

# **Appendix 3 – ‘Consultation Draft’ Summary of Comments and Council Response**

Hyndburn DM DPD  
Consultation Statement (Regulation 22)

January 2017

# Hyndburn DM DPD Consultation Draft (11th February 2016 - 24th March 2016)

All comments received and proposed Council response - ordered by DM DPD page no.

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
162		Dave	Coe	Support	Whole Document				It is encouraging to see that HBC have formulated this draft to encompass the many and varied planning issues listed and have also welcomed participation and comments from anyone who care to do so.	Noted	
1	National Trust - NW Regional Office	Alan	Hubbard	No comment					Confirmed in writing that the National Trust has no comments to make	Noted	
95	Coal Authority			Object	Whole Plan				There is no cross reference between the Hyndburn Local Plan and the content of the Lancashire Minerals and Waste Local Plan	Agree - make changes	Include somewhere in the DPD reference to LMWP
247	CBRE Ltd	Edward	Harvey	General Comment	Infrastructure Provision				United Utilities recommend that a detailed policy is included as part of the DM DPD in relation to infrastructure provision. This would help to ensure that, particularly with regards to large sites in fragmented ownership, that the practical issues of infrastructure strategy and delivery are considered up front. Specific policy text is proposed by UU.	Further work required	Consider benefits of proposed policy in the context of existing policy provision in the Core Strategy
198	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	Support	Whole document				LCC is supportive of the DM DPD, and the broad themes and policy direction that it covers in respect of environment, community infrastructure, economy and sustainability. These complement LCC's core objectives expressed through its emerging Corporate Strategy and supporting policy documents. The general principles and strategic issues are also aligned with LCC's published Highways and Transport Masterplan for East Lancashire, specifically with regard to sustainable transport infrastructure and traffic and highway safety. Improvements in order to bring better consistency and clarity in this respect are suggested against specific policies.	Noted	

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204	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Whole Plan				LCC's Planning and Public Health specialists should work with HBC planning officers, to undertake a health proofing exercise of the consultation draft policies. This may take the form of a rapid Health Impact Assessment (HIA), will enable any positive or negative health impacts of the neighbourhood plan policies to be identified. Recommendations can then be assessed and if required policy modifications could be made prior to the final submission version of the plan being prepared.	Further work required	Meet with LCC Health contact to discuss progressing this work and integrating with SA work
211	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Minerals Extraction				Mineral Safeguarding Areas (MSAs) are defined by Policy M2 of the Lancashire Minerals and Waste Site Allocation and Development Management Policies Local Plan and the Policies Map, a number of which are in Hyndburn. The Council will need to satisfy itself that the need for development outweighs the need to prevent the possible sterilisation of a possible mineral resource at some point in the future.	Further work required	Consider where in the DM DPD can make reference to this and the Lancashire M&W Plan
137	The Home Builders Federation	Matthew	Good	General Comment	Housing Requirement				The housing requirement (set in the Core Strategy) is based upon the now revoked RSS and as such can be considered out of date. This has implications not only for the forthcoming Site Allocations DPD but also policies within the DM DPD, such as affordable housing. It is therefore recommended that the Council consider reviewing their housing requirement as a matter of urgency. This could either be done through a partial review of the Core Strategy or as part of another DPD.	Noted	The Council is aware of this and is undertaking the necessary work on OAN in conjunction with progressing the DM DPD to ensure that it has a robust Local Plan in place.
156	Natural England			General Comment	Habitat Regulations				Natural England remind the Council that the plan must be screened with respect to the Conservation of Habitats and Species Regulations 2010 (as amended) to determine whether an Appropriate Assessment is required.	Further work required	The Council has already drafted HRA screening in consultation with NE and this will be completed prior to Publication

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
109	Highways England	Warren	Hilton	Support	Presumption in favour of sustainable development	GC1	10		Highways England supports Policy GC1	Noted	
27	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Support	Sustainable Development	GC1	10		Support the Council's presumption in favour of sustainable development as per the NPPF and that it will always work proactively with applicants to secure development that improves the environmental conditions in the area	Noted	
216	CPRE Lancashire	Jackie	Copley	Support	Sustainable Development	GC1	10	2.3	CPRE Lancashire is pleased to see that in paragraph 2.3. a definition for sustainable development is given as it is an obvious omission from the NPPF, given it is what it aims to achieve. We are supportive of sustainable development is that 'which meets the needs of the present generation without compromising the ability of future generations to meet their own needs'	Noted	

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171	JWPC Ltd	Matthew	Wyatt	General Comment	Planning Obligations & CIL	GC2	11	2d	It is requested that the Council carefully considers the future requirement to progress CIL charges within the Borough, given the contributions requested from developers via S106s. Persistend records of under-delivery and shortfalls in housing are obvious in the borough. JWPC have experienced CIL requirements elsewhere in northern england discouraging developer activity. Further financial contributions would be conterproductive to wider aims of promoting housing delivery.	Noted	The Council may seek to investigate CIL further in the future. If so and any future levy is implemented, then any S106 obligations would be complementary. Any CIL implementation will be supported by evidence on vaiability and be subject to examination in public, therefore there should be no negative impacts on development activity.
119	Environment Agency	Dave	Hortin	General Comment	Planning Obligations & CIL	GC2	11	3	Recommend adding Policy DM20 - Flood Risk Management and Water Resources to the list of policies requesting S.106 contributions	Agree - make changes	
217	CPRE Lancashire	Jackie	Copley	Support	Planning Obligations & CIL	GC2	11	4	CPRE Lancashire is pleased to note that where developers claim viability concerns open book appraisal will be required to make decision making concerning developer contributions more transparent.	Noted	

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28	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Support	Planning Obligations	GC2	11	1 and 3	Agree that the Council should support the provision of relevant infrastructure, services and facilities required to maintain and enhance the quality of life of local people and the local environment. Also support the Council's intention to seek contributions on a case-by-case basis that can/will include policies DM1(Open Space Provision in New Residential Development), DM1 (Trees, Woodland and Hedgerows) and DM1 (Protection and Enhancement of the Natural Environment).	Noted	
110	Highways England	Warren	Hilton	General Comment	Planning Obligations and CIL	GC2	11		Highways England welcomes Policy GC2, though it should be noted that any required developer-funded improvements to the Strategic Road Network are undertaken by virtue of an agreement under Section 278 of the Highways Act 1980. An additional policy link to the NPPF para 204 which includes the tests for planning obligations should be considered.	Agree - make changes	Add in reference to Paragraph 3 of the policy text and/or the justification text
97	Canal and River Trust	Tim	Bettany-Simmons	Support	Planning Obligations & CIL	GC2	11	3	The Canal & River Trust support contributions being sought on a case-by-case basis including for sustainable transport infrastructure	Noted	
111	Highways England	Warren	Hilton	General Comment	Planning Obligations and CIL	GC2	11		Consider including a reference to PPG: CIL 2014 as a development management policy link in GC2	Agree - make changes	Either in policy or justification text
112	Highways England	Warren	Hilton	Support	Planning Enforcement	GC3	13		Highways England believe that Policy GC3 is fit for purpose and welcomes the link to NPPF	Noted	
218	CPRE Lancashire	Jackie	Copley	General Comment	Planning Enforcement	GC3	13		CPRE Lancashire believes for the planning system to be effective enforcement must be adequate.	Noted	

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
66	Janet Dixon Town Planners Ltd	Mike	Gee	General Comment	Existing Employment Sites	DM1	17		The owners of Spring Mill, Spring Street Rishton (East Lancs Box Co) acknowledge that the DM DPD contains nothing specific to prejudice the continued use of the site in employment use. They do however confirm their intention to retain and invest in the premises, in addition to significant past and ongoing investment (details provided) and disagree with the categorisation of the site in the latest Employment Land Study as 'poor' quality. This should be reconsidered.	Disagree - no changes	The DM DPD sets the policy framework and is not the place for undertaking site assessments. Paragraph 3.13 of the DM DPD provides the flexibility for applicants to challenge site assessments in the latest ELS where they disagree. Consideration to be given to removing 'existing employment areas' from Policy Maps due to confusion over status (i.e. not allocations)
219	CPRE Lancashire	Jackie	Copley	Support	Employment Development	DM1	17	1f	CPRE Lancashire is supportive of inclusion of bullet f) relating to energy efficiency and BREEAM technical guidance ( <a href="http://www.breeam.com">www.breeam.com</a> ).	Noted	
172	JWPC Ltd	Matthew	Wyatt	General Comment	Employment Development	DM1	17	1f	The policy requirement to meet the minimum requirements of BREEAM may be superseded by other requirements introduced by the Government such as with the Code for Sustainable Homes. The Building Regulations ensure that town planning contributes towards energy-efficiency etc. Planning Officers are unlikely to review submitted info on BREEAM in any depth.	Further work required	Consider practicalities of policy further and in the context of BC Regulations and Officer consultation

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113	Highways England	Warren	Hilton	General Comment	Employment Development	DM1	17		Highways England believe that Policy DM1 is fit for purpose and appropriate. We consider that there should be a reference to assessing traffic generation in relation to existing employment sites and any potential change of use.	Agree - make changes	
67	Janet Dixon Town Planners Ltd	Mike	Gee	General Comment	Existing Employment Sites	DM1	17		The owners of Daisy Hill Mill, Ashworth Street Rishton (R E Walsh Investments Ltd) acknowledge that the DM DPD contains nothing specific to prejudice the continued use of the site in employment use. They do however confirm their intention to retain and invest in the premises, in addition to significant past and ongoing investment (details provided).	Noted	
29	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Object	Employment Development	DM1	17	1	There is no proviso regarding the protection and enhancement of biodiversity (sites, habitats and/or species) and geodiversity (geology and geomorphology). Additional wording could be added to proviso 'e' or a new proviso written as impacts may still be felt on land within the defined urban area.	Agree - make changes	
173	JWPC Ltd	Matthew	Wyatt	Object	Employment Development	DM1	17	4	The policy is too strict in requiring new office space to be located only within town and district centres. There is considerable demand for small B1 uses in more rural locations, increasingly following improvements in broadband. The policy should be more flexible to help support a prosperous rural economy as encouraged within Chapter 3 of the NPPF, and in line with recent more flexible PD rights for conversion of redundant rural buildings.	Further work required	Look into how the policy may be made more flexible in line with comments without compromising the sequential test
120	Environment Agency	Dave	Hortin	General Comment	Employment Development	DM1	17	1	Either include the same reference to flood risk as in DM10 (Residential Development - para 11) or cross reference DM20	Agree - make changes	
196	Omega Atlantic	Katie	Dent	General Comment	Employment Development	DM1	18		Policy Context and Relationships table should refer to Core Strategy Policy A8: Strategic Employment Site at Huncoat	Agree - make changes	Consider policy more closely in terms of Huncoat and Whitebirk strategic allocations



