

Appendix 1: Consultation Paper 1 (Core Strategy Scoping Assessment)

Comments and proposed Council response

Q1.a) Do you agree with the list of policies that are identified for review at Table 1 of the document? Please tell us any reasons in support of your response.

Rep I	Name	Response	Reasons	Council response	Council Notes
395	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Not Stated	<p>Table 1 concludes essentially that the Environment Policies in the 2012 Core Strategy only require minor editing. However, the Lancashire Wildlife Trust is of the opinion that it could do with a bit more than minor editing, even though the general gist of the policies are along the right lines. Recommendations include:</p> <p>Criteria in the Policies, including ENV 1-6, should include the consideration of the ecology of the site, enhancement of biodiversity and retention of features such as trees, hedgerows, streams etc., where applicable.</p> <p>The review covers most aspects that the Trust would wish to see covered, but it could be more strongly worded in terms of protecting and enhancing important wildlife sites, biodiversity (especially habitats and species of principal importance in England, which are matters of material consideration) and ecological networks as required by the NPPF (and mapped by Lancashire Environment Record Network for Lancashire).</p>	Disagree - no change	The specific issues raised around enhancement of biodiversity, retention of features, and important wildlife sites including ecological networks concern Policies ENV1 and ENV2 which, as currently written, are considered to provide sufficient strategic policy. Recently adopted Development Management DPD policies DM17 and DM18 also provide the more detailed local policy in support, and the Site Allocations DPD will identify specific sites mentioned.
401	Matthew Pardoe WYG	Yes	The review of policy to address current and emerging requirements is supported, but it may be necessary to update settlement boundaries to better reflect local needs, site circumstances (particularly the extent of existing development), and proposed allocations. In light of this, particularly when taking into account the relative sustainability of sites, a robust review of Green Belt boundaries to ensure that they meet their functional requirements without prejudicing land coming forward in an appropriately considered fashion is necessary.	Agree - no change	A proposed update of settlement boundaries is set out in paragraph 1.5 of Consultation Paper 3: The Site Allocations DPD Scoping and Site Assessment Methodology. The Council has also recently undertaken a Green Belt Assessment (GBA) in support of plan making. Any decisions to review green belt boundaries will be set out and justified in the Site Allocations DPD as it progresses using the findings of the GBA.

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Rep I	Name	Response	Reasons	Council response	Council Notes
408		Not Stated	We have no comments to make on this document.	Noted	
	Natural England				
410	Emily Hrycan Historic England - NW Office		<p>We would concur with the evaluation of the extent to which each of the existing Policies of the Adopted Core Strategy is justified, effective and consistent with national Policy. The only areas of the Plan where you might give some further thought are as follows:-</p> <ul style="list-style-type: none"> · Policy Env6 – Since this Core Strategy pre-dates the NPPF, unsurprisingly some of the terminology used is no longer consistent with that used in national policy guidance. For example, in terms of the historic environment, the NPPF now uses ‘conserve’ which, as the Glossary makes clear, is the process “of maintaining and managing change to a heritage asset in a manner which sustains and, where appropriate, enhances its significance”. Moreover, any ‘enhancement’ has to be ‘appropriate’ and should be a consideration not just on applications affecting the setting of a heritage asset (Criterion (e)), but also those affecting the heritage asset itself. Consequently, at the minimum, the introductory section of Policy Env6 and Criterion d might benefit from some amendment to more closely reflect national policy guidance. However, there is a more fundamental consideration regarding the approach in the Core Strategy towards the Borough’s historic environment. Paragraph 156 of the NPPF requires Local Plans to include “strategic policies to deliver the conservation and enhancement of the natural and historic environment, including landscape”. It is questionable whether Policy Env6 satisfies that requirement in terms of the historic environment. Whilst there are separate Policies for the Natural Environment (Policy ENV2), Green Infrastructure (Policy Env1), and Landscape (Policy Env3), the historic environment is subsumed within a general Policy dealing with the ‘Built Environment’. Notwithstanding the fact that not all the historic environment is actually ‘built’ (there are, for example, several historic parks (such as Milnshaw Park, Haworth Park and Oak Hill Park which would clearly be regarded as non-designated heritage assets)), it is questionable whether the existing Policy Env6 satisfies the requirements of the NPPF for plans to include a Strategic Policy for the historic environment. Such a Policy could identify the elements of Hyndburn’s historic environment which are of especial importance to the distinctive character of the Borough (and, therefore, may warrant greater weight in the decision-making process). · Policy RA2 – For the same reasons as Policy Env6, some of the terminology used is no longer consistent with that used in national policy guidance. Therefore it would benefit from some reconsideration to more closely reflect the NPPF. 	Agree - main modification	Policy Env6 and RA2 should be included for review to ensure that appropriate strategic policies on the historic environment are set out. These will be written in the context of recently adopted DM DPD policies such as DM22 and DM23 which provide the detailed local policy approach.

