

Central Lancashire Local Plan

Integrated Assessment Scoping Report

Consultation Outcomes Report

October 2019



Introduction

- 1.1 The Central Lancashire Authorities of Preston City, South Ribble and Chorley are undertaking a review of the development plan(s) for the area and are working towards the preparation of a Joint Local Plan for Central Lancashire. This will be a single Planning document containing the Council's vision and objectives. It will set strategic and local development management policies and site allocations for future development across the three authorities. Once adopted, the Local Plan will guide the future growth and development in the Central Lancashire area and replace the Central Lancashire Core Strategy (adopted in 2012) and the Local Plans/Site Allocations and Development Management Policies of the 3 Central Lancashire Authorities (all adopted 2015).
- 1.2 The Scoping Report represents the first stage of the Integrated Assessment (IA) which is carried out alongside the plan production process. It will make recommendations to enhance potential positive outcomes and minimise negative impacts of the policies within the CLLP. The process will follow the SA format as set out in NPPG¹(see Figure 1) and this Scoping Report represents Stage A of this process, this will produce a single joint appraisal for the Local Plan.
- 1.3 Consultation on the Scoping report was undertaken from 12th August until 7th October 2019 for a period of 8 weeks. In accordance with Article 5(4) of the European Union Directive 2001/42/EC Regulations set out in the Environmental Assessment of Plans and Programmes Regulations 2004, and the Environmental Assessment of Plans and Programmes Regulations 2004, the SA Scoping Report was sent to the statutory Strategic Environmental Assessment Consultation Bodies with environmental responsibilities. These are:
 - Environment Agency
 - Natural England
 - Historic England
- 1.4 In addition to the statutory consultees, the Scoping Report was also sent to other appropriate consultees, a full list of the bodies contacted can be found in Appendix 1. The document was also placed on the Central Lancashire Local Plan website (<https://centrallocalplan.lancashire.gov.uk/>) with details of how and when to respond.
- 1.5 A total of 17 responses were received to this consultation and included the following:
 - Environment Agency
 - Natural England
 - Historic England
 - Coal Authority
 - Highways England

¹ National Planning Practice Guidance: Sustainability Appraisal process, Paragraph: 013 Reference ID: 11-013-20140306

- United Utilities
- Lancashire County Council
- Local Councils – Preston, and Fylde
- Parish Councils – Whittingham, Woodplumpton, and Grimsargh
- Local Business
- Local resident
- Local Councillor
- Wildlife Trust

1.6 The table below summarises the comments made on the report and the Council’s response to those as well as indicating any changes proposed to the Scoping Report as a result of the comments received.

1.7 The comments received have been generally supportive of the IA and the proposed framework. Where changes have been suggested and agreed the table below identifies the new/amended text which has been included in a revised scoping report. These changes will now become the final IA for the purposes of assessment of the Central Lancashire Local Plan.

Summary of draft IA Scoping Report consultation responses (August – October 2019 consultation)

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
1.	Chorley Councillor 13/8/19	Public transport concerns; Chorley lacks coordinated bus transport within and around the town; Train use has declined and some services need re-instating; Electric charging points on all new and heavily used car parks needed.	Comments noted. The baseline issues referred to are already covered in the scoping report. These comments relate mainly to the Local Plan, rather than the IA scoping report and will be addressed through that route. Electric charging points will be picked up through the Local Plan.	No amendments required.
2.	United Utilities 21/8/19	The Plan should: - Promote the use of SUDs; - Promote opportunities to extend the green and blue infrastructure; - Apply the surface water hierarchy; - Avoid connecting surface water to the public sewer where possible; - Protection of water quality, including groundwater sources / groundwater protection zones (SPz's);	This information is useful in establishing the baseline, and will therefore be added to the scoping report baseline data. Specific reference can be made to SUDs, green and blue infrastructure, the surface water hierarchy, and avoiding connections to the public sewer where possible.	Additional baseline information added to the scoping report baseline (after para 5.6.22). No change to objectives.

