



Technical note: Pendle Borough Council Sustainability Appraisal Scoping Report – Consultation responses

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Scoping Report
Historic England: Ms Emily Hrycan (Pendle Borough Council Representor ID: 00198)				
C001.01SA	General	Response references Historic England guidance for providing effective assessment as part of SA/SEA.	Guidance reference in the consultation response is noted. No change required.	N/A
C001.02SA	1	The report should identify the built environment and its character and distinctiveness and refer to the historic environment. There is the potential for undesignated assets and archaeology on some sites and these should be referred to within the baseline information.	Noted. The SA Scoping Report considers the historic environment baseline under Section 3.12. The strategic nature of the baseline set out in the SA Scoping Report means that any specific information related to undesignated assets and archaeology on individual sites has not been presented. However, it does make reference to non-designated heritage assets in the Borough e.g. the buildings and infrastructure related to the weaving industry. The issue is included as a specific guide question in the SA Framework 'Will it protect or enhance the significance of non-designated heritage assets?' No change required.	N/A
C001.03SA	1	In terms of the plans and policies identified, this needs to cover all those relevant at an international, national and local level that would have a direct bearing for the historic environment.	Noted. In preparing the SA Scoping Report, over 100 international/European, national, regional/sub-regional, and local plans and programmes were reviewed, including those pertinent to the historic environment such as: <ul style="list-style-type: none"> • The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention); • The European Convention on the Protection of Archaeological Heritage (Valetta Convention); • HM Government – Ancient Monuments and Archaeological Areas Act (1979); • DCMS - Heritage Protection for the 21st Century - White Paper (2007); • Historic England - Historic Environment Good Practice Advice in Planning Note 1 (2015). No change required.	N/A
C001.04SA	1	Baseline information should describe the current and future state of the historic environment, providing the basis for identifying sustainability	Agreed. The Scoping Report presents contextual information for 11 topics to be included in the SA which for each includes the	Paragraph 3.12.2

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		<p>issue, predicting and monitoring effects and alternative ways of dealing with them. The baseline information in the scoping report on the historic environment should include 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, buried or submerged.</p> <p>The NPPF recognises the importance of undesignated heritage assets and therefore this should be included within the baseline data. The importance of local character and identity including the landscape and townscape of an area is an important consideration. The scoping report should recognise the importance of this and the source of this information should be included within the scoping report, with reference made to them in key issues and opportunities.</p>	<p>baseline information, the evolution of the baseline and a summary of the key issues. Section 3.12 of the Scoping Report presents the baseline for the historic environment. Whilst it provides the strategic context for the assessment, it also makes reference to non-designated heritage assets in the Borough through reference to the buildings and infrastructure related to the weaving industry and the canal corridor.</p> <p>To strengthen the Scoping Report's recognition that non-designated assets make an important contribution, the following will be added to paragraph 3.12.2: <i>"In addition to the Borough's designated cultural heritage assets, non-designated assets also contribute significantly to the Borough's historic environment."</i></p> <p>The SA Scoping Report includes baseline evidence relating to landscape and townscape (Section 3.13). The Report references baseline sources including the Lancashire Urban Extensive Survey and the Historic Town Assessment Reports prepared for Nelson, Colne and Barnoldswick. These reports outline the towns' historic development and identify areas which share common townscape characteristics.</p>	
C001.05SA	2	The key sustainability issues included in Table 3.15 should be amended to include reference to the historic environment and the need to conserve and enhance in line with the requirements of the NPPF (Bullet 1). It is important to note that, harm to designated heritage assets can also include their setting, and therefore, bullet 2 should be amended.	<p>Agreed. The first two bullet points under the 'cultural heritage' topic will be amended to read:</p> <ul style="list-style-type: none"> <i>"The need to protect and enhance the historic environment, heritage assets and their setting."</i> <i>The need to avoid harm to designated heritage assets and their setting."</i> 	Table NTS.2 Table 3.15 Section 3.142 'Key Sustainability Issues'
C001.06SA	3	The objective included under SA Objective 13 (Table 4.1) needs to be amended to closely reflect the approach and terminology of the NPPF in terms of heritage assets, which seems to be omitted. The word character is not relevant to this objective and should be deleted. Cultural heritage should be seen as one part of the historic environment, by defining it as such and not mentioning heritage assets, as it is therefore determining that these types of heritage assets are more significant than others. Therefore, it should be amended to read "To conserve and enhance the historic environment, heritage assets and their setting".	<p>Agreed. For consistency with the NPPF SA Objective 13 will be amended as follows:</p> <p><i>"13. To conserve and enhance the historic environment, heritage assets and their setting."</i></p>	Table NTS.3 Table 4.1 Appendix D Definitions of Significance
C001.07SA	3	The guide questions listed under SA Objective 13 (Table 4.1) needs to be amended to closely reflect the approach and terminology of the NPPF in terms of the significance of the historic environment, heritage assets and their setting. The sub-criteria incorrectly refers to "features of the historic environment" and a particular type of asset (archaeological, in this case) which does not need to be referred to individually within this question. In terms of Bullet 3, it is unclear how that differs from the requirements (and amendments suggested above)	<p>Agreed. For consistency with the NPPF and internal consistency within the SA Framework, the Guide Questions for SA Objective 13 will be amended as follows:</p> <ul style="list-style-type: none"> <i>"Will it help to conserve and enhance the significance of the historic environment, heritage assets and their setting?"</i> <i>Will it tackle heritage assets identified as being 'at risk'?"</i> <i>Will it protect or enhance the significance of non-designated heritage assets?"</i> 	Table NTS.3 Table 4.1 Appendix D Definitions of Significance