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422	Wallace Barnett	Yes	Since the core strategy policies were published, there have been changes of perception to some policies; actual changes of circumstances affecting others and generally a need to confirm that the core strategy is still "fit for purpose".	Agree - no change	The purpose of the scoping exercise was to confirm and agree which policies are still fit for purpose, and which ones aren't so should be updated. The comments received will inform the final list of policies to be updated and consulted on at the next stage.
432	Darragh McAdam Stephen Ward Town Planning & Development Consultants Ltd	Yes	<p>Policy E1: Certain sites identified as 'existing employment area' in the 2016 Employment Land Study are considered counterproductive to Core Strategy Policy BD1 and associated paragraph 5.55 as they pertain to Great Harwood. These parts of the Core Strategy acknowledge the re-development opportunities in and around the site of the abattoir and this area has been identified in the Core Strategy as an area of potential change that could accommodate appropriate commercial and residential development. The Core Strategy does not aspire to this area being retained for industrial/employment use. Indeed, the application of the DM1 objective to these sites makes the DPD inconsistent, conflicting with adopted elements of the Core Strategy. As such the proposed DPD may not meet the tests of 'soundness' as set out in para. 182 of the National Planning Policy Framework.</p> <p>Recent planning applications in this area attest to its changing character which is becoming increasingly incompatible with many existing historical industrial / employment uses. Policy needs to be more flexible and supportive to facilitating sites identified as 'existing employment area' to change to alternative uses.</p> <p>Policy E2: We feel this policy needs to be reviews in tandem with Policy E1 - they are not mutually exclusive. Our comments above equally apply to this Policy.</p>	Disagree - no change	The future of specific sites will be addressed through the Site Allocations DPD, in accordance with the agreed Site Assessment Methodology. The future of the area of potential change in Great Harwood will be addressed through the proposed review of Core Strategy Policies GH1 and GH2 (and reflected in a revised BD1). The application of Policy E2 in decision making will be in conjunction with the recently adopted DM DPD Policy DM1. This policy has recently undergone examination and the Council believes that it provides sufficient flexibility for consideration of existing employment areas around the Borough.

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Rep I	Name	Response	Reasons	Council response	Council Notes
433	Joanne Harding The Home Builders Federation	Not Stated	<p>Policy BD1: The Balanced Development Strategy The HBF support the recognition that the development strategy may need to be amended to reflect the latest OAN evidence and the need to release land from the Green Belt.</p> <p>Policy H1: Housing Provision The HBF support the recognition that the housing requirement and housing mix may need be varied to reflect the latest information available.</p> <p>Policy H2: Affordable Housing The HBF note the comments highlight the low rates of delivery of affordable homes, whilst the HBF support the recognition that the affordable housing target should not be increased, it may be necessary to review the policy to reduce the affordable housing requirement should it be found to be impacting on the viability of sites.</p> <p>Policy ENV4: Sustainable Development and Climate Change The HBF support the recognition that this policy will need to be reviewed following Government changes to technical housing standards.</p>	Noted	Comments in relation to H2 (regarding a potential reduction of the affordable housing requirement on viability grounds) are addressed by reference to viability in policy H2 as adopted. The Council does not therefore intend to review this policy.

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Rep I	Name	Response	Reasons	Council response	Council Notes
436	Liz Locke Environment Agency	No	<p>Suggested updates: We have reviewed the Scoping Assessment and would like to make the following comments:</p> <p>Policy Env1: Green Infrastructure We agree with the conclusion that there is no need to update the core policy. However, we would like to see the supporting text updated to better reflect the NPPF, as detailed below: Para 4.60 – Update 2nd sentence to “accompanied by a site-specific FRA to demonstrate that the development will be safe and how the risk of flooding would be managed over the lifetime of the development, taking climate change into account.” Update last sentence to “...the Council will also work with the Environment Agency, Lancashire County Council as the Lead Local Flood Authority, and United Utilities...”</p> <p>Policy Env4 Sustainable Development and Climate Change We would like to see the core policy updated as suggested below: Policy Env4 para d) - update text to more fully reflect that which is now included in Policy DM20 of the Development Management DPD, which seeks to reduce flood risk by careful management of surface water from upstream developments. •“All Brownfield development will be required to demonstrate that there will be a reduction of at least 30% in existing runoff rates, rising to a minimum of 50% in critical drainage areas. •Any proposal for development on a Greenfield site, must demonstrate no alteration to runoff rates upon completion. Peak discharge should be restricted to five litres per second per hectare, this also being the requirement for sites of less than one hectare. Any additional volume of runoff must be taken into account by providing storage capacity within the surface water drainage system. •Retrofitting for flood prevention and SuDS within the existing built environment must be explored where it would not damage environmental assets. •Development will not be allowed to increase the run-off rate from a site even if it is not viable to implement a SuDS scheme.”</p> <p>Policy Env4 para i) – change text to: “Working with all relevant partners to address flood risk from all sources, to implement schemes which will not create new flooding issues; and will not exacerbate, and where possible improve upon, existing problems. Directing new development away from areas at high risk of flooding; incorporating appropriate mitigation against flooding in areas of lower risk; and taking into account the continuing effects of climate change.”</p>	Agree - main modification	<p>Amend supporting text of Policy Env1 in line with comments</p> <p>Amend Env4 policy text to incorporate comments</p>