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<ul style="list-style-type: none"> - There are areas to the south of Central Lancs which are within public water supply catchment land. - A policy should be included in the plan to ensure engagement with the stat undertaker. - Split “flood risk” and “surface water management” into two separate Local Plan policies. - There should be an expectation for proposals to demonstrate discharge rights (it is the landowner of a watercourse who has the discharge rights); - Timing for delivery of proposals should align with the delivery of infrastructure – anticipated delivery should be provided as soon as possible; - All UU assets should be afforded due protection (e.g. avoiding deep rooted shrubs/trees), including public sewers and water mains; - For large sites in multiple ownership, detail should be provided of how they intend to work together to achieve appropriate infrastructure; 	<p>Comments noted.</p> <p>Most of these comments relate to the Local Plan itself, or the planning application stage, rather than the Integrated Assessment scoping report. Wording for certain policies is suggested, but these are relevant for the development of the Local Plan rather than the IA scoping report. Wording for various standard planning conditions is also suggested, but these relate to the planning application stage rather than the plan making stage. Comments about policy development will be used to help inform the development of the Local Plan.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<ul style="list-style-type: none"> - Allow for development or expansion of water supply / waste water facilities; - For proposals in close proximity to existing wastewater treatment works (WwTW), sufficient assessments should be provided to mitigate odour and noise; and -Ensure water efficiency measures. 		
3.	Highways England 16/9/19	<p>An ambition of Highways England is to ensure that major roads are more dependable, durable, and most importantly safe. The Strategic Road Network (SRN) should be given more commentary in the document generally. The SRN in the Central Lancashire area comprises the M6, M61, M65 and M55 motorways.</p> <ul style="list-style-type: none"> - In the Central Lancashire area, seven motorway links are in the worst 10% of the North West motorway network for personal injury collision rate. - Six motorway links are in the worst - 10% of the North West motorway network in terms of congestion (defined as 15 minute periods where speed dropped below 60% of the 90th percentile value for the link). 	<p>Reference to the SRN can be added to the main relevant aims and objectives on page 13 and to the baseline on page 14.</p> <p>Motorway data can be added to Central Lancs baseline on page 14.</p>	<p>General comments/text added into the scoping report baseline info / PPPSI review. Paras 5.2.3, 5.2.25 and 5.2.26 amended as suggested. Additional data sources also added to the scoping report, and to Annex 1: PPPSI review.</p> <p>No change to objectives.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>- Fourteen links were in the worst 10% of the North West motorway network in terms of severity of congestion (defined as difference between the peak-time congestion traffic speed and the free-flowing traffic speed).</p> <p>- Taken as a whole, the motorway network within in the Local Plan area has experienced an average traffic growth of 1% (AADF) per annum in the period between 2015 to 2018.</p> <p>Policy requirements relating to the creation of new junctions on the SRN are set out within the DfT Policy Circular 02/2013: “The strategic road network and the delivery of sustainable development” and the terms of Highways England’s Licence from the Secretary of State for Transport.</p> <p>Page 15, Para 5.2.3: Traffic flows: There should be a specific reference made to the current performance characteristics of the SRN.</p>	<p>DfT Circular 02/2013 can be added to the scoping report and Annex 1: PPPSI review.</p> <p>Reference to performance of the SRN can be added.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Pages 19-20, Paras 5.2.25 & 5.2.26: Key transport infrastructure schemes</p> <p>Reference should be made to the Roads Investment Strategy (RIS) as being the vehicle for long term strategic planning and funding of the network (including major improvements). Currently, there are no named major schemes within RIS.</p> <p>The IA objectives (IA3; IA9; IA10; IA12; and IA15) adequately capture and assess the issues most relevant to the SRN.</p>	<p>An additional para can be added to refer to the RIS.</p> <p>Noted.</p>	