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		for Bullet 1. Places that are locally distinctive and have a unique character and contain (undesigned) historic buildings should be sustained and enhanced wherever possible including through new development, rather than conserved, and bullet 6 should be amended accordingly. Some of the criteria appears to cross over into SA Objective 14 in terms of townscape and landscape references, and this should be corrected to provide further clarity.	<ul style="list-style-type: none"> • <i>Will it promote local cultural distinctiveness?</i> • <i>Will it help to sustain and enhance historic buildings, places and spaces that contribute to local distinctiveness, character and appearance through sensitive adaptation and re-use?</i> • <i>Will it improve and promote access to buildings and landscapes of historic/cultural value?"</i> <p>However, guide questions under SA Objective 14 are considered distinct from those under SA Objective 13 and are not proposed to be amended.</p>	
C001.08SA	3	The drafted objective and guide questions do not only refer to designated heritage assets, yet the appraisal criteria in table 4.5 only makes reference to these.	<p>Noted. Table 4.5 provides the site SA criteria. The SA is based on an assessment of the effects on sensitive receptors and features (which includes designated sites, assets and features). The site assessment, which is informed by GIS information, has to be informed by a clear, comprehensive and consistent evidence base. The data for undesigned assets is not as consistently available as the data on designated assets (as shown in Figure 3.14) and as such it is not considered pragmatic to incorporate this into the site assessment process.</p> <p>No change required.</p>	N/A
C001.09SA	3	The terminology used in the thresholds needs to be amended to better reflect that used in the NPPF in terms of harm to heritage assets rather than significant adverse effect. It is suggested that these be amended to read unacceptable harm.	<p>Noted. Table 4.5 presents the thresholds for criteria that will inform the identification of likely significant effects, as is required by the SEA Directive. The terminology is consistent with this requirement.</p> <p>No change required.</p>	N/A
C001.10SA	3	Further information needs to be provided to demonstrate how appraisal will determine as to whether a heritage asset is affected by a site. We would expect to see a robust assessment of the impact of sites on the historic environment. The use of buffers to determine the level of harm and the assets affected is not considered appropriate as the only way of identifying the harm to the historic environment.	<p>Noted. We agree that it is important to complete a robust assessment of effects arising from proposed policies and sites on heritage as it is for the full range of SA objectives. In this regard, the SA considers multiple issues and appraises effects across the 14 SA topics in a proportionate and equitable manner, consistent with the information available at this stage of local plan development.</p> <p>For the SA, the assessment of effects on heritage assets will be based on professional judgement using publicly available information/evidence and any responses received during consultation (as appropriate). To confirm, buffers will not be used to determine the level of harm to assets.</p> <p>Furthermore, detailed assessment of effects on heritage assets will be considered, where appropriate, as part of the evidence base as the plan develops and it should also be noted that once the plan is adopted and sites allocated, further site assessment</p>	N/A



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			will then be undertaken as part of the planning application process. No change required.	
C001.11SA	General	Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the local and county level to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the Plan, the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up approach is undertaken.	Noted. The site selection process and Sustainability Appraisal should be informed by the relevant evidence base incorporating stakeholder advice. No change required.	N/A
Dickman Associates Ltd Ms Jane Dickman On behalf of Trustees of the Green Emmott Trust (Pendle Borough Council Representer ID: 00528)				
C002.01SA	1	Para 3.2.7 – needs updating to reflect new Todmorden Curve Rail Link to Manchester.	Noted. The reference in paragraph 3.2.7 is intentionally focused on rail connections with mainline services in view of their importance in connecting Pendle sub-regionally and nationally (as is the case for the roads and bus services mentioned in the paragraph). The text does not include reference to the Todmorden Curve Rail Link (or other local rail services) as these are not mainline services. No change required.	N/A
Lancashire County Council: Mr Marcus Hudson (Pendle Borough Council Representer ID: 00258)				
C003.01SA	1	The following publications should be considered for inclusion in the SA Scoping Report, Review of Plans and Programmes, within Table 2.1 Plans and Programmes Reviewed for the SA of the Pendle Local Plan Part 2 and Appendix B. The guidance contained within them should then be used to update Section 2.3 Key Messages and Table 2.2 Key Messages Arising from the Review of Plans and Programmes. National Plans and Programmes: UK Strategies, Plans & Papers: <ul style="list-style-type: none"> • HM Government - Sporting Future: A New Strategy for an Active Nation, December 2015 • Department for Transport - Cycling and Walking Investment Strategy (draft), March 2016 • Public Health England: Working Together to Promote Active Travel, a briefing for local authorities, May 2016 • Public Health England - Everybody active, every day; an evidenced based approach to physical activity, October 2014 • Public Health England, Chartered Institute of Environmental Health, Local Government Association - Obesity and the environment: regulating the growth of the fast food outlets, March 2014 	Agreed. The key documents referenced in the consultation response in relation to health, community safety and road safety will be included a revised Review of Plans and Programmes; recognising the need for the SA to be proportionate to the Local Plan being assessed: UK wide: <ul style="list-style-type: none"> • <i>HM Government - Sporting Future: A New Strategy for an Active Nation, December 2015</i> • <i>Public Health England - Everybody active, every day; an evidenced based approach to physical activity, October 2014</i> • <i>Public Health England: Working Together to Promote Active Travel, a briefing for local authorities, May 2016</i> • <i>Marmot Review report - 'Fair Society, Healthy Lives', November 2010</i> • <i>Sport England - Towards an Active Nation, Strategy 2016-2021, May 2016</i> County level:	Table 2.1; 2.2 Appendix B

