy developments). However, in preparing local development documents and in discussions with developers, planning authorities should recognise that some previously developed sites, whilst being unsustainable in terms of other land uses (e.g. a site in a remote location unsuitable for housing) may offer opportunities for developing some forms of renewable energy projects. Many types of renewable energy developments are capable of being accommodated in urban as well as rural areas. Regional planning bodies and local planning authorities should therefore ensure that criteria included in regional spatial strategies and local development documents are appropriate for, and cover the specific requirements of, both urban and rural areas.	Agree	The comment appears refers to PPS9 (sic) rather than PPS22 Renewable Energy. The Core Strategy should look to develop policies which consider the most appropriate locations for stand along renewable schemes and this may involve brownfield or greenfield, urban or rural sites.

Issue 4d: Option 1

327976 / 254	Agree		Comments Noted	
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr Don McKay Bowland AONB Officer Forest of Bowland AONB				
327846 / 498 Ms Katie Fluhrer Lambert Smith Hampton	Agree	The principle of improving energy conservation and efficiency in new housing is supported. The requirement of developers to meet Code for Sustainable Homes standards in advance of 2016 is considered to be overly onerous to developers and would lead to a reduction in investment and reception within the Borough. Until such time as all areas have the same standard in place (2016) Pendle should not seek to impose interim standards and as such Option 1 is supported.	Comments Noted	The Government has since introduced a requirement for all homes to reach CSH Level 3 by 2010, so an interim standard will exist nationally. Any additional targets above this will need to be considered in terms of viability. The Affordable Housing Site Viability Study touches on this issue and the evidence base will be expanded further to consider this issue more fully.
328001 / 764 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	The principle of improving energy conservation and efficiency in new housing is supported. The requirement of developers to meet Code for Sustainable Homes standards in advance of 2016 is considered to be overly onerous to developers and would lead to a reduction in investment and reception within the Borough. Unless such standards are established as obligatory at national or regional level, Pendle should not seek to impose interim standards. As such Option 1 is supported.	Comments Noted	The Government has since introduced a requirement for all homes to reach CSH Level 3 by 2010, so an interim standard will exist nationally. Any additional targets above this will need to be considered in terms of viability. The Affordable Housing Site Viability Study touches on this issue and will be expanded further and the evidence base will be expanded further to consider this issue more fully.
328102 / 627 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327370 / 839 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327797 / 185 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 4d: Option 3				
327539 / 327 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	This approach, requiring phased implementation to attain Sustainable Homes Level 6 Standard by 2016, is considered to be the most reasonable and effective option, as the incremental advances from Level 1 in 2011 to Level 6 in 2016 should make it easier for developers to conform to.	Comments Noted	We will need to assess the impacts on viability of introducing levels of the code before they are mandatory, but agree that this approach would have the greatest impact on reducing CO2 emissions in the immediate future. We would also need to consider the potential impact on developers and whether introducing these additional requirements would potentially discourage developers from developing in Pendle.
327813 / 386 Mr. David Penney	Agree		Comments Noted	
327679 / 683 Ms. Louise Morrissey Head of Land and	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Planning Peel Investments (North) Ltd.				
327733 / 743 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
327597 / 1160 Mrs. Pam Slater	Agree		Comments Noted	
Issue 4d: Option other				
327651 / 1276 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Energy conservation and efficiency is an issue for existing housing. I refer you to our new website www.climatechangeyourhome.org.uk which provides guidance on the impact of climate change on traditional homes and advice on how to improve energy efficiency.	Comments Noted	The comments do not strictly address the option being considered here which is about standards for new homes. There may be a place for the Core Strategy to address the energy efficiency of existing buildings and this will be considered further as we develop the final document.
327836 / 1216 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	The achievement of Level 6 zero carbon by 2016 is supported (as in Options 1 and 3). The interim targets should reflect those in Policy EM17 of the Secretary of State's Proposed Changes to Regional Spatial Strategy.	Comments Noted	These targets (EM15) are what are proposed to be achieved through the tightening of Building Regulations. We need to consider whether there is a need for planning and specifically the Core Strategy to set interim targets in addition to these and if so to ensure consistency between the two.
328027 / 1119 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	Only Option 1 fully accords with Policy EM16. However there should be interim targets of level 3 by 2010 and Level 4 by 2013.	Comments Noted	These targets are what are proposed to be achieved through the tightening of Building Regulations. We need to consider whether there is a need for planning and specifically the Core Strategy to set interim targets in addition to these and if so to ensure consistency between the two.
Issue 4e: Option 1				
328021 / 996 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree		Comments Noted	
327539 / 328 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	This represents the most sustainable option, and will ensure all new development makes a contribution to CO2 reduction.	Comments Noted	
327813 / 387 Mr. David Penney	Agree		Comments Noted	
327370 / 840	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust				
327976 / 255 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
Issue 4e: Option 2				
328102 / 628 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327797 / 186 Ms. Lorna Metcalfe	Agree		Comments Noted	
327733 / 744 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
327597 / 1161 Mrs. Pam Slater	Agree		Comments Noted	
327679 / 684 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 4e: Option 3				
327846 / 499 Ms Katie Fluhrer Lambert Smith Hampton	Agree	No restrictions should be placed on developers in terms of construction materials used in a development. This will assist in ensuring that the opportunities for investment and regeneration of the Key Service Centres are maximised as sought by the LDF.	Disagree	A need to influence the choice of the building materials to be used may be necessary or desirable in certain circumstances. This can help to ensure that new developments are in keeping with their immediate surroundings, or that materials are obtained from sustainable sources (i.e. through accreditations such as the Forest Stewardship Council (FSC)).
327587 / 552 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328001 / 765 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	No restrictions should be placed on developers in terms of construction materials used in a development. This lack of restriction will assist in ensuring that the opportunities for investment and regeneration are maximised.	Disagree	A need to influence the choice of the building materials to be used may be necessary or desirable in certain circumstances. This can help to ensure that new developments are in keeping with their immediate surroundings, or that materials are obtained from sustainable sources (i.e. through accreditations such as the Forest Stewardship Council (FSC)).
327817 / 905 Ms Catherine Honeywell Development Planning Partnership (DPP)	Agree	Would recommend that it would be too prescriptive for the core strategy document to require all/major new developments to use such construction materials. Therefore support Option 3 as this would allow flexibility to developers. Although it is believed developers should be moving towards the use of sustainable construction methods, their required use should be determined on a case by case basis.	Agree	Whilst there may be a need to influence the choice of building materials in certain circumstances (i.e. to help ensure that new developments are in keeping with their immediate surroundings, or that materials are obtained from sustainable sources) there does need to be flexibility for developers, in order to ensure that new development remains viable and, where appropriate, to support innovative developments. Consideration will be given to adopting a criteria based policy, which allows a degree of flexibility in cases where it is not viable to meet stringent targets.
Issue 4e: Option 3				
327651 / 1277 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Demolition waste will be significant part of Pendle's waste arisings. The continued use and adaptive re-use of existing buildings will help alleviate this. The re-use of materials is supported though it will be important for careful control in order not to encourage the robbing of materials from buildings which are capable of repair.	Comments Noted	The comments offer general support for the reuse of materials. However, the issue of theft of materials from historic buildings is outside the control of the LDF process. Development control officers will, however, work closely with owners and the police to help reduce the possibility of such incidents occurring.
327836 / 1215 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	Policy CS2 of the Lancashire Minerals and Waste Development Framework document Managing our Waste and Natural Resources (Submission Draft Core Strategy) addresses the use of recycled and secondary materials in new development. The Pendle Core Strategy could cross reference to this Policy CS2.	Agree	The LMWDF Core Strategy will form part of the statutory Development Plan for Pendle and as such it is a key consideration in developing policies for the Core Strategy. A cross reference to the LMWDF will be included in the final policy.
Issue 4f: Choice 1				
327679 / 685 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327733 / 745 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
328023 / 1030 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328021 / 997 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree		Comments Noted	
327836 / 1217 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
327597 / 1162 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 841 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327587 / 553 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327977 / 303 Mr Tim Coyne	Agree	Alos helps to promote healhtier lifestyle for an increasingly unhealthy local population.	Comments Noted	the links to health and healthy lifestyles are explored further under Issue 9.
327976 / 256 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327813 / 388 Mr. David Penney	Agree	First Choice	Comments Noted	
327797 / 188 Ms. Lorna Metcalfe	Agree		Comments Noted	
327797 / 187 Ms. Lorna Metcalfe	Agree		Comments Noted	
328102 / 629 Mr Andrew Leyssens Senior Planner United	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Utilities Property Services				
Issue 4f: Choice 2				
327733 / 746 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
327836 / 1218 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
327597 / 1163 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 842 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 630 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327679 / 686 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327976 / 257 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327813 / 389	Agree	Second Choice	Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr. David Penney				
Issue 4f: Choice 3				
328023 / 1031 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments noted	
328021 / 998 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree		Comments Noted	
327846 / 500 Ms Katie Fluhrer Lambert Smith Hampton	Agree	The principle of improving the air quality in Pendle is supported. However, only those major developments where there is the potential for an increase in air pollutants should be required to address their impacts on local air quality. The findings of air quality reviews and assessments will be important in the consideration of local air pollution problems, and thus the requirements of developers to address their impact, if any.	Agree, in part	This choice proposes that an air quality assessment is required for developments where there is the potential for an increase in air pollutants; it would not require all developers to do it.
327597 / 1164 Mrs. Pam Slater	Agree		Comments Noted	
327836 / 1219 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
327813 / 390 Mr. David Penney	Agree	Fourth Choice	Comments Noted	
327797 / 189 Ms. Lorna Metcalfe	Agree		Comments Noted	
327370 / 843 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328001 / 766 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	The principle of improving the air quality in Pendle is supported. However, only those major developments where there is the potential for an increase in air pollutants should be required to address their impacts on local air quality. The findings of air quality reviews and assessments will be important in the consideration of local air pollution problems, and thus the requirements of developers to address their impact, if any.	Agree, in part	This choice proposes that an air quality assessment is required for developments where there is the potential for an increase in air pollutants; it would not require all developers to do it.
Issue 4f: Choice 4				
327797 / 191 Ms. Lorna Metcalfe	Agree	For major developments only.	Disagree	It is considered reasonable to require that all developments seek to minimise dust from building works, but that setting out how this is can be achieved/monitored reflects the scale of the development.
327813 / 391 Mr. David Penney	Agree	Fifth Choice	Comments Noted	
327679 / 687 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327370 / 844 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327836 / 1220 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
328021 / 999 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree		Comments Noted	
328023 / 1032 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 4f: Choice 5				
327797 / 190 Ms. Lorna Metcalfe	Agree		Comments Noted	
328023 / 1033 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327836 / 1221 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
327597 / 1165 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 845 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327679 / 688 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327813 / 392 Mr. David Penney	Agree	Third Choice	Comments Noted	
327813 / 393 Mr. David Penney	Agree	Third Choice	Comments Noted	
Issue 4f: Choice other				
327813 / 394 Mr. David Penney	Agree	But with an emphasis on Rail Transport [e.g. Reopening of Colne - Skipton Railway].	Comments Noted	Sustainable Transport is discussed under Issue 11.
Issue 4g: Choice 1				
327679 / 689	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.				
327423 / 1320 Mr. David Hardman Local Development Framework Lead United Utilities	Agree	United Utilities supports the words in Choice 1 about water saving devices and SUDS. However, United Utilities recognises that there is a lot of interest in grey water recycling and/or rainwater harvesting. However, a lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, often use significant amounts of energy (increasing carbon emissions) and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use at present.	Comments Noted	Further work will be done to look into the implications for supporting grey water harvesting as per the advice above.
327597 / 1166 Mrs. Pam Slater	Agree		Comments Noted	
327733 / 747 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree		Comments Noted	
327813 / 395 Mr. David Penney	Agree	Choice 1	Comments Noted	
327539 / 329 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	Choice 1 (on its own or in combination with Choices 2, 3 and/or 4) would contribute to the improved management of watercourses and water resources in Pendle. It will also aid compliance with the requirements of the Water Framework Directive, which come into force within the lifetime of the plan.	Comments Noted	Support noted, for the possible combination of all four choices.
327370 / 846 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327976 / 258 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
Issue 4g: Choice 2				
327679 / 690 Ms. Louise Morrissey	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Head of Land and Planning Peel Investments (North) Ltd.				
328021 / 1000 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree		Comments Noted	
327370 / 847 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328023 / 1034 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327976 / 259 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327813 / 396 Mr. David Penney	Agree	Fourth Choice	Comments Noted	
327539 / 330 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	Choice 2 (on its own or in combination with Choices 1, 3 and/or 4) would contribute to the improved management of watercourses and water resources in Pendle. It will also aid compliance with the requirements of the Water Framework Directive, which come into force within the lifetime of the plan.	Comments Noted	Support noted, for the possible combination of all four choices.
327597 / 1167 Mrs. Pam Slater	Agree		Comments Noted	
Issue 4g: Choice 3				
327370 / 848 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327597 / 1168 Mrs. Pam Slater	Agree		Comments Noted	
328023 / 1035 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327423 / 1321 Mr. David Hardman Local Development Framework Lead United Utilities	Agree	United Utilities supports the words in Choice 3 about reintroduction of natural surfaces into urban areas to reduce the speed of run-off into local watercourses.	Comments Noted	Support noted.
327679 / 691 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327976 / 260 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327539 / 331 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	Choice 3 (on its own or in combination with Choice 1, 2 and/or 4) would contribute to the improved management of watercourses and water resources in Pendle. It will also aid compliance with the requirements of the Water Framework Directive, which come into force within the lifetime of the plan.	Comments Noted	Support noted, for the possible combination of all four choices.
327813 / 397 Mr. David Penney	Agree	Third Choice	Comments Noted	
Issue 4g: Choice 4				
327597 / 1171 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 849 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327679 / 692 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327813 / 398 Mr. David Penney	Agree	Choice 2	Comments Noted	
327423 / 1322 Mr. David Hardman Local Development Framework Lead United Utilities	Agree	United Utilities supports the words in Choice 4 about Drainage Impact Assessments and we are pleased to inform this process in relation to flood risk from our apparatus.	Comments Noted	Further consultation with the respondent may be required to help develop this choice into a detailed planning policy.
328023 / 1036 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327539 / 332 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	Choice 4 (on its own or in combination with Choice 1, 2 and/or 3) would contribute to the improved management of watercourses and water resources in Pendle. It will also aid compliance with the requirements of the Water Framework Directive, which come into force within the lifetime of the plan.	Comments Noted	Support noted, for the possible combination of all four choices.
Issue 4g: Choice other				
327836 / 1222 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	No observations. The Environment Agency should advise on this topic.	Comments Noted	The Environment Agency has been consulted and they have also responded to this consultation. They will be fully engaged in the drawing up of relevant policies for inclusion in the Core Strategy.
328001 / 767 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The management of water resources and watercourse in Pendle is supported. In accordance with the requirements of the Environment Agency and guidance contained within PPS25 developments over 1ha in flood zone 1 and all developments in Zone 2 and 3 should be supported by a Flood Risk Assessment which amongst other criteria should assess the potential for flood risk, show pre and post development calculations and provide a summary of any SUDS to be incorporated which would help to control the quantity and quality of surface water run off from developments.	Comments Noted	Any policy developed would be in line with, but would not repeat, the national guidance and requirements set out in PPS25 on Flood Risk.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327846 / 501 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	The management of water resources and watercourse in Pendle is supported. In accordance with the requirements of the Environment Agency and guidance contained within PPS25 developments over 1ha in flood zone 1 and all developments in Zone 2 and 3 should be supported by a Flood Risk Assessment which amongst other criteria should assess the potential for flood risk, show pre and post development calculations and provide a summary of any SUDS to be incorporated which would help to control the quantity and quality of surface water run off from developments.	Comments Noted	Any policy developed would be in line with, but would not repeat, the national guidance and requirements set out in PPS25 on Flood Risk.

Options for Strategic Objective 5

327813 / 399 Mr. David Penney	Agree	Issue 5a, Option 1; 5b, 1; 5c, 1; 5d, Choice 1 [First], 2 [Fifth], 3 [Second], 4 [Third], 5 [Fourth].		
327993 / 480 Ms Sue Graham Head of Planning and Environment Burnley Borough Council	No Opinion	We have no wish at all to stifle Pendle's ambitions, but believe that care has to be taken to ensure we are not disadvantaging either the Burnley market or indeed those who find it difficult to enter the market. We generally experience the same spatial issues as Pendle particularly as we form just one housing market area, and we share many of your strategic objectives. The objective to deliver quality housing that is both appropriate and affordable, contributing to the creation of a balanced housing market is one that this authority would wholeheartedly endorse. Housing market weakness is an issue that affects both boroughs. Perhaps there should have been more discussion of the fragility of the housing market in the issues and options document and, although the provision of a lasting solution for areas affected by housing market failure is an issue that has already been raised by respondents, there is little acknowledgement of this in the section relating to the creation of a balanced housing market. Consequently, this section focuses on building new houses and housing numbers and tends to underplay what is required in terms of housing market renewal. The balanced housing market approach used in the Strategic Housing Market Assessment should be subject to further discussion between our two authorities and, whilst the Balancing Housing Markets results for Burnley and Pendle individually are of interest, they need to be considered in the context of the housing market as a whole and the need to restructure it. We have worked together jointly on the preparation of the Strategic Housing Market Assessment and would very much welcome the opportunity to work with you using the findings of this assessment to inform future housing policies for both boroughs that will contribute to the creation of a balanced housing market across the whole housing market area.	Comments Noted	The issues considered under Strategic Objective 5 are mainly concerned with the provision of new housing and how we can meet the housing needs of people in the Borough. It is recognised that housing market failure is a key problem in the Borough and that addressing those issues will be important to achieving a balanced housing market. The findings of the joint Burnley and Pendle Strategic Housing Market Assessment are clear in that there is a positive demand for new housing in Pendle. How this is delivered will need to be carefully planned as not to exacerbate the low demand for terraced housing in both Burnley and Pendle. The Area Action Plans being prepared for parts of Nelson and Colne and the SPDs being prepared for Brierfield are providing detailed guidance and policies to help regenerate these areas and restructure the housing market and housing offer. The strategic policies for housing in the Core Strategy will need to support the objectives of the AAPs and SPDs.
327773 / 1091 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	No Opinion	Parts of these issues deal with the redevelopment of brownfield land or the conversion and re-use of existing buildings, e.g. Option 1c. These all need to consider the natural and man-made heritage value of these sites and structures. This is not necessarily a significant hindrance to development or the other aims of the council, but their relative importance needs to be taken into account when reaching decisions. By retaining existing built structures the 'story' that is told of their construction, use and adaptation over time can be retained. In addition the present environmental capital investment in building materials, etc. can be maintained and requirements for waste disposal or demolition material minimised. Where a structure or site of significance is to be affected by development, then these works need to be adequately justified and the landscape, townscape or historic value incorporated in the development proposals by careful design. If permitted then it is likely that some form of recording in advance of development will be required and that a scheme of impact mitigation will be necessary.	Agree, in part	The reuse of buildings and previously developed land for housing development is a key government target in Planning Policy Statement 3. The Regional Spatial Strategy also supports the use of a sequential approach to the type of land to be used for new developments. The natural and man-made heritage value of such buildings will be an important consideration when determining applications. However, it should not restrict the strategic policy approach to reusing existing buildings.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 5a: Option 1				
327597 / 1172 Mrs. Pam Slater	Agree		Comments Noted	
327651 / 1278 Ms. Judith Nelson Regional Planner English Heritage	Agree	RSS housing numbers remain to be finalised, delivering these numbers can be done in such as away as to deliver regeneration objectives, Option 1 is supported.	Comments Noted	The North West of England Plan: Regional Spatial Strategy to 2021 was published on 30th September 2008. The publication of the RSS finalised the housing numbers for Pendle. The overall housing provision in Pendle remains unchanged from the draft RSS at 3,420 dwellings over the plan period. This equates to 190 dwellings per annum. Option 1 under Issue 5a suggests that Pendle should restrict house building to this number of dwellings. Although this strategy may help to focus house building in areas of regeneration it may restrict the number of affordable units which could be provided if the overall housing provision figures was higher. The published RSS requires Local Authorities to manage their housing land supply and explains that the overall housing provision and average annual figures are not absolute targets and can be exceeded where justified. The Burnley and Pendle Strategic Housing Market Assessment provides details of the Balanced Housing Market assessment which indicates that a higher housing provision figure in Pendle could be justified in order to help meet the housing needs of the borough. The housing strategy that is taken forward in the Core Strategy will need to balance the different issues of managing housing land supply and meeting the housing needs of the population.
327977 / 304 Mr Tim Coyne	Agree		Comments Noted	
327813 / 400 Mr. David Penney	Agree	As there are plenty of empty new homes and old ones in need of renovation.	Comments Noted	The RSS sets Pendle an overall housing provision figure of 3,420 dwellings over the plan period. This equates to 190 dwellings per annum. Although restricting house building to these targets may help to bring empty homes back into use it may also limit the amount of new affordable housing that can be provided. The RSS allows for the housing provision figures to be exceeded where justified by evidence. The housing strategy that is taken forward in the Core Strategy will need to balance the issues of managing the housing land supply, providing for the housing needs of the Borough and tackling the problems of empty homes.
327449 / 284 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree		Comments Noted	
Issue 5a: Option 2				
327982 / 454 Mr Malcolm Armstrong GL Hearn	Agree	We support Option 2 (275 dwellings per annum) as it will better assist economic growth and promote and an improved housing market offer.	Comments Noted	The RSS sets Pendle an overall housing provision figure of 3,420 dwellings over the plan period. This equates to 190 dwellings per annum. The RSS allows for these provision figures to be exceeded where justified by evidence. The Burnley and Pendle SHMA indicates that in order to provide a more balanced housing market and ensure the provision of affordable housing a higher annual housing provision figure fo 275 dwellings may be more appropriate. The SHMA indicates that of these 275 dwellings 45% of them should be affordable. The housing strategy that is taken forward in the Core Strategy will need to consider the issues of the provision of both market and affordable housing and the justification of