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Rep I	Name	Response	Reasons	Council response	Council Notes
449	Nick Lee NJL Consulting	No	<p>It is critical that the Core Strategy policies are reviewed to reflect the Council's aspirations for housing and employment growth. Hyndburn has great successes including those linked to driving its economy, which are in turn intrinsically linked with residential growth to accommodate a range of tenures and demographics.</p> <p>We have specific comments in relation to the following policies:</p> <p>1.Policy BD1: We agree this policy should be reviewed to reflect ambitions for housing and employment growth.</p> <p>2.Policy E1: We agree this policy should be reviewed to reflect ambitions for housing and employment growth, which in turn has repercussions on provision of retail and other complementary services and facilities for those who live and/or work in the Borough.</p> <p>3.Policy H1: We agree this policy should be reviewed to reflect up to date information and improve the accuracy of forecasting.</p> <p>4.Policy T1: While NJL agrees with Hyndburn that the policy wording may not need to be changed, we also agree the supporting text may need to be altered. We advise making it clear that improvements to connectivity, particularly in relation to the M65 corridor, are fundamental to unlocking the potential of new and established locations.</p> <p>5.Policy A2: We encourage revision of this policy to reflect the ambitions for housing and employment growth as explored by other policies (and other material considerations including evidence). Requirements for new convenience and comparison floorspace should be given due consideration. Similarly, in line with changing consumer trends and changing retail environments (both in-centre and out of centre environments), it is important that 'retail' policies are not focused on retail but consider other main town centre uses that are complementary for example leisure.</p> <p>6.Policy A3: We encourage review of Policy A3 in line with our comments regarding Policy A2.</p> <p>7.Policy GH2: We- encourage review of Policy GH2 in line with our comments regarding Policies A2 and A3. Town centre policies should consider the important contribution other main town centre uses have in providing complementary services to support retail, but also housing and employment uses within the vicinity.</p> <p>8.Policy H2: We encourage a review of Policy H2 in line with Policies A2, A3 and GH2.</p> <p>9.Policy KW1: We disagree with the Council's expectation that Policy KW1 does not need to be reviewed. Policy KW1 should reflect the wider context of neighbouring uses and examine how complementary services (including retail and leisure opportunities) can provide invaluable facilities to a workforce, in turn promoting the success of strategic employment sites</p>	Agree - main modification	The Council agrees with the issues raised and these will be taken into account in drafting revised policies. This includes the need to review Policy KW1 (Strategic Regional Employment Site at Whitebirk) which should be added to the list of policies requiring review.

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475	Rachael Graham Persimmon Homes	Not Stated	<p>Persimmon Homes have reviewed the documents mentioned above and have the following comments:</p> <p>Policy BD1: The balanced Development Strategy Persimmon Homes supports the potential need to assess the need to release land from the Green Belt.</p> <p>Policy H2: Affordable Housing Persimmon Homes note the recognition of low rates of delivery of affordable homes, and agree that affordable housing targets shouldn't be increased. If affordable housing policy is resulting in housing delivery becoming unviable this must be reviewed.</p> <p>Policy ENV4: Sustainable Development and Climate Change Persimmon Homes support the advancements towards housing developments which are sustainable and in line with Government changes to technical housing standards. It is essential that the changes don't make housing development unviable.</p>	Noted	<p>Viability is built into policy H2 (Affordable Housing) so the Council's view is that the policy is sufficiently flexible to cater for changes in viability over the plan period as it stands. Viability will continue to be considered through preparation of new plan policies accordingly, in line with national planning guidance.</p>