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Scoping Report
		<ul style="list-style-type: none"> • National Institute for Health and Care Excellence (NICE), Physical Activity local government briefing (LBG3), July 2012, updated April 2013 • National Institute for Health and Care Excellence (NICE), Cycling and Walking local government briefing (LBG8), January 2013 • Marmot Review report - 'Fair Society, Healthy Lives', November 2010 • Sport England - Towards an Active Nation, Strategy 2016-2021, May 2016 • LGiU the local democracy think tank - Planning, health and wellbeing, an LGiU essential guide, March 2015 • Town and Country Planning Association (TCPA) in collaboration with Public Health England and Local Government Association - Reuniting Health with Planning, 2010-2016 publications TCPA, Building the Foundations: tackling obesity through planning and development (March 2016)TCPA, Public Health in Planning: good practice guide (July 2015)TCPA, Planning Healthy-weight environments (December 2014)TCPA, Reuniting health with planning: Planning healthier places report (2013)TCPA, Reuniting health with planning. How planning and public health practitioners can work together to implement health and planning reforms in England (2012)TCPA, Spatial planning for health guide (2010) • SPAGH (Spatial Planning and Health Group) - Steps to Healthy Planning: Proposals for Action, June 2011 <p>Sub Regional (County) Plans and Programmes:</p> <ul style="list-style-type: none"> • Securing our Health and Wellbeing, Report of the Director of Public Health and Wellbeing 2016 • Towards Zero Lancashire: Road Safety Strategy for Lancashire 2016-2026: the Road Safety Strategy for Lancashire, approved in 2016 by the Lancashire Partnership for Road Safety • Lancashire Community Safety Agreement 2017 - 18 <p>Jacobs UK Limited – Draft Lancashire Cycling and Walking Strategy 2016-2026 (Document Available on request from Michelle Holroyd, Planning and Environment, LCC).</p>	<ul style="list-style-type: none"> • <i>Securing our Health and Wellbeing, Report of the Director of Public Health and Wellbeing 2016</i> • <i>Towards Zero Lancashire: Road Safety Strategy for Lancashire 2016-2026: the Road Safety Strategy for Lancashire, approved in 2016 by the Lancashire Partnership for Road Safety</i> • <i>Lancashire Community Safety Agreement 2017 - 18</i> <p>The key messages under Health and Wellbeing (Table 2.2) Objectives and Policy Messages will be updated to include: <i>"Promote opportunities to support active lifestyles and participation in sport."</i></p> <p>The key messages under Transport and Accessibility Key Objectives and Policy Messages (Table 2.2) will be updated to include: <i>"Improve road safety and reduce the number of people killed or seriously injured (KSI) in road accidents."</i></p>	
C001.02SA	1	<p>Table 2.2 Key Messages Arising from the Review of Plans and Programmes</p> <p>Recommendation: Under Key Objectives and Policy Messages, Biodiversity and Green Infrastructure; amend the 2nd bullet point to:</p> <ul style="list-style-type: none"> • Identify opportunities for green infrastructure provision and enhancement. 	<p>Agreed. The second bullet under Biodiversity and Green Infrastructure will be amended to read:</p> <p><i>"Identify opportunities for green infrastructure provision and enhancement."</i></p>	Table 2.2

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C001.03SA	3	<p>Recommendation: The SA Framework should include specific objectives relating to</p> <ul style="list-style-type: none"> The protection and enhancement of biodiversity. The protection, enhancement and provision of green infrastructure and open space within the Borough. 	<p>Agreed. These themes are already incorporated under SA Objectives 4 and 12, but some minor amendments are proposed. SA Objective 12 seeks 'to conserve and enhance' biodiversity and 'promote improvements to the green infrastructure network'. A guide question under this objective is 'Will it provide opportunities for people to access the natural environment?'. This will be amended to read:</p> <p><i>"Will it protect and enhance the provision of, and access to, the green infrastructure network?"</i></p> <p>Additionally under SA Objective 4 one guide question is: 'Will it maintain and improve access to open space, leisure and recreational facilities?' This will be amended to read:</p> <p><i>"Will it protect and enhance the provision of open space, leisure and recreational facilities?"</i> and <i>"Will it maintain and improve access to open space, leisure and recreational facilities?"</i></p>	NTS.3 Table 4.1 Appendix D
C003.04SA	1	<p>3.4 Population and Community</p> <p>As proportions of the population, the 60-79 and 80+ age groups will continue to gradually increase whilst the younger working age population groups will see slight decreases by 2025.</p> <p>Recommendation: Age group split population projections should be included in the baseline analysis.</p>	<p>Agreed. Paragraph 3.4.2 will be amended to include reference to read:</p> <p><i>"These patterns are projected to continue in the future with increases in the percentage of older age groups (those aged 60+) whilst of the younger working age (20-39) population is projected to decrease."</i></p>	Paragraph 3.4.2
C003.05SA	1	<p>Population by Ethnicity 3.4.4. The related health inequalities are also worthy of consideration. One example of this can be found in the Pendle 2015 Health Profile, Figure 2 displays emergency hospital admissions by ethnic group. The Asian ethnic group accounts for a higher percentage of emergency admissions than the national average for that group, and locally higher than dominant white group.</p> <p>Recommendation: Health inequalities across ethnic groups should be included in the baseline analysis.</p>	<p>Agreed. Additional text at paragraph 3.5.2 will be included to reflect that health inequalities exist across the diverse population of Pendle, as follows:</p> <p><i>"Health inequalities exist across different ethnic groups within the Borough. For example, the Asian ethnic group (which is the second highest in the Borough) accounted for a higher percentage of hospital admissions considered to be emergencies (50.7%) than the national average (44.0%) in 2014/15. For comparison, the percentage for the white ethnic group (40.9%) is only slightly above the national average (39.9%) and for all ethnicities it stands at 42.2% within the Borough.*"</i></p> <p><small>*Public Health England Pendle Profile 2015 (2016)</small></p>	Paragraph 3.5.2
C003.06SA	1	<p>The Sustainability Appraisal (SA) discusses the overall IMD deciles and ranking, however there are two domains of deprivation that are worth considering in more detail. Half of Pendle's wards fall into Decile 1 for Health Deprivation and Disability. This domain combines</p>	<p>Agreed. Further text in paragraph 3.4.6 will be included to reflect that this issue, as follows:</p>	Paragraph 3.4.6