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327836 / 1223 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	The Secretary of States Proposed Changes to Regional Spatial Strategy are no longer a maximum. As the evidence (SHMA) identifies a higher provision than RSS is required, Option 2 is supported.	Comments Noted	<p>exceeding the RSS housing provision figures.</p> <p>The RSS indicates that the overall and average annual housing provision figures are not absolute targets and may be exceeded where justified. The Burnley and Pendle SHMA indicates that a higher annual house building target may be more appropriate in order to meet the housing needs of the borough. The housing strategy in the Core Strategy will need to consider the impact of using higher housing figures and providing the justification for such an approach.</p>
327370 / 851 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Issue 5a: Option 3

327846 / 502 Ms Katie Fluhner Lambert Smith Hampton	Agree	Housing within Pendle should be delivered in accordance with annual RSS housing targets, with the opportunity for further redevelopment where there is an identified regeneration need such as the key service centre of Nelson.	Comments Noted	<p>The RSS indicates that the overall and annual average housing provision figures are not absolute targets and may be exceeded where justified by evidence. The Burnley and Pendle SHMA indicates that higher housing provision figures may be appropriate in order to meet the housing needs of the Borough. Option 3 under Issue 5a would allow for additional dwellings above the RSS figure but directed to areas of regeneration need. The housing strategy in the Core Strategy will need to consider whether there is an alignment between areas of regeneration need and areas of housing need. Any increase in housing numbers above the RSS targets will need to be justified by evidence of need, demand, affordability and sustainability issues. It is possible that a combination of approaches to housing provision may be required in order to ensure the housing needs of the Borough are met while also ensuring regeneration objectives are met. Links between the housing strategy and the settlement hierarchy will be essential when deciding on the location of new housing development.</p>
328001 / 768 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	It is recognised that housing within Pendle should be delivered in accordance with RSS housing targets. However, it should also be recognised that the annual RSS housing targets are not maximum requirements and, where local circumstances dictate, there may be a case for greater housebuilding above annual requirements. Cases for greater housebuilding would include opportunity for further development in HMRAs and areas where there is an identified regeneration need, such as Colne.	Comments Noted	<p>Policy L4 of the RSS explains that the overall and average annual housing figures are not absolute targets and may be exceeded where justified by evidence. The Burnley and Pendle SHMA indicates that higher housing figures may be appropriate in order to meet the housing needs of the Borough. There may also be scope for increased house building in areas of regeneration particularly the HMR areas in Pendle. The housing strategy in the Core Strategy will need to be linked to the settlement hierarchy approach in terms of the location of new housing development. Furthermore the strategy will need to consider the issues of higher housing figures, the evidence for such an increase and the potential impacts.</p>
327976 / 261 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328027 / 1120 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Option 3 seems most appropriate given that the RSS targets are no longer expressed as maxima. Although the impact of new build on the existing stock needs to be carefully considered as in the response to option 1b.	Comments Noted	The RSS indicates that the overall and average annual housing provision figures are not absolute targets and may be exceed where justified by evidence. Allowing additional house building above the RSS requirement in areas of regeneration will need to be considered carefully. Over provision of new housing in these areas could have a negative impact on the existing housing stock and lead to further problems in these areas. Any additional housing over and above the RSS target will need to be justified by evidence of need, demand, affordability and sustainability issues.
Issue 5a: Option 4				
327797 / 192 Ms. Lorna Metcalfe	Agree		Comments Noted	
328003 / 796 Ms Nicola Sewell Senior Planner Indigo Planning	Agree	Consider Option 4 as the most appropriate option which seeks to deliver housing above the RSS target in order to meet the figure identified in the Pendle Strategic Housing Assessment and consider future development in areas where there is an identified need for regeneration. The emerging North West RSS sets a target for Pendle of 3,420 new homes from 2008 to 2026. This is equivalent to 190 dwellings per annum. However, the Pendle Strategic Housing Market Assessment (May 2008) sets out the need for a total of 4950 by 2026, 275 new homes per annum. The figure set out in the RSS is a guideline and does not represent a ceiling figure. Pendle Borough Council made representations objecting to the Draft RAA housing figures for Pendle stating:"The figure is significantly too low and will harm the economy of the Borough. The under provision of housing in the current Structure Plan has led to a significant impact on the ability of the Council to address problems of decline in its urban areas. The general undersupply of housing land is also having a wider economic impact and is stifling the ability of the Borough to regenerate generally". Clearly, Pendle Council recognise the need to deliver a greater number of houses than the targets set out in the RSS. By increasing the delivery of housing above the RSS target will assist Pendle in achieving the regeneration objectives and address the long term problems with the economy and housing market. Consequently, the Core Strategy should include a figure higher than the indicative figure set out in the RSS.	Comments Noted	The RSS indicates that the overall and average annual housing figures are not absolute targets and may be exceeded if justified by evidence. The Burnley and Pendle SHMA indicates that a higher housing provision figure may be appropriate in order to meet the housing needs of the Borough. The housing strategy in the Core Strategy will need to consider the impacts of any increase in the housing figures particularly in areas of regeneration and on the existing housing stock.
328102 / 632 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327999 / 530 Mr Robert Ingham K & R Ingham	Agree		Comments Noted	
327733 / 748 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	The annual RSS housing targets are not maximum figures and it may be necessary to deliver sufficient housing above the RSS target in order to meet the figure identified in the SHMA. Further development in areas where there is an identified need should be considered in order to provide a balanced market and the type of dwellings in demand. Each case should be assessed on its own merits.	Comments Noted	The RSS indicates that the overall and average annual housing provision figures are not absolute targets and may be exceeded where justified by evidence. The Burnley and Pendle SHMA indicates that a higher housing provision figures may be appropriate in order to meet the housing needs of the Borough. Any increase in the housing figure would need to be justified by evidence of need, demand, affordability and sustainability issues. Option 4 under issue 5a would allow for higher figures based on the affordability issues identified in the SHMA but also allow further

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
				development in areas of regeneration need. The housing strategy in the Core Strategy would need to consider the potential impact of allowing higher housing figures, particularly the impact on the existing housing stock in regeneration areas.
327587 / 555 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327679 / 693 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 5a: Option 4				
327828 / 957 Mr Steven Broomhead Chief Executive North West Development Agency	Disagree	Represents a market-led rather than a plan-led approach and, as such, would not be compatible with RSS or PPS3.	Comments Noted	It is unlikely that this approach would actually help to meet the housing needs of the Borough and would not be in conformity with either the RSS or PPS3. It is therefore unlikely that this option will be progressed as a reasonable alternative.
Issue 5a: Option other				
328023 / 1037 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327828 / 956 Mr Steven Broomhead Chief Executive North West Development Agency	No Opinion	The starting point for all five options put forward is the Draft RSS housing requirement of 3420 new homes in the period 2003 to 2021. We note that this is referred to as a 'target' in the consultation paper. As a general comment we would point out that the Secretary of State's proposed changes to Draft RSS removed the word 'maximum' from the table showing total housing provision within the region. A letter from Baroness Andrews on 'Housing in the North West', which was copied to all local authority Chief Executives, confirms that the RSS housing figures should not be viewed as caps or ceilings. However, the letter also refers to the need to ensure that, in areas such as Pendle, additional housing does not conflict with the Elevate's activities and, ideally, complements or strengthens the pathfinders programme. We would also point out that the draft RSS figure makes no allowance for clearance replacement. The consultation paper does not appear to provide any indication of the likely scale of housing clearance over the LDF period. We would hope to see this matter addressed at the preferred options stage. Subject to making an appropriate allowance for clearance replacement, Option 1 proposed to meet	Comments Noted	The published RSS indicates that the overall and annual average housing figures are not absolute targets and can be exceeded where justified by evidence. The housing strategy that is taken forward in the Core Strategy will need to consider the impact on the existing housing stock and areas of regeneration if a higher housing provision figure is proposed. With regard to clearance and replacement the RSS indicates that the housing provision figures are net of clearance and replacement i.e. they are net dwelling gains over and above the replacement of any dwellings lost through clearance or conversion. In terms of potential clearance in Pendle, although the Area Development Frameworks for Nelson, Colne and Brierfield recommended that clearance could be an option the masterplanning work that has been undertaken so far has proposed only limited amounts of clearance in the priority action areas. Furthermore these master plans have proposed new housing to replace the cleared dwellings. The issue of clearance and replacement will be addressed in the housing policy that is taken forward in the Core Strategy.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		the Draft RSS housing requirement. To varying degrees, options 2, 3 and 4 propose additional levels of provision in excess of the Draft RSS requirement. Options 3 and 4 both advocate higher levels of housebuilding in the HMR areas. Whilst we are not in a position to comment on the merits of the various options proposed, the overall level of provision will need to be managed carefully in order to support, rather than have a detrimental impact on the HMR programme.		
Issue 5b: Option 1				
327976 / 262 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327733 / 749 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	According to the SHMA (paragraph 12.18) it is generally the urban areas that require larger dwellings. It is considered that new housing should specifically deliver the type, size and tenure of housing required in each area rather than disregarding local need.	Agree	The Burnley and Pendle SHMA provides broad guidance on the types, sizes and tenures required in different areas. Issue 5b Option 1 would see the development of a policy that requires new housing to meet the housing needs of the borough as identified in the SHMA. Following this approach will help to create a better mix of housing and more sustainable communities.
327370 / 852 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327813 / 401 Mr. David Penney	Agree		Comments Noted	
327797 / 193 Ms. Lorna Metcalfe	Agree	With a priority weighting for detached properties and bungalows.	Disagree	This consultee supports the proposal that new housing should deliver the type, size and tenure of housing required in each area, but suggests that there should be a priority weighting for detached properties and bungalows. The inclusion of a priority weighting for detached properties and bungalows would not necessarily accord with the findings of the SHMA in terms of helping to provide a balanced housing market and a balanced mix of dwellings in each area.
327597 / 1173 Mrs. Pam Slater	Agree		Comments Noted	
327449 / 285 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	There should also be local planning policy to ensure that the problem of second home ownership and increasing rural house prices does not force people away from their 'home' or workplace, allowing young people to stay within their villages, rather than creating dormitories for the retired. A policy similar to the Lakes has been suggested.	Comments Noted	The housing policy approach in the Core Strategy will need to take account of the needs and requirements of different households. The issue of second homes is not a major consideration in Pendle at the present time.
327828 / 958 Mr Steven Broomhead Chief Executive North	Agree	Of the three options put forward Option 1 would most closely accord with the requirements of PPS3. Under this option the LDF would plan for a mix of new housing, in terms of type, size and tenure, based on the evidence provided by Pendle's Strategic Housing Market Assessment.	Comments Noted	Following the approach in Option 1 under Issue 5b will help to ensure that the right type, size and tenure of housing is provided in the right areas where it is needed. This will help to create a better mix of housing and more sustainable communities.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
West Development Agency				
327836 / 1224 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 1 is supported.	Comments Noted	Support noted.
328023 / 1038 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
328027 / 1122 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Option 1 should be supported as far as possible in line with Policy L4.	Comments Noted	Policy L4 of the RSS indicates that new dwellings should be provided to meet the needs and requirements of different groups. Also to ensure the construction of a mix of appropriate house types, sizes, tenures and prices. Option 1 under Issue 5b would aim to deliver the type, size and tenure of dwelling required in each area in line with the SHMA, therefore generally complying with Policy L4.
Issue 5b: Option 2				
327628 / 1085 Mr Steve Staines Planning Officer Friends, Families and Travellers	Agree	Clearly Option 2 provides the most certainty of provision for Gypsies and Travellers if there is a need and FFFT endorses this option.	Agree	Option 2 under Issue 5b would see the equal distribution of different types of accommodation across the Borough. With specific regards to Gypsies and Travellers this would mean that the number of sites / pitches would be provided equally across Pendle and therefore bring certainty to these communities that provision would be available. However, it would also mean that if there was a larger requirement/need in one part of the Borough than another then there may be a shortage of provision in that area and a surplus in another. Option 1 would take account of the needs of such communities and provide housing to meet those needs.
Issue 5b: Option 3				
327999 / 531 Mr Robert Ingham K & R Ingham	Agree		Comments Noted	
327679 / 694 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327977 / 305	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr Tim Coyne				
327587 / 556 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
328102 / 633 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	

Issue 5b: Option other

328001 / 769 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The need to provide a mix of households, tenure and price across the borough in accordance with PPS3 is generally supported. However, the LDF should recognise that the mix of dwellings provided by the new development on individual sites can be dependent upon a number of factors including local need and market demand. The Core Strategy should therefore avoid overly prescriptive policy which would limit household size, type and tenure on individual sites or in a particular area of the Borough.	Agree, in part	It is important that the policy approach in relation to housing type, size and tenure in the Core Strategy is based on robust and credible evidence. At the Core Stratgey level it is likely that the housing policy will provide broad, general guidance on the housing types, sizes and tenures that are needed in the Borough. It is acknowledged that every site is different and there may be cases where developments cannot provide the housing types, sizes and tenures that are specifically needed in an area. The policy approach should be sufficiently flexible to deal with such cases but also give guidance on the different housing needs of each area in order to help provide a better mix of housing an create more sustainable communities.
327846 / 503 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	The need to provide a mix of households, tenure and price across the borough in accordance with PPS3 is generally supported. However, the LDF should recognise that the mix of dwellings provided by the new development on individual sites can be dependent upon a number of factors including local need and market demand. The Core Strategy should therefore avoid overly prescriptive policy which would limit household size, type and tenure on individual sites or in a particular area of the Borough.	Agree, in part	It is important that the policy approach in relation to housing type, size and tenure in the Core Strategy is based on robust and credible evidence. At the Core Stratgey level it is likely that the housing policy will provide broad, general guidance on the housing types, sizes and tenures that are needed in the Borough. It is acknowledged that every site is different and there may be cases where developments cannot provide the housing types, sizes and tenures that are specifically needed in an area. The policy approach should be sufficiently flexible to deal with such cases but also give guidance on the different housing needs of each area in order to help provide a better mix of housing an create more sustainable communities.

Issue 5c: Option 1

327449 / 286 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	Although there is a large quantity of terraced housing, there is very little suitable for young families.	Comments Noted	Option 1 under Issue 5c considers the amount of affordable housing that should be provided in Pendle. It suggests that a target of 45% should be set across Pendle. It does not specifically consider the type of housing that should be provided. This is considered under Issue 5b. With regard to housing type, the SHMA provides a general indication of the types, sizes and tenures of housing that are required in each area of Pendle. It acknowledges that there are very high proportions of terraced houses in the main urban areas and therefore in terms of new build dwellings care must be taken to ensure that this is not exacerbated. The SHMA considers different types of housing need, looking at family accommodation and housing for the elderly and minority ethnic households. It suggests that providing more housing opportunities across the area would help to improve the mix of households. The housing policy approach in the Core Strategy will need to take account of the different housing needs of the population.
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 402 Mr. David Penney	Agree		Comments Noted	
327976 / 263 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
Issue 5c: Option 3				
327982 / 455 Mr Malcolm Armstrong GL Hearn	Agree	We support Option 3 (affordable housing at less than 30 per cent) to ensure appropriate delivery of both market and affordable housing.	Comments Noted	Planning Policy Statement 3: Housing requires that when setting an overall (plan-wide) affordable housing target, this should reflect the likely economic viability of land for housing within the area. The draft Burnley and Pendle Affordable Housing Site Viability Assessment indicates that the majority of sites within the Housing Market Areas are currently viable for housing development. The recommendation is for an aspirational target to be set for the borough along with a flexible target depending on the viability of specific areas at specific times in the economic cycle.
327999 / 532 Mr Robert Ingham K & R Ingham	Agree		Comments Noted	
327797 / 194 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 5c: Option 4				
327679 / 695 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327587 / 558 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327836 / 1225 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 4 is supported. This should, when aggregated to Borough level, broadly coincide with the SHMA (see Annex C, PPS3).	Comments Noted	Planning Policy Statement 3: Housing requires that when setting an overall (plan-wide) affordable housing target, this should reflect the likely economic viability of land for housing within the area. The draft Burnley and Pendle Affordable Housing Site Viability Assessment indicates that the majority of sites within the Housing Market Areas are currently viable for housing development. The recommendation is for an aspirational target to be set for the borough along with a flexible target depending on the viability of specific areas at specific times in the economic cycle. It is likely that the aspirational target will be set at 45% as set out in the SHMA. The flexible target may be much lower than this depending on viability at a particular point in time.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327597 / 1174 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 853 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 634 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327733 / 750 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	It is considered affordable housing requirements should be based on an assessment of local needs and viability. This would then ensure an appropriate level was provided. The threshold of 15 dwellings (PPS3) or more is considered appropriate for affordable housing policy.	Comments Noted	Planning Policy Statement 3: Housing requires that when setting an overall (plan-wide) affordable housing target, this should reflect the likely economic viability of land for housing within the area. The draft Burnley and Pendle Affordable Housing Site Viability Assessment indicates that the majority of sites within the Housing Market Areas are currently viable for housing development. The recommendation is for an aspirational target to be set for the borough along with a flexible target depending on the viability of specific areas at specific times in the economic cycle.
328023 / 1039 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Issue 5c: Option other