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Rep I	Name	Response	Reasons	Council response	Council Notes
478	Mohammed Ahmed Lancashire County Council (Environment Directorate)	Not Stated	<p>We recommend that health related policies (HC1 to HC4) within the Core Strategy should be reviewed, as well as the health impacts of other reviewed policy areas such as housing and employment.</p> <p>We recommend that policy HC1 and other policies relating to physical activity, green space and active travel are reviewed in collaboration with Public Health.</p> <p>We recommend that green space, walking and cycling are not regarded simply in terms of facilities for leisure pursuits but as a means of encouraging an increase in physical activity for people of all abilities as a part of daily life. We also recommend that policy HC1 and T2 should be reviewed with a view to improving the interconnectivity of residential streets, green spaces and employment and retail sites.</p> <p>We recommend that planning policy requires new developments to follow Active Design principles to encourage physical activity.</p> <p>We recommend that Policies HC1, HC3 and Env6 should be reviewed to ensure future developments in Hyndburn give consideration to how the design of environments promotes physical activity in older people and can ensure access to essential services and transport to reduce isolation.</p> <p>The Public Health Wider Determinants team would welcome the opportunity to have further discussions with Hyndburn planners to identify how support can be provided to the reviewing of policies, giving consideration to the recommendations made.</p> <p>We recommend that as the Council seeks to review Policy E1 and determine future policies on how space for new employment sites are allocated, consideration must be given to how new developments will benefit those wards with high unemployment (as measured by the claimant count).</p> <p>We also recommend that Hyndburn BC work with developers to ensure good access to new employment sites through walking, cycling and public transport for each site.</p>	Further consideration required	The Council will have further discussions with the Public Health team to identify specific issues in need of review in relation to the policies identified and whether these can be incorporated into the supporting text as opposed to a full policy review.

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488	Helen Ledger Sport England		<p>Paper one - Core strategy scoping assessment consultation paper</p> <p>We welcome policy HC1 on walking and cycling, this has the potential to link in with our Active design guidance and support: https://www.sportengland.org/facilities-planning/active-design/</p> <p>Policy ED1 - new and improved education facilities – beware our statutory role to protect playing fields. Very often expansion of school buildings will necessitate building on school playing fields which triggers our role, see: https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/</p> <p>Welcome the inclusion of proposed Policy HC2 (which leisure health and culture) and ENV1 GI which are flagged no need to update policy save minor amendments. Beware GI can also include playing fields, and their use for formal sport should be protected. These policies should be supported by robust and up to date evidence base material to include playing pitch strategy and built facilities research, more information at: https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p>	Noted	Comments noted. The Council intends to undertake a number of Green Infrastructure (GI) related evidence base studies over the next 12-18 months in support of the new Local Plan. The intention is to have these all complete prior to Publication/Submission (planned early 2020)
493	Daniel Hughes PWA Planning	Yes	<p>It's clear that the majority of the policies put forward for review are policies which specifically deal with the level of development which is to be promoted within the Borough. It is agreed that such policies ought to be a key consideration in the review of any development plan documents and consequently it is accepted that the necessary and relevant polices have all been put forward for review.</p> <p>Notwithstanding the above, the more pertinent point for the Council to consider is how the relevant policies are modified. Namely PWA Planning support the assertion made in relation to policy BD1 that 'Green Belt may be required'. If any revised iteration of policy BD1, or indeed H1, is to be considered sound it needs to provide clarity as to what level, if any, of Green Belt development is to be permitted and indeed in which locations. On this basis we also concur with the Council that the review of the local plan includes a review of the Green Belt boundaries. Undertaking a review at this time would be in line with the guidance detailed in the National Planning Policy Framework (NPPF) which states that the review of a local plan would represent an exceptional circumstance whereby Green Belt Boundaries can be altered (Paragraph 83).</p>	Noted	The issues raised in relation to how much green belt release may be required, and where, will be addressed in subsequent local plan consultations. The Council will publish its preferred Growth Option and Spatial Option in early 2019 alongside draft Core Strategy policies for comment.

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504	Rachael Graham	Not Stated	<p>1. Core Strategy Policies Scoping Assessment</p> <p>Policy BD1: The Balanced Development Strategy We support the need for the development strategy to be amended and updated in order to reflect the most recent OAN evidence, as well as current (economic, among other) aspirations of the borough and the subsequent need to identify and release land from the Green Belt. This matter is entirely interrelated with Consultation Papers 2 & 3.</p> <p>Policy H1: Housing Provision The housing provision (both the mix and quantitative requirement) may (and most likely will), need to be varied to reflect the most recent evidence. This premise is supported.</p> <p>Policy H2: Affordable Housing We do not support the retention of the 20% minimum in the event that new evidence did not back it up. It is however acknowledged and supported that the current policy allows for the reduction of this level if applicable due to viability. This is currently a borough wide issue, as the commentary already states the recent low levels of delivery due to impact on development viability. Any updated policies should also be carefully considered for their impact on viability as any additional burden on development could further reduce the level of affordable, or even market housing being delivered in the borough.</p> <p>Policy A1: Amount and Distribution of Housing in Accrington & Policy RA1 Amount and Distribution of Housing in Rural Areas. We support a full review of these policies in light of new evidence to be analysed.</p> <p>Policy A7: Housing in Huncoat The effectiveness of this policy over the past 5 years is questioned. It is expected that this will be updated following new work associated with Policy A9 (Whinney Hill Link Road).</p>	Noted	Comments in relation to H2 (regarding a potential reduction of the affordable housing requirement on viability grounds) are addressed by reference to viability in policy H2 as adopted. The Council does not therefore intend to review this policy. Viability will continue to be considered through preparation of new plan policies accordingly, in line with national planning guidance