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		<p>indicators such as the risk of premature death and the impairment of quality of life through poor physical or mental health.</p> <p>The Living Environment Deprivation domain also stands out as a key indicator of deprivation within Pendle. The domain measures the quality of the local environment with indicators falling into two sub-domains: the 'indoor' living environment measures the quality of housing, while the 'outdoor' living environment measures air quality and road traffic accidents.</p> <p>Recommendation: the baseline analysis should make specific reference to health deprivation and living environment deprivation scores.</p>	<p><i>"Finer grain analysis of the IMD shows that some areas of Pendle perform particularly poorly with regard to two domains of deprivation: Health Deprivation and Disability (with indicators related risk of premature death and the impairment of quality of life through poor physical or mental health); and Living Environment Deprivation (which measures the quality of the local environment with measures of indoor (housing) and outdoor (air quality and road traffic collisions) quality). The poorly performing areas against the Health Deprivation and Disability domain are concentrated around the M65 Corridor whilst those areas performing poorly against the Living Environment Deprivation domain are more widespread across the Borough."</i></p>	
C003.07SA	1	<p>Under Housing (3.4.8) reference is made to Pendle's proportion of households without central heating, consideration should also be given to the fact that Pendle ranks top for fuel poverty within Lancashire. Figure 5 demonstrates that Pendle has the highest proportion of households in fuel poverty, this is likely due to the "oversupply of poor quality terraced properties" as stated in the SA.</p> <p>Housing is a significant determinant of health, and poor housing can compound existing health problems such as respiratory or cardiovascular conditions.</p> <p>Pendle's dominant mosaic group is Transient Renters, who account for 17.82% of the population and this group is concentrated in the most deprived areas.</p> <p>The SA recognises the supply of affordable housing as a key point of concern. The baseline assessment should also site the supply of social housing as a key point of concern, as this also can provide an alternative to residents renting poor quality terrace houses in the deprived areas of the borough. An increase in the supply of social housing would help to contribute to better health outcomes for Pendle.</p>	<p>Noted. The change proposed in response to comment ref C003.15SA reflects that affordable housing includes all types of affordable housing, including social housing. An amendment to include a reference to <i>tenure</i> as well as type of housing reflects that a range of housing to meet the needs of all of Pendle's communities is required.</p>	N/A
C003.08SA	1	<p>Pendle's life expectancy indicators have been consistently, significantly worse than the England average since at least 2000. In addition to life expectancy indicators, consideration should also be given to mortality from preventable causes, which are also significantly worse than the England average. These indicators are not dissimilar to most of Pendle's East Lancashire neighbours or Lancashire as a whole.</p> <p>Recommendation: The 'mortality rate from causes considered preventable' should be included alongside the 'life expectancy' indicators in the baseline analysis, due to the impact that the built environment can have on addressing them.</p>	<p>Agreed. The links between health and housing are such that preventable mortality should be referenced in the baseline. Include reference within paragraph 3.5.2 to read:</p> <p><i>"The mortality rate from causes considered preventable is also significantly worse in Pendle than England as a whole. From 2013-15 it stood 221.5 per 100,000 population whereas for England the rate was 184.5."*</i></p> <p><small>*Public Health England statistics taken from the Mortality overview Lancashire County Council. Available via - http://www.lancashire.gov.uk/lancashire-insight/health-and-care/mortality/mortality-overview.aspx</small></p>	Paragraph 3.5.2

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C003.09SA	1	<p>The percentage of physically inactive adults in Pendle has been significantly higher than in England since at least 2012. Between 2013 and 2015, the percentage of adults with a BMI classed as overweight (including obese) was significantly higher than the England average. The percentage of 10 and 11 year old children classified as overweight or obese in Pendle has been significantly higher than in England on two occasions in recent years.</p> <p>Recommendation: Paragraph 3.5.2 should be updated to include the latest available statistics from Public Health England rather than 2012 statistics. Reference should also be made in paragraph 3.5.2 to the following:</p> <ul style="list-style-type: none"> • The percentage of physically inactive adults in Pendle has been significantly higher than in England since 2012; • The percentage of Pendle's adults classified as overweight (including obese) is significantly higher than the England average; • The percentage of Pendle's 10 and 11 year old children (Year 6) classified as overweight or obese has been higher or significantly higher than in England from 2012. 	<p>Agreed. Paragraph 3.5.2 with latest information from Public Health England will be amended to read:</p> <p><i>"In 2014/15 21.4% of (Year 6) children were classified as obese which is higher than the average across England (19.1%). Between 2012 and 2014 67.1% of adults were considered to have excess weight compared to the England average of 64.6%..."</i></p>	Paragraph 3.5.2
C003.10SA	1	<p>Recommendation: Include a separate paragraph after 3.5.3 which references key actions from Securing our Health and Wellbeing, Report of the Director of Public Health and Wellbeing 2016. On pages 25-26 of the report, recommendations for future action are based on the analysis of health outcomes and their determinants in Lancashire. Of particular relevance to how planning and the built environment can facilitate improvements in health outcomes, are the recommendations under the headings 'Create the conditions for wellbeing and health' and 'Enable sustainable behaviour and lifestyle change'. Planning policy can facilitate improvements in health outcomes in relation to the following future action recommendations:</p> <ul style="list-style-type: none"> • Achieve year on year improvement on all the Marmot indicators for socioeconomic and environmental determinants of health. • Promote healthy living environments by addressing the variation in road safety (particularly for children), housing standards and fuel poverty, and access to green space, cycling and walking paths across Lancashire. • Facilitate the development of a Dementia Friendly Lancashire by supporting the dementia friendly communities and programmes to support raising awareness, early detection and supporting people with dementia. • Continue to enable the citizens of Lancashire to adopt healthier lifestyles through a comprehensive behaviour change approach to tackle smoking, physical inactivity, obesity, alcohol consumption. 	<p>Agreed. The baseline would benefit from reflecting the county wide report on health and wellbeing, to complement the reference to the Lancashire Health and Wellbeing Strategy. It is proposed to include the recommendations within the section entitled Likely Evolution of the Baseline Without the Local Plan following paragraph 3.5.11 to reflect that broader plans are in place to support improvements to health and wellbeing. These outcomes could be realised without planning policy in Local Plan Part 2.</p> <p><i>"Securing our Health and Wellbeing, Report of the Director of Public Health and Wellbeing 2016 sets out a series of recommendations, including to:</i></p> <ul style="list-style-type: none"> • <i>Achieve year on year improvement on all the Marmot indicators for socioeconomic and environmental determinants of health;</i> • <i>Promote healthy living environments by addressing the variation in road safety (particularly for children), housing standards and fuel poverty, and access to green space, cycling and walking paths across Lancashire;</i> • <i>Facilitate the development of a Dementia Friendly Lancashire by supporting the dementia friendly communities and programmes to support raising awareness, early detection and supporting people with dementia;</i> 	Paragraph 3.5.11