327846 / 504 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	Whilst the provision of affordable housing should be informed by evidence including the SHLAA, the Core Strategy should recognise that an unrealistic affordable housing target may reduce the attractiveness of the borough as a place to build. An appropriate balance should therefore be struck to achieve the delivery of both market and affordable housing.	Agree	Planning Policy Statement 3: Housing requires that when setting an overall (plan-wide) affordable housing target, this should reflect the likely economic viability of land for housing within the area. The draft Burnley and Pendle Affordable Housing Site Viability Assessment indicates that the majority of sites within the Housing Market Areas are currently viable for housing development. The recommendation is for an aspirational target to be set for the borough along with a flexible target depending on the viability of specific areas at specific times in the economic cycle. The aspirational target is likely to reflect the 45% target set out in the SHMA. The flexible target will help to ensure that the requested percentage will be viable and also ensure that a balance between market and affordable housing can be achieved. This balance will change as the flexible target changes to reflect particular economic circumstances.
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328001 / 770 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	Whilst the provision of affordable housing should be informed by evidence including the SHLAA, the Core Strategy should recognise that an unrealistic affordable housing target may reduce the attractiveness of the borough as a place to build. An appropriate balance should therefore be struck to achieve the delivery of both market and affordable housing.	Agree	Planning Policy Statement 3: Housing requires that when setting an overall (plan-wide) affordable housing target, this should reflect the likely economic viability of land for housing within the area. The draft Burnley and Pendle Affordable Housing Site Viability Assessment indicates that the majority of sites within the Housing Market Areas are currently viable for housing development. The recommendation is for an aspirational target to be set for the borough along with a flexible target depending on the viability of specific areas at specific times in the economic cycle. The aspirational target is likely to reflect the 45% target set out in the SHMA. The flexible target will help to ensure that the requested percentage will be viable and also ensure that a balance between market and affordable housing can be achieved. This balance will change as the flexible target changes to reflect particular economic circumstances.
328027 / 1123 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	We are not in a position to give a view at this stage given that we don't yet have affordable housing targets.	Comments Noted	Planning Policy Statement 3: Housing requires that Local Planning Authorities set an overall, plan-wide target for affordable housing in their Local Development Documents (in this case the Core Strategy). This should be supported by evidence from Strategic Housing Market Assessments and reflect the likely economic viability of land for housing in the area. The draft Burnley and Pendle Affordable Housing Site Viability Assessment indicates that the majority of sites within the Housing Market Areas are currently viable for housing development. The recommendation is for an aspirational target to be set for the borough along with a flexible target depending on the viability of specific areas at specific times in the economic cycle. The aspirational target is likely to reflect the 45% target set out in the SHMA. The flexible target will help to ensure that the requested percentage will be viable and also ensure that a balance between market and affordable housing can be achieved. This balance will change as the flexible target changes to reflect particular economic circumstances.
Issue 5d: Choice 1				
328023 / 1040 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327797 / 195 Ms. Lorna Metcalfe	Agree		Comments Noted	
327813 / 403 Mr. David Penney	Agree	First Choice	Comments Noted	
327976 / 264 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327651 / 1279 Ms. Judith Nelson Regional Planner English Heritage	Agree	Choice 1 is supported; affordable housing should be tenure and design blind.	Comments Noted	Choice 1 would aim to ensure the provision of affordable housing on-site. It would be in line with Policy L5 which suggests that Local Authorities consider seeking a proportion of affordable housing on all development sites which are above the relevant thresholds. The provision of affordable housing on-site will help to create mixed and sustainable communities and allow the provision of affordable housing to be design and tenure blind.
Issue 5d: Choice 2				
328023 / 1041 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327813 / 404 Mr. David Penney	Agree	Fifth Choice	Comments Noted	
Issue 5d: Choice 3				
328102 / 635 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327846 / 505 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In terms of delivery of affordable housing the Council should create a flexible policy which in some instances will encourage the delivery of affordable housing on site, but, where this is not appropriate, will seek contributions from the developer in accordance with PPS3. However regard should be had to the particular costs affecting development. The LDF should therefore make provision for lower levels of affordable housing contribution where particular costs may constrain development, such as contaminated land or where other abnormal costs are encountered. In accordance with the emerging RSS, the Council should consider the release of publicly owned land to provide affordable housing.	Comments Noted	Policy L5 of the RSS suggests that Local Authorities should consider seeking a proportion of affordable housing on all development sites which are above the relevant thresholds.
327449 / 287 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	Needs change very quickly, especially with economic trends, so there needs to be some flexibility. Needs also vary spatially.	Comments Noted	It is likely that there will be cases/scenarios where the provision of affordable housing on-site is not possible. In such circumstances it could be more appropriate to require developers to provide a contribution to allow the Council to provide affordable housing elsewhere. The SHMA provides a general indication of the areas where there is a greater need for affordable housing, this should be used as evidence to show where affordable housing should be targeted. Choice 3 would allow the Council to require on-site provision in the first instance but also allow for contributions where on-site provision is not feasible.
327813 / 405 Mr. David Penney	Agree	Second Choice	Comments Noted	
327587 / 559	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr. Tony Sowerbutts Managing Director LBS Group				
327679 / 696 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327733 / 751 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	This choice is a compromised position as it allows flexibility in whether affordable housing is provided on site or whether a contribution is made towards affordable homes off site.	Disagree	This choice would encourage the provision of affordable housing on-site but acknowledges that this is not always possible. The choice therefore allows contributions to be made to the Council so that affordable housing can be provided elsewhere.
328027 / 1124 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Choice 3, but with an emphasis on on-site delivery to accord with the Government's affordable housing policy statement.	Comments Noted	Choice 3 encourages the provision of affordable housing on-site in the first instance. This is in support of PPS3 in terms of helping to create mixed communities. However, this choice recognises that in some circumstances in may not be possible to provide the affordable housing on-site. In these situations the policy would require a financial contribution to be made to the Council in order for off-site affordable housing to be provided. Developers pursuing this approach would need to suitably demonstrate why the affordable housing could not be provided on site. This choice provides a flexible policy approach to the provision of affordable housing.
327999 / 533 Mr Robert Ingham K & R Ingham	Agree		Comments Noted	
327370 / 854 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1175 Mrs. Pam Slater	Agree		Comments Noted	
327628 / 1086 Mr Steve Staines Planning Officer Friends, Families and Travellers	Agree	As a proportion of Gypsy and Traveller accommodation where owned and or run by a Registered Social Landlord is a form of affordable housing then Choice 3 seems the most appropriate giving most flexibility.	Comments Noted	Gypsy and Traveller pitches/sites would not be provided through contributions as part of affordable housing provision. Specific sites will be allocated in the Land-use Allocations DPD for Gypsies and Travellers.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327828 / 960 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Option 3 would most closely accord with PPS3 (paragraph 29) which establishes a presumption that affordable housing will be provided on-site in order to contribute towards a mix of housing. It does, however, recognise that off-site provision or a financial contribution in lieu of on-site provision may be acceptable where such an approach can be robustly justified.	Comments Noted	Choice 3 encourages the provision of affordable housing on-site in the first instance. This is in support of PPS3 in terms of helping to create mixed communities. However, this choice recognises that in some circumstances it may not be possible to provide the affordable housing on-site. In these situations the policy would require a financial contribution to be made to the Council in order for off-site affordable housing to be provided. Developers pursuing this approach would need to suitably demonstrate why the affordable housing could not be provided on site.
327836 / 1226 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Choice 3 is supported provided it conforms to paragraph 29 (5th indent) of PPS3.	Comments Noted	Choice 3 encourages the provision of affordable housing on-site in the first instance. This is in support of PPS3 in terms of helping to create mixed communities. However, this choice recognises that in some circumstances it may not be possible to provide the affordable housing on-site. In these situations the policy would require a financial contribution to be made to the Council in order for off-site affordable housing to be provided. Developers pursuing this approach would need to suitably demonstrate why the affordable housing could not be provided on site. This choice provides a flexible policy approach to the provision of affordable housing.
328003 / 797 Ms Nicola Sewell Senior Planner Indigo Planning	Agree	Support Choice 3 which seeks to create a flexible policy in relation to affordable housing, in some instances it will encourage the delivery of affordable housing on site, and where this is not appropriate, will seek contributions from the developer off site. The threshold for delivering affordable housing should be consistent with PPS3 and therefore the threshold should be established at at 15 dwellings to allow contributions of affordable housing both on and off site. This is the most appropriate option in order to provide greater flexibility within the planning system.	Comments Noted	Choice will encourage the provision of affordable housing on-site in the first instance but will allow for contributions to be made for off-site provision in those circumstances where on-site provision is not possible. With regard the threshold for requiring affordable housing, PPS3 indicates that the national indicative minimum site size threshold is 15. However, it points out that Local Planning Authorities can set lower minimum thresholds where viable and practicable. Any lower threshold would need to be supported and justified by appropriate evidence.
328001 / 771 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In terms of delivery of affordable housing the Council should create a flexible policy which in some instances will encourage the delivery of affordable housing on site, but, where this is not appropriate, will seek contributions from the developer in accordance with PPS3. However regard should be had to the particular costs affecting development. The LDF should therefore make provision for lower levels of affordable housing contribution where particular costs may constrain development, or where other abnormal costs are encountered. In accordance with the emerging RSS, the Council should consider the release of publicly owned land to provide affordable housing.	Comments Noted	Choice 3 would provide a flexible policy where on-site affordable housing would be encouraged in the first instance but allow for contributions to be made for off-site provision in those circumstances where provision on-site is not feasible. The affordable housing policies will need to take account of the viability of providing affordable housing. The policies may allow for a reduced affordable housing provision rate where it can be demonstrated that it is not financially viable to provide the required levels of affordable housing (either on-site or off-site). The allocation of land for housing will come forward through the Land-use Allocations DPD. The consideration of Council owned land will be dealt with through that process.

Issue 5d: Choice 4

327813 / 406 Mr. David Penney	Agree	Third Choice	Comments Noted
327836 / 1227 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted
327370 / 855 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 5d: Choice 4				
327449 / 288 Mr. Steve Wormwell Clerk Salterforth Parish Council	Agree	There is has been identified earlier.	Comments Noted	The consultee has made representation on Choice 3 where this issue is covered.
327370 / 856 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1176 Mrs. Pam Slater	Agree		Comments Noted	
327828 / 962 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Option 5 relates to the identifcation of rural exception sites. This is a specific issue in its own right and should not be seen as an alternative to the other options put forward here.	Comments Noted	The consultation indicates that where choices are presented under each issue then more than one of these can be selected. Therefore we are not suggesting that the identification of rural exception sites is an alternative to the provision of affordable housing elsewhere in the Borough. It is likely that the preferred approach will incorporate a number of the choices presented under this issue.
327836 / 1228 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
328027 / 1125 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	We would also support Choice 5 where it is appropriate in accordance with Policy L6.	Comments Noted	Policy L5 in the RSS deals with the provision of affordable housing. It suggests that local authorities should consider the allocation of rural exceptions site for 100% affordable housing where this is necessary. We will therefore consider the needs of the rural communities when deciding whether to allocate a specific rural site for affordable housing.
327813 / 407 Mr. David Penney	Agree	Fourth Choice	Comments Noted	
Issue 5d: Choice other				
328023 / 1042 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Options for Strategic Objective 6				
328021 / 1004 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	No Opinion	Locations need to be guided by a thorough 'green infrastructure' study.	Comments Noted	The Lancashire Green Infrastructure - the draft is due to be published for public consultation in March 2009 - will form an integral part of the evidence base for the Core Strategy and be included in the new Pendle Biodiversity Audit.
327773 / 1092 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	Agree	Parts of these issues deal with the redevelopment of brownfield land or the conversion and re-use of existing buildings, e.g. option 1c. These all need to consider the natural and man-made heritage value of these sites and structures. This is not necessarily a significant hindrance to development or the other aims of the council, but their relative importance needs to be taken into account when reaching decisions. By retaining existing built structures the "story" that is told of their construction, use and adaptation over time can be retained. In addition the present environmental capital investment in building materials, etc, can be maintained and requirements for waste disposal or demolition material minimised. Where a structure or site of significance is to be affected by development, then these works need to be adequately justified and the landscape, townscape or historic value incorporated in the development proposals by careful design. If permitted then it is likely that some form of recording in advance of development will be required and that a scheme of impact mitigation will be necessary.	Comments Noted	The re-use of vacant buildings and previously developed land (PDL) is a key government target, particularly for new housing (PPS3). The Regional Spatial Strategy also supports the use of a sequential approach to identify the most suitable type of land for new development. Again this prioritises the use of vacant premises and PDL within settlements boundaries as these make the best use of existing infrastructure and in most instances offer the most sustainable solution. The best landscapes and townscapes in Pendle have been designated as Conservation Areas. The Conservation Area Design and Development Guidance SPD, adopted as recently as August 2008, requires new development in each of the 26 Conservation Areas in pendle to be of a high quality and sympathetic in design to its immediate surroundings. Elsewhere both the natural and man-made heritage value of the locality will be an important consideration in the determination of planning applications. However, it should not be allowed to restrict the strategic approach of re-using existing buildings and PDL or high quality innovative development in appropriate locations.
327813 / 408 Mr. David Penney	Agree	Issue 6a, Choice 1 [Third], 2 [Fifth], 3 [Sixth], 4 [Fourth], 5 [First], 6 [Second]; Issue 6b, Option 1; Issue 6c, Option 4.	Comments Noted	
Issue 6a: Choice 1				
328023 / 1043 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327797 / 196 Ms. Lorna Metcalfe	Agree		Comments Noted	
327797 / 197 Ms. Lorna Metcalfe	Agree		Comments Noted	
327813 / 409 Mr. David Penney	Agree	Third Choice	Comments Noted	
327977 / 308 Mr Tim Coyne	Disagree		Comments Noted	
327587 / 564 Mr. Tony Sowerbutts Managing Director LBS	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Group				
327997 / 518 Mr Peter Vernon Vernon & Co	Agree		Comments Noted	
Issue 6a: Choice 2				
327813 / 410 Mr. David Penney	Agree	Fifth Choice	Comments Noted	
327977 / 309 Mr Tim Coyne	Disagree		Comments Noted	
327587 / 565 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327997 / 519 Mr Peter Vernon Vernon & Co	Agree		Comments Noted	
328102 / 636 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327797 / 198 Ms. Lorna Metcalfe	Agree		Comments Noted	
327679 / 697 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 6a: Choice 3				
328023 / 1044 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327370 / 857 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327977 / 310 Mr Tim Coyne	Disagree		Comments Noted	
327813 / 411 Mr. David Penney	Agree	Sixth Choice	Comments Noted	
327797 / 199 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 6a: Choice 4				
327597 / 1177 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 858 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 637 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327997 / 520 Mr Peter Vernon Vernon & Co	Agree		Comments Noted	
327679 / 698 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327977 / 306 Mr Tim Coyne	Agree		Comments Noted	
327797 / 200	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Ms. Lorna Metcalfe				
327813 / 412 Mr. David Penney	Agree	Fourth Choice	Comments Noted	
Issue 6a: Choice 5				
327609 / 913 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	In order to increase participation in cultural activity and enhance the experience of visitors, consideration should be given to providing local facilities in villages that combine space or resources for a range of cultural, commercial and community activities in one place. This is especially important for rural areas where settlements and communities are more dispersed and redundant farm buildings may provide a convenient base for such activities.	Comments Noted	Rural diversification is a key social and economic objective, provided that it can be located in sustainable locations.
327797 / 201 Ms. Lorna Metcalfe	Agree		Comments Noted	
327813 / 413 Mr. David Penney	Agree	First Choice	Comments Noted	
327977 / 307 Mr Tim Coyne	Agree		Comments Noted	
328102 / 638 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327370 / 859 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1178 Mrs. Pam Slater	Agree		Comments Noted	
328023 / 1045 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 6a: Choice 6				
327797 / 202 Ms. Lorna Metcalfe	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327797 / 203 Ms. Lorna Metcalfe	Agree		Comments Noted	
327813 / 414 Mr. David Penney	Agree	Second Choice	Comments Noted	
327370 / 860 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Issue 6a: Choice other

328023 / 1046 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327828 / 964 Mr Steven Broomhead Chief Executive North West Development Agency	No Opinion	The Issues and Options paper asks which types of employment should be attracted into Pendle as a priority. We consider that the LDF should provide a portfolio of employment sites that is capable of attracting different sectors of the market. The Council's Employment Land Reivew should provide a firm basis for such an approach.	Comments Noted	Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. Evidence will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennnine Lancashire Economic Strategy. These will help inform existing and future demand. From a planning perspective policies in the RSS, in particular DP4, RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. The final decision on the size and location of sites in Pendle will be based on the evidence in these and any subsequent documents that address employment land requirements in the north west, together with the findings of the Sustainability Appraisal undertaken for sites put forward during the preparation of both the Core Strategy and Land-use Allocations DPDs.
327651 / 1280 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Land is a scarce resource, employment should focus on intensive high value sectors, from the choices listed this would include manufacturing and service sector though could also include technology spin off companies.	Comments Noted	Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. Evidence for which industries should be targeted will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennnine Lancashire Economic Strategy. These will help inform existing and future demand. Pendle has one of the country's highest

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327836 / 1229 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	Choices that support the development of high technology manufacturing and other growth sectors and diversify the economy are supported.	Comments Noted	<p>proportions of employees working in the manufacturing industries at 33% in 2006, three times the national average. Many of these people are employed in highly skilled precision engineering allied to the aerospace industry. Clearly the area has a strong foundation from which to build. However, diversification into other high technology, high value added sectors with the potential for growth will help to further diversify and strengthen the local economy. In addition attracting service sector employment, particularly in the 'white collar' sectors of business and finance, which are under-represented in Pendle would further help to diversify and strengthen the local economy. From a planning perspective policies in the RSS, in particular DP4, RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. The final decision on the size and location of sites in Pendle will be based on the evidence in these and any subsequent documents that address employment land requirements in the north west, together with the findings of the Sustainability Appraisal undertaken for sites put forward during the preparation of both the Core Strategy and Land-use Allocations DPDs.</p> <p>Local planning authorities are required to use a wide evidence base to help them understand both existing business needs and likely changes in the market and to prepare policies that support sustainable economic development in their area. Evidence for which industries should be targeted will be drawn from a wide range of sources. The economic strategies most pertinent to Pendle are the Regional Economic Strategy and the Pennine Lancashire Economic Strategy. These will help inform existing and future demand. Pendle has one of the country's highest proportions of employees working in the manufacturing industries at 33% in 2006, three times the national average. Many of these people are employed in highly skilled precision engineering allied to the aerospace industry. Clearly the area has a strong foundation from which to build. However, diversification into other high technology, high value added sectors with the potential for growth will help to further diversify and strengthen the local economy. From a planning perspective policies in the RSS, in particular DP4, RDF1, W2, W3, CLCR1 and CLCR2 will help to guide decisions on location. At a local level the Pendle Employment Land Review (Pendle Council, 2008) demonstrates that there is a need for an additional 7.121 ha of employment land in Pendle. In view of the current distribution of the available supply (an identified surplus exists in West Craven), the patterns of current demand and previous uptake (both focus on the M65 corridor) and areas of regeneration need (again centred on the towns in the M65 corridor), the ELR states that this additional supply should ideally be provided in the M65 corridor. The final decision on the size and location of sites in Pendle will be based on the evidence in these and any subsequent documents that address employment land requirements in the north west, together with the findings of the Sustainability Appraisal undertaken for sites put forward during the preparation of both the Core Strategy and Land-use Allocations DPDs.</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 415 Mr. David Penney	Agree		Comments Noted	
327977 / 311 Mr Tim Coyne	Agree		Comments Noted	
327836 / 1232 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 1 may be acceptable if a proposed development has an intrinsic link with that particular location.	Comments Noted	Offering policy protection to key sites seeks to retain employment uses in those locations that are considered to be the most sustainable and accessible, avoiding their potential loss to higher value end uses such as retailing and housing.
328023 / 1047 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 6b: Option 2				
327997 / 521 Mr Peter Vernon Vernon & Co	Agree		Comments Noted	
327797 / 204 Ms. Lorna Metcalfe	Agree		Comments Noted	
327977 / 312 Mr Tim Coyne	Disagree		Comments Noted	
327587 / 566 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327679 / 699 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327836 / 1230 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327828 / 967 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Options 1 and 2 both refer to the protection of key employment areas from alternative (i.e. non-employment) uses. It would appear that under Option 1 the redevelopment of vacant sites and premises would be resisted in all cases, whereas under Option 2 redevelopment may be acceptable where this would assist regeneration objectives. However, it is unclear whether these approaches would apply to all employment sites or only those identified as key employment sites. Clearly it is important to afford protection to key employment sites. However, there is little merit in seeking to protect sites which are no longer suitable for employment use and unattractive to the market. We would therefore favour Option 2, provided that stringent criteria are in place to ensure that sites and premises are only redeveloped for other uses where the applicant can provide clear evidence that the site has been actively marketed for a reasonable length of time and is demonstrably no longer suitable for continued employment use.	Comments Noted	The intention of Option 2 is to only afford protection to the Borough's key employment sites. The existing Protected Employment Areas identified in the Replacement Pendle Local Plan (2001-2016) will be reviewed as part of this process, with those no longer considered to be in a sustainable location, unsuitable for continued employment use, or unattractive to the market having their protected status removed. For those sites where protection is considered to be appropriate, criteria will be used so that only those sites and premises where the applicant can provide clear evidence that they have been actively marketed for a reasonable length of time and demonstrate that they are no longer suitable for continued employment use, can be considered for redevelopment for non-employment uses.
327817 / 906 Ms Catherine Honeywell Development Planning Partnership (DPP)	Agree	Support the objective to facilitate growth that supports economic diversification and rural regeneration. In relation to the protection of existing employment areas we would support option 2 believing there is a need to consider the redevelopment of vacant employment sites in order to meet regeneration objectives. This is in accordance with the objectives of PPS1 to bring underused previously developed land back into beneficial use.	Comments Noted	Option 2 seeks to provide protection to the Borough's key employment sites, irrespective of size - i.e. those sites best placed to help deliver economic diversification and/or rural regeneration. The existing Protected Employment Areas, identified in the Replacement Pendle Local Plan (2001-2016), will form the starting point for any analysis, with additional sites considered as part of this process. Only those considered to be in a sustainable location, suitable for continued employment use and attractive to the market will be afforded protection.
327370 / 861 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 639 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327597 / 1179 Mrs. Pam Slater	Agree		Comments Noted	
Issue 6b: Option 3				
327836 / 1231 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
327977 / 313	Disagree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mr Tim Coyne				
Issue 6b: Option other				
327956 / 1308 Mr Jeff Pedder Owner P & H Castings	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	The intention of Option 2 is to only afford protection to the Borough's key employment sites. The existing Protected Employment Areas identified in the Replacement Pendle Local Plan (2001-2016) will be reviewed as part of this process, with those no longer considered to be in a sustainable location, unsuitable for continued employment use, or unattractive to the market having their protected status removed. Both existing and potential protected sites will undergo a thorough sustainability appraisal as part of the LDF process. Only those considered to be best placed to help deliver economic diversification and/or rural regeneration offered protection.
328001 / 772 Mr Nicolas Mills Associate Director Lambert Smith Hampton	No Opinion	The need to protect existing employment areas is generally supported. In considering the protection of existing employment areas, the Council should consider whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development, in accordance with PPS3.	Comments Noted	The intention of Option 2 is to only afford protection to the Borough's key employment sites. The existing Protected Employment Areas identified in the Replacement Pendle Local Plan (2001-2016) will be reviewed as part of this process, with those no longer considered to be in a sustainable location, unsuitable for continued employment use, or unattractive to the market having their protected status removed. Both existing and potential protected sites will undergo a thorough sustainability appraisal as part of the LDF process. Only those considered to be best placed to help deliver economic diversification and/or rural regeneration offered protection.
327846 / 506 Ms Katie Fluhrer Lambert Smith Hampton	No Opinion	In considering the protection of existing employment areas, the Council should consider whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development, in accordance with PPS3. Retaining existing employment land, especially that on the edge of existing industrial estate, on the basis of a historic boundary is considered to be a wasted resource within the Borough.	Comments Noted	Both existing and potential protected sites will undergo a thorough sustainability appraisal as part of the LDF process. Only those considered to be best placed to help deliver economic diversification and/or rural regeneration offered protection.
328009 / 1305 Mssrs S & P Simpson Owners Simpsons Furniture	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	The intention of Option 2 is to only afford protection to the Borough's key employment sites. The existing Protected Employment Areas identified in the Replacement Pendle Local Plan (2001-2016) will be reviewed as part of this process, with those no longer considered to be in a sustainable location, unsuitable for continued employment use, or unattractive to the market having their protected status removed. Both existing and potential protected sites will undergo a thorough sustainability appraisal as part of the LDF process. Only those considered to be best placed to help deliver economic diversification and/or rural regeneration offered protection.
328010 / 1304 Mr Anthony Pilling Textile Engineering & Architectural Historian	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	The intention of Option 2 is to only afford protection to the Borough's key employment sites. The existing Protected Employment Areas identified in the Replacement Pendle Local Plan (2001-2016) will be reviewed as part of this process, with those no longer considered to be in a sustainable location, unsuitable for continued employment use, or unattractive to the market having their protected status removed. Both existing and potential protected sites will undergo a thorough sustainability appraisal as part of the LDF process. Only those considered to be best placed to help deliver economic diversification and/or rural regeneration offered protection.
328008 / 1306 Mr Lester Spencer Owner Trojan Plant Services Ltd	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	The intention of Option 2 is to only afford protection to the Borough's key employment sites. The existing Protected Employment Areas identified in the Replacement Pendle Local Plan (2001-2016) will be reviewed as part of this process, with those no longer considered to be in a sustainable location, unsuitable for continued employment use, or unattractive to the market having their protected status removed. Both existing and potential protected sites will undergo a thorough sustainability appraisal as part of the LDF process. Only those considered to be best placed to help deliver