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509	Stuart Booth JWPC Ltd	No	Policy H2: Affordable Housing requires review to consider if it is acting as a barrier to development, Appendix 6: Changes to Green Belt may require review to meet housing need	Disagree - no change	The Council does not believe that Policy H2 requires review as it provides the strategic policy only which is the starting point for negotiations and acknowledges that consideration will be given to evidence provided on economic viability of individual developments. More recently, Policy DM12 of the adopted DM DPD clarifies the approach the Council will take to viability and affordable housing in more detail, including the expectations of information in support of applications.
516	Stuart Booth JWPC Ltd	Yes	(none given)	Noted	
518	Tim Bettany-Canal and River Trust	Yes	In terms of the policies relevant to the Canal & River Trust, we consider that those identified for review would be appropriate. In terms of the suggestion to merge the policies relating to the Leeds & Liverpool canal, this may be appropriate given that as drafted policies A4, A6 and R3 are very similar. However, it would be important that local distinctiveness is still recognised. It may be appropriate to have a general Leeds & Liverpool canal policy, but with the supporting text picking out local distinctiveness.	Noted	
526	Judith Douglas Judith Douglas Town Planning Limited	Yes	The list of policies identified for review at Table 1 is generally supported. It is noted that Policy BD1 is included within the list of policies to be reviewed. It is submitted that the review of Policy BD1 should extend to those parts of the policy that relate to the extent of Green Belt. In particular, it is submitted that the review should include land at Great Harwood to which more specific reference is made at sections 4, 6 and 7 below.	Noted	

Q1.b) Do you agree with the additional policy subjects identified at Table 2 of the document (air quality and highway safety) that should be included in the Core Strategy Review? Please tell us any reasons in support of your response.

Rep I	Name / Organisation	Response	Reasons	Council response\	Council Notes
402	Matthew Pardoe WYG	No	It is considered that these matters are already adequately covered by policy and separate legislation, and therefore do not need to be the subject of further scrutiny.	Noted	The new policies will only introduce new strategic policy guidance, therefore existing policies will not be subject to further scrutiny.
416	Warren Hilton Highways England	Not Stated	Highways England welcomes commitment by the Council to introduce specific policies to consider air quality and road safety, which at present are not directly considered by the adopted Core Strategy. Air quality and road safety are important issues for Highways England, and we would welcome the opportunity to work with the Council in shaping these policies.	Noted	Support noted. The Council will consult Highways England on draft policies once prepared
423	Wallace Barnett	Yes	Both air quality and highway safety are topics that are currently of significant public concern and so they warrant addressing by the review.	Noted	Support noted
437	Liz Locke Environment Agency	Yes	We support the proposed additional policy subjects	Noted	Support noted
450	Nick Lee NJL Consulting	Not Stated	We have no strong views in relation to these new policy considerations	Noted	
461	Darragh McAdam Stephen Ward Town Planning & Development	part agree/part disagree	We agree in principle that these policy subjects should be included in the Core Strategy Review. However care should be taken to avoid additional default / 'blanket application' policies that place additional time and cost burdens on developers and which can mitigate against the viability of schemes. Any new policy requirements should only be introduced if strictly necessary and consideration should be given to thresholds.	Noted	Any additional policy burdens placed on developers through Local Plan policies will be subject to viability testing in line with requirements set out in the NPPF

Q1.b) Do you agree with the additional policy subjects identified at Table 2 of the document (air quality and highway safety) that should be included in the Core Strategy Review? Please tell us any reasons in support of your response.