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			<ul style="list-style-type: none"> Continue to enable the citizens of Lancashire to adopt healthier lifestyles through a comprehensive behaviour change approach to tackle smoking, physical inactivity, obesity, alcohol consumption. <p>The recommendations and actions would be expected to help deliver improvements to health and wellbeing across the County without the Local Plan Part 2. However, it is recognised that new policies and proposals may help towards these aims.”</p>	
C003.11SA	1	<p>The rate of violent crime (including sexual violence) in Pendle has been above the England average since at least 2009/10. Consider including indicators in the baseline analysis that relate to the priorities within the Lancashire Community Safety Agreement:</p> <ul style="list-style-type: none"> Violence against the person Domestic abuse Child sexual exploitation (CSE) Anti-social behaviour (ASB) Road safety 	<p>Agreed. It is proposed that additional sentences are added to paragraph 3.5.9 to reflect violent crimes and anti-social behaviour within the Borough in relation to the Lancashire average and England average. The Crime in Lancashire 2015/16 Report data suggests that rates are lower in Pendle than England:</p> <p><i>“Additionally, rates of violence against the person crime (14.22 per 1000 people) were both lower in Pendle than across Lancashire (17.6 per 1000 population) and England as a whole (17.3 per 1000 population) in 2015-16. The rate of sexual offences, robbery, and theft were also lower than across England as whole whilst the rate of criminal damage and arson was marginally higher (0.9 per 1000 population compared to 0.8). Anti-social behaviour (47.85 per 1000 people) is lower than across Lancashire.*</i></p> <p><small>*Crime in Lancashire 2015/16 Key findings for Lancashire-14, Lancashire County Council (2016) Available at: http://www.lancashire.gov.uk/media/899770/crime-in-lancashire-2015_16.pdf</small></p>	Paragraph 3.5.9
C003.12SA	2	<p>In Key Sustainability Issues, add in the following issues relating to Crime:</p> <ul style="list-style-type: none"> Will it reduce actual levels of crime and anti-social behaviour? Will it reduce the fear of crime? Will it promote design that discourages crime? 	<p>Agreed. The following will be incorporated into the Key Sustainability Issues:</p> <ul style="list-style-type: none"> “Will it reduce actual levels of crime and anti-social behaviour?” Will it reduce the fear of crime? Will it promote design that discourages crime?” 	Table NTS.2 Table 3.15 Section 3.5 Key Sustainability Issues
C003.13SA	1, 2	<p>Recommendation: A section on Road Safety should be included in the Transport and Accessibility section of the baseline analysis and the section should include KSI indicators should be included in the baseline analysis. Additional road safety information can be made available from LCC Public Health, Safe and Healthy Travel service, including the breakdown of age groups and methods of transport involved in road accidents. Road safety should also be added as a Key Sustainability Issue.</p>	<p>Agreed. There are important sustainability linkages between highways usage, accessibility and road safety. The following further paragraph re. road safety in Section 3.6 Transport and Accessibility will be added:</p> <p><i>“The number of people killed or seriously injured (KSI) within the Borough generally increased from 2010-2015*. 51 people were killed or seriously injured in 2015. This represents a rate of 0.57 per 1000 population killed or seriously injured as a result of road traffic collision in the Borough. This is lower than neighbouring</i></p>	Table NTS.2 Section 3.6 Transport and Accessibility Table 3.15 Section 3.6 Key Sustainability Issues