4.	Historic England 19/9/19	<p>Historic England has produced an advice note "Sustainability-appraisal-and-strategic-environmental-assessment-advice-note", which should be referenced:</p> <p>Historic England has also produced an advice note: "Site Allocations and the Historic Environment in Local Plans": Site allocations are not referred to within the IA. There is a need to consider the historic environment in any site allocations.</p>	<p>The Historic England advice notes can be added to the list of relevant PPPSI's at Chapter 5.5, page 59.</p> <p>The process of allocating sites is part of the Local Plan process. Potential sites will be subject to SA, and will be assessed using the assessment criteria set out in the IA framework within the IA scoping report.</p>	<p>Additional baseline information added. Paras 5.5.29; 5.5.30; 5.5.31; 5.5.32; and 5.5.33 all amended, as suggested. Additional legislation added to the scoping report and Annex 1: PPPSI review.</p> <p>Objective IA16 amended to say "<i>..local character and distinctiveness..</i>" rather than just "<i>.. character..</i>"</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Conservation, archaeology and urban design colleagues at the local and county level should be engaged in the process to help inform the baseline data.</p> <p><u>Baseline info:</u> The baseline info should include all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged. This not only involves undesignated (or local heritage assets) but the potential for unrecorded archaeology, and historic landscape character areas for example.</p> <p>The importance of local character and identity including the landscape and townscape of an area is an important consideration, as well as referring to the historic environment.</p> <p><u>Relevant PPSIs:</u> The following legislation for the historic environment including listed buildings and</p>	<p>LCC and local Councils were consulted.</p> <p>Noted. Reference can be made to this in the baseline information.</p> <p>Noted.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>scheduled monuments at an international level (Florence, Granada and Valetta Conventions) should be included, and at a national level (Planning (Listed Buildings and Conservation Areas) Act 1990, Ancient Monuments and Archaeological Areas Act 1979) etc.</p> <p>It is important that the role the historic environment plays in sustainable development and the contribution it makes to delivering social, cultural, economic and environmental benefits is recognised.</p> <p>The historic environment underpins sustainable development and therefore, it may warrant including in other objectives including the need for specific reference to landscape character.</p> <p>IA objective 16 This is welcomed. For consistency with the assessment criteria, reference should be made to <i>“local character and distinctiveness”</i> (not just <i>“character”</i>).</p>	<p>This legislation can be added to the scoping report relevant PPPSIs, and to Annex 1 PPPSI review.</p> <p>The text can be amended to emphasise the importance of the historic environment.</p> <p>Specific reference can be made to landscape character.</p> <p>The assessment criteria for IA objective 16 can be amended to refer to <i>“local character and distinctiveness”</i> as suggested (not just <i>“character”</i>).</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
5.	Fylde Council Planning Policy 25/9/19	<p>The sequence of the topic papers is not reflected in the sequence of the Integrated Assessment Framework.</p> <p>There is no indication as to how the baseline data from the topic papers will be used to judge against the indicators.</p> <p>Chapter 5.2: Accessibility: The need for open spaces to be accessible to all members of the community regardless of age or disability needs to be fully addressed.</p> <p>Chapter 5.2: Main aims & objectives identified: Bullet points 1-2: These are vague. An integrated approach to development and accessibility to key facilities (GPs, community facilities, schools)</p>	<p>Due to the large degree of overlap / inter-linked issues, it is not possible to accurately reflect the order of the topic papers when compiling IA objectives/assessment criteria.</p> <p>The baseline data identified the relevant aims and objectives, from which the IA objectives and assessment criteria were identified. These social, economic and environmental assessment criteria set out the issues that the emerging Local Plan will need to address as it progresses.</p> <p>Para 5.2.26 can be amended to refer to accessibility to open spaces.</p> <p>Bullet points 1-2 can be amended to provide greater clarity.</p>	<p>Alterations and additional text added to the baseline information where appropriate.</p> <p>Appropriate alterations made to the assessment criteria of Objectives IA1, IA2, IA4, IA6, and IA16.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>by walking, cycling and public transport should be emphasized.</p> <p>Page 14, Para 5.2.1: The 4 motorways should be identified.</p> <p>Page 14, Bullet point 1: Seems contradictory to some of the other main indicators. Instead of working to accommodate the expected rise in vehicular traffic, a modal shift is required.</p> <p>Page 19: There is no mention to the various assets within Central Lancashire that could be promoted and better utilised. The Leeds Liverpool Canal and the Lancaster Canal provide opportunity for walking, cycling and water related activities for example.</p> <p>Chapter 5.4: Quality of life:</p>	<p>The names of the 4 motorways can be added to the baseline information.</p> <p>This aim at bullet point 1 can be amended, but do not agree that providing better roads and increasing capacity where there is existing congestion (particularly as population is expected to increase), is contradictory to seeking a modal shift. Preston and South Ribble Councils are signed up to City Deal, which will facilitate growth and relieve existing congestion.</p> <p>A sentence can be added to para 5.2.8 on page 19 to refer to canals.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>There is a large quantity of baseline data, but it isn't clear within the objectives how this will be utilised to improve or monitor quality of life.