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145	Stephen Ward Planning Consultants Ltd	Stephen	Ward	Object	Employment Development	DM1	20	3.13-3.14	We object to the designation of ABP owned land in Great Harwood as an 'adequate' quality existing employment area as per the latest Employment Land Study. This is contrary to Core Strategy BD1 (para 5.55) and the land should remain undesignated/white land. We submit an alternative site appraisal proforma indicating why the sites are 'poor' quality.	Further work required	The DM DPD sets the policy framework and is not the place for undertaking site assessments. Paragraph 3.13 of the DM DPD provides the flexibility for applicants to challenge site assessments in the latest ELS where they disagree. Consideration to be given to removing 'existing employment areas' from Policy Maps due to confusion over status (i.e. not allocations)
174	JWPC Ltd	Matthew	Wyatt	General Comment	Employment Strategies	DM2	21	1	The policy needs to provide much more information on how developers will work alongside Job Centre Plus. Employers are concerned to refuse employment from someone out of the area to avoid discrimination (contrary to equal opportunities legislation). Also an understanding of how planning enforcement would be progressed is required where the local Jobcentre Plus are not able to provide suitable candidates.	Further work required	
114	Highways England	Warren	Hilton	Support	Employment Strategies	DM2	21		Highways England believe that Policy DM2 is appropriate and fit for purpose	Noted	

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186	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	22	5a	Paragraph states that small scale facilities will be acceptable if they contribute to a local parade or local centre. Such a restriction would hinder the delivery of local convenience stores which often standalone to support a residential community and can equally be appropriate where they are located to serve areas with large numbers of employees such as Greenbank and Whitebirk. Furthermore, local centres and parades should be designated as such, in which case delivery of improvements to them would not be classed as out of centre development and Point 5 a) would not be necessary.	Further work required	Consider whether to designate local parades in Site Allocations DPD or not and implications for DM DPD if so.
115	Highways England	Warren	Hilton	Support	Town Centre Development	DM3	22		Highways England welcomes Policy DM3 and considers it fit for purpose. References in 5c and 6b are to access on foot and car parking arrangements are particularly welcomed.	Noted	
192	NJL Consulting	Nicole	Roe	Object	Town Centre Development	DM3	22		With all of the above in mind (set out in Repls 185-191) we would object to the policy as it currently stands and recommend that thresholds be set out which look at operator type rather than location e.g. Foodstores: 1,500sqm, non-food retail warehousing: 2,500sqm	Further work required	Consider best policy approach to address these points in the context of the Retail Thresholds Advice Note (once published)
189	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	22		Grouping retail uses together is more sustainable than providing standalone facilities and there should be recognition of this fact through the Local Plan	Agree - make changes	Reference this point as appropriate in the DM DPD

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187	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	22		We have serious reservations about the 'Outside of Town Centre Locations' element of the policy. If the policy remains in the current form it would have to - Clearly define the catchment areas of the settlements to ensure clarity on which threshold should apply; - Explain what would happen if a proposed development would sit on the edge of two catchments; and - Explain the approach that would be taken should a proposed development provide a combination of convenience and comparison goods floor space. E.g. B&M, would such a unit have to provide an impact assessment for purely the convenience goods element or for both?	Further work required	Consider amendments to policy in the context of the Retail Thresholds Advice Note once complete
185	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	22	5 & 7	There appears to be no logic to having a different threshold for sequential assessment and impact assessments which will be difficult to apply in a sensible and meaningful manner. The lack of the Retail Thresholds Advice Note at this stage precludes confirmation of whether or not we agree with the approach.	Noted	The Retail Thresholds Advice Note will be published prior to the Publication version
147	Stephen Ward Planning Consultants Ltd	Stephen	Ward	General Comment	Town Centre Development	DM3	22	4 and 7	The floorspace thresholds under para 4 of DM3 should be increased, and also the gross floorspace caps under para 7 in so far as they concern brownfield land that is either referred to in the Core Strategy and/or that is contained within a future Site Allocations DPD. Accordingly, the wording of DM3 should be amended to reference 'brownfield land referred to in the Core Strategy' and/or 'sites for which specific policy provision is set out in a future Site Allocations DPD'.	Further work required	Floorspace thresholds in Policy DM3 will be reviewed following completion of the Retail Study and Retail Thresholds Advice Note
190	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	23	7	Extending existing facilities should not be subject to the same thresholds as wholly new retail facilities as extensions will not have the same scale of impact as providing a new standalone retail unit e.g. it may be to provide more circulation space.	Further work required	Consider best policy approach to address these points in the context of the Retail Thresholds Advice Note (once published)

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188	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	23	7	There should be some recognition of the role of the Peel Centre within the retail market and hierarchy of Hyndburn. It plays an important role accommodating largescale retail units which cannot be located within existing centres and provides a valuable facility, including for people who work close by because they can link trips to and from work with using the retail park. Policy should allow for the asset management of the retail park in a way that maximises its potential to provide the people of Hyndburn with a local alternative to retail park facilities within areas such as Bolton and Preston, encouraging more sustainable shopping patterns.	Further work required	Consider best policy approach to address these points in the context of the Retail Thresholds Advice Note (once published) and DtC discussions to be held with BwD
191	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	23	7	Lastly, the type of retailer that locates at a retail park such as the Peel Centre, would more often than not compete with a different level of store and centre than that provided in the lower order centres of Rishton etc. For example, the type of convenience goods shopping that is carried out in small newsagents and convenience stores is very different to the type carried out at larger format national multiple retailers.	Noted	
184	Blackburn with Darwen Borough Council	David	Proctor	Object	Town Centre Development	DM3	23	7	Blackburn with Darwen objects to the proposed threshold of 2,000sqm for comparison retail proposals in Accrington because: - evidence has not been made available to support the figure; - it is not clear in the policy how 'Accrington' will be defined in terms of the requirement; and - the threshold is too high and will allow comparatively large retail proposals to be considered without an assessment of impact on existing centres thereby harming vitality and viability	Further work required	Complete and publish Retail Thresholds Advice Note and consider Whitebirk scenario in terms of location. Arrange DtC meeting with BwD to discuss issues further.
193	NJL Consulting	Nicole	Roe	General Comment	Town Centre Development	DM3	24	3.24	The policy or supporting text should specify that impact assessments should be proportionate to the proposed development	Agree - make changes	

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175	JWPC Ltd	Matthew	Wyatt	Object	Hot Food Takeaways	DM5	26		The policy as stands will inevitably focus new hot food takeaways towards a number of concentrated areas that fall outside the exclusion area. Criteria B and C are therefore in conflict. It is also inherently unsustainable as it forces new proposals towards the fringes of the urban area, rather than towards accessible locations. It will also fail to impact on childhood obesity as most takeaways are closed until early evening and are far too expensive. It would be much more relevant to focus on Class A1 and A3 premises within the vicinity of schools due to opening hours, prices and products they sell.	Further work required	Review policy in line with comments received and discussions with LCC Health Officers
199	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Delivering Schools and Early Learning	DM6	31	3	LCC suggests minor amendments to the paragraph and additional wording to clarify that contributions will be to address the direct impact of development, and that 'development will not be acceptable if it cannot address its impact on education where this necessitates provision of additional school places'.	Agree - make changes	
200	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Delivering Schools and Early Learning	DM6	33	4.9	<p>i) This is a long term projection so we cannot assume that the birth rate will remain low through the lifetime of the plan.</p> <p>ii) LCC recognises that the viability of developments in Hyndburn is a concern but at the same time it must be recognised that a development can only be sustainable if it addresses its infrastructure needs and addressing the impact on school places is a key element of this.</p> <p>iii) there is a clear expectation from Government that local authorities will supplement education capital funding through developer contributions where this can be justified.</p> <p>iv) There are no details about how viability will be assessed. There is also concern that education has specifically been singled out, when there are many factors that influence the viability of a development.</p> <p>v) The County Council would welcome assurance that the Borough Council will consider the sustainability of a development if the impact on school places is not being addressed</p>	Further work required	Discuss any proposed changes to policy with LCC to address comments raised

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201	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Cultural and Community Facilities	DM7	34	1	LCC is in the process of rationalising its property portfolio through the Neighbourhood Centre review, which will reduce the number of public facing properties by half across Lancashire, providing public facing service provision in newly formed Neighbourhood Centres. It is anticipated the requirements of DM7.1(a) will have been achieved following this process and LCC will be in a position to re-use or dispose of the surplus properties as it sees fit.	Noted	
68	The Theatres Trust	Ross	Anthony	Support	Cultural and Community Facilities	DM7	34		The Theatres Tust supports policy DM7 which reflects paragraph 70 of the NPPF	Noted	
76	NHS Property Services Ltd	Anna	McComb	Object	Cultural and Community Facilities	DM7	35	4.17	NHS Property Services object to the overly restrictive nature of the policy, in particular the requirement for surplus facilities (that include health - footnote 37) to be marketed. The NHS estate reorganisation programme is sufficient evidence that a facility is neither needed nor viable as it involves rigorous NHS testing and approval processed to be satisfied. Minor change to policy wording proposed to resolve concern, deletion of 'and' between points 1b and 1c.	Further work required	Consider implications for other community facilities of the proposed wording change and whether a specific NHS statement may be more appropriate
242	CAMRA (East Lancs Branch)	Philip	Drew	Support	Public Houses	DM8	36	2	This is very good	Noted	
176	JWPC Ltd	Matthew	Wyatt	General Comment	Public Houses	DM8	36	1	The emerging policy sets out that the Council will support proposals for the change of use of public houses to any other A or D1 use classes. This needs to be reworded since planning permission is not required to change the use of such premises to a development falling within Class A	Further work required	Review PD rights with DM and update policy accordingly