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			<p><i>Burnley (0.74) and Ribble Valley (0.77) but higher than Hyndburn (0.37), Rossendale (0.40) and Blackburn with Darwen (0.52) in the wider East Lancashire sub-region. It is also higher than the wider North West region (0.42) and England as a whole (0.39). 23.5% of KSIs in Pendle were children. This is the highest percentage in the county and is significantly higher than England as a whole (8.3%)."</i></p> <p><small>*Road traffic collisions 2015 Key findings for Lancashire, Lancashire County Council (2016) Available at: http://www.lancashire.gov.uk/media/899772/road-traffic-collisions-article-2015-26oct16-version.pdf</small></p> <p>Propose additional Key Sustainability Issue:</p> <p><i>"The need to improve road safety within the Borough"</i></p>	
C003.14SA	2	<p>Under Air Quality Key Sustainability Issues, add the following issue:</p> <ul style="list-style-type: none"> The need to ensure that air quality impacts from future developments do not result in the designation of new AQMAs in the borough. 	<p>Noted. It is considered that this is implicitly covered within the first Key Sustainability Issue identified for Air Quality which states the need to minimise pollutants to the air.</p> <p>No change required.</p>	N/A
C003.15SA	3	<p>For SA Objective 1 pursuing opportunities to improve the existing housing stock should also be a key consideration. This could be made more specific in terms of targeting improvements towards the most deprived wards as the resultant improvement in living conditions would contribute to better health outcomes. Change the guide questions to:</p> <ul style="list-style-type: none"> Will it provide a range of housing types and tenures to meet current and emerging need for market, social and affordable housing? Will it promote improvements to the boroughs existing housing stock, particularly the older terraced housing located in the most deprived areas. 	<p>Agreed. Bullet point one of Table 4.1 will be amended to reflect tenure as well as type, although it is considered that 'affordable' housing includes all types of affordable housing including social housing.</p> <p><i>"Will it provide a range of housing types and tenures to meet the current and emerging need for market and affordable housing?"</i></p> <p>The second bullet point will be amended in Table 4.1 to particularly highlight that terraced housing comprises the majority of the existing housing stock considered to be of poor quality.</p> <p><i>"Will it promote improvements to the Borough's existing housing stock, particularly the older terraced housing located in the most deprived areas?"</i></p>	NTS.3 Table 4.1 Appendix D
C003.16SA	3	<p>For SA Objective 4 include a question which makes explicit reference to the health deprivation and living environment deprivation scores and the need for future developments to make a specific contribution to reducing the IMD score of these domains.</p>	<p>Noted. The guide questions under SA Objective 4 make explicit links between health and the environmental circumstances surrounding development; access to open space, leisure and recreational facilities; the promotion of healthier lifestyles; healthcare facility investment and provision; and access to healthcare services. It is considered that this objective and guide questions provide a suitable basis to consider the impacts of the Local Plan Part 2 on the health of Pendle's population.</p> <p>No change required.</p>	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Scoping Report
C003.17SA	3	<p>For SA Objective 5 separate the question on traffic congestion and road safety into two questions:</p> <ul style="list-style-type: none"> • Will it help to reduce traffic congestion? • Will it improve road safety and contribute towards a reduction in KSIs (killed and seriously injured indicator)? 	<p>Agreed. For clarity, the question “Will it help to reduce traffic congestion and improve road safety?” under SA Objective 5 will be revised to comprise two separate questions as follows:</p> <p><i>“Will it help reduce traffic congestion?”</i> <i>“Will it improve road safety and contribute towards a reduction in those killed and seriously injured (KSI)?”</i></p>	Table NTS.3 Table 4.1 Appendix D
C003.18SA	3	<p>The Appraisal Criteria in Table 4.5 Proposed Appraisal Matrix - Sites, does not relate in full to the guide questions for each of the SA Objectives, which are provided in Table 4.1 SA Objectives and Guide Questions. It is a concern that the list of potential sites for allocation will therefore not be fully appraised against the relevant health guide questions and the potential health impacts will not be identified.</p> <p>Recommendation: In Paragraph 4.3.6, clarify the process for the Sustainability Appraisal of the Site Allocations at the Technical Assessment stage of the site allocation methodology. It is important that the list of site allocations at this stage are assessed using the SA Objectives and all the guide questions as per Table 4.1, so that potential health impacts from the list of sites can be fully explored. This should occur before the next stage of short-listed sites are appraised using the Proposed Appraisal Matrix - Sites as per Table 4.5.</p> <p>Recommendation: We are not able at this stage to provide early comment on the Table 4.5 Proposed Appraisal Matrix - Sites, apart from noting that there are approx. 30 Appraisal Criteria, with associated threshold metrics for the 14 SA Objectives compared to approx. 100 guide question as provided in Table 4.1. Whilst it is acknowledged that the appraisal of sites has resource implications, it is important that all potential impacts, including health impacts, are fully explored. It is therefore recommended that Table 4.5 is reviewed following the Technical Assessment of Sites, as the technical advice received at this stage of the site allocation process will highlight important appraisal criteria based on the guide questions of the SA objectives. The Technical Assessment stage will be opportunity to consider whether any changes or additions are required to the appraisal criteria (and corresponding threshold metrics) in the Appraisal Matrix for sites.</p>	<p>Noted. It is important to establish a site SA process at the outset of the Local Plan preparation process, and prior to the appraisal of sites. This ensures that a proportionate and robust approach exists for the consideration of the sustainability implications of potential site allocations and that reasonable alternatives are fully assessed throughout process.</p> <p>However, SA is only one of a number of assessments the sites will be subjected to (including constraints and viability) prior to allocation. Appendix 1 of the LP2 Scoping Report & Methodology identifies the criteria against which sites will be assessed. A number of these (e.g. 3.20, 3.26, 3.27) consider potential implications for health, and sit alongside the SA process. The site appraisal matrix has to reflect the SA Framework and incorporate appraisal criteria relevant to the specific consideration of site allocations. It is recognised that not all guide questions or even SA Objectives can be actually reflected for the specific appraisal of sites (as evidenced by the fact that SA Objective 10 is not given site appraisal criteria).</p> <p>Under SA Objective 4 the site appraisal matrix incorporates health and wellbeing appraisal criteria relating to proximity to GP surgeries, provision of open space and health facilities and proximity to unsuitable neighbouring uses which may have effects on human health. An overall appraisal score for the potential site allocations and reasonable alternatives against this SA Objective will be determined from consideration of these criteria.</p> <p>The definitions of significance in Appendix D provide further guidance on the implementation of appraisal of sites and policies.</p> <p>Detailed appraisal of any candidate site will be limited to the reasonably available information for the site. In such circumstances, the consideration of all the factors suggested is premature. However, whilst work will continue proportionate to the information available for the site, it is also noted that if sites are included in the adopted plan, any planning application for the</p>	N/A