</p> <p>Page 32, Main aims and objectives Bullet points 4-7 These do not read as aims or objectives.</p> <p>Page 39-40, Figures 8, 9 & 10: The figure titles say they go up to 2017, but they only go up to 2015.</p> <p>Page 43, para 5.4.32: The figure references are incorrect.</p> <p>Chapter 5.5: Buildings and heritage</p>	<p>The SA is not a monitoring tool – it is an assessment tool to ensure the policies being developed in the emerging Local Plan take account of social, environmental, and economic issues. The SA identifies data sources available to us, which will then be used to inform and develop the monitoring framework for the Local Plan.</p> <p>Main aims and objectives (bullet points 4-7) can be amended slightly to be clearer.</p> <p>The figure titles of 8, 9 & 10 are correct.</p> <p>Para 5.4.32 can be amended to refer to the correct figure references.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>There are opportunities for enhancing the tourism potential of heritage assets across Central Lancashire.</p> <p>It is important to ensure that the wider historic landscape is protected and not missed within the document. Non-designated heritage and archaeological sites and resources should be considered.</p> <p>Page 70, Bullet point 1: Needs to be re-worded.</p> <p>Page 70, Bullet point 3: Should refer to the sequential test from the NPPF.</p> <p>Page 73, Para 5.6.10 and 5.6.15 The text on the river Wyre should be deleted as it is not in Central Lancashire. There are also other rivers such as the Yarrow, Darwen and Lostock that are not mentioned.</p>	<p>Text can be added to reflect the opportunities for tourism potential.</p> <p>Text can be amended slightly to ensure the wider historic landscape is protected.</p> <p>Bullet point 1 can be corrected (minor correction).</p> <p>Text can be amended to include reference to a sequential approach and the NPPF.</p> <p>Although the River Wyre is not in Central Lancs, its surface water management catchment is. However, the text can be amended to clarify that the River Wyre itself is not in Central Lancs, and to refer to other watercourses.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Page 74, para 5.6.21 This para concerns air quality, but is in the middle of paras that concern flood risk. It would be better placed in a section on air pollution/quality (<i>in the baseline paras starting at 5.6.1?</i>).</p> <p>Chapter 5.8: Natural Environment (Relevant aims and objectives identified) The relevant aims and objectives identified should include 'Net Gain' in Biodiversity for all new development as this will soon be mandated in law, and is already included in Planning Practice Guidance.</p> <p>Page 89, Para 5.8.2 This mentions the River Yarrow. However, the river Yarrow was not mentioned in the rivers section in the chapter on Climate Change (ie page 73, Para 5.6.10 and 5.6.15). At present, the text appears to be rather vague.</p> <p>Page 112, para 5.8.47</p>	<p>The para about air quality can be moved to a more appropriate place in the air quality section.</p> <p>The Environment Bill has not yet gained assent and has not yet become law. However, text can be added to the relevant aims and objectives to refer to the relevant main aims of the Environment Bill.</p> <p>Reference to the River Yarrow can be added.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Canal banks are mentioned. The Lancaster Canal in Preston is extremely biodiverse with Kingfishers and Herons found well within the urban area. The Leeds Liverpool Canal will also provide a wide range of habitats.</p> <p>Canals should also be valued as cycling, walking and running routes, and for fishing and boating.</p> <p>Chapter 5.9: Land and natural resources This section mentions minerals. The NPPF definition of minerals includes On Shore Oil and Gas which should be mentioned if this document is going to cover minerals.</p> <p>The document does not mention the emerging Joint Minerals and Waste Local Plan Site Allocations and Development Management Development Plan Document.</p>	<p>Reference to canals can be added to the accessibility and the natural environment sections.</p> <p>Minerals and waste are dealt with by the County Council. This section only refers to land minerals and is just for information. Oil and gas areas are not mapped and are governed by the Oil and gas Authority (OGA) through Petroleum Exploration and Development Licences (PEDL's) which are subject to change if licences are revoked or time expire. Changes to the MSAs will be picked up as the Local Plan progresses.</p> <p>The emerging Minerals & Waste Local Plan can be added to the baseline info and to Annex 1: PPPSIs.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Page 119, para 5.9.10 It is not clear within paragraph 5.9.10 whether these figures are for wind or solar.</p> <p>Should reduction of traffic congestion not be an objective (or indicator)?</p> <p>Objective IA1 (Housing) - The term “objectively assessed need” needs to be changed, as it no longer appears in the Framework. [Is the aim to meet the minimum local housing need, or some other figure (eg a housing requirement figure yet to be determined?)]</p> <p>- Should an “appropriate” quantity and quality of housing land not be a “sufficient”?