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177	JWPC Ltd	Matthew	Wyatt	General Comment	Public Houses	DM8	36	2	The requirements set for justifying demolition or change of use of a public house to any other use class are far too strict and the policy does not reflect the high number of public houses located in urban areas, which is typical of many former mill-towns in the North West. JWPC feel that the criteria should not be applied cumulatively and a change of use should principally be supported if (under Criterion C) the loss of the pub will not result in a shortfall of pub provision in the area. Only if the pub remains the last in the local area, should the remaining criteria be applied	Further work required	Consider implications of request and how the policy may be made more flexible whilst retaining the original policy intention
178	JWPC Ltd	Matthew	Wyatt	General Comment	Public Houses	DM8	36	2b	Requirements for marketing should be applied flexibly, bearing in mind that the need for a consistent period of 12 months' marketing would discourage investment on many old, struggling and vacant public houses that are in a rapidly deteriorating state. The Council should also come to their own view as to whether a public house is economically viable and CAMRA's Public House Viability Test is something which may change over the course of the Plan period	Further work required	Consider marketing process and adopting a more flexible viability assessment process in line with comments
241	CAMRA (East Lancs Branch)	Philip	Drew	Object	Public Houses	DM8	36	1	CAMRA object strongly as this would mean no opposition by the Council to change of use from Public House to restaurants, shops, financial/professional offices and 'non-residential institutions' (e.g. chreches, childrens nurseries and places of worship) even where the community value of a pub is recognised. Pubs need to be properly protected from inappropriate A or D1 use class applications. Also, 'other relevant policies' is a bit vague and these should be clearly stated.	Further work required	Consider policy amendments to resolve objection
220	CPRE Lancashire	Jackie	Copley	Support	Telecommunications	DM9	37	1b	CPRE Lancashire is pleased to see the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual and residential amenity, character and appearance of the surrounding areas.	Noted	

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77	Historic England - NW Office	Emily	Hrycan	Object	Telecommunications	DM9	37	1d	Replace 'adverse effect' with 'unacceptable harm'. Replace 'archaeological sites, conservation areas or buildings of architectural or historic interest' with 'heritage assets and their setting'. This will ensure the policy better accords with NPPF	Agree - make changes	
30	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Telecomms	DM9	37	1d	Reference should be added to include sites of geodiversity as well (geology and geomorphology). In conjunction with this the explanatory text (4.24-4.30) could have broader referencing to the natural environment and providing net gains in line with the NPPF	Agree - make changes	
221	CPRE Lancashire	Jackie	Copley	Support	Housing Chapter		41	5.1	CPRE is pleased to see that the key elements of the housing strategy are set out in the DM DPD	Noted	
138	The Home Builders Federation	Matthew	Good	General Comment	New Residential Development	DM10	42	1c	The HBF supports a flexible approach to applying the principles of Building for Life standard. Paragraph 5.7 of the justification text appears to offer such flexibility in that applicants will be expected 'to use the principles' set out in BfL 12, however the policy wording in para 1c is less flexible as worded and implies a rigid mandatory standard. The Council should clarify the flexible approach in the policy text itself.	Agree - make changes	Clarify wording of policy text and justification text to ensure consistency
121	Environment Agency	Dave	Hortin	General Comment	New Residential Development	DM10	42	1	Amend in line with the approach taken to DM1 (Rep ID 120)	Agree - make changes	
46	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	New Residential Development	DM10	42	1c	is the BfL12 reference sufficient to request that developers consider lifetime homes, secured by design, ECO Homes standards and the Code for Sustainable Homes etc?	Noted	The Government have abolished these standards in favour of a single set of national housing standards covered by Policy DM16 of the DM DPD



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78	Historic England - NW Office	Emily	Hrycan	Object	New Residential Development	DM10	42	1a	Reword criteria 1a to reference 'enhancing local character and distinctiveness' and to replace 'the protection and enhancement of heritage resources' with 'there will be no unacceptable harm to heritage assets and their setting'	Agree - make changes	
163	Mcateer Associates Ltd	Tony	McAteer	General Comment	New Residential Development	DM10	42	1c	The requirement for schemes of 5 or more dwellings to consider and address Building for Life 12 criteria in the design of the scheme in the policy is unclear. The justification text (para 5.7) suggests a flexible approach which Morris Homes supports. However we would encourage the Council to make this more explicit within the text and policy as it was never the intention for this to be a mandatory standard for all developments.	Agree - make changes	Clarify wording of policy text and justification text to ensure consistency
226	CPRE Lancashire	Jackie	Copley	General Comment	New Residential Development	DM10	42		Reference to the landscape and visual impact of a proposed housing development should be considered if the site is visible from open countryside to avoid adverse impacts.	Further work required	Consider how policy could best be edited to address this
47	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	New Residential Development	DM10	43	3 and 5.10	static caravan sites – does this reference include 'residential park home schemes?'	Agree - make changes	Clarify scope of statement and include policy link to DM15
148	Stephen Ward Planning Consultants Ltd	Stephen	Ward	Object	Open Space Provision	DM11	45	1f	This point should be clarified as it could be interpreted as meaning the Developer must directly fund and be responsible for open space maintenance for 20 years, as opposed to funding the Council to do so if/when they accept responsibility to do so through formally adopting the open space.	Disagree - no changes	The Council will not formally adopt new areas of open space therefore the Policy facilitates either developer funded maintenance, or an alternative sustainable scheme of management to be put in place.
122	Environment Agency	Dave	Hortin	General Comment	Open Space Provision	DM11	45		Amend policy to state that any Main River (protected under Land Drainage Byelaws) will need to be retained.	Agree - make changes	

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31	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Open Space Provision	DM11	45	1	Agree with criteria a-d of Policy DM11. However suggested improvements include: - reference ANGSt under criteria a in line with para 6.44 of DM21 - criteria c) and d) should also apply to geodiversity - the policy does not refer to the need to have regard to any ecological networks(s); and - the accompanying explanatory text makes no reference to biodiversity or geodiversity	Agree - make changes	
223	CPRE Lancashire	Jackie	Copley	Support	Open Space Provision	DM11	45		We are supportive of the open space and affordable housing policies particularly provision of 'on-site' housing to make sure they are built out in reality.	Noted	
140	The Home Builders Federation	Matthew	Good	General Comment	Affordable Housing	DM12	47	2	In identifying obligations the Council will need to take account of the need to ensure that the scale of obligations sought do not threaten the ability of the site to be developed viably and the need for a competitive return for a willing land owner and developer. The HBF encourage the Council to work with the development industry in the production of its viability study to ensure that the assumptions utilised are realistic.	Noted	A Plan Viability Study is being undertaken to address this point and will involve the development industry
141	The Home Builders Federation	Matthew	Good	General Comment	Affordable Housing	DM12	47	1b, 5.19 & GN2 3.7	The suggested split of housing tenure should not be applied rigidly to all sites as housing needs will vary across a LA area as well as over time. HBF note that this is acknowledged in the Guidance Note. The Council will need to take account of the forthcoming Government requirement for Starter Homes as the DPD progresses.	Further work required	Look at how best to integrate Starter Homes proposals into tenure split info
142	The Home Builders Federation	Matthew	Good	Support	Affordable Housing	DM12	47	1d & 5	The HBF supports parts 1d and 5 of Policy DM12 which refer to viability considerations. This is considered an essential element of the policy given that the viability of individual sites will vary considerably	Noted	
179	JWPC Ltd	Matthew	Wyatt	General Comment	Affordable Housing	DM12	47		JWPC have no particular objection to the policy however it should be flexible enough to take on-board the significant changes currently being pursued by the Government (e.g. Starter Homes etc.)	Agree - make changes	Policy is to be updated to reflect the Government's Starter Homes proposals

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139	The Home Builders Federation	Matthew	Good	General Comment	Affordable Housing	DM12	47	1	The requirement for 20% affordable housing provision whilst consistent with the Core Strategy is extremely challenging evidenced by affordable housing delivery rates. The HBF note that a Plan Viability Study is planned and reserve our position upon the threshold and targets set out within the policy until further evidence is provided.	Noted	A Plan Viability Study is being undertaken to address this point
224	CPRE Lancashire	Jackie	Copley	Support	Affordable Housing	DM12	47		We are supportive of the open space and affordable housing policies particularly provision of 'on-site' housing to make sure they are built out in reality.	Noted	
165	Mcateer Associates Ltd	Tony	McAteer	General Comment	Affordable Housing	DM12	47	2	The requirement for landowners and developers to take account of cumulative costs of obligations and policies is usual in most development land transactions, however this should not be used as a reason to either retain or increase the level of contributions sought.	Noted	
166	Mcateer Associates Ltd	Tony	McAteer	General Comment	Affordable Housing	DM12	47	1b, 5.19 & 3.7 GN2	All references refer to the split in housing tenure being 60:40 between social or affordable rent and intermediate housing or based upon the latest housing needs evidence. It is important the Council does not seek to apply this split rigidly to all sites as needs vary across the area as well as over time. There may be significant implications for viability.	Further work required	Consider making policy more flexible to ensure viability of schemes is retained
167	Mcateer Associates Ltd	Tony	McAteer	Support	Affordable Housing	DM12	47	1d and 5	Morris Homes supports the parts of the policy that refer to viability considerations. This is considered an essential element of the policy given that the viability of individual sites will vary considerably.	Noted	
48	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Affordable Housing	DM12	47	1d and 5	Clarity required that viability assessments will be expected where no affordable provision is proposed, not just 'fewer'. Paragraphs 1d and 5 could be combined to achieve this clarity.	Agree - make changes	

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164	Mcateer Associates Ltd	Tony	McAteer	General Comment	Affordable Housing	DM12	47	1	The policy requires 20% affordable on sites of 15 units or more. Whilst conformity with the Core Strategy is important, it was adopted prior to final publication of the NPPF and the need to undertake a thorough plan wide viability assessment. Until the study is concluded it is difficult to ascertain whether the requirement and threshold remain valid. The Council's poor record of AH delivery suggests that 20% is too high.	Further work required	A Plan Viability Study is being undertaken to address this point
180	JWPC Ltd	Matthew	Wyatt	Object	Development of Housing within Residential Gardens	DM13	50		JWPC object to the presumption against development within the curtilage of residential properties. The Council has fallen considerably short of targets for housing delivery, and the presumption against falls contrary to wider aims to significantly boost the supply of homes set out in the NPPF. The Council make adequate provision within Policy DM10 and the Council's Householder Design Guide SPD to resist inappropriate garden developments.	Further work required	Consider the implications of meeting objector's comments in the context of other plan policies
225	CPRE Lancashire	Jackie	Copley	Support	Development of Housing within Residential Gardens	DM13	50	1	We commend the strong presumption against the development of housing within the garden or curtilage of residential properties, as we have seen a flurry of applications across Lancashire and arguably an erosion of local character and quality of place where they have been consented.	Noted	
181	JWPC Ltd	Matthew	Wyatt	General Comment	Housing with Care for Older People and People with Disabilities	DM14	52	1c-d	In our experience of dealing with such proposals, care providers will often prioritise the proximity and availability of public transport and services over car parking provision and open/space grounds in selecting sites. The location of such developments often focus on enabling occupants to remain an active part of the community and able to access local amenities. The policy needs to be more flexible so that it reflects the needs of future occupants.	Further work required	Consider how the policy may be made more flexible whilst retaining original policy aims and intentions
79	Historic England - NW Office	Emily	Hrycan	Object	Gypsy and Traveller Sites	DM15	54	2cv	Replace 'to the setting of heritage asset' with 'heritage assets and their setting' to ensure that it is not just the setting that is considered.	Agree - make changes	