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
				economic diversification and/or rural regeneraton offered protection.
Issue 6c: Option 1				
327466 / 726 Mr Andy Pepper Planner (North-West) British Waterways	Agree	In the rural areas of the Borough, it should be noted that as a leisure, recreation and tourism resource, the canal corridor needs facilities to support its use. The canal network is not footloose, nor is it entirely located within established centres and supporting facilities need to be provided within waterways corridors. These could include mooring facilities including large marinas, service facilities and facilities for land based visitors providing refreshments. Without these essential facilities the ability to realise the economic and social benefits of the canal would be undermined. For example, large marina developments can only occur along the canal network and land is not available in urban areas partly because of land prices. They must therefore by their nature occur in open countryside. However, they can represent appropriate development in open countryside areas and can be carefully designed to enhance the landscape as well as contributing to the rural economy, tourism and leisure. British Waterways would therefore like the Core Strategy to allow for appropriate essential waterway development in rural areas.	Agree, in part	RSS Policy RDF2 seeks to focus development in 'rural areas' on the Key Service Centres. The Sustainable Settlement Study (Pendle Council, 2008) suggests that these are the towns of Nelson (including Brierfield), Colne and Barnoldswick. RSS Policy RDF2 recommends that in remoter rural areas, development should support more equitable access to employment and the creation of a more diverse economic base. Employment generating proposals in the leisure, recreation and tourism industries in the canal corridor, which help to support diversification of the rural economy will be supported where these are shown to be in sustainable locations.
Issue 6c: Option 2				
328023 / 1048 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327977 / 314 Mr Tim Coyne	Agree		Comments Noted	
327370 / 862 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 640 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
Issue 6c: Option 3				
327679 / 700 Ms. Louise Morrissey Head of Land and	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Planning Peel Investments (North) Ltd.				
327609 / 914 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	Future leisure, arts and cultural facilities should be located within the town centres and be part of a successful mixed-use environment so that a balanced leisure scene will entertain and stimulate visitors, residents and local businesses with theatre audiences enlivening the surrounding area in the evening, and helping to provide regular custom for local bars and restaurants outside normal working and shopping hours.	Comments Noted	The spatial principles and Policy RDF2 in the RSS seek to focus development in Pendle on the HMR areas and key service centres. The Sustainable Settlement Study (Pendle Council, 2008) suggests that the key service centres are the towns of Nelson (including Brierfield), Colne and Barnoldswick, each of which has a clearly defined town centre. With the exception of Barnoldswick these settlements also form part of the HMR area. In seeking to address climate change, focussing development in areas that promotes the re-use or best use of existing infrastructure, and is well connected to public transport networks and reduces the need to travel (i.e. town centres) is likely to receive a favourable score in terms of its overall contribution to sustainable development.
328023 / 1049 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 6c: Option 4				
327813 / 416 Mr. David Penney	Agree		Comments Noted	
327797 / 205 Ms. Lorna Metcalfe	Agree		Comments Noted	
327466 / 724 Mr Andy Pepper Planner (North-West) British Waterways	Agree	In terms of the distribution of new development within Pendle, British Waterways would suggest that the Leeds and Liverpool Canal corridor through the urban areas of Brierfield and Nelson could represent a focus for urban regeneration and brownfield development, including the re-use or re-development of existing canalside mills and industrial buildings.	Comments Noted	RSS Policy RDF2 seeks to focus new development in Pendle on the HMR areas and Key Service Centres. The Sustainable Settlement Study (Pendle Council, 2008) suggests that the Key Service Centres are the towns of Nelson (including Brierfield), Colne and Barnoldswick. Only the latter does not form part of the HMR area. As such development along the canal corridor in Brierfield and Nelson would help to support both regional policy and local regeneration initiatives, provided that it can be shown to be in an accessible and sustainable location.
327651 / 1281 Ms. Judith Nelson Regional Planner English Heritage	Agree	The option asks about a "focus" for new development and this could be themed around historic buildings and spaces. This would cover places in addition to Leeds and Liverpool Canal in Option 4. An amended Option 4 for the re-use of historic buildings with appropriate new development is suggested.	Disagree	Issue 6c is seeking to identify the most appropriate (sustainable) locations for future development in the tourism and leisure sector, rather than the types of building. The protection and re-use of historic buildings is a separate issue and their suitability for conversion to tourist and leisure uses will depend on a series of factors, irrespective of their location. The main drivers for the protection of historic buildings will be environmental rather than economic policies.
328015 / 942 Mr James Ellis Planning Officer Craven DC	Agree	With regard to question 6c (p77) the pursuit of Option 4 could result in an increased use of the Leeds-Liverpool Canal for tourism related uses to the benefit of both Pendle and Craven.	Comments Noted	RSS Policy RDF2 seeks to focus new development in Pendle on the HMR areas and key service centres. The Sustainable Settlement Study (Pendle Council, 2008) suggests that the key service centres are the towns of Nelson (including Brierfield), Colne and Barnoldswick. Only the latter does not form part of the HMR area. As such development along significant stretches of the canal corridor would help to support both regional policy and local regeneration initiatives, provided that it can be shown to be in an

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328023 / 1050 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	accessible and sustainable location.
327597 / 1180 Mrs. Pam Slater	Agree		Comments Noted	
Issue 6c: Option other				
327976 / 265 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Disagree	Suggest variation on Strategic Objective as follows: In accessible rural locations, provided that development is at an appropriate scale and complimentary to existing provision, small scale business start ups to be allowed in all rural locations where they can be safely accommodated from a highways viewpoint and without detriment to the natural environment.	Agree, in part	RSS Policy RDF2 seeks to focus development in 'rural areas' on the Key Service Centres. The Sustainable Settlement Study (Pendle Council, 2008) suggests that these are the towns of Nelson (including Brierfield), Colne and Barnoldswick. RSS Policy RDF2 recommends that in remoter rural areas, development should support more equitable access to employment and the creation of a more diverse economic base. Employment generating proposals in the leisure, recreation and tourism industries, which help to support diversification of the rural economy will be supported where these are shown to be in sustainable locations.
327828 / 969 Mr Steven Broomhead Chief Executive North West Development Agency	No Opinion	We do not necessarily see the options put forward in relation to this issue as alternatives. The LDF Core Strategy should accommodate different types of tourism related development in appropriate locations. Clearly the scale of the development proposed will be an important consideration. Whilst town centres are likely to provide the most suitable locations for cultural and tourism facilities which attract significant visitor numbers, the LDF should also provide a supportive planning framework for smaller scale developments that would assist rural regeneration and farm diversification.	Agree, in part	RSS Policy RDF2 seeks to focus new development in Pendle on the HMR areas and key service centres. The Sustainable Settlement Study (Pendle Council, 2008) suggests that the key service centres are the towns of Nelson (including Brierfield), Colne and Barnoldswick. Only the latter does not form part of the HMR area. Outside the Key Service Centres development that is appropriate in scale, and situated in an accessible and sustainable location, will be supported where it can be shown to meet an identified local need. This would include projects that help to diversify the rural economy.
Options for Strategic Objective 7				
327813 / 417 Mr. David Penney	Agree	Issue 7a, Option 3; 7b, 3; 7c, 3; 7d, 2.	Comments Noted	
327773 / 1093 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	Agree	Parts of these issues deal with the redevelopment of brownfield land or the conversion and re-use of existing buildings, e.g. Option 1c. These all need to consider the natural and man-made heritage value of these sites and structures. This is not necessarily a significant hindrance to development or the other aims of the council, but their relative importance needs to be taken into account when reaching decisions. By retaining existing built structures the "story" that is told of their construction, use and adaptation over time can be retained. In addition the present environmental capital investment in building materials, etc, can be maintained and requirements for waste disposal or demolition material minimised. Where a structure or site of significance is to be affected by development, then these works need to be adequately justified and the landscape, townscape or historic value incorporated in the development proposals by careful design. If permitted then it is likely that some form of recording in advance of development will be required and that a scheme of impact mitigation will be necessary.	Comments Noted	The re-use of vacant buildings and previously developed land (PDL) is a key government target, particularly for new housing (PPS3). The Regional Spatial Strategy also supports the use of a sequential approach to identify the most suitable type of land for new development. Again this prioritises the use of vacant premises and PDL within settlements boundaries as these make the best use of existing infrastructure and in most instances offer the most sustainable solution. The best landscapes and townscapes in Pendle have been designated as Conservation Areas. The Conservation Area Design and Development Guidance SPD, adopted as recently as August 2008, requires new development in each of the 26 Conservation Areas in pendle to be of a high quality and sympathetic in design to its immediate surroundings. Elsewhere both the natural and man-made heritage value of the locality will be an important consideration in the determination of planning applications. However, it should not be allowed to restrict the strategic approach of re-using existing buildings and PDL or high quality innovative development in appropriate locations.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 7a: Option 1				
327993 / 483 Ms Sue Graham Head of Planning and Environment Burnley Borough Council	Disagree	We do not support any of the options that would allow new retail floorspace in excess of the forecast growth as this could undermine Burnley's position as a retail and service centre for Pennine Lancashire. We need to maintain the vitality of Burnley town centre and continue to support the regional retail hierarchy as set out in the RSS.	Comments Noted	Exceeding the growth in expenditure forecast in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007) need not necessarily be in conflict with the RSS. This requires new (retail) development to be focussed on Key Service Centres (Policy RDF2) and not to undermine the role of higher order centres (Policy W5) - in East Lancashire these are Burnley and Blackburn. We will seek to deliver retail development that addresses the needs identified in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007). All new development will be proportionate to the position that a particular town or village has been assigned to within the retail and/or settlement hierarchy. A sequential approach will be used to guide new retail development towards settlements with an identified town or local shopping centre. Only where no suitable sites exist will edge-of-centre or out-of-centre locations, that can be shown to offer a sustainable alternative, be considered.
328102 / 641 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327817 / 907 Ms Catherine Honeywell Development Planning Partnership (DPP)	Agree	Support Option 1 and would encourage Pendle Council to allow new retail floorspace in excess of the forecasted growth in expenditure, identified in the Pendle Retail Capacity Study. The draft PPS6: Planning for Town Centres has indicated that full quantative need should not need to be demonstrated in all retail development cases, with a greater importance placed on the need to justify impact and less emphasis placed on need. In addition, it should be taken into account that forecasts will fall out of date, with growth rates subject to change and this flexibility is necessary. Furthermore recent appeal and call-in decisions granted planning permission for new retail development confirm that PPS6 does not require full demonstration of quantative need for all of the turnover of a proposed development. In some case it will be appropriate to grant permission for a proposal where full quantative need does not exist but qualitative considerations indicate the need for the form of development proposed.	Disagree	We will seek to deliver retail development that addresses the needs identified in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007). Exceeding the growth in expenditure forecast in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007) need not necessarily be in conflict with the RSS. This requires new (retail) development to be focussed on Key Service Centres (Policy RDF2) and not to undermine the role of higher order centres (Policy W5) - in East Lancashire these are Burnley and Blackburn. New development will be proportionate to the position that a particular town or village has been assigned to within the settlement and/or retail hierarchy.
Issue 7a: Option 2				
327836 / 1233 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
327370 / 863 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327679 / 701 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327797 / 206 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 7a: Option 3				
327813 / 419 Mr. David Penney	Agree		Comments Noted	
328023 / 1051 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327813 / 418 Mr. David Penney	Agree		Comments Noted	
327651 / 1282 Ms. Judith Nelson Regional Planner English Heritage	Agree	The provision of new retail development should not undermine the success of existing retail areas. Option 3 covers this matter.	Comment Noted	We will seek to deliver retail development that addresses the needs identified in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007). It must also be in conformity with the RSS, which requires new (retail) development to be focussed on Key Service Centres (Policy RDF2) and not to undermine the role of higher order centres (Policy W5) - in East Lancashire these are Burnley and Blackburn. New development will also be proportionate to the position that a particular town or village has been assigned to within the retail and/or settlement hierarchy.
327597 / 1181 Mrs. Pam Slater	Agree		Comments Noted	
327977 / 315 Mr Tim Coyne	Agree		Comments Noted	
Issue 7b: Option 2				
327797 / 207 Ms. Lorna Metcalfe	Agree		Comments Noted	
328102 / 642 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327679 / 702 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327370 / 864 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328023 / 1052 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327836 / 1234 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Large national multiples operate in a variety of formats. Option 2 is supported, provided that the scale of any proposed development is appropriate to the size of centre. As such it would not be contrary to Policy W5 of the Secretary of State's Proposed Changes to Regional Spatial Strategy.	Comments Noted	We will primarily seek to deliver retail development that addresses the needs identified in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007). The RSS requires new (retail) development to be focussed on Key Service Centres (Policy RDF2) and not to undermine the role of higher order centres (Policy W5) - in East Lancashire these are Burnley and Blackburn. As such any new retail development in Pendle will be proportionate to the position that a particular town or village has been assigned to within the settlement and/or retail hierarchy.
Issue 7b: Option 3				
327813 / 420 Mr. David Penney	Agree		Comments Noted	
327597 / 1182 Mrs. Pam Slater	Agree		Comments Noted	
327977 / 316 Mr Tim Coyne	Agree	There is already an abundance of national multiples in neighboring Burnley. Opening the same stores in Pendle does not help to differentiate Pendle.	Comments Noted	We will primarily seek to deliver retail development that addresses the needs identified in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007). The RSS requires new (retail) development to be focussed on Key Service Centres (Policy RDF2) and not to undermine the role of higher order centres (Policy W5) - in East Lancashire these are Burnley and Blackburn. As such any new retail development in Pendle will be proportionate to the position that a particular town or village has been assigned to within the settlement and/or retail hierarchy.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327651 / 1283 Ms. Judith Nelson Regional Planner English Heritage	Agree	Option 3 safeguards the viability of town centres.	Comments Noted	We will primarily seek to deliver retail development that addresses the needs identified in the Pendle Retail Capacity Study (Nathaniel Lichfield, 2007). The RSS requires new (retail) development to be focussed on Key Service Centres (Policy RDF2) and not to undermine the role of higher order centres (Policy W5) - in East Lancashire these are Burnley and Blackburn. As such any new retail development in Pendle will be proportionate to the position that a particular town or village has been assigned to within the settlement and/or retail hierarchy.

Issue 7c: Option 1

327609 / 915 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	Town centres are the heart of communities and an expression of their culture and identity. As well as shops town centres should provide a range of realistic functions for leisure, recreation and cultural activities centred on restaurants, pubs, clubs, theatres, cinemas, libraries and museums. As such all these elements play an active role in creating and maintaining vibrant town centres and an appropriately stimulating night-time economy.	Comments Noted	PPS6 indicates that shopping and other employment generating uses, including leisure, recreation and cultural activities, are regarded as a primary function of town centres. The principal reason for this is that they are central and accessible by a variety of means of transport. PPS6 (Para 2.4) indicates that wherever possible, growth should be accommodated by more efficient use of land and buildings within existing centres. Compact walkable town centres with multi-modal accessibility are arguably a key component of sustainable development. As such local circumstances, together with the settlement and/or retail hierarchy will be a key to determining the level of growth we should seek to accommodate in each settlement/town centre.
327817 / 909 Ms Catherine Honeywell Development Planning Partnership (DPP)	Agree	We would encourage that in order to increase the vitality and viability of town centres in Pendle, the Council should implement Option 1 in response to question 7c (p82). Through the extension of town centre boundaries a greater variety of retailers may be attracted to a particular centre, thus enhancing consumer choice. In line with paragraph 2.45 of PPS6 local planning authorities should identify an appropriate range of sites to allow for the accommodation of identified need. The extension of town centre boundaries will aid the range available.	Agree, in part	PPS6 indicates that shopping and other employment generating uses are regarded as a primary function of town centres. The principal reason for this is that they are central and accessible by a variety of means of transport. PPS6 (Para 2.4) indicates that wherever possible, growth should be accommodated by more efficient use of land and buildings within existing centres. Only where growth cannot be accommodated is the extension of the town centre appropriate (Para 2.5). Extending a town centre, to take-in edge of centre sites will also open up new 'edge of centre' sites. Both actions increase the potential for custom to be drawn away from the traditional town centre and its supporting infrastructure. The desirability of this course of action will depend on the nature of the centre. Whilst the opportunity to provide larger town centre developments may help to revitalise retail activity in some locales, in others it may have the opposite effect on regeneration by making it more difficult to find occupiers for vacant premises within the existing town centre. The three waves of retail decentralisation, for food, bulky goods and comparison goods, tend to have varying effects on different sizes of centre. Larger town centres with a range of comparison retail opportunities - both in terms of variety and size of retail unit - are more likely to suffer a slow attrition whereas local shopping centres, where the focus is on convenience stores, could suffer an immediate and adverse effect from the presence of a large 'out of town' supermarket. Compact walkable town centres with multi-modal accessibility are arguably a key component of sustainable development. On this basis it may be better for some town centres to contract commercially, but continue to prosper by encouraging housing and service based activities. Local circumstances, together with the settlement and/or retail hierarchy will be a key to determining the level of growth we should seek to accommodate in each settlement/town centre.