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479	Mohammed Ahmed Lancashire County Council (Environment Directorate)	Not Stated	<p>We welcome that the issue of highway safety is being considered at a strategic level and recommend that Lancashire County Council's Safe and Healthy Travel Team are consulted for their expertise in this area.</p> <p>On the subject of air quality, Consultation Paper 1 states: The Government published a draft UK Air Quality Plan in 2017, and planning can be a central tool for bringing issues around the built environment, infrastructure and air quality together. The current Core Strategy Policy Env7 covers issues of air pollution at a very broad level in the context of other amenity considerations. However the Council could introduce a specific strategic policy on air quality matters to help tackle the issues raised in the Air Quality Plan.</p> <p>At present, although Hyndburn has no Air Quality Monitoring Areas (AQMA), there are number of indicators and sources of information which could further inform discussion around this subject. The Public Health Outcomes Framework contains district level indicators such as Air Pollution: Fine Particulate Matter and The Fraction of Mortality Attributable to Particulate Air Pollution . We welcome that the issue of air quality being put forward for consideration at a strategic level as it is a growing Public Health concern both locally and nationally. We recommend that Hyndburn BC consults with the Public Health Wider Determinants Team at Lancashire County Council to inform the creation of a strategic policy in this area.</p>	Noted	The Council will consult with relevant teams in LCC further in relation to development of these strategic policies
494	Daniel Hughes PWA Planning	Yes	The inclusion of the referenced additional policy subjects does not give rise to any concerns and as such no further comment is provided on the matter.	Noted	
510	Stuart Booth JWPC Ltd	Yes		Noted	Support noted
519	Tim Bettany-Simmons Canal and River Trust	Yes	These would seem appropriate given the anticipated growth of the Borough.	Noted	Support noted

Q1.b) Do you agree with the additional policy subjects identified at Table 2 of the document (air quality and highway safety) that should be included in the Core Strategy Review? Please tell us any reasons in support of your response.

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527	Judith Douglas Judith Douglas Town Planning Limited	No		Noted	Objection noted, however no reason is provided so the Council is unable to provide a specific response

Q1.c) Please tell us about any further matters you think the Core Strategy Review should cover and any reasons in support

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396	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	<p>Table 1 concludes essentially that the Environment Policies in the 2012 Core Strategy only require minor editing. However, the Lancashire Wildlife Trust is of the opinion that it could do with a bit more than minor editing, even though the general gist of the policies are along the right lines. Recommendations include:</p> <p>Criteria in the Policies, including ENV 1-6, should include the consideration of the ecology of the site, enhancement of biodiversity and retention of features such as trees, hedgerows, streams etc., where applicable.</p> <p>The review covers most aspects that the Trust would wish to see covered, but it could be more strongly worded in terms of protecting and enhancing important wildlife sites, biodiversity (especially habitats and species of principal importance in England, which are matters of material consideration) and ecological networks, which have been identified for Lancashire since the 2012 Core Strategy was adopted) and are specific requirements in the National Planning Policy Framework (NPPF, 2012). Note: Ecological networks have been mapped by Lancashire Environment Record Network, commissioned by Lancashire's Local Nature Partnership and funded by Natural England.</p> <p>The Core Strategy's policies should seek to protect the existing network and strengthen it wherever possible, in line with the requirements in the NPPF.</p>	Disagree - no change	Recommendations are noted however the Council considers that the suite of Environment policies provides sufficient strategic policy to address the matters raised. Ecological networks have been integrated into the recently adopted DM DPD.

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416	Warren Hilton Highways England	<p>It is also noted that the Council are currently updating their plans for the former Huncoat Power Station site as a result of new Objectively Assessed Need (OAN) evidence, the planned review of Growth and Spatial Options, and HCA masterplanning work. Highways England would welcome further engagement to understand the impact of the proposed development and to identify appropriate transport schemes to ensure the future safe operation of the SRN alongside suitable access to and from the site by all modes. The current Core Strategy includes three policies which specifically address accessibility issues in Hyndburn. These are:</p> <ul style="list-style-type: none"> <input type="checkbox"/> T1 – Improving Connectivity <input type="checkbox"/> T2 – Cycle and Footpath Networks <input type="checkbox"/> T3 – Motorway and Trunk Road Improvements <p>The Core Strategy Review – Core Strategy Policies Scoping Assessment states that each of these policies will remain, however minor amendments may be made to the supporting text. Highways England welcome the continuity of these policies alongside the introduction of policies addressing air quality and road safety. We would also welcome the opportunity to shape the text supporting these policies to ensure they fully support our strategic objectives, provide adequate mitigation measures for new developments, and support sustainable growth and development in Hyndburn. The Council are currently in the process of determining the scale and extent of growth which is required in Hyndburn to 2033, and therefore at present no sites are specifically identified within the consultation documents. Consequently, it is not possible currently to quantify the exact effect of the proposals on the SRN. The emergence of specific sites, and an assessment of their impact on the SRN, is something we would expect to see and would like to work jointly with the Council on preparing, as the plan further develops.</p>	Noted	Support noted. The Council will consult Highways England on draft policies once prepared
438	Liz Locke Environment Agency	<p>Policy Env4 new para) – insert a new sub-policy recognising the risks associated with culverted watercourses in the council area “Preserving the role of open watercourses as valuable linear features in the urban and rural environment, and reducing the risk of flooding associated with culverted watercourses by:</p> <ul style="list-style-type: none"> •Supporting the restoration of culverted watercourses to open channels. •Resisting proposals to build over an existing culvert. •Resisting proposals to culvert a watercourse for land gain purposes. <p>Para 4.77 update to reflect the forthcoming revised SFRA, which should incorporate information regarding flooding from all sources including from reservoir, groundwater and surface water. Any potential site allocations in areas of flood risk should be the subject of further detailed flood risk assessment in the form of a Level 2 SFRA or site-specific FRA to inform whether the site is suitable for the development.</p>	Agree - main modification	Redraft of Policy Env4 to incorporate comments from EA