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53	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Gypsy and Traveller Sites	DM15	54	5.31	The GTAA makes reference to permanent and transit pitches / sites. A reference should be made to this in this paragraph. Reference should also be made to working collaboratively across boundaries with neighbouring LAs to address the needs of the G&T community and looking at transit site provision (as per key policy conclusion of the GTAA - p55).	Agree - make changes	Update in line with Gypsy and Traveller Accommodation Needs Assessment
32	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Object	Gypsy and Traveller Sites	DM15	54	2c	An additional criteria should be added referring to no unacceptable harm to the biodiversity and geodiversity of the area	Agree - make changes	
56	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Housing Standards	DM16	56	Footnote 51	add 'and/or local housing needs assessment'	Agree - make changes	
54	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Housing Standards	DM16	56	1a	Should the 30% AH provision for elderly or disabled residents also be referred to in Policies DM12 and DM14?	Agree - make changes	Add in cross-references from policies DM12 and DM14
169	Mcateer Associates Ltd	Tony	McAteer	General Comment	Housing Standards	DM16	56	1b	The Planning Practice Guidance clearly indicates that inclusion of space standards must be justified and based on clear evidence of need, viability and timing. The Council is taking a one-size-fits-all approach. Morris Homes note that the Council intend to provide further evidence. This should assess the need for, and effects of, adoption of space standards on new-build and conversion, different tenure and house types as their adoption is likely to compromise viability.	Further work required	A Plan Viability Study is being undertaken to address this point

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
144	The Home Builders Federation	Matthew	Good	General Comment	Housing Standards	DM16	56	1b	The Planning Practice Guidance clearly indicates that inclusion of space standards must be justified and based on clear evidence of need, viability and timing. The Council is taking a one-size-fits-all approach. The HBF note that the Council intend to provide further evidence (para 5.40). This should assess the need for, and effects of, adoption of space standards on new-build and conversion, different tenure and house types as their adoption is likely to compromise viability.	Further work required	The Plan Viability Study will address the 'effects' issue. Further evidence also to be provided around the 'need' for space standards in line with PPG requirement.
143	The Home Builders Federation	Matthew	Good	General Comment	Housing Standards	DM16	56	1a	The Planning Practice Guidance clearly indicates that inclusion of access standards must be justified and based on clear evidence. The SHMA fulfils some of these requirements but there are obvious gaps, not least the issue of viability. Issues of accessibility and adaptability of existing stock, how needs vary across different tenures, and the overall impact upon viability all need to be addressed and clarified.	Further work required	The Plan Viability Study will in part address this. The Council will also look at the 'Guide to available disability data' published by CLG to further evidence this policy requirement.
168	Mcateer Associates Ltd	Tony	McAteer	General Comment	Housing Standards	DM16	56	1a	The Planning Practice Guidance clearly indicates that inclusion of access standards must be justified and based on clear evidence. The SHMA fulfils some of these requirements but there are obvious gaps, not least the issue of viability. Issues of accessibility and adaptability of existing stock, how needs vary across different tenures, and the overall impact upon viability all need to be addressed and clarified.	Further work required	A Plan Viability Study is being undertaken to address this point
57	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Housing Standards	DM16	57	Footnote 57	SHME should be SHMA	Agree - make changes	
55	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Housing Standards	DM16	57	5.36-5.37	There is quite a bit of overlap in content with Policy DM14 should there be some cross references?	Agree - make changes	Look into relevant cross-references and ensure no repetition

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98	Canal and River Trust	Tim	Bettany-Simmons	General Comment	Green Infrastructure Network		60	6.2 & 6.16	The Trust supports the Councils proposals to map the GI network in the Site Allocations DPD. This should include the canal corridors, and paragraph 6.16 should be amended to specifically mention the canal network.	Agree - make changes	
227	CPRE Lancashire	Jackie	Copley	General Comment	Environment (Natural & Built Environment ) Chapter		60		In section six there is no mention of tranquillity, yet the NPPF references tranquillity in Paragraph 77, and 123, stating 'planning policies should identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.' Areas of notable tranquillity ought to be protected in policies relating to the natural environment.	Further work required	Investigate and consider how tranquility can best be incorporated into the policy
33	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Trees, Woodlands and Hedgerows	DM17	61	3d	Overall support for the policy however reference to the positive contribution to biodiversity (as well as green infrastructure) would strengthen further.	Agree - make changes	
250	The Woodland Trust	Nick	Sandford	Support	Trees, Woodland and Hedgerows	DM17	61		I have to say this is one of the best trees and woodland policies I have come across in nearly 10 years of working in policy for Woodland Trust. . In particular, we welcome your use of our Access to Woodland Standard, the 3 for 1 replacement ratio when trees have to be removed, the strong protection for both ancient woodland and ancient trees and your strong commitment to a continuing significant expansion of tree and woodland cover.	Noted	
228	CPRE Lancashire	Jackie	Copley	General Comment	Trees, Woodlands and Hedgerows	DM17	61		Policy should refer to Hedgerows Regulations 1997 as a metric for decisions concerning hedgerows. Its omission from the policy is an error as by law the removal of most hedgerows must be prevented in line with the guidance on countryside hedgerows regulation and management	Agree - make changes	

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
152	Natural England			General Comment	Protection and Enhancement of the Natural Environment	DM18	64		Natural England welcome the references to soils, although recommend geodiversity is also covered. Soils form the thin layer of our geodiversity, linking the underlying geology with the land surface and atmosphere. Therefore it is important to make the link between geodiversity, biodiversity and soil resources. Further guidance on soils, including links to important publications such as 'Safeguarding our soils: A strategy for England' (Defra, 2009) can be found on Natural England website.	Agree - make changes	
34	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Natural Environment	DM18	64		Generally supportive of the policy. However: - should also cover geodiversity and Geological Heritage Sites - 2c refers to 'UK priority habitat' but not to 'UK priority species' - the Council should be clear what they mean by priority habitats and species, i.e. UK BAP or S41 NERC	Agree - make changes	
229	CPRE Lancashire	Jackie	Copley	Support	Protection and Enhancement of the Natural Environment	DM18	64	1	Policy DM18: Protection and Enhancement of the Natural Environment must accord with environmental protections set out by European and English courts. We applaud the reference of the National Character Area (NCA) Profile: 35 Lancashire Valleys, which is an important reference document for the landscape of Hyndburn with 36 Southern Pennines to the south and 33 Bowland Fringe & Pendle Hill to the north.	Noted	
153	Natural England			General Comment	Protection and Enhancement of the Natural Environment	DM18	64		Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development. LAs should ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider environment, and maximise opportunities to include geodiversity in and around developments as part of the design process.	Agree - make changes	Edit policy to ensure that geodiversity is appropriately covered in line with the comments



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123	Environment Agency	Dave	Hortin	General Comment	Protection and Enhancement of the Natural Environment	DM18	64	2	Add 'a watercourse (Main River or Ordinary Watercourse) will only be permitted if the relevant environmental permit/consent is obtained from the Environment Agency or Lead Local Flood Authority, as appropriate'	Agree - make changes	
150	Natural England			Support	Protection and Enhancement of the Natural Environment	DM18	64	1	Natural England welcome the inclusion of National Character Area Profiles for the Lancashire Valleys	Noted	
149	Natural England			General Comment	Protection and Enhancement of the Natural Environment	DM18	64		Natural England welcome this policy, but suggest that it is broadened to include 'maintain' Hyndburn's habitats and biodiversity - the potential negative impacts of increased access on sensitive habitats, including designated sites, should be recognised and mitigation measures ultimately identified.	Agree - make changes	
248	Geolancashire	Andy	Wiggett	General Comment	Protection and Enhancement of the Natural Environment	DM18	65	6.11	Paragraph 6.11 refers to one site (Star Delph and Close Brow Quarry) as being recognised for its geological interest. The record held by Geolancashire indicates that there are two such sites, Snipe Rake Accrington SD787 293 and Oswaldtwistle Moor SD737 244.	Agree - make changes	
146	Stephen Ward Planning Consultants Ltd	Stephen	Ward	Object	Protection and Enhancement of the Natural Environment	DM18	66	6.15	In the absence of any area specific studies or evidence to suggest ecological value at the specific locations in ABPs ownership covered by the 'Lancashire Woodland Ecology Network', it is considered that the proposed DM18 designation boundaries here are arbitrary. It is therefore requested that this policy layer be adjusted to exclude land within the ownership of ABP.	Further work required	Investigate accuracy of data further with LCC and update Policy Maps accordingly or clarify policy approach to resolve objection

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230	CPRE Lancashire	Jackie	Copley	General Comment	Protected Species	DM19	67		Policy must accord with environmental protections set out by European and English courts and in accordance to guidelines for Ecological Impact Assessment in the UK, Council of the Institute of Ecology and Environmental Management (CIEEM), 2006.	Further work required	Check with Tree/Ecology Officer that policy addresses all legal requirements raised by CPRE
151	Natural England			General Comment	Protected Species	DM19	67		Natural England welcomes the inclusion of a policy for protected species. Standing advice is available on our website Natural England to help the local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, the local planning authority may need to undertake further consultation with Natural England.	Agree - make changes	Refer to Natural England standing advice in the policy or justification text
35	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Protected Species	DM19	67		Generally supportive of policy, however the Species of Principal Importance in England, as listed in S41 of NERC 2006, should be referred to and covered either here or in DM18	Agree - make changes	
126	Environment Agency	Dave	Hortin	General Comment	Flood Risk Management	DM20	69	4	recommend adding at the end of the sentence, "e.g. through the application of suitable SUDS where appropriate."	Agree - make changes	
209	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Flood Risk Management	DM20	69		LCC as LLFA strongly recommends that any developer should submit a management and maintenance plan covering the lifetime of the development. This is required to ensure that the sustainable drainage system (SuDS) will not pose a future flood risk as a result of poor maintenance. Minimum requirements are set out in the representation.	Further work required	Will need to be considered in the context of the Plan Viability Study
124	Environment Agency	Dave	Hortin	General Comment	Flood Risk Management	DM20	69	1	Replace 'areas identified at risk of flooding' with 'Flood Zones 2 and 3'	Agree - make changes	