Issue 7c: Option 2

328023 / 1053 Mr. Juan Murray	Agree		Comments Noted	
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Planning (LDF) Consultant Lancashire CPRE				
327651 / 1284 Ms. Judith Nelson Regional Planner English Heritage	Agree	Options 2 and 3 could both be pursued to secure the viability of town centres and decrease vacancy rates.	Comments Noted	PPS6 indicates that shopping and other employment generating uses are regarded as a primary function of town centres. The principal reason for this is that they are central and accessible by a variety of means of transport. Compact walkable town centres with multi-modal accessibility are arguably a key component of sustainable development and promoting the re-use of existing premises would assist this objective, a fact acknowledged in PPS 6 (Para 2.3). In addition, the contraction of the commercial areas in some town centres, may help their continued prosperity, by opening up opportunities for new housing or service based activities that would increase the day-to-day use of outlets within the retail core. Only where growth cannot be accommodated is the extension of the town centre appropriate (Para 2.5).
Issue 7c: Option 3				
328023 / 1054 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327651 / 1285 Ms. Judith Nelson Regional Planner English Heritage	Agree	Options 2 and 3 could both be pursued to secure the viability of town centres and decrease vacancy rates.	Comments Noted	PPS6 indicates that shopping and other employment generating uses are regarded as a primary function of town centres. The principal reason for this is that they are central and accessible by a variety of means of transport. Compact walkable town centres with multi-modal accessibility are arguably a key component of sustainable development and promoting the re-use of existing premises would assist this objective, a fact acknowledged in PPS6 (Para 2.3). In addition, the contraction of the commercial areas in some town centres, may help their continued prosperity, by opening up opportunities for new housing or service based activities that would increase the day-to-day use of outlets within the retail core. Only where growth cannot be accommodated is the extension of the town centre appropriate (Para 2.5).
327370 / 865 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 643 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 421 Mr. David Penney	Agree		Comments Noted	
327797 / 208 Ms. Lorna Metcalfe	Agree		Comments Noted	
327597 / 1183 Mrs. Pam Slater	Agree		Comments Noted	
327679 / 703 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	

Issue 7c: Option other

327836 / 1235 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	The options appear to major on retailing. PPS6 defines a wider range of uses than retailing (Paragraphs 1.7 and 1.8). Any option should allow for the full range of uses to be accommodated.	Comments Noted	Acknowledge that PPS6 indicates that shopping and other employment generating uses are regarded as a primary function of town centres.
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Issue 7d: Option 1

328023 / 1055 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327679 / 704 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	

Issue 7d: Option 2

327609 / 916 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	Cultural, leisure and tourism facilities that are likely to attract large numbers of visitors should in the first instance be clustered within the strategic and other town centres and should have good accessibility to the public transport network. Locally important cultural facilities should be protected and enhanced where they contribute to wider regeneration. Allowing restaurants and cafes in an open plan setting would enhance theatre/cinema use which would help give an area a sense of local identity and pride. Audiences coming	Comments Noted	PPS6 indicates that shopping and other employment generating uses are regarded as a primary function of town centres. This would include cultural, leisure and tourism facilities as well as the hospitality sector that helps to support it.
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		to a theatre/cinema would enliven the surrounding area in the evening and provide regular custom for the local bars and restaurants outside normal working and shopping hours.		
327597 / 1184 Mrs. Pam Slater	Agree	For Nelson	Comments Noted	Acknowledge that the respondent would like to see a Night-time economy established in Nelson.
327370 / 866 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327813 / 422 Mr. David Penney	Agree	Second Choice	Comments Noted	
327679 / 705 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
328102 / 644 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
Issue 7d: Option 3				
327797 / 209 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 7d: Option other				
328023 / 1056 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Options for Strategic Objective 8				
327813 / 423 Mr. David Penney	Agree	Issue 8a, Option 2; Issue 8b (i) Yes: (a) Nelson, Colne, Brierfield; (b) More Accessible Green Spaces; Issue 8b (ii) Yes: (a) Waterside, Colne; (b) New Youth & Community Centre	Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327609 / 917 Ms. Rose Freeman Planning Assistant The Theatres Trust	Agree	It is important that local authorities carry out thorough and rigorous assessments of the need for all community and cultural facilities in the Borough in line with PPG17 to reflect local distinctiveness. Efforts should be made to ensure that young people and other hard to reach groups are engaged in discussions about the use of space, and opportunities for the provision of combined community facilities should be explored for poorly served areas. For clarity a description of "community facilities" should be included either in the accompanying text of a policy or in a Glossary and we recommend community facilities provide for the health, welfare, social, educational, leisure and cultural needs of the community. The Theatres Trust is particularly concerned that current provision of venues for cultural activities in Nelson and Colne are protected and enhanced to meet existing and new populations and that any new facilities for performance arts are of the highest quality to provide opportunities for the greatest operational sustainability.	Comments Noted	PPG17 does not require a rigorous assessment of the need for "all community and cultural facilities." What PPG 17 does say is that "to ensure effective planning for open space, sport and recreation it is essential that the needs of local communities are known. Local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sports and recreational facilities". To comply with PPG17 a thorough review of open space and recreation facilities in the borough, is undertaken every three years and the results published in the Pendle Open Space Audit. The Sustainable Settlements Study, adopted in 2008, looks at the annual survey of retail and leisure land to identify the site availability for these two uses throughout the borough. The Infrastructure Study will identify the current quantities of cultural and leisure facilities as part of its auditing work. This may also provide an opportunity to identify additional needs.
327620 / 1082 Mr. Paul Daly Planning Manager Sport England North West	Agree	Central to the proper consideration of this topic i.e. understanding the nature and spatial distribution of inequality of access to community facilities is the existence of a sound evidence base. A fundamental pre-requisite to decision-making is a sound evidence base on patterns of usage and value to the local community. A PPG17-compliant assessment of open space, sport and recreation facilities should address this issue. The PPS12 Companion Guide (p.34) states that: "comprehensive survey and monitoring information will be needed to develop evidence bases which help authorities to identify opportunities, constraints and issues for their areas. Authorities will need to assess and build on this to ensure they have sufficient social, environmental, economic and physical information to identify the spatial characteristics of their locality". The centrepiece of this effort should be a PPG17-compliant assessment of open space and recreation facilities.	Comments Noted	Pendle Council updates its Open Space Audit approximately every three years. The latest update was adopted in November 2008 and closely follows the guidance in the PPG17 Companion Guide. In addition, the Sustainable Settlements Study (Pendle Council, November 2008) has recorded the spatial distribution of recreation facilities across the Borough. In addition the Outdoor Recreation Strategy (2003-2008), Pendle Parks Strategy (2007-2017), Pendle Children's and Youth Play Area Strategy (2006-2016) and Playing Pitch Assessment (2001), all produced by the Council's Park & Recreation section, help to address the PPG17 requirement to consider the need and usage of facilities throughout the Borough. The infrastructure study will also look at current levels in terms of sport facility provision and may identify areas where further facilities are needed.

Issue 8a: Option 1

327836 / 1236 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Options 1 and 2 are not mutually exclusive and are supported.	Comments Noted	Support for both Options 1 and 2 is noted.
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Issue 8a: Option 2

327836 / 1237 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Options 1 and 2 are not mutually exclusive and are supported.	Comments Noted	Support for both Options 1 and 2 is noted.
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327813 / 424 Mr. David Penney	Agree		Comments Noted	
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Issue 8a: Option 3

327597 / 1185 Mrs. Pam Slater	Agree		Comments Noted	
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327836 / 1238 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Option 3 would be desirable but its achievement would be dependent on the operational model of the service provider.	Comments Noted	Addressing inequalities in spatial provision will be a key component in the move towards achieving more sustainable patterns of development. As such targeting new facilities at areas where there is an identified/projected need is likely to be a key element of any strategy/policy that seeks to address this issue. The extent to which this is reflected in the final strategy will be reflected in the delivery plan.
327370 / 868 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 645 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327679 / 706 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree			
327658 / 452 Mrs Kate Grimshaw Planning and Review Officer Lancashire County Council	Agree	As this enables Lancashire County Council service providers to put the resources where they are needed.	Comments Noted	
328023 / 1057 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Issue 8a: Option 4

327797 / 210 Ms. Lorna Metcalfe	Agree
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Issue 8b (i): Option				
328007 / 940 R H Greenwood	Agree	Need for car parking in Blacko.	Comments Noted	The point is noted, but the allocation of sites for specific functions is the role of the Land-use Allocations DPD.
328023 / 1058 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree	All rural villages Facilities for young people. Evening transport in rural areas.	Comments Noted	This representor is suggesting that all rural areas require additional facilities for young people and better evening public transport. The infrastructure study will document current facilities. Additional work may be required to look at the level of need for services in different locations. There are a number of factors that will need to be considered including funding, deliverability and need.
327813 / 425 Mr. David Penney	Agree	More Accessible Green Spaces in Urban areas of Nelson, Colne and Brierfield	Comments Noted	The provision of more accessible green spaces will be considered in the Natural Environment Policy. Additional open space allocations will be considered in the preparation of the Land-use Allocations DPD.
327679 / 707 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	No Opinion		Comments Noted	
327797 / 211 Ms. Lorna Metcalfe	Agree	Nelson	Comments Noted	This representor has indicated that there is a need for larger community facilities in Nelson, but has not state what in particular is required. Further work will be required to look at the individual needs of each area.
Issue 8b (ii): Option				
327679 / 708 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	No Opinion		Comments Noted	
328023 / 1059 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	No Opinion		Comments Noted	
327797 / 212 Ms. Lorna Metcalfe	Agree	Brierfield	Comments Noted	This representor has indicated that there is a need for larger community facilities in Brierfield, but has not state what in particular is required. Further work will be required to look at the individual needs of each area.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 426 Mr. David Penney	Agree	New Youth & Community Centre in Waterside, Colne	Comments Noted	This representor is agreeing that there is a need to provide larger community facilities elsewhere in Pendle and suggesting that there should be a new Youth and Community Centre in Waterside. All suggestions will be considered as part of the infrastructure planning process, however, this is not a guarantee that suggestions will be included. There are a number of factors that will need to be considered including funding, deliverability and need.
327797 / 213 Ms. Lorna Metcalfe	Agree	Brierfield	Comments Noted	This representor has indicated that there is a need for larger community facilities in Brierfield, but has not state what in particular is required. Further work will be required to look at the individual needs of each area.
327529 / 931 North West Planning Natural England	Agree	In relation to Issue 8b, we consider that the provision, enhancement and improved access to green spaces of all types should be a priority. The benefits of green space for health and welfare are well documented and are recognised in this report. Green spaces can be multi-functional, as we pointed out recently in our comments on the Draft Open Space Audit, and offer many benefits.	Comments Bited	Note the comment that "the benefits of green space for health and welfare are well documented and are recognised in this report."

Options for Strategic Objective 9

327813 / 427 Mr. David Penney	Agree	Issue 9a, Option 1; 9b, 2.	Cooments Noted	
327529 / 932 North West Planning Natural England	Agree	In our comments on the Draft Open Space Audit, we pointed out that open space provides a venue for recreation, but it can also provide a venue for the enjoyment and appreciation of biodiversity and the natural environment. We were therefore pleased that the local authority recognised there the value of open space in providing important habitats for wildlife. In relation to natural and semi-natural greenspace the Audit also referred to Natural England's Accessible Natural Greenspace Standards, which we also welcomed. We would encourage the authority to look at green spaces as 'multi-functional' rather than for just one use - e.g. parks provide amenity (they are visually attractive), but they are also habitats for wildlife, a space for recreation, (whether formal or just walking), improve air quality and health, are a potential resource for schools for study). Throughout the Audit document there was reference to "surplus" open space. The terminology "surplus" infers that this open space is superfluous or expendable. As pointed out in our comments on the Audit, we would view the recommended standards as the minimum, rather than absolutes.	Comments Noted	The Council's Open Space Audit classifies open space under its main or primary use but paragraph 4.5 acknowledges that spaces may contribute to fulfilling the objectives of more than one typology e.g. providing both amenity space and wildlife habitats. The Core Strategy will develop this multi-functional approach further, under the framework of the Green Infrastrutture Strategy being developed by Lancashire County Council, in identifying a network of green spaces and providing a framework under which these spaces and networks can be enhanced and protected.
327620 / 1083 Mr. Paul Daly Planning Manager Sport England North West	Agree	Sport England welcomes the attention paid to this topic, and the specific reference to the forthcoming Open Space Audit. However, as noted above in respect of the provision of community facilities, the evidence base should include built facilities. The options presented appear not to pay attention to built facilities, or to the opportunities presented by the urban fringe or wider countryside for sport and recreation. These issues could perhaps be addressed as part of the development of policy in future versions of the document.	Comments Noted	This issue is concerned primarily with open space, which whilst this may encompass some sports facilities, is not meant to cover all. Sports facilities are considered further under Issues 8 'Community Facilities'. However, in terms of the evidence base being developed to inform the Core Strategy, the proposed Infrastructure Audit will look at built sports facilities in its consideration of wider community facilities or social infrastructure. The Sustainable Settlements Study also includes consideration of existing sports facilities (sports centres and recreational space) in aseessing the level of service provision in the rural settlements.
328027 / 1127 Mr Andrew Ashall Principal Regional Planning Officer 4NW	No Opinion	The Core Strategy should link its approach to Open Space to the concept of Green Infrastructure as promoted by Policy EM3 of draft RSS. Green public open space can benefit an area in many different ways, for example public health, meeting regional biodiversity targets, climate change adaptation and the economic benefits of an improved urban environment. The use of trees in an urban setting can produce effects such as 'city cooling' as we face a future	Agree	It is intended to link the consideration of open space to the wider topic of Green Infrastructure, within the framework of the Lancashire Green Infrastrutture Strategy, which is currently being finalised. This approach will therefore be in line with Policy EM3 of the NW RSS and the North West Green Infrastrutture Guide.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		of unpredictable temperatures due to climate change. Public open space can also help to link areas together, in terms of green walking and cycling routes and biodiversity networks. The North West Green Infrastructure Guide provides further information . I would encourage the Council to include this in their list of key documents providing additional information. EM1 within Draft RSS provides a strategic framework for Section 10.		
327836 / 1257 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	It is suggested that a role for the local authority in improving access to Pendle's green open spaces could be presented as an option.	Comments Noted	The issue of access to open space is considered in Issue 9b. The options presented centred on the provision of new open space or financial contributions, from new developments. The role of the local authority will need to be considered in developing these options into our preferred approach.
Issue 9a: Option 1				
327813 / 428 Mr. David Penney	Agree		Comments Noted	
327846 / 507 Ms Katie Fluhrer Lambert Smith Hampton	Agree	The protection of existing formal open space should as stated within the Issues and Options Report be directed by the Pendle Open Space Audit 2008. The development of brownfield and suitable green field land should be a priority for development in the Borough and as such open space should be protected until such as time as available, previously developed land and suitable greenfield land has been fully considered.	Comment Noted	The development of our preferred approach will be informed in part by the findings in the Open Space audit. I would challenge the claim that it is preferable to build on green field land before open space. PPG17 states that open space can be built on where it is clearly shown to be surplus to requirements. In such circumstances, where low quality surplus open space is available, such sites may be sequentially preferable and more sustainable due to their urban location etc than developing on green field sites. Obviously, this approach would be assessed on a site by site basis.
328001 / 773 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	The protection of existing formal open space should as stated within the Issues and Options Report be directed by the Pendle Open Space Audit 2008. The development of brownfield and suitable green field land should be a priority for development in the Borough and as such open space should be protected until such as time as available, previously developed land and suitable greenfield land has been fully considered.	Comment Noted	The development of our preferred approach will be informed in part by the findings in the Open Space audit. I would challenge the claim that it is preferable to build on green field land before open space. PPG17 states that open space can be built on where it is clearly shown to be surplus to requirements. In such circumstances, where low quality surplus open space is available, such sites may be sequentially preferable and more sustainable due to their urban location etc than developing on green field sites. Obviously, this approach would be assessed on a site by site basis.
327370 / 869 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1186 Mrs. Pam Slater	Agree		Comments Noted	
327651 / 1286 Ms. Judith Nelson Regional Planner English Heritage	Agree	Green open space can serve many functions including the historic environment, this does not relate to a deficiency in provision or its presents quality, on this basis option 1 is supported.	Comments Noted	It is agreed that option 1, in protecting all existing areas of open space, has the opportunity to provide the most positive impact to the historic environment, including the settings of historic buildings. This issue does not relate to the intrinsic quality or amount of space but its wider townscape value. Agreed that this is an issue that needs to be considered in developing our preferred approach; it would be important that any policy which was to allow the redevelopment of areas of open space considered its wider townscape role and relationship to the historic and/or built

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
				environment.
Issue 9a: Option 2				
327679 / 709 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 9a: Option 3				
327733 / 752 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	The principle of protecting good quality open space is supported. The release of poor quality areas of open space can also lead to investment of other areas via Section 106 contributions.	Comments Noted	It is agreed that the development of poor quality open space in areas with a surplus of open space could assist in the delivery of wider investment and development opportunities for example in housing, employment and community uses.
328102 / 646 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327977 / 317 Mr Tim Coyne	Agree		Comments Noted	
327797 / 214 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 9a: Option other				
327980 / 458 Mr Nick Sandford Regional Policy Officer The Woodland Trust	Disagree	The introductory paragraph to this section, headed "Why this is considered a priority for Pendle", on page 93, is very encouraging, emphasising the contribution which open space makes to sustainable development, including benefits for human health and wildlife habitats. We also note that your council has carried out an audit of open space in the district. This audit identified 173 woodland sites covering 148 hectares, which are either within the district or within 300 metres of defined settlement boundaries. The Open Space Audit quotes the Natural England Access to Natural Green Space Standard and that is something which we very much support. Numerous studies on greenspace and particularly woodland have shown that they are highly valued by communities (MORI, 2002, The Environment: Who cares?) and that access to woodland is not only important for health benefits through exercise but also makes visitors feel happy, relaxed and close to nature (Coles R.W. and Bussey S.C. 2000, Urban forest landscapes in the UK - progressing the social agenda. Landscape and Urban Planning 52, pp181- 8). Nature is able to improve the quality of people's lives and we believe everyone should experience it and have easy access to it. In both urban and rural areas, the Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and other social and economic issues. Recognising this, the Woodland Trust has researched and developed a	Comments Noted	In preparing the open space and natural environment policies in the Core Strategy we will need to consider whether the incorporation of woodland accessibility standards are appropriate. We will be looking at the current level of open space and woodland provision within the borough and as part of that process we will consider the accessibility of open space.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		Woodland Access Standard for local authorities to aim for. This standard is endorsed by Natural England and complements the Natural England ANGST Standard. The Woodland Trust Woodland Access Standard recommends: - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. The figures for Pendle are 13.64% of people living within 500 metres of a wood of 2ha and 34.32% living within 4km of a 20ha wood. Comparable figures for Lancashire as a whole are 8.98% and 35.85% respectively. We would like to see our Woodland Access Standard adopted as part of your Core Strategy. In Section 9b of the document on page 84, we would like to see standards adopted for different types of open space and these used to determine where enhancement and expansion of open space is needed for the benefit of local residents.		
327529 / 933 North West Planning Natural England	No Opinion	In relation to Issue 9a, therefore, we therefore favour an option (not one of those set out in the Issues and Options Report) which would seek to protect all open space and make the most of the benefits of the open space by improving its functionality.	Comments Noted	Support for the essence of option 1 i.e. protect all areas of open space. Further comment regarding improving the functionality of open space; this will be considered within considering open space within the wider Green Infrastructure framework set out by Policy EM3 of NW RSS, The North West Green Infrastructure Guide and the Lancashire Green Infrastructure Strategy (draft).
328023 / 1060 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	No Opinion		Comments Noted	
Issue 9b: Option 1				
328102 / 647 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327836 / 1239 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	By only requiring provision in areas of deficiencies, other developments where this is not required would be better placed to contribute to other initiatives such as affordable housing provision, climate change abatement or wider infrastructure requirements.
327370 / 870 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328001 / 774 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In order to enhance the quality of, and improve access to green spaces Options 1 is supported in so far as the Council should only require major new development to make provision, or a financial contribution towards open space provision, in areas where there is a relative deficiency, when compared to the average for the Borough as a whole. Any contribution should also be in accordance with the regulations set out in Circular 05/2005 Planning Obligations.	Comments Noted	By only requiring provision in areas of deficiencies, other developments where this is not required would be better placed to contribute to other initiatives such as affordable housing provision, climate change abatement or wider infrastructure requirements.
327846 / 508 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In order to enhance the quality of, and improve access to green spaces Options 1 is supported in so far as the Council should only require major new development to make provision, or a financial contribution towards open space provision, in areas where there is a relative deficiency, when compared to the average for the Borough as a whole. Any contribution should also be in accordance with the regulations set out in Circular 05/2005 Planning Obligations.	Comments Noted	By only requiring provision in areas of deficiencies, other developments where this is not required would be better placed to contribute to other initiatives such as affordable housing provision, climate change abatement or wider infrastructure requirements.
327679 / 710 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327651 / 1287 Ms. Judith Nelson Regional Planner English Heritage	Agree	Option 2 is supported.	Comments Noted	Comment incorrectly logged under Qu 152 - support for Option 1.
327797 / 215 Ms. Lorna Metcalfe	Agree		Comments Noted	
327733 / 753 Mr Saadat Khan Managing Director Comfortable Living Ltd	Agree	It is considered that the provision of open space or a financial contribution towards it should be required in areas where there is a deficiency. This option will look at areas with the greatest need and increase quantity and/or improve quality.	Comments Noted	By only requiring provision in areas of deficiencies, other developments where this is not required would be better placed to contribute to other initiatives such as affordable housing provision, climate change abatement or wider infrastructure requirements.