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448	Adam Brennan United Utilities	<p>Suggested Planning Policies</p> <p>If the review to the Core Strategy is to include new policies, we wish to stress the importance of providing policies that emphasise the need for water supply and wastewater drainage infrastructure to be given due consideration in the earliest stages of planning for proposed developments. We are aware that the adopted Development Management DPD has included policy suggestions from our consultation response. We would like to request that such emphasis and wording is repeated should any policies as part of the new Local Plan be under review, and that we would like to be involved at the earliest stage of policy review. UU are happy to engage with Hyndburn should any policy dialogue be requested.</p>	Noted	The Council will work with United Utilities in preparing an Infrastructure Delivery Plan in support of the Core Strategy Review and Site Allocations DPD which will support any allocations that come forward. Specific policies are therefore not considered necessary.
451	Nick Lee NJL Consulting	It is critical that Hyndburn's Core Strategy drives ambition , including in relation to housing and employment growth	Noted	
452	Nick Lee NJL Consulting	<p>Consultation Paper 1: Core Strategy Review: Core Strategy Policies – Scoping Assessment</p> <p>The Scoping Assessment document confirms within its Executive Summary that the Council ‘is very keen to receive feedback at this early stage to feed into the plan making process.’ NJL welcomes this approach for feedback as it enables an opportunity to draw ideas from a range of stakeholders including land owners, developers, small businesses, large enterprises, and local residents.</p> <p>The Scoping Assessment confirms the desired outcome of this consultation is ‘a single, consistent and comprehensive new strategic planning document... against which planning applications in Hyndburn will be assessed’ (Para. 1.4). Other documents, including the Site Allocations Development Management Plan (DPD) will provide the more detailed policies to guide decision making on development.</p> <p>The Scoping Assessment also confirms this consultation offers an opportunity to consider if new policies or revised existing policies may enable filling in gaps (Para. 1.5). Hyndburn provides their view on where individual policies may need updating or where they are judged to be appropriate in their current form. We provide our associated comments on the completed responses form.</p>	Noted	Specific comments are addressed under separate representations

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462	Darragh McAdam Stephen Ward Town Planning & Development Consultants Ltd	<p>Paragraph 5.55 which pertains to Great Harwood.</p> <p>This part of the Core Strategy acknowledges the re-development opportunities in and around the site of the abattoir and this area has been identified in the Core Strategy as an area of potential change that could accommodate appropriate commercial and residential development. A large residential planning application has been permitted/commenced nearby (Application Ref. No's 11/15/0248 and 11/17/0114) and a further application for residential development is under assessment at time of writing (Ref. No. 11/17/0566). The Core Strategy should further acknowledge the changing character of this area and the increasing incompatibility with existing historical industrial / employment uses.</p> <p>Policy needs to be more flexible and supportive to facilitate development for residential uses of sites identified as 'existing employment area' in the area around the abattoir and identified in the Core Strategy as an area with redevelopment opportunities and as an area of potential change.</p>	Noted	The issues raised will be considered and addressed in the review of the Great Harwood section of the Core Strategy
480	Mohammed Ahmed Lancashire County Council (Environment Directorate)	We recommend that the Core Strategy provides more clarity on how it will cater for the housing needs of the aging population of Hyndburn, both in terms of appropriate adaptable housing and access to essential services.	Agree - main modification	The proposed review of Policy H1 will address the issue of housing needs, supporting recently adopted DM DPD Policy DM16 on access standards. Access to essential services for future allocations is addressed in the Site Assessment Methodology, and criteria 1b of Policy DM14 (DM DPD) for applications of housing with care