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
206	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Flood Risk Management	DM20	69		It is recommended that policies within the DPD are reflective of and incorporate sustainable drainage systems (SuDS), water sensitive urban design and climate change principles from the earliest stage. It is noted that policy DM20 of the DPD does reflect the requirement for SuDS, where appropriate.	Noted	LCC and the EA have submitted detailed comments on DM20 that will address the individual points raised
36	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Support	Flood Risk Management	DM20	69	3	Support for the requirement of SUDS and tree and woodland planting	Noted	
231	CPRE Lancashire	Jackie	Copley	Support	Flood Risk Management	DM20	69	1	With the incidence of flooding set to increase and understanding the disruption to businesses and households wherever they exist, we believe priority action is required to prevent future floods in the way new development is planned, combined with good land management practices and proper investment in flood defences. CPRE Lancashire is therefore pleased to use of a sequential test and exceptions test.	Noted	
243	CBRE Ltd	Edward	Harvey	General Comment	Flood Risk Management	DM20	69		United Utilities welcomes the inclusion of Policy DM20 in regards to flood risk management and water resources. However, we recommend that the policy is split into three separate detailed policies to deal with flood risk, surface water and water efficiency, independently of each other.	Further work required	Consider implications vs benefits of splitting policy into 3 as per request
244	CBRE Ltd	Edward	Harvey	General Comment	Flood Risk Management	DM20	69	2	In regards to the surface water drainage policy, we recommend expanding upon the existing Policy DM20, Point 2 to include additional details on the order of priority for surface water discharge, future maintenance and management, and the requirement for betterment in any redevelopment. Specific policy wording is proposed.	Further work required	Consider proposed policy re-wording in the context of EA and LCC comments received on DM20

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205	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Flood Risk Management	DM20	69		Policy context and relationships table should reference the Lancashire and Blackpool Local Flood Risk Management Strategy 2014-2017 as a material consideration, and this should also be taken into account in the plan making process.	Further work required	Review Strategy content and any implications for DM DPD
125	Environment Agency	Dave	Hortin	General Comment	Flood Risk Management	DM20	69	2	Suggest amending to say that major developments in all Flood Zones will require surface water management to be required as part of any flood risk assessment	Agree - make changes	
245	CBRE Ltd	Edward	Harvey	General Comment	Water Resources	DM20	69	4	We welcome the policy reference to efficiency measures, however we recommend expanding upon the existing Policy DM20, Point 4 to create a new standalone policy. Specific policy wording is proposed.	Further work required	Consider policy wording proposed and most effective way of integrating into DM DPD
129	Environment Agency	Dave	Hortin	General Comment	Flood Risk Management	DM20	70	6.29	For clarity we would recommend expressing the probability of flooding in percentage terms as well as the standard e.g. a 1 in 1000 is a 0.1% annual probability and a 1 in 100 is a 1% probability.	Agree - make changes	
128	Environment Agency	Dave	Hortin	General Comment	Flood Risk Management	DM20	70	6.28	There are several Main Rivers in Hyndburn that are not listed here. These may be useful listed in a table: Lottice Brook; Tinker Brook, Antley Syke; Woodnook Water; Broad Oak Water; Pleck Brook; River Hyndburn; Hyndburn Brook; Spaw Brook; Harwood Brook; Woodlands; and River Calder	Agree - make changes	
127	Environment Agency	Dave	Hortin	General Comment	Flood Risk Management	DM20	70	6.24	Suggest amending to reflect the roles in the table attached to representation, to accurately describe the role of the flood risk management authorities	Agree - make changes	
210	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Flood Risk Management	DM20	70	6.26	The EA has updated guidance on how climate change could affect flood risk to new development - 'Flood risk assessments: climate change allowances' was published on gov.uk on 19 February. This guidance replaces previous 'Climate Change for Planners' note. All references should be updated.	Agree - make changes	Ensure new guidance included in the Policy context and relationships table for DM20

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208	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Flood Risk Management	DM20	71	6.31	LCC as the LLFA strongly recommends that paragraph 6.31 is amended to include the full range of criteria for FRA requirement as set out in the NPPF (paragraph 103, footnote 20)	Agree - make changes	
207	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	Support	Water Resources	DM20	71	6.33	The LLFA is pleased to note that paragraph 6.33 refers to the Water Framework Directive and associated Core Strategy Policy.	Noted	
130	Environment Agency	Dave	Hortin	General Comment	Flood Risk Management	DM20	71	6.33	We would recommend referring to the use of SUDS in water quality improvements as outlined against Rep ID 126	Agree - make changes	
154	Natural England			General Comment	Protection of Open Spaces	DM21	73	1a	Green Infrastructure (GI) is covered well in the document and within policies. in order to ensure green infrastructure delivers a wider range of benefits a specific green infrastructure policy is recommended to seek to deliver multifunctional green infrastructure. Natural England considers that the environmental objectives, and some of the social and economic objectives could be improved by further emphasising the importance of GI and its multifunctional benefits, which would assist in the delivery of a range of SA topic areas, e.g. biodiversity, landscape, health and wellbeing and climate change	Further work required	We have the strategic GI policy in the Core Strategy (Env1) and propose policy in the SA DPD, however consider additional references in DM DPD to address NE points
37	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Support	Protection of Open Spaces	DM21	73	2	Support taking into account the Lancashire Ecological Network, and employing ANGSt to assess provision and accessibility. The Council should also make clear how local communities can identify Local Green Space in Hyndburn.	Noted	Local Green Space identification and assessment will be undertaken at the Site Allocations stage of the Local Plan
155	Natural England			Support	Protection of Open Spaces	DM21	74	6.44	Natural England welcomes the Council employing ANGSt to assess open space provision and accessibility	Noted	

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85	Historic England - NW Office	Emily	Hrycan	Object	Heritage Assets	DM22	75	5	It is unclear as to what the archaeology aspect of the policy refers to - is it archaeology of local importance or a non-designated heritage asset of archaeological interest that is of equal significance to a scheduled monument? The policy should be rewritten to clarify this and to ensure that the latter are appropriately dealt with.	Agree - make changes	
80	Historic England - NW Office	Emily	Hrycan	Object	Heritage Assets	DM22	75		Historic England strongly objects to this policy and suggests the re-writing of the policy to provide sufficient detailed guidance to enable those proposing schemes to determine the level of success where it is likely to affect the different elements of the historic environment, heritage assets and their setting.	Noted	Objection resolved through other subsequent specific points on DM22
81	Historic England - NW Office	Emily	Hrycan	Object	Heritage Assets	DM22	75	1	Historic England strongly objects to the aspect of the policy on conservation areas. This paragraph of the policy should be re-written to better reflect the focus of the NPPF and to ensure consistency. The policy should clearly put down the expectations of an application affecting a conservation area. Detailed policy re-wording proposed.	Agree - make changes	Need to look at detail of wording and consider any knock-on/negative implications
82	Historic England - NW Office	Emily	Hrycan	Object	Heritage Assets	DM22	75	2	Historic England strongly objects to the aspect of the policy on listed buildings. The starting point for any proposals involving a listed building and/or affecting its setting should be to sustain and enhance its significance and setting. Any harm will only be justified where the public benefits of the proposal outweighs the harm. Detailed policy re-wording proposed.	Agree - make changes	Need to look at detail of wording and consider any knock-on/negative implications
83	Historic England - NW Office	Emily	Hrycan	Object	Heritage Assets	DM22	75	3	The policy on locally listed buildings is unclear and needs to be amended to clarify the Council's position and requirements on applications affecting local listed buildings, e.g. what will/will not be permitted, what will be required if loss of an asset is proposed etc.	Agree - make changes	Elaborate policy approach more to address concerns raised by objection
84	Historic England - NW Office	Emily	Hrycan	Object	Heritage Assets	DM22	75	4	Historic England strongly objects to the aspect of the policy on Scheduled Monuments. It needs to be re-written to reflect the requirements of the NPPF and primary legislation on this matter.	Agree - make changes	

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87	Historic England - NW Office	Emily	Hrycan	Object	Demolition of Buildings in a Conservation Area	DM23	78	4	There appears to be some incorrect information regarding protected species in bullet point 4	Further work required	Clarify with objector
86	Historic England - NW Office	Emily	Hrycan	Object	Demolition of Buildings in a Conservation Area	DM23	78		Why is there a separate policy on demolition in conservation areas? Could DM23 not be included within DM22: Heritage Assets?	Disagree - no changes	Policies should be kept as brief as possible and there is no duplication between DM22 and DM23 therefore separate policies will be retained.
94	Coal Authority			Object	Contaminated or Unstable Land	DM24	80	2	Minor policy changes to paragraph 2 are recommended to make the policy fully effective and the meet the requirements of the NPPF. Specific policy wording proposed.	Agree - make changes	
212	Health and Safety Executive	John	Moran	General Comment	Contaminated or Unstable Land	DM24	80	Policy context table	HSE recommends that para 172 of the NPPF is included in the links section of the policy context table as it is directly relevant to HSE land use planning policy	Agree - make changes	
213	Health and Safety Executive	John	Moran	General Comment	Hazardous Substances	DM24	81	6.57	It is stated there is only one major accident hazard installation in the Council area which is incorrect. There are 4 establishments within the borough boundary, there are also 2 located in Ribble Valley and Rossendale with consultation zones crossing into Hyndburn. There is also no reference to the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs). There are 8 MAHPs within Hyndburn. All relevant information on locations is available on HSEs extranet system along with advice on HSE's land use planning policy.	Further work required	Review HSEs extranet and update DM DPD and Policy Maps accordingly