Issue 9b: Option 2

327529 / 934 North West Planning Natural England	Agree	Turning to Issue 9b, we consider that all major new developments should make a contribution to open space either on-site or by way of a contribution to off-site provision. One of our recent press releases confirms that Natural England is advocating that new development meets a variety of green space requirements, including that there is a green space within 300m of every home. All new developments should feature a green infrastructure which: 1. Provides greenspace within 300m of every home; 2. Supports an increase in priority species and habitats in and around new developments; 3. Provides a wide variety of parks, wild areas and open spaces to meet the needs of both nature and people; 4. Equips new development to cope with the effects of climate change and extreme weather events; 5. Is designed to ensure it fits into any surrounding countryside and into its landscape setting. We would suggest referring to the green infrastructure approach to take forward the work on green infrastructure in the borough. To help with this, there is a North	Comments Noted	By requiring all developments to make a provision towards open space, regardless of existing provision in the locality, we may affect the viability of the development to contribute towards other requirements such as affordable housing, climate change abatement or wider infrastructure requirements ? The Green Infrastructure approach to open space will be considered as we develop our preferred approach.
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Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		West Green Infrastructure Guide.		
327597 / 1187 Mrs. Pam Slater	Agree		Comments Noted	
327813 / 429 Mr. David Penney	Agree		Comments Noted	
Issue 9b: Option other				
328023 / 1061 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	No Opinion		Comments Noted	
Options for Strategic Objective 10				
327836 / 1258 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	The opening sentence should be worded to more accurately reflect Pendle's environment, most of which is heavily influenced by man's activities. Again it is recommended that landscape character is identified and discussed in the text. The following is suggested: Our natural and historic landscapes are a key and irreplaceable resource. Some of the key requirements of national planning policy are absent from the list under the heading "What are we already required to do?" Reference to the following should be included: a)PPS1: Delivering Sustainable Development. This indicates in paragraph 17 that planning should promote sustainable development by seeking to "protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole". b)PPG 2: Green Belts. This advises in paragraph 3.15 that the "visual amenities of the Green Belt should not be injured by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design". c) PPS 7: Sustainable Development in Rural Areas. This document identifies, among its key principles, one of the Government's overall aims which is "to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes: so it may be enjoyed by all". Options for the protection and enhancement of Pendle's built heritage make no reference to historic designed landscapes. No options are offered for conserving, enhancing or restoring landscape character, which is a requirement placed on local planning authorities by the above policies. Only options relating to protection and enhancement of "open countryside" are presented, which would leave large areas of landscape character without any suitable landscape policy. Green Infrastructure There are no references to this key issue in the report. There should be a reference to the Lancashire Green Infrastructure Strategy and the importance of green infrastructure within Lancashire as the City Region with "room to breathe".	Comments Noted	Reference will be made to landscape character, however the issues considered under this Strategic Objective are not solely to do with landscapes they do cover the natural and historic environment, of which landscape is an important part. The 'what we are already required to do?' section is not a complete and exhaustive list - it covers the key requirements which are dealt with under the issues. Reference will be made to other key national planning guidance as suggested by LCC. The issue considering 'open countryside' can be adapted and revised to include landscape character. Green Infrastructure is a cross cutting theme between a number of the issues in the Issues and Options document. It has been considered in responses to comments on Strategic Objective 2 on Infrastructure and also under Strategic Objective 9 on Open Spaces. There may be scope for making reference to Green Infrastructure under Strategic Objective 10.
327813 / 430 Mr. David Penney	Agree	Issue 10a, Choice 1 [Second], 2 [First]; Issue 10b, Choice 1 [Second], 2 [First], 3 [Third]; 10c, Option 1; 10d, 1.	Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328021 / 1005 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	Agree	In addition to the stated; Under Key documents please add. Lancashire Landscape and Heritage SPG Guidelines for the Selection of Biological Heritage Sites. And under What are we required to do please add reference to: Section 40 NERC Act Policy EM1 of the emerging NW RSS.	Comments Noted	The 'what are we already required to do?' section of the Issues and Options document only provided a brief summary/overview of the key requirements which the Council will need to address in its nature conservation policies in the Core Strategy. It is acknowledged that not all requirements were listed. Reference will be made to the Lancashire Landscape and Heritage SPG and the guidelines for the selection of Biological Heritage Sites or equivalent. Reference will also be made to Section 40 of the NERC Act and Policy EM1 of the RSS.
327773 / 1096 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County Council	No Opinion	<p>The options within key issue 10a (built heritage) are almost completely concerned with the design of new buildings, and do not consider how historic sites, structures and remains are to be dealt with. This is at odds with the present approach outlined in the Local Plan. It could be remedied by the insertion of a new key issue between the present 10a and 10b, worded in a similar fashion to those two, with the following options and comments, or by the insertion of these options and comments into key issue 10a.</p> <p>Option 1 Require all developments proposals to include a full statement of the archaeological and historical significance of the site, to justify any impacts on archaeological and historical features and to set out an appropriate scheme of impact mitigation. Comment 1 This would allow the implications of any development proposals to be understood and informed decisions reached, ensuring the protection of the district's archaeological and historical heritage. It would increase the cost of making applications and may delay their submission or validation. Much time may be spent creating and administering reports of no or negligible impact. Beyond ensuring full compliance and quality control, no further archaeological screening of planning applications would be needed, although some specialist input may still be required. There may be an issue of the availability of suitably qualified professional advisors to developers and this policy is likely to lead to increased demands on and costs to sources of information such as archaeological databases, museums and libraries. Mitigation costs may make a small number of development proposals unviable.</p> <p>Option 2 Identify sites and areas where development proposals must include a full statement of the archaeological and historical significance of the site, to justify any impacts on archaeological and historical features and to set out an appropriate scheme of impact mitigation. This would include the areas of Scheduled Monuments, Listed Buildings, locally listed buildings, any parks and gardens designated in the future as of special historic interest, Conservation Areas and any other specified sites of district and higher importance. It may also include particular types or sizes of development regardless of their location. Comment 2 This would allow the implications of significant development proposals to be understood and informed decisions reached, ensuring the protection of the district's archaeological and historical heritage. It would increase the cost of making a small number of applications and may delay their submission or validation. Archaeological screening of other planning applications (Option 4) would still be required. There may be a small issue of the availability of suitably qualified professional advisors and some knock-on consequences to archaeological databases, museums, libraries, etc. Mitigation costs may make a small number of development proposals unviable.</p> <p>Option 3 Require all developments proposals impacting a Scheduled Monument or a Grade I or Grade II* listed building or its setting to include a full statement of the archaeological and historical significance of the site, to justify any impacts on archaeological and historical features and to set out an appropriate scheme of impact mitigation. Comment 3 This would allow the implications of a small number of the most significant development proposals to be understood and informed decisions reached. This would only ensure the protection of a small</p>	Comments Noted	Key issue 10a should be revised to cover other historic sites, structures and remains as well as built heritage. It is logical that these issues are considered together they can often be found together and proposed development can have a combined impact.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		<p>part of the district's archaeological and historical heritage, where the issues are likely to have already been recognised. Other development proposals may still require further information to be submitted before planning decisions could be reached. It would increase the cost of making a very small number of applications and may delay their submission or validation. Full archaeological screening of planning applications would still be required (Option 4). Mitigation costs may make a small number of development proposals unviable. Option 4 Where a development proposal does not fall into a category requiring the submission of an heritage impact assessment with the application (as part of Options 1-3), then any application will be screened for its heritage implications and dealt with on its merits. Further information may be requested before a decision is reached and a scheme of impact mitigation may be required. Comment 4 A system of archaeological screening and advice to the council will need to be in place. Such a system is currently in operation. When implemented correctly this is likely to be the most cost- and time-effective method of protecting the majority of the district's archaeological and historical heritage. Unless independent advice has been obtained or pre-application consultation has occurred (as advised by PPG16), developers will not be aware of the archaeological implications of their proposals and a small number may find themselves subject to unexpected delays or expense to assess or mitigate their impact. Mitigation costs may make a very small number of development proposals unviable. Option 5 The council will develop a specific strategy for the protection and enhancement of the district's archaeological and historical heritage. This may include limited investigative or recording works; targeted schemes to increase awareness of and accessibility to sites and structures; appropriate management of sites and structures in public ownership; the development of a formal list of locally important sites and buildings and the provision of information, encouragement and advice to private owners. Comment 5 By devising and implementing a heritage strategy the council will encourage others to take a similar responsible attitude to sites in their ownership or control. Improvements to sites in the public realm will, if properly designed and implemented, result in longer-term savings despite the requirement for an initial investment in the strategy and heritage. Knock-on improvements and unanticipated savings are possible and perhaps even likely. [Example of the above - EH have suggested the removal of unnecessary signage, street furniture, roadside clutter, etc. as part of townscape improvement schemes. See http://www.helm.org.uk/server/show/ConWebDoc.5287 (Streets for All) and http://www.english-heritage.org.uk/server/show/nav.8680 (Save our Streets). This approach is also advocated by some road experts as a method of improving traffic flows and reducing accidents. It of course also removes the costs for their installation and routine maintenance, as well as replacement of accident damaged, stolen or vandalised items. See e.g. web articles on the Dutch town Drachten or, more recently, the German town of Bohmte]</p>		
327651 / 1288 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	<p>The recently published English Heritage report Conservation Principles: Policies and Guidance defines conservation as: "The process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations "; and the historic environment as; "All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible or buried, and deliberately planted and managed flora". This is reflected in your introduction to the issue. The list of key documents should include the draft conservation area design spd.</p>	Comments Noted	<p>The English Heritage guide: Conservation Principles, Policies and Guidance will be used in the development of the built heritage policies in the Core Strategy. Reference will be made to the adopted Conservation Area Design and Development Guidance SPD.</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327529 / 935 North West Planning Natural England	Agree	<p>We are pleased that this section, page 93, recognises the importance of conserving and enhancing the natural and semi-natural environment, including recognition of the social and economic benefits as well as environmental benefits. However, the text on pages 93 and 94 needs substantial amendment in parts to reflect accurately the key documents and requirements, as we have set out below. The list of key documents, page 93, should include the Lancashire Biodiversity Action Plan. The table of requirements on page 94 makes reference to the 'biodiversity duty', which we welcome. However, the requirements for protected species should refer to "proposals which would be likely to result in harm to the species or its habitat" (i.e. not only "disturbance", which is all that is currently mentioned in the table). The references to legislation should be amended. The legislation on protected species and their habitats is mainly in the Wildlife and Countryside Act 1981 (as amended) and the Conservation (Natural Habitats &c.) Regulations 1994 (as amended). Some species are protected under their own legislation e.g. the Protection of Badgers Act 1992. These requirements (and others) are set out in detail in Circular 06/2005 to PPS9 "Biodiversity and Geological Conservation". Paragraph 98 of Circular 06/2005 states that "the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat". A list of all protected species of animals and plants can be found in Annex A of Circular 06/2005. The table does not make reference to the local authority's duties with regard to Sites of Special Scientific Interest (SSSIs), as set out in the Wildlife and Countryside Act 1981 (as amended), and Defra's Code of Guidance on SSSIs. The Council should note that local authorities have many and varied responsibilities and duties, including land designated as a Site of Special Scientific Interest (SSSI) (i.e. as section 28G bodies). This includes duties as an owner of land designated as an SSSI (section 28H), and also in providing authorisations which may impact upon the special interest of SSSIs (section 28I). There is a section within the table concerning Habitats and Species of Principal Importance. The potential impact of development on certain species and habitats of principal importance is addressed in detail under regulation 3(4) of The Conservation (Natural Habitats &c.) Regulations 1994 and section 74 of the Countryside & Rights of Way Act 2000. Again, these duties and others are set out in detail in Circular 06/2005 to PPS9 "Biodiversity and Geological Conservation" and we would urge the Council to bear this in mind in the execution of its nature conservation related functions. The two rows within the table on European sites are not worded appropriately. In particular, the intent of the Habitats Regulations is not to restrict development, per se, but to conserve Habitats and Species. Reference should be made to the Authority's duties and requirements as Competent Authority under the Habitats Regulations. You may wish to refer to DCLGs "Planning for the Protection of European Sites" publication, and our own series of Guidance notes (HRGNs) to assist Competent Authorities, which we would be pleased to send to you on request. The Council should also consider the hierarchy of designations both in terms of level of protection (European, national, local) and also the principles of avoidance first, then mitigation, then compensation as last resort (as set out within key principle vi of PPS9).</p>	Comments Noted	<p>The 'what are we already required to do?' section of the Issues and Options document only provided a brief summary/overview of the key requirements which the Council will need to address in its nature conservation policies in the Core Strategy. It is acknowledged that not all requirements were listed. The references to the legislation will be amended in line with the comments from Natural England in order to ensure accuracy. Consideration will be given to the hierarchy of designations and take account of the key principles set out in PPS9.</p>
327773 / 1095 Mr Peter Iles Specialist Advisor (Archaeology) Lancashire County	Agree	<p>This issue would need to be re-worded if the change suggested at 4 above is adopted. In the first section, "Why is this important for Pendle?" the second paragraph should be altered slightly to read: "Historic buildings, sites and areas of significant architectural, archaeological and historical interest should be..." The list of important documents in this section should include the 2004 LCC Landscape Strategy, the draft RSS policy EM1, the 2006 LCC SPD for</p>	Comments Noted	<p>Consideration will be given to archaeological features / sites as well as historic buildings and areas of significant architectural and historic interest. The list of key documents is only a list of some example documents that will be considered in the development of policies in the Core Strategy.</p>