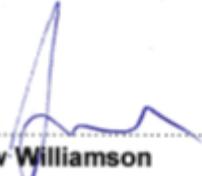
Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Scoping Report
			site will be subject to further scrutiny, against the requirements of the adopted plan policies. No change required.	
Environment Agency: Mrs Liz Locke (Pendle Borough Council Representor ID: 00152)				
C004.01SA	2	The following should be included in Table NTS.2 Key Sustainability Issues Relevant to the Local Plan Part 2: <ul style="list-style-type: none"> Biodiversity and Green Infrastructure – <ul style="list-style-type: none"> Include mention of the need to protect and improve habitat for designated <i>species</i>, where they occur outside of designated habitats. Include mention of the need to take account of the impact of climate change on biodiversity (NPPF para 99). 	Agreed. Table NTS.2 will be revised to include the following bullet points: <ul style="list-style-type: none"> <i>“The need to protect and improve habitat for designated species, even when they occur outside designated habitats.”</i> <i>“The need to take into account the impact of climate change on biodiversity.”</i> 	Table NTS.2 Table 3.15 Section 3.3 Key Sustainability Issues
C004.02SA	2	The following should be included in Table NTS.2 Key Sustainability Issues Relevant to the Local Plan Part 2: <ul style="list-style-type: none"> Water – include mention of the need to ensure development is steered to comply with the hierarchy of foul drainage options (National Planning Practice Guidance Water supply, wastewater and water quality para 020). 	Agreed. However, Table 2.2 will be revised which sets out the key messages from the review of Plans, Programmes and Policies rather than as a Key Sustainability Issue: <ul style="list-style-type: none"> <i>“Need to ensure development complies with the hierarchy of foul drainage options.”</i> 	Table 2.2
C004.03SA	2	The following should be included in Table NTS.2 Key Sustainability Issues Relevant to the Local Plan Part 2: <ul style="list-style-type: none"> Climate Change - include mention that new development should be planned to avoid increased vulnerability to the impacts of climate change (NPPF para 99). 	Agreed. The first bullet point under the Climate Change topic Key Sustainability Issues will be revised to read: <p><i>“The need to ensure that new development is adaptable to the effects of climate change and is planned to avoid increased vulnerability to its impacts.”</i></p>	Table NTS.2 Table 3.15 Section 3.10 Key Sustainability Issues
Rural Solutions: Mr Mike Powell on behalf of Ribble Estates: Mr Tim Webber (Pendle Borough Council Representor ID: 01524)				
C005.01SA	1	We have no comments to make on the level of the information set out in the Scoping Report to establish the context for the SA.	Comment noted. No change required.	N/A
C005.02SA	2	We agree that the main economic, social and environmental issues identified in the Scoping Report are relevant to the SA. We consider that locational sustainability, i.e. proximity to transport, services and facilities, is an extremely important matter to consider throughout the emerging Local Plan, in particular with regard to future residential allocations.	Comments welcomed. No change required.	N/A
C005.03SA	3	We consider that the broad approach to the SA is appropriate and do not suggest any changes.	Comments welcomed. No change required.	N/A
Natural England: Miss Elizabeth Knowles (Pendle Borough Council Representor ID: 00336)				
C006.01SA	1	Natural England has not reviewed any plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area: <ul style="list-style-type: none"> Green infrastructure strategies Biodiversity plans Rights of Way Improvement Plans 	Noted. In preparing the SA Scoping Report, over 100 international/European, national, regional/sub-regional, and local plans and programmes were reviewed, including those pertinent to the topics referenced such as:	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Scoping Report
		<ul style="list-style-type: none"> • River basin management plans • AONB and National Park management plans. • Relevant landscape plans and strategies. 	<ul style="list-style-type: none"> • Lancashire Economic Partnership (2009) The Lancashire Green Infrastructure Strategy; • Pendle Borough Council (emerging) Green Infrastructure Strategy; • Defra (2011) Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services; • Defra (2012) UK post 2010 Biodiversity Framework • Lancashire Biodiversity Partnership (2011) Lancashire Biodiversity Action Plan; • Pendle Biodiversity Audit (2010); • Environment Agency (2015) Water for life and livelihoods: North West river basin district basin management plan (Updated); • Environment Agency (2015) Water for life and livelihoods: Humber river basin district river basin district basin management plan (Updated); • Forest of Bowland Area of Outstanding Natural Beauty Partnership (2014) AONB Management Plan 2014 – 2019; • Lancashire County Council (2000) Landscape Strategy for Lancashire and Landscape Character Assessment; • Lancashire County Council (2002) Lancashire Historic Landscape Characterisation Programme. <p>No change required.</p>	
C006.02SA	1	There are a number of useful sources for general natural environmental evidence that can support SA/SEA including National Character Areas (NCAs), natural capital maps, GIS layers on Magic Map, local environmental records and information from organisations such as Local Nature Partnerships, Wildlife trusts, Areas of Outstanding Natural Beauty, and Nature Improvement Areas. Evidence relating to the significant environmental effects of the current post-NPPF local plan should be available.	<p>Noted. The SA Scoping Report includes a variety of baseline evidence including reference to National Character Areas (para. 3.13.1 – 3.13.3), figures showing the range of sites designated for their habitat and conservation value (Figure 3.3) and references to relevant strategies, including the Forest of Bowland Area of Outstanding Natural Beauty (AONB) Management Plan.</p> <p>The SA Scoping Report is considered to have presented the most up-to-date available baseline information in relation to existing environmental conditions within Pendle (and neighbouring authorities where appropriate).</p> <p>No change required.</p>	N/A
C006.03SA	2	We note that there is no reference to improving people's access to nature (be that to linear routes or open space). This should be included as a key issue.	<p>Noted. The accessibility of green infrastructure (which incorporates natural assets) is identified as a key sustainability issue under Biodiversity and Green Infrastructure (Section 3.3). Additionally under Health and Wellbeing (Section 3.5) the need to address open space accessibility is recognised as a key sustainability issue. These key issues are incorporated into Table 3.15. This is also then included in the SA framework under</p>	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Scoping Report
			<p>appraisal criteria for SA objective 4 regarding health and well-being and SA objective 12 concerning biodiversity.</p> <p>No change required.</p>	
C006.04SA	3	<p>As set out in Planning Practice Guidance, the significant environmental effects of implementing the current local plan should be monitored. The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions. The following indicators may be appropriate.</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> • Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. • Percentage of major developments generating overall biodiversity enhancement. • Hectares of biodiversity habitat delivered through strategic site allocations. <p>Landscape:</p> <ul style="list-style-type: none"> • Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact. <p>Green infrastructure:</p> <ul style="list-style-type: none"> • Percentage of the city's population having access to a natural greenspace within 400 metres of their home. • Length of greenways constructed. • Hectares of accessible open space per 1000 population. 	<p>Noted. The monitoring indicators identified by Natural England as appropriate relate to development. The Local Plan should incorporate a suitable set of indicators to measure delivery of the plan and to identify where any thresholds for undertaking remedial action are met. The SA will include proposals for monitoring measures that reflect any significant effects identified as required by the SEA Directive and regulations.</p> <p>No change required.</p>	N/A
Barton Willmore: on behalf of Junction Properties Limited (Pendle Borough Council Representor ID: 00238)				
C007.01SA	3	<p>Paragraph 4.3.6 of the SA states that an assessment of potential site availability (taking into account responses to the 'Call for Sites') will screen out sites which do not represent a realistic option for development, either because it conflicts with national policy or where the available evidence suggests that land availability and/or physical constraints cannot be overcome. In principle, the above approach is supported, one of the key issues facing the Local Plan is the allocation and delivery of viable sites. Whilst the SA has due regard to the need to deliver the housing requirements of the borough we consider that there is insufficient evidence to demonstrate how the Scoping Report will take into account the viability of potential allocations and their ability to deliver infrastructure improvements. This is a matter that is fundamental to the effectiveness of the Plan.</p> <p>It is crucial that the initial sieve of sites referred to above does not discount sites too early from the SA process. Where there is evidence to suggest that mitigation can be provided to overcome constraints, or</p>	<p>Noted. Pendle Borough Council will undertake the site selection process to determine the sites that are allocated in the Local Plan Part 2.</p> <p>The SA is required to assess not only the proposed site allocations, but all reasonable alternatives as well and this is clearly stated in the Scoping Report. Pendle Borough Council will determine the sites that are considered to be reasonable alternatives through the site selection process outlined in Chapter 5 of the LP2 Scoping Report and Methodology (published for consultation in February 2017).</p> <p>No change required.</p>	N/A