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
246	CBRE Ltd	Edward	Harvey	General Comment	Pollution Control	DM25	82		United Utilities recommends the following text is included within the body of draft Policy DM25, in relation to health, well-being and residential amenity. "The proposed development of sensitive uses (such as residential) adjacent to existing sources of pollution (e.g. noise, odour, traffic etc.) must demonstrate through the submission of appropriate impact assessments that there would be no detrimental impact on future residential amenity."	Agree - make changes	
215	Health and Safety Executive	John	Moran	General Comment	Hazardous Substances	DM24	82	6.61	Replacement of PADHI+. Planning authorities now are advised to use HSE's Planning Advice Web App. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on HSE's website: <a href="http://www.hse.gov.uk/landuseplanning/padhi.htm">http://www.hse.gov.uk/landuseplanning/padhi.htm</a>	Agree - make changes	
88	Historic England - NW Office	Emily	Hrycan	Object	Design Quality and Materials	DM26	87	1a	Reference to heritage assets should be removed as it is confusing and appears to refer to character in terms of the design of new developments, followed by heritage assets as an afterthought.	Agree - make changes	
99	Canal and River Trust	Tim	Bettany-Simmons	Support	Design Quality and Materials	DM26	87		The Trust supports the policy which appears to be robust and comprehensive and would support the design objectives as set out in the Core Strategy (policies A4, A6 and R3)	Noted	
131	Environment Agency	Dave	Hortin	General Comment	Design Quality and Materials	DM26	87	2	We would recommend including climate change under the design criteria to take into account. The Climate Change Allowances (revised February 2016) recommend future flood risk is considered for development. This may include such actions as leaving open space for the improvement or construction of flood defences.	Agree - make changes	
232	CPRE Lancashire	Jackie	Copley	General Comment	Design Quality and Materials	DM26	87		CPRE hopes this policy helps to enhance local rural character	Noted	



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182	JWPC Ltd	Matthew	Wyatt	General Comment	Design Quality and Materials	DM26	88	3	The requirement to demonstrate and consider Building for Life 12 could become out of date very quickly. Adequate provision is already set out in Parts 1 and 2 of the policy in terms of how new homes should be considered accessible and adaptable which is well within the spirit of intentions for the BfL scheme.	Disagree - no changes	Parts 1 and 2 of the policy capture all new developments, the requirement for BfL is a more structured assessment proposed for schemes of 5 or more dwellings only therefore it should remain in the policy
222	CPRE Lancashire	Jackie	Copley	Support	Design Quality and Materials	DM26	88	3	We welcome Policy DM26: Design Quality and Materials, and that for 5 or more dwellings, requiring the applicant to demonstrate, through their Design and Access Statement, how they have considered and addressed the requirements of the 'Building for Life 12' assessment criteria in the design of their scheme, nor should schemes be overbearing.	Noted	
2	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Support	Advertisement Control	DM27	91		Considers Policy DM27 generally sound	Noted	
136		Michael	Demaine	Support	Shop Fronts and Security Shutters	DM28	93		I fully support the initiative to control the quality of shop front design within the Borough, we have had to endure the industrial style barricades for far too long	Noted	
3	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Support	Advertisement Control	DM28	93		Considers Policy DM28 generally sound	Noted	

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183	JWPC Ltd	Matthew	Wyatt	Object	Shopfronts and Security Shutters	DM28	93		The emerging policy should be amended to acknowledge the fact that in granting planning permission for the change of use of sites with former shopfronts, alterations to the principal elevations will often be required. Given that many urban areas are subject to low values, it is felt that such strict requirements for the conservation of shopfronts (of non-statutory listed buildings and outside conservation areas) would be harmful to investment within the Borough	Disagree - no changes	Paragraph 3 of the policy text provides sufficient flexibility stating that the applicant can demonstrate why retention is not appropriate under the specific circumstances of the site and proposal
89	Historic England - NW Office	Emily	Hrycan	Object	Shop Fronts & Security Shutters	DM28	93	2 and 7.23	The policy wording should be amended to ensure that it is clear that any applications that affect a designated heritage asset follow the requirements of the NPPF in terms of harm to significance. Alternatively, reference to statutory listed buildings should be removed, and reference made to Policy DM22, to make it clear that this policy applies instead.	Further work required	Clarify policy approach to designated heritage assets
100	Canal and River Trust	Tim	Bettany-Simmons	Support	Environmental Amenities	DM29	96	1d & 7.33	The Trust supports criteria (d) of this policy in relation to artificial light and the supporting text at paragraph 7.33 which acknowledges the nuisance to residents. This should also include reference to the potential impact poor lighting can have on wildlife especially along canal corridors/waterways	Agree - make changes	Add in reference to paragraph 7.33 the potential impact poor lighting can have on wildlife
69	Arcus Consulting	Darren	Hendley	Support	Wind Energy	DM30	99	1a	The commitment to identify areas suitable for wind energy development is supported. The Dean Clough Reservoir Site has been put forward to inform the Site Allocations DPD, supported by feasibility and environmental summary report.	Noted	
71	Arcus Consulting	Darren	Hendley	General Comment	Wind Energy	DM30	99	1h	The weight to be applied / status of Guidance Note 6 should be clarified here or in the supporting policy text.	Disagree - no changes	The status of the Guidance Notes is set out clearly on p129

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73	Arcus Consulting	Darren	Hendley	General Comment	Wind Energy	DM30	99	3	It is preferable to leave underground structures in situ when minimising environmental impacts therefore 'underground concrete foundations' and 'underground cables' should be removed from the policy text.	Further work required	Investigate further
233	CPRE Lancashire	Jackie	Copley	Support	Wind Energy	DM30	99		CPRE Lancashire is supportive of renewables but the siting of wind turbine infrastructure is important as not to significantly adversely impact on rural landscapes. We are therefore pleased to note the policy states proposals should not have significant adverse effects, either as a stand-alone turbine or cumulatively, on landscape character and value and that the impacts on public rights of way and bridleways will be duly considered. It is right that the policy expresses the development of wind turbines in the Green Belt constitutes inappropriate development that harms the openness of the Green Belt.	Noted	
72	Arcus Consulting	Darren	Hendley	Support	Wind Energy	DM30	99	2	Support based on consistency with paragraph 91 of the NPPF	Noted	
70	Arcus Consulting	Darren	Hendley	General Comment	Wind Energy	DM30	99	1b-h	The criteria listed do not include a planning balance, where the benefits are weighed against the impacts. As such an additional criterion should be added i) 'The benefits of wind energy development, in respect of the contribution to renewable energy consumption and reducing carbon emissions, and associated legally binding targets; increasing energy security; providing new energy infrastructure; and providing demonstrable economic and other public benefits, outweigh any of the impacts which may arise from the proposal'.	Further work required	All DM decisions are made by weighing the benefits of a scheme against the impacts through the decision making process. Consider how best to clarify this in the DM DPD, whether policy specific or a general comment at the outset.

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74	Arcus Consulting	Darren	Hendley	General Comment	Wind Energy	DM30	100	Context table	Key documents list should include the Climate Change Act 2008 (as amended) and Renewable Energy Directive 2009/28/EC as these set legally binding targets for the reduction of emissions and consumption of energy from renewable resources respectively.	Agree - make changes	Add reference to EC Directive into policy Justification Text for context. The Climate Change Act is already referenced (indirectly) via the NPPF paragraph links so does not need specific reference.
234	CPRE Lancashire	Jackie	Copley	General Comment	Wind Energy	DM30	102	7.49	CPRE Lancashire agrees that it is important Wind Turbine have an enforceable planning condition concerning decommissioning, restoration and aftercare plan and suggests a bond is agreed to cover the cost of restoration.	Further work required	Investigate this further and whether the Council would wish to seek this being introduced into the policy
235	CPRE Lancashire	Jackie	Copley	General Comment	Waste Management	DM31	103		CPRE believes in the inclusion of a waste hierarchy to encourage reuse, recycling in advance of waste landfilling.	Further work required	Consider how best to integrate this into policy
236	CPRE Lancashire	Jackie	Copley	Support	Accessibility and Transport		108	7.57	CPRE Lancashire supports the assertion in Paragraph 7.57 concerning reducing reliance and use of the private car, and ensuring that development is located in accessible locations and can be accessed using a variety of modes of transport.	Noted	
116	Highways England	Warren	Hilton	Support	Sustainable Transport	DM32	109		Highways England supports Policy DM32. In particular we welcome the specific policy links to NPPF (32 and 36). This is evidence of a well considered Accessibility and Transport policy and is sufficient in detail.	Noted	
101	Canal and River Trust	Tim	Bettany-Simmons	General Comment	Sustainable Transport	DM32	109	4	The Trust is supportive of the general thrust of this policy but considers that both criteria 4c and 4f should specifically reference and include 'along the canal towpath'	Agree - make changes	

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
62	Network Rail			General Comment	Sustainable Transport Infrastructure	DM33	113	5	Where proposals include railway stations, consultation by developers and the LPA with Network Rail is requested	Agree - make changes	Clarify in justification text
61	Network Rail			General Comment	Sustainable Transport Infrastructure	DM33	113	2	Network Rail's policy (and the Office of Rail Regulation) is, wherever possible, to close level crossings to reduce risk. Network Rail consider even a minor increase in usage at a level crossing unacceptable. As such, the DM DPD should include a policy requiring developers to provide funding towards mitigation measures at level crossings. These should fund replacement bridges, diversion of routes or mitigation measures to enhance a level crossing.	Further work required	Consider how best to address comments through further discussions with Network Rail
58	Network Rail			General Comment	Sustainable Transport Infrastructure	DM33	113	2	If there is a potential for impact on railway stations as a result of increased footfall from third party developments, then a developer contribution should be sought towards any necessary enhancements. An additional comment should be added to highlight these potential impacts. It is not reasonable to expect Network Rail to fund infrastructure mitigation measures as a result of third party proposal impacts.	Further work required	The comments appear to refer to infrastructure requirements that would need to be identified on a Regulation 123 list as part of any implementation of CIL - the Council will review Policy DM33 and GC2 to seek clarity on the distinction between CIL and S106 contributions
59	Network Rail			General Comment	Sustainable Transport Infrastructure	DM33	113	4	Replace 'Network Rail's Asset Protection Team' with 'Network Rail' as it is not the remit of the Asset Protection Team to comment on planning applications, this is undertaken by the Network Rail Planning Team. All applications, consultations etc. should be directed to TownPlanningLNW@networkrail.co.uk	Agree - make changes	