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482	Mohammed Ahmed Lancashire County Council (Environment Directorate)	<p>Paper One: Core Strategy Policies Scoping Assessment</p> <p>The core strategy adopted in 2012 requires periodic reviews generally at five year intervals. The current plans falls into this timeline and therefore HBC has produced a number of policies that require specific review.</p> <p>The scoping document has indicated at Policy BD1The Balanced Development Strategy Potential new growth may result in an extension to the plan period to 2033. If this is the case SPT will work with HBC planning officers to forecast the potential impact for the term of an extended plan on primary and secondary education. The forecast will be dependent on HBC providing the housing trajectory across the district and potential phasing for the term of the plan. School Planning Team receive annually the district 5 year housing land supply document. This information is used to forecast the impact on education, taking into consideration birth rates and assuming the housing will come forward within five years.</p> <p>School planning divide primary education in to specific planning areas therefore significant development in one planning area may affect a number of primary schools.</p> <p>Policy ED1 New and Improved Educational Facilities</p> <p>Across Hyndburn there are 35 primary and 6 secondary schools, the condition of individual schools varies with many in primary occupying older challenging buildings with poor facilities. It is the responsibility of SPT to provide basic need funding for school places where it is forecast to be a shortfall.</p> <p>SPT are not responsible for the condition of a building however work in close partnership with LCC officers responsible for the Property Capital Investment Programme, with both teams falling under the LCC Asset Management Department.</p> <p>The continued financial situation faced by LCC and the district councils makes for a challenging future to provide the funding to improve the condition and suitability of schools. Future demand from new housing developments will contribute to the increasing situation.</p> <p>School planning will continue to advise HBC planning officers the impact of new housing on the existing education provision. In certain situations the potential for a new or replacement school may be required to meet the demand.</p> <p>The scoping document makes references to various policies to be reviewed across the planning areas based on new Objectively Assessed Need (OAN) evidence, this includes Rishton, Huncoat, Great Harwood, Accrington and Rural Areas.</p> <p>As it is not clear what changes are to be made, SPT will wait for further communications with HBC planning officers and respond with potential impact to reflect the changes across education when further information is received. SPT has responded to previous stages of the local plan, also attending face to face meetings to share information and consider this an appropriate method to build effective relationships.</p>	Noted	The Council will continue to work with the LCC Schools Planning Team to ensure that the impacts of planned development on school places and investment is fully understood. Any specific investment required to support growth planned in the Local Plan will be set out in the Council's Infrastructure Delivery Plan (IDP)

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485	Melanie Lindsley The Coal Authority	I have reviewed the Scoping Assessment and can confirm that the Coal Authority has no specific comments to make at this early stage.	Noted	
495	Daniel Hughes PWA Planning	It is noted that Policy H2 – Affordable Housing is not a policy put forward for review. Whilst it is accepted that a revised policy isn't necessary, it's worthwhile noting that the latest consultation version of the revised NPPF provides additional guidance as to when such affordable contributions should be sought. The revised guidance does not seek to enforce a floorspace threshold (previously 1000sqm) for residential development.	Noted	
511	Stuart Booth JWPC Ltd	A review of reasons for low house building rate would assist future strategy	Noted	The Government is introducing a requirement for Councils to produce annual reviews and annual position statements in relation to housing delivery and supply which should address this point
520	Tim Bettany-Simmons Canal and River Trust	Health and Wellbeing should be addressed. The canal has a key role to play in addressing the health and wellbeing of the local communities near to the waterways. The NPPF has a whole chapter devoted to promoting healthy communities and there is further guidance in the NPPG, with a chapter on health and wellbeing.	Noted	The Sustainability Appraisal incorporates health matters and will assess specific impacts of proposed draft policies and site allocations as the plan develops

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528	Judith Douglas Judith Douglas Town Planning Limited	<p>The consultation papers can have had no regard to the draft revised National Planning Policy Framework (NPPF), as it was published by the Government in March 2018 following the start of Hyndburn's consultation exercise. Self-evidently, the Council will need to have full regard to this document and the subsequent final revised NPPF.</p> <p>2.3 In particular, the Government's wish to significantly boost the supply of homes and the importance attached to a sufficient amount and variety of land being brought forward where it is needed should be noted. The draft NPPF states that "strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals". For the reasons set out in section 3 below, it is submitted that there are clear and exceptional circumstances that would justify an alternative approach being adopted at Hyndburn.</p> <p>It should also be noted that the draft NPPF specifically refers to the important contribution that small sites can make to meeting housing requirements. This should be factored into the review of policies and, indeed, the site assessment methodology (see section 4 below).</p>	Noted	The Council will take into account requirements of the new NPPF once it is published as it is required to do so to ensure the Local Plan is found sound