</p> <p>- The objective refers to “locations” but the assessment criteria do not. There needs to be a criterion that ensures that the CLLP</p>	<p>The figures at para 5.9.10 refer to wind and solar.</p> <p>Traffic congestion is covered under IA9.</p> <p>Objective IA1 can be amended to say “identified need” to reflect the wording of the Framework. Further detail in terms of housing requirements for the sub-region will be set out in the Central Lancashire Housing Study, which is currently being prepared as a key evidence document for the emerging Local Plan.</p> <p>“Appropriate” is considered a suitable word in this context, going above and beyond “sufficient”, to meet specific needs.</p> <p>“Local demand” is referred to in the assessment criteria for IA1.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>delivers a distribution of sites across the plan area that meets local needs.</p> <ul style="list-style-type: none"> - No mention of housing needs for specific groups other than affordable housing. NPPF19 and PPG require this to be considered and it is of utmost importance in the social sustainability of the plan. There is a need for an indicator (at least one) to ensure that the needs of specific groups, most notably the elderly but also others, are provided for. - The mix should relate to need rather than demand and the data source used to measure the need for various types should be referred to. - The pricing level in the rental market is not within the control of the CLLP, so this indicator should be deleted. - Housing land should not just be 	<p>Assessment criteria can be added to refer to the needs of specific groups, as set out in the Framework. Detailed indicators to ensure that the needs of specific groups are met will be developed for the Local Plan. The IA framework as set out in the IA scoping report is a means of assessing the Local Plan and its policies as it develops.</p> <p>Objective IA1 relates to housing need. However, local demand based on the type of property required and where that is needed will be used to assess that this need is being met properly. Policies within the local plan will specify local housing need.</p> <p>Affordable housing is something that can be included in Local Plan policies.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>“well-connected”, but should be well-connected on foot, by bicycle and by quick and frequent public transport with employment land, centres, main transport nodes and green space.</p> <p>Objective IA2 (Economy)</p> <ul style="list-style-type: none"> - The indicator should meet needs over the plan period (which should be assessed within the evidence base), not “demand” (paragraph 81 of the Framework). - There needs to be an indicator that aims to ensure that employment land is distributed to a broad range of locations across the plan area each of which should be well connected on foot, by bicycle and by quick and frequent public transport to housing, centres and main transport nodes (not just “well-connected”). <p>Objective IA3 (Transport and Utilities)</p> <p>For the purposes of sustainability over the plan period, should there be a specific mention to public transport within this indicator?</p>	<p>IA objectives IA3 and IA9 refer to transport connectivity. Connectivity is not just specific to housing and will be addressed through a number of policies in the Local Plan.</p> <p>The assessment criteria of IA2 can be amended as suggested to refer to “need” rather than “demand”.</p> <p>IA objectives IA3 and IA9 refer to transport connectivity. Connectivity is not just specific to employment and will be addressed through a number of policies in the Local Plan.</p> <p>Public transport is referred to in IA objective IA9. No amendment necessary.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Objective IA4 (Reducing deprivation, disparity and crime) This is a very broad objective with two significant aspects. The assessment criteria does not reference crime specifically. Reducing levels of crime may be better placed as a separate objective with its own assessment criteria.</p> <p>Objective IA6 (Health and wellbeing) There should be an indicator concerning the promotion of social inclusion, especially considering the increase in the over 80's (para 5.4.2) and the high black and minority ethnic populations in Preston (5.4.5). These populations are at higher risk of social isolation within their community.</p> <p>Objective IA16 (Heritage assets, etc) The importance of tailored land management is picked up on in para 5.5.31. As risks to heritage can be reduced by good land management, could there be an aim or objective concerning appropriate management?</p>	<p>Crime is not referred to specifically, but it is inferred under the last criteria of this objective. However, a reference to crime can be added for clarity.</p> <p>Additional text can be added to the assessment criteria, to reflect social inclusion of groups and communities.</p> <p>Some additional text can be added to refer to appropriate land management in the assessment criteria of IA16. The IA assessments ensure Local Plan policies are developed which are fit for purpose.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
			<p>Most of the comments made relate more to the Local Plan process than the IA scoping report. The SA is not a monitoring tool – it is an assessment tool to ensure the policies being developed in the emerging Local Plan take account of social, environmental, and economic issues. The SA identifies data sources available to us, which will then be used to inform and develop the monitoring framework for the Local Plan.</p>	