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105	Canal and River Trust	Tim	Bettany-Simmons	Object	Sustainable Transport Infrastructure	DM33	113	4	Under criteria 4 of policy DM33 this relates specifically to Network Rail. Given the prominence of the canal network in the Borough it is considered that the policy should be expanded to include the role of the Canal and River Trust as a statutory consultee. Specific policy wording is also proposed including a CRT consultation 'buffer zone'.	Further work required	Discuss with the C&RT their 'buffer zone' as proposed in their policy wording
102	Canal and River Trust	Tim	Bettany-Simmons	General Comment	Sustainable Transport Infrastructure	DM33	113	2-3	The Trust is generally supportive of this policy approach and that developer contributions will be sought where necessary towards the improvement of transport infrastructure, particularly to encourage walking and cycling. However specific reference should be made to canal towpaths in the actual policy wording under points 2 and 3.	Agree - make changes	
195	Omega Atlantic	Katie	Dent	General Comment	Sustainable Transport Infrastructure	DM33	113		Policy Context and Relationships table should make reference to Core Strategy policies T3: Motorway and Trunk Road Improvements and Policy A9: Whinney Hill Link Rd	Agree - make changes	
60	Network Rail			General Comment	Sustainable Transport Infrastructure	DM33	113	4b-c	Network Rail seek support from the Council for a policy statement on level crossings due to the level crossings being impacted in a variety of ways by planning proposals (8 ways provided in full representation). It should state that: 'developments resulting in a material increase or a significant change in the character of traffic using a rail crossing will be refused, unless it can be demonstrated that safety will not be compromised in consultation with Network Rail'.	Further work required	Consider how best to address comments through further discussions with Network Rail
117	Highways England	Warren	Hilton	Support	Sustainable Transport Infrastructure	DM33	113		Highways England supports Policy DM33. In particular we welcome the specific links to the SRN via Core Strategy Policy T3.	Noted	
106	Canal and River Trust	Tim	Bettany-Simmons	Object	Sustainable Transport Infrastructure	DM33	114	7.70	The role of the Trust as a statutory consultee should be acknowledged as it has been for Network Rail within the DPD. The Trust would be happy to work with the Council on specific wording.	Agree - make changes	

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202	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Sustainable Transport Infrastructure	DM33	114	7.68	Insert 'this includes completing the Huncoat Greenway and improving and extending National Cycle Route 6 from Accrington town centre into Rossendale towards Ramsbottom' between the 3rd and 4th sentences of para 7.68	Agree - make changes	
63	Network Rail			General Comment	Sustainable Transport Infrastructure	DM33	114	7.70	Network Rail is a statutory consultee for any development 10m or less from the railway boundary (see Article 16 of the 2015 Development Management Procedure Order). Measurements should be taken from the operational railway / Network Rail boundary and not from the railway tracks themselves as critical infrastructure will be located inbetween.	Agree - make changes	Clarify in justification text and check constraint layer on Policy Maps
103	Canal and River Trust	Tim	Bettany-Simmons	General Comment	Sustainable Transport Infrastructure	DM33	114	7.68	Canal towpaths should also be referenced as follows: "Long distance footpaths, bridleways, canal towpaths and cycle routes act as key sustainable transport links..."	Agree - make changes	
237	CPRE Lancashire	Jackie	Copley	Support	Rural Issues Chapter		115		CPRE Lancashire is pleased to see Chapter 9 dedicated to Rural Issues, as two thirds of the Borough is classified as rural.	Noted	
157		Christine	Coe	Object	Development in the Green Belt and Countryside Area	DM34	116		I object to the tight restrictions shown in the draft core strategy for new buildings on greenbelt land. Single houses should be able to be built on the curtilage of individual's properties in greenbelt areas as Ribble Valley Council have allowed. This would have so little impact to the greenbelt and its rural environment	Further work required	Investigate Ribble Valley policy as referenced by objector and consider implementation (as deemed appropriate) to Hyndburn
159		Christine	Coe	General Comment	Rural Issues		116		I support more development in the greenbelt land especially on urban fridges and within the curtilage of people's properties within greenbelt areas	Noted	

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
160		Dave	Coe	Object	Development in the Green Belt and Countryside Area	DM34	117	1-2	It does seem strange that so many new-build restrictions apply on green belt land even though some of that land is actually on the curtilage of property already with buildings. Also, the restriction to named occupations whose applications would be accepted (paragraph 1 a) is extremely prohibitive. I would like to have seen recommendations where the main consideration was that the building was appropriate to the area, and met all current planning issues in that it was in keeping with the surrounding rural landscape, of good quality and could benefit the area.	Further work required	Consider whether a more flexible policy is possible in the context of national green belt policy restrictions
107	Canal and River Trust	Tim	Bettany-Simmons	General Comment	Development in the Green Belt and Open Countryside	DM34	117		Within the Core Strategy policy BD1 (c) it is recognised within rural areas the need to include 'promoting leisure and recreational facilities'. This however does not appear to be reflected in DM DPD policy. Specific mention should be made within DM34 to recreation and leisure in the countryside. The promotion of waterways and towing paths as part of green infrastructure and open space network should be acknowledged and embedded within policy. The multifunctional role of the canal network should be recognised as they perform a range of functions - encourage use of waterways for tourism, leisure, recreation and sporting activities.	Further work required	Consider incorporating into DM34 or even creating a new policy to cover tourism, leisure etc



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238	CPRE Lancashire	Jackie	Copley	Object	Development in the Green Belt and Countryside Area	DM34	117		The policy refers more to what can be developed rather than heading the presumption against development and exceptional circumstances test. CPRE recommend that the five purposes of Green Belt should be explicitly referenced, with explicit reference to exceptional circumstances in the Local Plan to largely discourage planning applications to keep its openness and permanence.	Further work required	The policy is considered to be a positive one in line with 'the presumption in favour or sustainable development' set out in the NPPF. Investigate how best to address CPRE concerns without simply repeating national planning policy within the DM DPD
38	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Development in the Green Belt and Open Countryside	DM34	117		Para 2b - policy should reference NPPF requirement for a net gain in nature which can involve 'enhancement' and not just 'protection'. Extensions and conversions should cross reference to DM18 and/or DM19 to ensure that statutorily protected species are taken account of appropriately.	Agree - make changes	

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158		Christine	Coe	Object	Development in the Green Belt and Countryside Area	DM34	117		<p>It seems unfair that HBC is restricting new builds/replacing buildings for residential use as agricultural/forestry worker occupancy as it is quite common these days for farmers to have diversified. It also seems highly unlikely that these building will be occupied by the intended inhabitants. I would like the Council to support farm buildings made by any structure to be granted planning rather than current policies of just brick or stone buildings to be able to be extended or rebuilt. Many of the portal framework buildings would make excellent conversions to residential properties which would really improve the appearance of an existing structure and enhance the area sympathetically.</p> <p>I therefore ask you to relax this clause and allow new builds/ replacing buildings for other households whom reside in the greenbelt land and particularly on the urban fridges.</p> <p>A single house of quality construction in the correct areas would have very little impact on the rural environment and in many instances the overall appearance would enhance it especially if it has replaced a dilapidated farm building.</p>	Further work required	Investigate possibility of relaxing policy further in line with comments
194	Omega Atlantic	Katie	Dent	General Comment	Development in the Green Belt and Countryside Area	DM34	118		Policy Context and Relationships table should make reference to both Core Strategy Policy A8: Strategic Employment Site at Huncoat, paragraph 5.47 and/or, in the main text, a refence to building on (or release of land from greenbelt) in 'special circumstances' and with reference to Policy 13, NPPF	Further work required	Clarify comment/request with consultee as submission is unclear
90	Historic England - NW Office	Emily	Hrycan	Object	Development in the Green Belt and Open Countryside	DM34	118	6	Replace 'retain features of historical value' with 'have no unacceptable harm to elements that contribute to the significance of heritage assets'	Agree - make changes	

RepID	Organisation	Name	Surname	Type	Subject	Policy	Pg.	Para.	Summary of comment	Response	Council Notes
161		Dave	Coe	Object	Development in the Green Belt and Countryside Area	DM34	118	4-5	The parameters quoted here are very restricting. Where an existing building is in a state of possible disrepair and because of the age and type of construction materials, regardless of what they may be, it looks fragile, surely it could be converted or better still rebuilt using modern materials, to a much higher specification. As long as the position, the character, the materials used, access and all other relevant criteria can be met and co-ordinated, and the end result is a quality dwelling which is in keeping with the surrounding rural landscape, this achievement would be acceptable rather than a new-build on green belt land.	Further work required	Consider whether a more flexible policy is possible in the context of national green belt policy restrictions
39	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Farm Diversification	DM35	120	1d	the Council should be seeking to 'enhance' not just 'safeguard' the open character and landscape quality including ecology, to ensure net gains in nature	Agree - make changes	
239	CPRE Lancashire	Jackie	Copley	General Comment	Farm Diversification	DM35	120	1b	Best and Most Versatile land is afforded extra weight against development in the NPPF and this should be explicit in the Local Plan policy wording. CPRE recommends that Policy DM35 should state that Best and Most Versatile land will not be permitted for development, except in exceptional circumstances.	Further work required	Hyndburn has no Grade 3a land therefore reconsider this policy wording and rep in light of this
132	Environment Agency	Dave	Hortin	General Comment	Equestrian Development	DM36	122	1e	For consistency we would recommend that the waste management arrangement refer to our Local Planning Guidance for Local Authorities (attached to representation)	Agree - make changes	
240	CPRE Lancashire	Jackie	Copley	General Comment	Equestrian Development	DM36	122		CPRE recommends the inclusion of wording relating to scale of buildings to fit in the context of local surroundings and not be unduly prominent, especially in Green Belt where the presumption against development to retain openness remains.	Agree - make changes	

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42	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Support	Open Space GN	GN1	131	1.0d and 3.1b	Support inclusion of these statements	Noted	
41	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Open Space GN	GN1	131		Reference should be made to ecological networks (DM18) or Natural England's ANGSt, as referred to in DM21 paragraph 6.44	Agree - make changes	
40	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Open Space GN	GN1	131		In order to conform to the requirements of NPPF, there should be 'net gains in nature' e.g. through habitat creation. The provision of open space in new residential development should take account of the presence of ecological networks and/or GI networks.	Agree - make changes	
64	Network Rail			Support	Open Space GN	GN1	132	3.1e	Network Rail welcomes comments on the potential for open spaces to impact upon the railway	Noted	
108	Canal and River Trust	Tim	Bettany-Simmons	General Comment	Open Space GN	GN1	133	3.1f	The Trust are pleased that the canal is acknowledged but the guidance could go further. The Trust would suggest that the guidance note should be amended so that it is consistent with Policies A4, A6 and R3 of the adopted Core Strategy which encourage development to relate positively to the canal and integrate the waterway into the public realm. The canal should not be viewed purely in environmental terms.	Agree - make changes	
65	Network Rail			General Comment	Open Space GN	GN1	133	4	A further criteria should be added k) 'open spaces adjacent to railway infrastructure should include suitable trespass proof fencing to prevent accidental or unauthorised access onto operational railway land'.	Agree - make changes	