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Council		Landscape and Heritage, the Lancashire Extensive Urban Survey historic town reports for Barnoldswick, Colne and Nelson (LCC 2006) and the 2002 LCC Historic Landscape Characterisation Programme. Under "What we are required to do?" the following three bullet points (included in the present local plan) need to be added: - Take account of and protect archaeological sites and historical landscapes in our various roles as planning, education and recreation authorities. Appropriate policies must be included in development plans and their implementation ensured through development control. (PPG16 Planning and Archaeology, DoE 1990). - Sites and structures identified as of national importance must be earmarked for preservation, whilst other remains of lower importance are to be managed on their merits. (PPG 16). - A "no net loss" strategy for natural and built heritage should be implemented. (Evolving RSS policy EM1; LCC Landscape and Heritage SPG, 2006).		
Issue 10a: Choice 1				
327813 / 431 Mr. David Penney	Agree	Second Choice	Comments Noted	
327370 / 871 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
Issue 10a: Choice 2				
327597 / 1188 Mrs. Pam Slater	Agree		Comments Noted	
328023 / 1062 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
328001 / 775 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In order to protect and enhance the built heritage most regard should be had to sites of national importance such as Listed Buildings and Conservation Areas, followed by those designated of regional and local importance. Only development which impacts upon those sites which have been designated as being the most important historic environments should be expected to meet any higher standards of design.	Disagree	Local authorities have a duty to protect nationally recognised built heritage designations. Suitable policies within the development plan should be formulated to strengthen the local authority's commitment to the stewardship of the historic environment. The choices set out under issue 10a are potential ways of protecting and enhancing the Borough's built heritage. It maybe that a number of methods can be included in the policy approach in the Core Strategy. The identification of areas where higher standards of design will apply would help to protect and enhance the quality of our historic built environment in those specific locations.
327679 / 711 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327587 / 567 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327846 / 509 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In order to protect and enhance the built heritage most regard should be had to sites of national importance such as Listed Buildings and Conservation Areas, followed by those designated of regional and local importance. Only development which impacts upon those sites which have been designated as being the most important historic environments should be expected to meet any higher standards of design.	Disagree	Local authorities have a duty to protect nationally recognised built heritage designations. Suitable policies within the development plan should be formulated to strengthen the local authority's commitment to the stewardship of the historic environment. The choices set out under issue 10a are potential ways of protecting and enhancing the Borough's built heritage. It maybe that a number of methods can be included in the policy approach in the Core Strategy. The identification of areas where higher standards of design will apply would help to protect and enhance the quality of our historic built environment in those specific locations.
327813 / 432 Mr. David Penney	Agree	First Choice	Comments Noted	
Issue 10a: Choice 3				
327846 / 510 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In order to protect and enhance the built heritage most regard should be had to sites of national importance such as Listed Buildings and Conservation Areas, followed by those designated of regional and local importance. Only development which impacts upon those sites which have been designated as being the most important historic environments should be expected to meet any higher standards of design.	Disagree	Local authorities have a duty to protect nationally recognised built heritage designations. Suitable policies within the development plan should be formulated to strengthen the local authority's commitment to the stewardship of the historic environment. The choices set out under issue 10a are potential ways of protecting and enhancing the Borough's built heritage. It maybe that a number of methods can be included in the policy approach in the Core Strategy. Requiring higher standards of design only in Conservation Areas would only help to enhance those areas. Other areas with historic built heritage would not be protected and enhanced to the same standard. There are groups of listed buildings and other locally important historic buildings that can be located outside of a conservation area. Choice 3 would not specifically help to enhance the surroundings of these buildings. The policy approach in the Core Strategy should employ a number of methods to help protect and enhance the built heritage of the Borough.
328001 / 776 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In order to protect and enhance the built heritage most regard should be had to sites of national importance such as Listed Buildings and Conservation Areas, followed by those designated of regional and local importance. Only development which impacts upon those sites which have been designated as being the most important historic environments should be expected to meet any higher standards of design.	Disagree	Local authorities have a duty to protect nationally recognised built heritage designations. Suitable policies within the development plan should be formulated to strengthen the local authority's commitment to the stewardship of the historic environment. The choices set out under issue 10a are potential ways of protecting and enhancing the Borough's built heritage. It maybe that a number of methods can be included in the policy approach in the Core Strategy. Requiring higher standards of design only in Conservation Areas would only help to enhance those areas. Other areas with historic built heritage would not be protected and enhanced to the same standard. There are groups of listed buildings and other locally important historic buildings that can be located outside of a conservation area. Choice 3 would not specifically help to enhance the surroundings of these buildings. The policy approach in the Core Strategy should employ a number of methods to help protect and enhance the built heritage of the Borough.
328102 / 648 Mr Andrew Leyssens	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Senior Planner United Utilities Property Services				
Issue 10a: Choice 4				
327679 / 712 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327370 / 872 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327797 / 216 Ms. Lorna Metcalfe	Agree		Comments Noted	
328023 / 1063 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 10a: Choice 5				
328023 / 1064 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 10a: Choice other				
327370 / 873 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	No Opinion	In addition, ensure that built heritage policy includes consideration of the wider setting of designated features - including where appropriate seeking to define the wider setting of major features - in accordance with national planning guidance and RSS.	Comments Noted	The preferred policy approach for protecting and enhancing Pendle's built heritage will need to consider whether it is appropriate to define specific areas where higher design standards will be required. This may include looking at the wider setting of major historical features.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327956 / 1300 Mr Jeff Pedder Owner P & H Castings	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	This consultee is requesting that the protected employment area designation should be removed from historic buildings in conservation areas to allow alternative, more appropriate uses to occupy these buildings to help ensure the long term sustainability of these historic assets. Restricting the usage of these buildings could have a negative impact on the protection of the historic environment. If low order uses occupy these buildings repairs and maintenance may be neglected. As the needs of modern industries change these old industrial buildings cannot adequately provide a suitable option. Giving flexibility to the usage of historic buildings can help to secure the long term future of the building. The designation of sites as protected employment areas is covered under Issue 6b of the Core Strategy and will also be covered as part of the Land-use Allocations DPD. The flexibility of usage of historic industrial areas could be considered as an option under Issue 10a.
328008 / 1301 Mr Lester Spencer Owner Trojan Plant Services Ltd	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	This consultee is requesting that the protected employment area designation should be removed from historic buildings in conservation areas to allow alternative, more appropriate uses to occupy these buildings to help ensure the long term sustainability of these historic assets. Restricting the usage of these buildings could have a negative impact on the protection of the historic environment. If low order uses occupy these buildings repairs and maintenance may be neglected. As the needs of modern industries change these old industrial buildings cannot adequately provide a suitable option. Giving flexibility to the usage of historic buildings can help to secure the long term future of the building. The designation of sites as protected employment areas is covered under Issue 6b of the Core Strategy and will also be covered as part of the Land-use Allocations DPD. The flexibility of usage of historic industrial areas could be considered as an option under Issue 10a.
328009 / 1302 Mssrs S & P Simpson Owners Simpsons Furniture	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	This consultee is requesting that the protected employment area designation should be removed from historic buildings in conservation areas to allow alternative, more appropriate uses to occupy these buildings to help ensure the long term sustainability of these historic assets. Restricting the usage of these buildings could have a negative impact on the protection of the historic environment. If low order uses occupy these buildings repairs and maintenance may be neglected. As the needs of modern industries change these old industrial buildings cannot adequately provide a suitable option. Giving flexibility to the usage of historic buildings can help to secure the long term future of the building. The designation of sites as protected employment areas is covered under Issue 6b of the Core Strategy and will also be covered as part of the Land-use Allocations DPD. The flexibility of usage of historic industrial areas could be considered as an option under Issue 10a.
327651 / 1289 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Issues 10a asks about the protection and enhancement of built heritage yet offers no choices relating to proactive enhancement schemes, for example THI and PSICA. It is important to address the preparation of conservation area appraisals and management plans, the need to review and designate further conservation areas, the need for wider characterisation studies, the preparation of a list of locally important heritage assets and heritage assets at risk. Whilst Pendle has no entries in the 2008 HAR register this does not cover Grade II listed buildings. PPS1 calls for the rejection of design inappropriate to its context or which fails to improve the quality of the area. Pendle should therefore strive to achieve high quality design throughout its area as proposed in choice 1. Additional guidance as delivered in your excellent Draft Conservation Area Design and Development Guidance SPD	Agree, in part	Issue 10a specifically looks at the protection and enhancement of our built heritage and considers the need for higher design standards in specific areas which have a high heritage value. Choice 1 under this issue considers whether higher design standards should be required throughout Pendle. The approach in the Preferred Options document may well incorporate a number of these suggestions and combine a number of the choices.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		tailors this requirement. It is wrong to counter the need for high quality design with the suggestion of increased or even prohibitive costs. High quality environments and buildings attract high value users and rents. Article 4 directions should be seen as part of the management of conservation areas, the cumulative effect of small changes can significantly undermine the character and quality of conservation areas. In addition to a core policy to protect, preserve and enhance the character and appearance and amenity of the borough's built environment the Council should also develop a policy which encourages developments to take a more proactive approach to the management and improvement of areas of historic and local distinctiveness. See the approach taken by Trafford Council.		
328010 / 1303 Mr Anthony Pilling Textile Engineering & Architectural Historian	No Opinion	Change use designation from specific (eg gen industry) to a flexible designation (such as white land) which will allow appropriate use (or uses) that give(s) a sustainable long term future that respects and retains the heritage buildings. This consideration should be applied throughout the conservation areas.	Comments Noted	This consultee is requesting that the protected employment area designation should be removed from historic buildings in conservation areas to allow alternative, more appropriate uses to occupy these buildings to help ensure the long term sustainability of these historic assets. Restricting the usage of these buildings could have a negative impact on the protection of the historic environment. If low order uses occupy these buildings repairs and maintenance may be neglected. As the needs of modern industries change these old industrial buildings cannot adequately provide a suitable option. Giving flexibility to the usage of historic buildings can help to secure the long term future of the building. The designation of sites as protected employment areas is covered under Issue 6b of the Core Strategy and will also be covered as part of the Land-use Allocations DPD. The flexibility of usage of historic industrial areas could be considered as an option under Issue 10a.
Issue 10b: Choice 1				
327539 / 333 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	This option would require developers to improve and enhance the natural environment in and around a proposal site, instead of merely mitigating for any habitat or species loss that the development results in. This would be a very positive option, integrating environmental enhancements in to a requirement of development proposals.	Comments Noted	Choice 1 under issue 10b would provide a positive impact on the natural environment as it would make sure developments built-in beneficial features for our natural heritage. The Core Strategy may take a combined approach to protecting and enhancing our natural environment by requiring developments to build-in beneficial features but also to mitigate against any adverse impacts of the development.
327976 / 266 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327587 / 568 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
327813 / 433 Mr. David Penney	Agree	Second Choice	Comments Noted	
328102 / 649 Mr Andrew Leyssens Senior Planner United Utilities Property	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Services				
327370 / 874 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1189 Mrs. Pam Slater	Agree		Comments Noted	
Issue 10b: Choice 2				
327679 / 713 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327597 / 1190 Mrs. Pam Slater	Agree		Comments Noted	
327813 / 434 Mr. David Penney	Agree	First Choice	Comments Noted	
327976 / 267 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327539 / 334 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	This option will preserve the value of existing protected sites, to the benefit of the borough as a whole.	Comments Noted	Buffer zones could be used to provided added protection to existing natural heritage desingations. The Core Strategy could take a combined approach of including buffer zones, mitigating against any negative impacts of development and requiring developers to build beneficial features into their developments.
327370 / 875 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Issue 10b: Choice 3

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328001 / 778 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	In order to protect and enhance the natural heritage most regard should be had to sites of international and national importance followed by those of regional and local interest. However, this should not limit development when suitable mitigation can be incorporated to overcome any ecological constraints. In accordance with national guidance contained in PPS9 only where development will result in adverse impacts on biodiversity and conservation should mitigation be required.	Comments Noted	This choice would require developers to provide mitigation measures where the development would result in adverse impacts on biodiversity and conservation. This could be part of a range of measures to help protect the Borough's natural heritage. PPS9 provides clear guidance on the circumstances for when compensation is required. PPS9 is also clear about the need for plan policies to aim to maintain, enhance, restore or add to biodiversity and geological conservation interests. On this basis it will be important for the Core Strategy policy to include measures which help to enhance the biodiversity of the Borough and not just to protect what is already there. The option in choice 1 to require developers to provide beneficial measures into their developments could be incorporated into the policy approach.
327597 / 1191 Mrs. Pam Slater	Agree		Comments Noted	
328023 / 1065 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327976 / 268 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327797 / 217 Ms. Lorna Metcalfe	Agree		Comments Noted	
327797 / 218 Ms. Lorna Metcalfe	Agree		Comments Noted	
327846 / 777 Ms Katie Fluhrer Lambert Smith Hampton	Agree	In order to protect and enhance the natural heritage most regard should be had to sites of international and national importance followed by those of regional and local interest. However, this should not limit development when suitable mitigation can be incorporated to overcome any ecological constraints. In accordance with national guidance contained in PPS9 only where development will result in adverse impacts on biodiversity and conservation should mitigation be required.		This choice would require developers to provide mitigation measures where the development would result in adverse impacts on biodiversity and conservation. This could be part of a range of measures to help protect the Borough's natural heritage. PPS9 provides clear guidance on the circumstances for when compensation is required. PPS9 is also clear about the need for plan policies to aim to maintain, enhance, restore or add to biodiversity and geological conservation interests. On this basis it will be important for the Core Strategy policy to include measures which help to enhance the biodiversity of the Borough and not just to protect what is already there. The option in choice 1 to require developers to provide beneficial measures into their developments could be incorporated into the policy approach.
327539 / 335 Mr. Philip Carter Planning Liaison Officer Environment Agency	Agree	We support this option, and feel that agreeing the mitigation measures necessary where development will result in adverse impacts on biodiversity and conservation up-front would be a positive requirement. Ensuring developers understand the extent of mitigation required of a proposed development in each individual case will be beneficial.	Comments Noted	Mitigating against any adverse impact of development will help to ensure a 'no net loss' of biodiversity. This could form one of a number of measures in the Core Strategy policy to help protect and enhance the Borough's natural assets.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327651 / 1290 Ms. Judith Nelson Regional Planner English Heritage	Agree	Issue 10b choice 3 calls for the mitigation of adverse impacts, a similar approach is required in relation to the historic environment.	Comments Noted	This choice is specifically referring to the natural environment and not the historic built environment. This choice is derived from PPS9 and seeks to ensure that the most appropriate site has been selected for the proposed development. With regards to the historic built environment, mitigation measures could be included in the policy approach in the Core Strategy in order to reduce the impact of new development on the historic environment.
327679 / 714 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327813 / 435 Mr. David Penney	Agree	Third Choice	Comments Noted	
327370 / 876 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Issue 10b: Choice other

327370 / 877 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	No Opinion	In addition, seek to secure the protection and enhancement of existing wildlife corridors and the provision of new wildlife corridors in order to provide both a) new foraging routes for wildlife and b) the opportunity for flora and fauna to migrate in response to the inevitable impacts of climate change.	Agree, in part	PPS9 (para 12) clearly explains that Local Authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development and where possible strengthened by or integrated within it. In light of this advice, the environmental policies within the Core Strategy will seek to protect those established wildlife corridors and encourage the creation of new linkages. However, it will be the Land-use Allocations and proposals map DPDs that will identify the location of these wildlife corridors.
327980 / 459 Mr Nick Sandford Regional Policy Officer The Woodland Trust	Disagree	Again we welcome the reference in the introductory paragraphs to social, economic and environmental benefits provided by biodiversity and the landscape. Under the section "What we are already required to do?", you make reference to PPS9 but fail to mention the strong protection given by this Government planning policy to ancient woodland and ancient/veteran trees. Planning Policy Statement 9 on Biodiversity and Geological Conservation clearly states: "Ancient woodland is a valuable biodiversity resource both for the diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as an SSSI). They should not grant planning permission for any developments that would result in its loss or deterioration...Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Planning authorities should encourage the conservation of such trees as part of development proposals." (ODPM, PPS9, 2005, paragraph 10). We would like to see this translated into a new option under Section 10b "How can we protect and enhance our natural heritage?". This	Agree, in part	It is clear that PPS9 gives significant weight to the protection of ancient woodland and other important natural habitats. The Core Strategy will need to include strong environmental policies in order to protect the limited ancient woodland that is present in the Borough. The preferred policy approach is likely to take a combined approach of choices 1-3 under issue 10b and also include additional detail provided through responses to the consultation process. All five ancient woodlands in Pendle are designated as Biological Heritage Sites and are afforded protection at a county level. Restrictive development policies may be required to ensure the protection of these irreplaceable semi-natural habitats.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
		could be done by amending Option 3 to read:"Require mitigation measures to be put in place where development will result in adverse impacts on biodiversity and conservation but ensuring that irreplaceable semi-natural habitats, such as ancient woodland and ancient/veteran trees, are protected from development." Paragraph 3.40 of the Issues and Options Report on page 11 states: "there are only five ancient woods covering 19.6 hectares in Pendle which is low compared to regional and national figures." We therefore believe that it is even more important that your core strategy has strong policies in it to protect what little of this valuable habitat remains.		
327529 / 936 North West Planning Natural England	No Opinion	In terms of the choice options for Issue 10b, there is not a particular option amongst those set out on page 97 that would embrace all of our objectives; a combination of them would come nearer to what we would wish to see.	Comments Noted	It is recognised that the policy in the Core Strategy relating to the protection and enhancement of our natural environment should encompass a combination of the choices presented under Issue 10b. This is likely to be the only satisfactory way to ensure the protection of our natural heritage/environment.
328021 / 1006 Mr Peter Jepson Specialist Advisor - Ecology Lancashire CC	No Opinion	NW RSS Policy EM1 seeks a step change to increase in biodiversity not simply a "no net loss" approach. It will replace Policy 21 of the JLSP which requires "as a minimum no net loss". Within this issue there is a need to incorporate "ecological networks" to buffer affects of recreation, development and climate change, in this respect Choice 2 is far too simplistic. It is important to recognise that PPG 9 seeks to address de-fragmentation of habitats in respect to ecological networks.	Agree	Policy EM1 of the RSS indicates that where proposals and schemes affect the region's landscape, natural or historic environment or woodland assets, prospective developers should first avoid loss or damage to the assets, then mitigate any unavoidable damage and compensate for loss or damage through offsetting actions with a foundation of no net loss in resources as a minimum requirement. The policies in the Core Strategy will need to be in line with this approach. With regard to ecological networks, PPS9 is clear that local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats. Networks should be protected from development, and where possible, strengthened by or integrated within it. The policies in the Core Strategy will need to support the protection of wildlife corridors and encourage the creation of new ecological networks. It will be the role of the Land-use Allocations and Proposals Map DPDs to identify the locations of these corridors / networks.
Issue 10c: Option 1				
327813 / 436 Mr. David Penney	Agree		Comments Noted	
327828 / 970 Mr Steven Broomhead Chief Executive North West Development Agency	Disagree	We consider option 1, which would permit only agriculture or forestry related development in open countryside, to be unduly restrictive.	Comments Noted	Option 1 under Issue 10c would restrict any new developments apart from agricultural or forestry related development. This option would satisfy the aims of this issue to protect the open countryside. However those rural areas with specific needs would be restricted to the current limits of their settlements. It is likely that the preferred approach in the Core Strategy will allow for some development to meet certain needs.
Issue 10c: Option 2				
327836 / 1240 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	The consultee supports Option 2 under Issue 10c.
327597 / 1192	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Mrs. Pam Slater 328102 / 650 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327846 / 511 Ms Katie Fluhrer Lambert Smith Hampton	Agree	The settlement hierarchy discussed in 1a Option 2 provides for adequate protection to the open countryside through directing development towards the Key Service Centres of Nelson and Colne. The Settlement Hierarchy restricts development in rural areas unless it addresses a specific local need and does not harm regeneration efforts in Nelson and Colne. As such, option 2 in conjunction with the suggested settlement hierarchy is considered to provide adequate protection to the open countryside.	Comments Noted	The settlement hierarchy approach to development and the protection of the open countryside are linked and the policy approach in the Core Strategy is likely to address both issues. Pendle's distinctive landscape helps to shape our cultural identity. It is important to protect the open countryside from inappropriate development and maintain this natural asset. The settlement hierarchy approach alone would not provide adequate protection. Additional guidance is needed to restrict development in the open countryside. The preferred approach will need to take account of the needs of the community and the need for agricultural diversification. Elements from each of the options may provide the best policy approach.
327679 / 715 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327587 / 569 Mr. Tony Sowerbutts Managing Director LBS Group	Agree		Comments Noted	
328001 / 779 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	The settlement hierarchy discussed in 1a Option 2 provides for adequate protection to the open countryside through directing development towards the Key Service Centres of Nelson and Colne. The Settlement Hierarchy restricts development in rural areas unless it addresses a specific local need and does not harm regeneration efforts in Nelson and Colne. As such, option 2 in conjunction with the suggested settlement hierarchy is considered to provide adequate protection to the open countryside.	Comments Noted	The settlement hierarchy approach to development and the protection of the open countryside are linked and the policy approach in the Core Strategy is likely to address both issues. Pendle's distinctive landscape helps to shape our cultural identity. It is important to protect the open countryside from inappropriate development and maintain this natural asset. The settlement hierarchy approach alone would not provide adequate protection. Additional guidance is needed to restrict development in the open countryside. The preferred approach will need to take account of the needs of the community and the need for agricultural diversification. Elements from each of the options may provide the best policy approach.
Issue 10c: Option 3				
327976 / 269 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	
327977 / 318 Mr Tim Coyne	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327370 / 878 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327828 / 972 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Whilst development in the open countryside needs to be carefully managed, we would suggest that the LDF Core Strategy should make appropriate provision for facilities which support diversification of the rural economy. We therefore support Option 3.	Comments Noted	It is important to protect the open countryside from inappropriate development and maintain this natural asset. Additional guidance is needed to restrict development in the open countryside. The preferred approach will need to take account of the needs of the rural communities and the need for agricultural and economic diversification. Elements from each of the options may provide the best policy approach.
327836 / 1241 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	The consultee supports Option 3 under Issue 10c.

Issue 10c: Option other

327370 / 879 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	No Opinion	In addition, consideration needs to be given to the impact of new development upon existing landscape character and its historic dimension. Accordingly new development needs to be informed by a proper analysis of landscape character and an assessment of the impact of proposed development upon it.	Comments Noted	The open countryside is a valuable natural asset which should be protected against unnecessary and inappropriate development. Policy EM1 of the RSS indicates that plans should identify, protect, maintain and enhance natural, historic and other distinctive features that contribute to the character of landscapes. The policies within the Core Strategy will need to be in conformity with this requirement. Furthermore the policies will need to take account of landscape character assessments. Lancashire County Council has produced a landscape character assessment which covers the Pendle area. This can be used to help to determine priority areas for the maintenance, enhancement and/or restoration of different landscape areas across the borough. Development proposals can then be judged against the character assessment to determine the impact on the landscape.
328003 / 798 Ms Nicola Sewell Senior Planner Indigo Planning	No Opinion	Consider that the settlement boundaries should be reviewed and in some instances extended to include sites which are more closely related to the urban area.	Comments Noted	There will be cases where the settlement boundaries may need altering in order to incorporate new allocations. This will be pursued through the Land-use Allocations DPD. This will only occur where there is clear justification for bringing land into the settlement limits. The open countryside is an important natural asset which should be given appropriate protection from unnecessary development. The preferred policy approach is likely to incorporate a combination of the options allowing some development where there is a clear need.
327651 / 1294 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Protecting Sites: The report does not raise the need to review existing green belt boundaries and the retention of current boundaries is supported. The advice of your conservation officer should be sought on any additional sites which may require protection.	Comments Noted	The RSS indicates that a strategic review of Green Belt boundaries in Lancashire is not due until 2011 and that it is expected that little change will occur. At present the general extent of the Region's Green Belt will be maintained. Detailed changes at the local level should be examined through the LDF process. Actual changes to the Green Belt boundary will be brought forward in the Land-use Allocations DPD. In terms of Green Belt policy this will be considered within the Open Countryside policy and