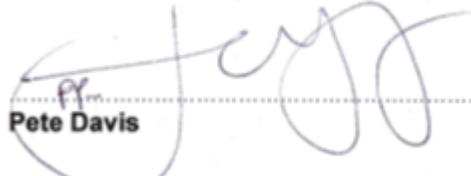
Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Scoping Report
		further information is required, that information should be sought before sites are discounted.		
C007.02SA	3	<p>Agree that the potential site allocation options (including all reasonable alternatives) are to be appraised against the SA Framework using tailored appraisal criteria with associated thresholds of significance to determine the type and magnitude of effect against each SA objectives.</p> <p>However, the SA fails to take into account opportunities for sites to deliver improvements to a location's infrastructure which, as LP2 identifies, is one of the key issues for new development to address. It is not helpful to the assessment of a sites sustainability to have a scoring system that doesn't take into account the extent to which it can deliver benefits to local infrastructure rather than simply measuring how those sites benefit from existing infrastructure.</p>	<p>Agreement with the overall approach is noted. The SA Framework and site appraisal matrix allows for appraisal of sites within the context of existing infrastructure provision. It is recognised that potential site allocations could provide infrastructure to mitigate. This would be captured in the broader site selection process.</p> <p>With regards the site selection process, the provision of infrastructure is a consideration when assessing potential site allocations. Appendix 1 of the LP2 Scoping Report and Methodology (published for consultation in February 2017 identifies the criteria that will be used to assess individual sites. Several of these address infrastructure requirements, notably 3.1-3.6 and 3.29-3.31 inclusive.</p> <p>No change required.</p>	N/A
C007.03SA	3	<p>As important as the assessment of individual sites is the assessment of the sustainability of LP2 as a whole, in particular the impact of development across each settlement, spatial area and borough as a whole. Whilst the Scoping Report notes that the SA will include an assessment of 'Secondary, Cumulative and Synergistic Effects' that assessment relates more to the cumulative effect of various policies within the Local Plan and other strategies and plans. There is insufficient detail on how the SA will assess the likely sustainability of the Plan as a whole which is considered crucial to the soundness of the Local Plan as a whole. In short, the SA needs to ask itself the question of whether LP2 is likely to achieve the sustainability objectives set out within LP1.</p>	<p>The SA Framework provides a basis for assessing the development across the Borough. The Local Plan Part 1: Core Strategy sets out the overall levels of housing and employment development across the Borough and the broad spatial distribution of development. The Core Strategy was subject to Sustainability Appraisal.</p> <p>The SA Framework will assess any policy provisions related to the number and extent of sites identified to meet any settlement's need and the individual potential site allocations. The SA Framework, together with the appraisal of the adopted Core Strategy, addresses the concerns raised.</p> <p>No change required.</p>	N/A

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Andrew Williamson

Reviewer



Pete Davis

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