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49	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Affordable Housing	GN2	135	1.3	The implications of the Government's Starter Homes legislation on Policy DM12 and GN2 need to be considered and incorporated	Agree - make changes	
50	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Affordable Housing	GN2	139	7.4	If the Council is supporting affordable housing levels of greater than 20% should this also be referred to in the Policy DM12 text?	Further work required	This will be reviewed in light of the Plan Viability Study evidence that comes forward to determine the best approach
52	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Affordable Housing	GN2	140	8.5	If a s106 agreement would also be required for the affordable housing element to be provided by a registered provider then this needs to be clarified in this paragraph.	Agree - make changes	Clarify status of S106 Agreements for registered providers
51	Hyndburn Borough Council	Fiona	Goodfellow	General Comment	Affordable Housing	GN2	140	8.2	In some instances the LA may want to bring a specific registered provider to the table to discuss processing a planning application e.g in relation to a major regeneration project. Could a reference be made to this please?	Agree - make changes	
91	Historic England - NW Office	Emily	Hrycan	Object	Materials and Colour GN	GN3	141		GN3 should be amended to ensure that those using it are clear that this does not apply to designated heritage assets.	Agree - make changes	Expand upon the first paragraph of GN3 to address objection
10	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	145	C2	Replace final sentence with 'advance signs to individual premises must be very carefully designed and sited so as not to adversely affect the appearance of the surroundings. Proliferation of such signs will be an important consideration (see C1)'	Further work required	Discuss impact of proposed change with DM
8	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	145	A5	Amend to state that 'traditional-style hanging signs may be acceptable above ground floor level where they can be successfully related to the building and street scene'	Further work required	Discuss impact of proposed change with DM

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7	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	145	A2	Delete statement that 'signs should be displayed at the normal fascia height of the building' as it is a generalisation and other types of signs and advertisements may commonly be seen on buildings	Further work required	Discuss impact of proposed change with DM
4	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	145		GN4 is unnecessary and excessively detailed and prescriptive. GN4 should be totally removed from the document as policy advice in DM27 is adequate for the control of advertisements	Further work required	Discuss impact of proposed change with DM
92	Historic England - NW Office	Emily	Hrycan	Object	Advertisements GN	GN4	145		Any reference to listed buildings should be removed as they will be expected to conserve and enhance the elements that contribute towards its significance and would therefore be subject to listed building consent. This would clarify that the GN does not apply to designated heritage assets.	Agree - make changes	
11	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	146	E2	No justification for the restriction on box signs in Conservation Areas or on Listed Buildings. Modern internally illuminated signs can be designed without any adverse impact on amenity. Final sentence referencing colours should be explained or deleted.	Further work required	Discuss impact of proposed change with DM
12	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	146	E2	There is no reason why properly designed internally illuminated signs should not be as acceptable as externally illuminated signs.	Further work required	Discuss impact of proposed change with DM
13	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	146	F1	The meaning of the statement 'colours unrelated to the overall local colour scheme' should be clarified or removed.	Agree - make changes	Discuss with DM

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14	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN4	146	F2-F3	The generalities in these paragraphs are wholly unjustified and should be deleted.	Further work required	Discuss impact of proposed change with DM
16	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	149	4 and 8	Paragraphs referencing advertisement consent and planning permission should be removed and reference made to the DCLG booklet 'Outdoor Signs and Advertisements - a guide for advertisers'	Further work required	Discuss impact of proposed change with DM
93	Historic England - NW Office	Emily	Hrycan	Object	Shop Front Design GN	GN5	149		Any reference to listed buildings should be removed as they will be expected to conserve and enhance the elements that contribute towards its significance and would therefore be subject to listed building consent (as stated in Para 7 of GN5). This would clarify that the GN does not apply to designated heritage assets.	Agree - make changes	
6	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	149		Parts of GN5 relating to advertisement displays overlap with advertisement control, are misplaced, repeat and partly contradict GN4. These should be removed from the document.	Further work required	Discuss impact of proposed change with DM
15	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	General Comment	Advertisement Control	GN5	149		All advice on advertisements should be moved to GN4 (or deleted) with a simple cross-reference to GN5	Further work required	Discuss impact of proposed change with DM
21	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	154	29f	Statement is contradictory and inaccurate/incorrect	Further work required	Discuss further with DM and/or objector

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19	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	154	29b	Reinstatement of corbels on modern shopfronts where no pilaster exists would look dreadful so this sentence should be deleted	Further work required	Discuss impact of proposed change with DM
18	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	154	29a	Clarify the meaning of 'large panel fascias'	Further work required	Discuss with DM
20	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	154	29d-e	Generalities should be explained further or deleted, this advice is totally unacceptable and impractical	Further work required	Discuss impact of proposed change with DM
22	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	154	30	Statement should be made more flexible by adding in 'where considered essential' after 'Listed Buildings'	Agree - make changes	Make reference to Conservation Officer in guidance who will determine where 'considered essential'
23	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	154	31	This advice is impractical and unenforceable therefore should be deleted	Further work required	Discuss further with DM
17	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	154	29-34	These paragraphs are out of place, solely concern advertisements and not the structural elements of the shopfront so should be moved to GN4 or deleted.	Further work required	Discuss impact of proposed change with DM



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25	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	155	33	There should be no restrictions on suitable designed, sited and illuminated projecting 'box' sign if it is acceptable in terms of amenity and public safety.	Further work required	Discuss further with DM
24	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	155	33	It is beyond the powers of the Council to specific content therefore the text stating that signs should be 'simple and limited to the relevant information' should be deleted.	Further work required	Discuss further with DM
26	Chris Thomas Ltd, Outdoor Advertising Consultants	Chris	Thomas	Object	Advertisement Control	GN5	155	34 (bullet 3)	Advice is impractical and should be deleted as all advertisements within buildings are excepted from control or permitted with deemed consent.	Further work required	Discuss further with DM
43	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	General Comment	Wind Turbine GN	GN6	159		Reference to priority species and habitats are not defined here, in Policy DM18 or anywhere in the DPD as a whole	Agree - make changes	
75	Arcus Consulting	Darren	Hendley	General Comment	Wind Turbines GN6	GN6	159	3	The Council's approach to identifying suitable areas should fully conform to the positive approach to wind energy development set out in NPPF and EN-1 and EN-3 National Policy Statements. Significant supporting evidence has been submitted (and produced by the Council) demonstrating that the Dean Clough Site provides a suitable location.	Noted	Suitable areas will be identified in the Site Allocations DPD
44	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Support	Wind Turbine GN	GN6	161	Hydrological section	Agree with statement that 'the integrity of any area of deep peat should not be adversely affected'	Noted	

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96	Coal Authority			Object	Policy Maps	Policy Maps	181		The Policy Maps do not indicate that the Minerals and Waste Plan contains allocations and constraints which need to be taken into account in decision making. It could be argued that all of the content of the Lancashire Minerals and Waste Plan policy maps should also be on the Hyndburn map once adopted (Reg 9 of the T&CP (Local Planning) (England) Regs 2012)	Further work required	Look at how other Lancashire authorities have addressed this and the practicality of implementing
104	Canal and River Trust	Tim	Bettany-Simmons	Object	Policy Maps	Policy Maps	181		The canal should form part of the strategic links identified on the DM DPD Policy Maps under Policy DM33 (Sustainable Transport Infrastructure)	Agree - make changes	
170	Mcateer Associates Ltd	Tony	McAteer	General Comment	Policy Maps	Policy Maps	181		The Policy Map should be updated to relocate the urban boundary to include land south of Foxwood Chase, Huncoat granted planning permission. This would mean the site is located inside the settlement boundary and no longer allocated as a Countryside Area covered by emerging Policy DM34.	Disagree - no changes	The settlement boundary will be subject to a full update/review as part of the Site Allocations DPD and therefore the change will be considered as part of that process and not the Development Management DPD.
197	Omega Atlantic	Katie	Dent	General Comment	Policy Maps	Policy Maps	181		The strategic employment allocation at Huncoat is not identified under DM1 Existing Employment Area Assessment.	Noted	The Existing Employment Areas are a separate category to allocated sites and so should not be identified on the DM DPD Policy Maps
133		David	Leitherd	Object	Policy Maps	Policy Maps	181		The urban boundary indicated on the Policy Maps around land to the south of Burnley Road Huncoat is incorrect. Documentation provided as part of representation as evidence for correct boundary	Agree - make changes	Amend Policy Map as appropriate

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134	Ribble Valley Borough Council	Joanne	Macholc	General Comment	Policy Maps	Policy Maps	181		Officer comment only, not a formal response/resolution of the Council - the Policy Maps identify a large area of Ancient woodland abutting the boundary of Ribble Valley that appears to be incorrect	Further work required	Investigate accuracy of data further with LCC and update Policy Maps accordingly
135	Ribble Valley Borough Council	Joanne	Macholc	General Comment	Policy Maps	Policy Maps	181		Officer comment only, not a formal response/resolution of the Council - the Policy Maps identify woodland/grassland ecological network (under Policy DM18) that are schematic only and bear no relation to features on the OS base, as such it is difficult to make sense of the policy on the ground in relation to specific sites.	Further work required	Consider removing from Policy Maps and updating Policy DM18 text as appropriate.
118	Highways England	Warren	Hilton	General Comment	Policy Maps	Policy Maps	181		Highways England have reviewed the Policy Maps and conclude that none of the policy zones identified have any major impact on the SRN.	Noted	
203	Lancashire County Council (Strategy and Policy)	Melissa	Sherliker	General Comment	Policy Maps	Policy Maps	181		The policies map shows both cycle routes that the county council aims to improve in Hyndburn but doesn't refer to the East Lancashire Cycleway. It is suggested that they are labelled 'East Lancashire Strategic Cycleway – 'Huncoat Greenway' and 'National Cycle Route 6'	Agree - make changes	
214	Health and Safety Executive	John	Moran	General Comment	Policy Maps	Policy Maps	181		HSE advises that you contact the pipeline operators for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.	Further work required	Contact relevant pipeline operators and update Policy Maps accordingly
249	Geolancashire	Andy	Wiggett	General Comment	Policy Maps	Policy Maps	181		Footnote 66 to Policy DM18 states that the 'ecological network' includes the boundaries as defined by the Lancashire Environment Record Network. The Geoconservation sites are included within LERN and should therefore be notated as such on the Policy Map.	Agree - make changes	

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45	The Wildlife Trust for Lancashire, Manchester and North Merseyside	John	Lamb	Object	Policy Maps	Policy Maps	181		Geological Heritage Sites (GHS as identified by GeoLancashire and formerly known as RIGS) should also be shown on the Policy Maps alongside SSSIs, BHS and Local Sites.	Agree - make changes	