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327529 / 937 North West Planning Natural England	No Opinion	We strongly support the protection and enhancement of the countryside. However, none of the options which are set out represent our own view, which is that development should reflect the needs in the area and seek to conserve and enhance the character and quality of the landscape, biodiversity and other elements of the natural environment.	Comments Noted	is likely to incorporate additional development criteria. The preferred policy approach is likely to incorporate a combination of the options presented in the Issues and Options paper. The policy relating to the natural environment will need to address issues of landscape, biodiversity, and other elements of the natural and historic environment. The policies should require new developments to respect the landscape character and be justified by evidence of need.
327651 / 1292 Ms. Judith Nelson Regional Planner English Heritage	No Opinion	Development in the open countryside has the potential to harm the historic landscape and setting of heritage assets. It is however important to allow the adaptive re-use of, for example, traditional farm buildings. It is suggested that there may be a halfway house between option 1 and 2 to cover this issue.	Comments Noted	The policy approach in the Core Strategy is likely to be a combination of elements from each of the options. It will be important to protect, maintain and enhance natural, historic and other distinctive features that contribute to the character of Pendle's landscape whilst also allowing for some development to meet the needs of the rural communities.
Issue 10d: Option 1				
327370 / 881 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328023 / 1066 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327597 / 1193 Mrs. Pam Slater	Agree		Comments Noted	
327813 / 437 Mr. David Penney	Agree		Comments Noted	
Issue 10d: Option 2				
327797 / 219 Ms. Lorna Metcalfe	Agree		Comments Noted	
327679 / 716 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327976 / 270 Mr Don McKay	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Bowland AONB Officer Forest of Bowland AONB				
328102 / 651 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
Issue 10d: Option other				
327651 / 1293 Ms. Judith Nelson Regional Planner English Heritage	Disagree	Sites of Settlement Character is not a common term, should they fall within a conservation area the CA appraisals would underline their importance, or should they be in the Green Belt then Option 1 could cover an assessment of alternative means of protecting such sites where they are determined as being of continued importance.	Comments Noted	Issue 10d should be considered within the Land-use Allocations DPD rather than the Core Strategy. The need for sites of settlement character is not an overarching key principle for the Core Strategy. The consultee indicates that the need for the sites of settlement character should be considered on a site by site basis. An assessment of each site may therefore be appropriate and the reclassification of such sites could be made using this evidence.
Options for Strategic Objective 11				
327813 / 438 Mr. David Penney	Agree	Issue 11a, Option 3; 11b, Choice 1 [Third], 2 [Fourth], 3, [Fifth], 5 [Sixth], 6 [First], 7 [Seventh], 8 [Second]; Issue 11c, Option 3.	Comments Noted	
327500 / 784 Mrs. Lindsay Alder Assistant Network Strategy Manager Highways Agency	Agree	The Agency welcomes some of the objectives set out in the core strategy, particularly those focussed on helping to reduce the need to travel. It is important to ensure that where development is identified in the plan, the implications on transport infrastructure is considered. Indeed transport infrastructure constraints are one of the material considerations that need to be taken into account in deciding how land should be allocated and should form part of the evidence base. It also recognises the need to ensure developments are sited in sustainable locations and can be accessible for different modes of transport.	Comments Noted	An infrastructure study will form part of the evidence base for the Core Strategy and Land Use Allocations DPDs and will consider the issue of transport infrastructure as part of this. The policies developed in the CS will need to have the scope to consider the impacts of proposed development on transport infrastructure and an overall aim of the CS will be to ensure development occurs in sustainable locations, in line with national government objectives.
327529 / 938 North West Planning Natural England	Agree	While not commenting in detail on the choices in the report, in general we favour proposals to reduce the need to travel, especially by car, and to improve opportunities for sustainable travel choices, including walking, cycling and public transport.	Comments Noted	Comments noted.
Issue 11a: Option 1				
328027 / 1128 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Acceptable as in Eddington terms it is "modally agnostic", i.e. does not preclude any one specific mode. LCC has proposals for the A56 Villages Bypass, but this is not a priority in the RFA transport investment programme and is most unlikely to become one. Funding is unlikely until beyond 2018/19 at the earliest. There are aspirations to reopen the Colne to Skipton rail line (SELRAP), but again, funding likely to be an obstacle.	Comments Noted	Comments noted. The best protection for the former trackbed will be considered in the Preferred Options document.
327976 / 271 Mr Don McKay Bowland AONB Officer Forest of Bowland AONB	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327597 / 1194 Mrs. Pam Slater	Agree		Comments Noted	
327836 / 1242 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted
327828 / 973 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Would favour option 1, which would continue to protect the route of the former Colne-Skipton railway line for future transport use pending further investigation into the costs, benefits and feasibility of the road and rail alternatives.	Comments Noted	Comments noted.
328102 / 652 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
Issue 11a: Option 2				
328027 / 1129 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Disagree	Protect for road only - not now acceptable in Eddington terms.	Comments Noted	Recommendations of Eddington report will be considered in developing the Preferred Options Document.
327679 / 717 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 11a: Option 3				
328027 / 1131 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Disagree	Protect for rail only - again, not acceptable in Eddington terms, although more sustainable than Option 2.	Comments Noted	Recommendations of Eddington report will be considered in developing the Preferred Options document.
327370 / 882 Mr. Alan Hubbard	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Land Use Planning Adviser (E Midlands & NW) National Trust				
327813 / 439 Mr. David Penney	Agree	Since the whole track-bed is required for the restoration of the double track railway. If a Multi-User Path is planned along the route of the railway as well as a new bypass road, then more land adjacent to the trackbed would have to be acquired to meet the transport needs along this protected transport corridor.	Comments Noted	The different potential uses and protection of the track bed will be considered as part of the Preferred Options document.
327797 / 220 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 11a: Option 4				
327977 / 319 Mr Tim Coyne	Agree	Aligns with many other strategies eg reducing reliance on cars, improving health, improving green space etc	Comments Noted	
328023 / 1067 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
328027 / 1132 Mr Andrew Ashall Principal Regional Planning Officer 4NW	Agree	Acceptable in RSS terms, and may not preclude any future road/rail improvement, although this would then need to be set alongside loss of amenity and green infrastructure.	Comments Noted	Need to consider implication of designating as public footpath/cycleway etc and then removing facility in future to develop as transport corridor.
Issue 11a: Option other				
328015 / 943 Mr James Ellis Planning Officer Craven DC	Agree	With regard to question 11a (p 101-102) on the route of the Skipton-Colne Railway Line, draft policy INF 5 of our Preferred option Core Strategy (p.34 see policy below) is of relevance. Policy INF 5: Skipton to Colne Railway Line - Safeguarding of Route Requires the Allocations DPD to safeguard the disused Skipton to Colne Railway Line and promote its development for alternative sustainable transport for example as a footpath or cycle route. Where appropriate to consider whether part of the route could be used to realign short stretches of the A56 as part of its upgrading to a strategic transport route.	Comments Noted	Potential conflict with no support for reinstatement of railway route. On further investigation, the Preferred Options paper from Craven DC outlines a general support in principle of the re-instatement of the railway line but acknowledges that funding means this is likely to be a long term plan, possibly even outside the plan period of the proposed Core Strategy. Therefore not necessary a conflict with Pendle BC proposing to protect the former railway line bed for possibly reinstatement in the future. Careful consideration is needed to the wording of any policy to ensure that if funding did become available, the possible reopening was not prevented by a policy or land use allocation.
Issue 11b: Choice 1				
327813 / 440 Mr. David Penney	Agree	Third Choice	Comments Noted	
327836 / 1243 Mr Mike Kirby Chief Planning Officer Lancashire County	Agree	Supported	Comments Noted	Support noted

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Council				
328023 / 1068 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 11b: Choice 2				
327679 / 718 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327836 / 1244 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support Noted
327828 / 975 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Would favour option 3 whereas large scale employment generating development or other uses which generate a significant amount of movement would be required to submit green travel plans. Before doing so, however, it is first necessary to establish thresholds to define the terms 'large-scale' and 'significant'. we therefore see option 2 to be an essential pre-requisite to Option 3.	Comments Noted	Choice 2 refers to Transport Assessments or Impact Statements that outline current and future transport needs of the development. Choice 3 refers to Green Travel Plans where businesses outline plans for managing the travel needs of their staff in a sustainable way. The two are not the same thing and so therefore disagree that 2 is a pre-requisite of 3. However the two could both be applied by a travel policy and this comment will be interpreted as support for both.
327597 / 1195 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 883 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
328102 / 653 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327846 / 512 Ms Katie Fluhner Lambert Smith Hampton	Agree	Travel impact statements should only be required for major developments or those likely to generate significant travel movements.	Comments Noted	This option proposes the establishing of thresholds above which it is judged that developments could have significant transport implications. Such developments would be required to submit a transport assessment / impact statement. Guidance would be taken from regional and sub regional policy in establishing such thresholds.
327813 / 441 Mr. David Penney	Agree	Fourth Choice	Comments Noted	
328001 / 780 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	Travel impact statements should only be required for major developments or those likely to generate significant travel movements.	Comments Noted	This option proposes the establishing of thresholds above which it is judged that developments could have significant transport implications. Such developments would be required to submit a transport assessment / impact statement. Guidance would be taken from regional and sub regional policy in establishing such thresholds.
Issue 11b: Choice 3				
327836 / 1245 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support Noted.
327597 / 1196 Mrs. Pam Slater	Agree		Comments Noted	
327813 / 442 Mr. David Penney	Agree	Fifth Choice	Comments Noted	
327828 / 976 Mr Steven Broomhead Chief Executive North West Development Agency	Agree	Would favour option 3 whereas large scale employment generating development or other uses which generate a significant amount of movement would be required to submit green travel plans. Before doing so, however, it is first necessary to establish thresholds to define the terms 'large-scale' and 'significant'. we therefore see option 2 to be an essential pre-requisite to Option 3.	Comments Noted	Choice 2 refers to Transport Assessments or Impact Statements that outline current and future transport needs of the development. Choice 3 refers to Green Travel Plans where businesses outline plans for managing the travel needs of their staff in a sustainable way. The two are not the same thing and so therefore disagree that 2 is a pre-requisite of 3. However the two could both be applied by a travel policy and this comment will be interpreted as support for both.
328023 / 1069 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
328001 / 781 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	Only those developments which will generate significant amount of movement should be required to submit a green travel plan.	Comments Noted	Support for the Choice noted. The Choice would only require large scale employment generating developments or those which will generate a significant amount of movement to submit such a plan. thresholds would have to be established for when a plan would be required. Guidance will be sought from regional and sub regional guidance.

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327846 / 513 Ms Katie Fluhner Lambert Smith Hampton	Agree	Only those developments which will generate significant amount of movement should be required to submit a green travel plan.	Comments Noted	Support for the Choice noted. The Choice would only require large scale employment generating developments or those which will generate a significant amount of movement to submit such a plan. thresholds would have to be established for when a plan would be required. Guidance will be sought from regional and sub regional guidance.
327679 / 719 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
Issue 11b: Choice 4				
327679 / 720 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327797 / 221 Ms. Lorna Metcalfe	Agree		Comments Noted	
327836 / 1246 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	The selected option depends on what is in the Government's Community Infrastructure Levy proposals and your Council's response to it.	Comments Noted	The Council has yet to form its response to the Governments proposed CIL. However, CIL is one way in which future developer contributions could be raised but not the only method, with S106 still proposed to be used. In fact, this Choice, which proposes that developers only need address the immediate transport requirements of their development would align more closely with the use of S106, whereas CIL is intended to provide for developers to contribute to wider infrastruture requirements.
Issue 11b: Choice 5				
327836 / 1247 Mr Mike Kirby Chief Planning Officer Lancashire County Council	No Opinion	The selected option depends on what is in the Government's Community Infrastructure Levy proposals and your Council's response to it.	Comments Noted	The Council has yet to form its response to the Government's proposed CIL. CIL is intended to provide for developers to contribute to wider infrastruture requirements, whereas currently under the method of S106 agreements, contributions are limited to requirements immediately connected with the proposed development. Therefore to pursue this Choice within the policy it would be suggested that the Council would need to sign up to using CIL.
327597 / 1197 Mrs. Pam Slater	Agree		Comments Noted	
327370 / 884 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327813 / 443 Mr. David Penney	Agree	Sixth Choice	Comments Noted	
Issue 11b: Choice 6				
327813 / 444 Mr. David Penney	Agree	First Choice	Comments Noted	
327813 / 445 Mr. David Penney	Agree	First Choice	Comments Noted	
327597 / 1198 Mrs. Pam Slater	Agree		Comments Noted	
327836 / 1248 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support noted.
328023 / 1070 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327370 / 885 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
Issue 11b: Choice 7				
327813 / 446 Mr. David Penney	Agree	Seventh Choice	Comments Noted	
327813 / 447 Mr. David Penney	Agree	Seventh Choice	Comments Noted	
328023 / 1071 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
327836 / 1249 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support Noted
Issue 11b: Choice 8				
327836 / 1250 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Supported	Comments Noted	Support Noted
327370 / 887 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327813 / 448 Mr. David Penney	Agree	Second Choice	Comments Noted	
327797 / 222 Ms. Lorna Metcalfe	Agree		Comments Noted	
Issue 11b: Choice 9				
328102 / 654 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327836 / 1251 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Disagree	Not Supported	Comments Noted	Disagreement Noted. This Choice could also be contrary to national and regional guidance which seek to location new major developments to locations which have good access to public transport to minimise the need to travel by private car (RSS Policy RT2).
327977 / 320 Mr Tim Coyne	Disagree		Comments Noted	
Issue 11b: Choice other				

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
328023 / 1072 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 11c: Option 1				
327979 / 344 Mrs Sarah Worthington Wm Morrison Supermarkets plc	Agree	Wm Morrison Supermarkets plc consider that car parking requirements should generally comply with the guidance set out in PPG13. Allowance should be made for developments within or on the edge of town centres where car parking can often play a dual role, accommodating both customers of the development, but also providing a convenient location for customers also wishing to use other shops and facilities in the town centre. In such situations, additional parking may be appropriate to accommodate the dual use. In terms of cycle parking, careful consideration should be given to the scale and type of development in relation to the likely demand in cycle parking. Policies based purely upon a number of cycle parking spaces per square metre of development area may result in excessive cycle parking which may not match the demand for cycle parking at the development. This may result in an inefficient use of urban land.	Comments Noted	The detailed setting of car and cycle parking standards will be considered as part of the Development Control Principles DPD - these comments will be considered as part of that process.
328001 / 783 Mr Nicolas Mills Associate Director Lambert Smith Hampton	Agree	The approach to car parking should reflect that set out in the RSS. The Council should not seek to impose overly restrictive car parking standards which are not in accordance with maximum standards set at national and regional level.	Comments Noted	RSS Policy RT2 does give the provision for LPAs to set more stringent targets than those outlined in the RSS, where appropriate, such as areas with the highest level of accessibility or those of environmental sensitivity such as National Parks. In developing the preferred option the Council will need to assess whether there is a case for adopting more stringent standards in the Borough.
327846 / 782 Ms Katie Fluhrer Lambert Smith Hampton	Agree	The approach to car parking should reflect that set out in the RSS. The Council should not seek to impose overly restrictive car parking standards which are not in accordance with maximum standards set at national and regional level.	Comments Noted	RSS Policy RT2 does give the provision for LPAs to set more stringent targets than those outlined in the RSS, where appropriate, such as areas with the highest level of accessibility or those of environmental sensitivity such as National Parks. In developing the preferred option the Council will need to assess whether there is a case for adopting more stringent standards in the Borough.
328102 / 655 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327797 / 223 Ms. Lorna Metcalfe	Agree		Comments Noted	
327836 / 1252 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Options 1 and/or 3 are supported. The Joint Lancashire Structure Plan will cease to have effect when the Regional Spatial Strategy is approved.	Comments Noted	Option 3 proposed to adopt the RSS standards but also define local standards for the land use categories not covered in the RSS. Since the publication of the Issues and Options Document, a partial review of the RSS parking standards has now done this and established standards for all most use classes as well as proposing a 3 tier 'area accessibility categories' approach to the standards and the introduction of a second stage in the process where an accessibility questionnaire would be used to

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
				<p>assess the accessibility of each site and establish whether a reduction in the maximum spaces should be considered, where sites have particularly good access from public transport. The outcome of the partial review will need to be considered as we develop our preferred options.</p>
Issue 11c: Option 2				
327679 / 721 Ms. Louise Morrissey Head of Land and Planning Peel Investments (North) Ltd.	Agree		Comments Noted	
327597 / 1199 Mrs. Pam Slater	Agree		Comments Noted	
328023 / 1073 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
Issue 11c: Option 3				
327836 / 1253 Mr Mike Kirby Chief Planning Officer Lancashire County Council	Agree	Options 1 and/or 3 are supported. The Joint Lancashire Structure Plan will cease to have effect when the Regional Spatial Strategy is approved.	Comments Noted	<p>Option 3 proposed to adopt the RSS standards but also define local standards for the land use categories not covered in the RSS. Since the publication of the Issues and Options Document, a partial review of the RSS parking standards has now done this and established standards for all most use classes as well as proposing a 3 tier 'area accessibility categories' approach to the standards and the introduction of a second stage in the process where an accessibility questionnaire would be used to assess the accessibility of each site and establish whether a reduction in the maximum spaces should be considered, where sites have particularly good access from public transport. The outcome of the partial review will need to be considered as we develop our preferred options.</p>
327813 / 449 Mr. David Penney	Agree		Comments Noted	
327370 / 888 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
A Spatial Strategy for Pendle				
327679 / 722 Ms. Louise Morrissey	Agree		Comments Noted	

Consultee	Your View	Reasons for comment	Outcome	Officer's Recommendation
Head of Land and Planning Peel Investments (North) Ltd.				
327587 / 570 Mr. Tony Sowerbutts Managing Director LBS Group	Disagree	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.	Comments Noted	We will consider this issue as part of the preparation of the spatial vision.
328023 / 1074 Mr. Juan Murray Planning (LDF) Consultant Lancashire CPRE	Agree		Comments Noted	
327813 / 450 Mr. David Penney	Agree		Comments Noted	
328102 / 656 Mr Andrew Leyssens Senior Planner United Utilities Property Services	Agree		Comments Noted	
327370 / 889 Mr. Alan Hubbard Land Use Planning Adviser (E Midlands & NW) National Trust	Agree		Comments Noted	
327597 / 1200 Mrs. Pam Slater	Agree		Comments Noted	

Issues & Options Consultation: Sustainability Appraisal

[illegible]

Issues & Options Consultation: Sustainability Appraisal

[illegible]

Issues & Options Consultation: Sustainability Appraisal

Issues and Options			Sustainability Appraisal																	Consultation Response and Comments			
SO	Issue	Option	H1	H2	E1	E2	E3	E4	C1	C2	C3	C4	C5	P1	P2	P3	P4	P5	P6	P7			
7	a	Level of new retailing	1																			38%	Option 1, although favoured is strongly opposed by Burnley BC and contrary to RSS
		2																				35%	
		3																				27%	
7	b	Need to attract national multiples	1																			23%	
		2																				35%	
		3																				42%	
7	c	Increase vitality and viability of town centres	1																			14%	
		2																				4%	
		3																				71%	
7	d	Establish/support night-time economy	1																			24%	
		2																				51%	
		3																				22%	
8	a	Location of new community facilities	1																			6%	
		2																				23%	
		3																				29%	
		4																				10%	
		5																				31%	
8	b	Types of community facility	-																			N/A	
9	a	Protection for open space	1																			N/A	40%
		2																				24%	
		3																				31%	
9	b	Improving access to open space	1																			44%	
		2																				54%	
10	a	Protect and enhance our built heritage	1																			14%	The SA Report favours higher standards of design in all areas of the borough, but respondents appear to prefer the greater flexibility afforded by only requiring such standards to be applied in specified areas (i.e. Conservation Areas)
		2																				25%	
		3																				11%	
		4																				18%	
		5																				7%	
10	b	Protect and enhance our natural heritage	1																			24%	The pragmatic approach of Option 3 is supported by the majority of respondents, but the SA Report favours the stronger environmental protection afforded by Options 1 and 2. The biodiversity study to be prepared for the LDF evidence base will help inform decisions on this issue.
		2																				18%	
		3																				49%	
10	c	Protect and enhance the open countryside	1																			19%	
		2																				33%	
		3																				30%	
10	d	Sites of Settlement Character	1																			57%	
		2																				36%	
11	a	Physical connections with adjacent areas	1																			33%	The apparent conflict with policies proposed by Craven DC and the support in our consultation for Option 3 requires further negotiation and investigation.
		2																				9%	
		3																				42%	
		4																				9%	

Issues & Options Consultation: Sustainability Appraisal

Issues and Options			Sustainability Appraisal																	Consultation Response and Comments				
SO	Issue	Option	H1	H2	E1	E2	E3	E4	C1	C2	C3	C4	C5	P1	P2	P3	P4	P5	P6			P7		
11	b	Address use of the car for personal transit	1																			8%		
			2																					9%
			3																					9%
			4																					4%
			5																					9%
			6																					26%
			7																					4%
			8																					11%
			9																					18%
11	c	Parking	1																			52%	The apparent conflict between public support for relaxed standards and the SA Reports preference for more restrictive standards requires further consideration. The RSS Partial Review is also revisiting this issue.	
			2																					18%
			3																					20%

Key

SA - Projected impact of option

- Moves significantly away from sustainability objectives
- Moves marginally away from sustainability objectives
- 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
- Preferred option in terms of meeting the sustainability objectives of housing (H), employment (E), community (C) and environment (P)

Consultation

- Favoured option
- Significant support for this option
- Some support for this option
- Little or no support for this option

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

- H1 Helps to meet the housing needs of whole 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 and/or rural renaissance
- C1 Contributes to the reduction of crime and the fear of crime
- C2 Helps to improve access to basic goods and services
- C3 Helps to protect landscapes and 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

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in a way which is better for you,
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اگر آپ یہ معلومات کسی ایسی شکل میں چاہتے ہیں، جو کہ
آپ کے لئے زیادہ مفید ہو تو برائے مہربانی ہمیں ٹیلیفون کریں۔



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