6.	<p>The Wildlife Trust for Lancashire 30/9/19</p>	<p><i>“Forest”</i> is used inaccurately throughout the document to refer to woodland – whether ancient, secondary or planted. <i>“Forest”</i> has principally come to mean <i>“woodland (especially plantation woodland) principally managed for timber production and/or amenity”</i>.</p> <p><i>“Farmland”</i>, <i>“Pasture”</i> and <i>“Upland”</i> are described throughout as separate land uses. However, they are not in the same category class. <i>‘Farmland’</i> (farmed land) is an overarching category for land in agricultural production;</p>	<p><i>“Forest”</i> can be replaced with <i>“woodland”</i> where relevant.</p> <p><i>“Farmland”</i>, <i>“Pasture”</i> and <i>“Upland”</i> can be clarified within the baseline information.</p>	<p>Additional / amended text and sources of information added to the baseline information and Annex 1: PPPSI review.</p> <p>No amendments required to the objectives.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p><i>'Pasture'</i> is an agricultural land use type; and <i>'Upland'</i> is a topographical description.</p> <p>Within Central Lancashire, <i>"farmland"</i> is overwhelmingly either:</p> <ul style="list-style-type: none"> - <i>"Pastoral"</i> (grazed to produce milk and/or meat products); - <i>"Arable"</i> (used to produce crops – mainly cereals, usually by tilling); or - <i>"Market gardening"</i> (tilled to produce vegetables or flowers, sometimes under glass or in poly-tunnels). <p>Pastoral farming (Pasture) in Central Lancashire primarily produces:</p> <ul style="list-style-type: none"> - Upland areas: lamb-meat; - Lowland areas: beef, or cows' milk. <p>Arable and market gardening production in Central Lancashire is now almost exclusively confined to lowland farmland, west of the central urban "spine".</p> <p>Lowland raised bog is now a very rare habitat in Central Lancashire, with just one identified lowland raised bog Local Wildlife Site ("Biological Heritage Site") remaining: Much Hoole Moss, in South Ribble Borough.</p>	<p>A para can be added to the baseline info to reflect the types of farming within Central Lancashire.</p> <p>A para can be added to the baseline info about lowland raised bog.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Page 112, Para 5.8.46 The current value of the majority of Central Lancashire’s farmland to the sub-region’s biodiversity resources is markedly exaggerated in the scoping report (most of the Central Lancashire sub-region’s farmland is not currently a “natural asset” but is a depleted and degraded ecological network). Most of Central Lancashire has been farmed very intensively for many decades and now mainly supports a narrow range of robust and opportunistic species. Semi-natural habitats characteristic of less intensively farmed land – whether pastoral, arable or market-gardened - have become rare and fragmented. Most – aspirationally all – within Central Lancashire are identified as Local Wildlife Sites (Biological Heritage Sites) or biological Sites of Special Scientific Interest.</p> <p>This is not a crisis unique to Central Lancashire. The UK has become one of the most nature-depleted countries in the world, ranked 189th out of 218 countries in</p>	<p>Text can be added to the baseline info to reflect these comments and clarify the value of the majority of Central Lancashire’s farmland.</p> <p>Noted.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>2016 (<i>State of Nature Report, 2016, RSPB, The Wildlife Trusts et al</i>). The loss of semi-natural habitat to agricultural intensification has been the principal driver of that depletion.</p> <p>There needs to be effective incentives to farmers and growers to maintain, restore and expand the ecological network as part of the UK Government’s projected Nature Recovery Network for England, a concept introduced in the UK 25-Year Plan for the Environment.</p> <p>(The identification and delivery of that network, through ‘biodiversity net gain’ and ‘public payment for public goods’ is proposed to be underpinned by an Environment Bill, the former scheduled to be brought forward in the current Parliament (2016 – 2021) and the latter in the Agriculture Bill, currently before Parliament).</p>	<p>A para can be added to the scoping report, and added to Annex 1: PPPSIs, to refer to the 25-Year Plan for the Environment (in particular “biodiversity net gain”) and the Environment Bill.</p>	
7.	4/10/19 Preston City	The IA has captured the essence of the law and evidenced that a thorough (<i>Equalities Impact</i>) assessment will be undertaken.	Noted.	Minor correction made to text.

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
	Council Equalities Section	<p>Section 2.14 – 2.16 Looks fine but one typo in bullet points - should be “effects” rather than “effect”?</p> <p>Perhaps refer to the Gunning consultation principles?</p>	<p>Correction can be made.</p> <p>No need to refer to the Gunning principles in the IA scoping report. They are not specific to the IA.</p>	No amendments required to the objectives.
8.	Member of the public 4/10/19	<p>Para 2.7 Should be linked to the construction of 'wildlife friendly' housing developments including bat and swift boxes, the retention of greenspace and the planting of orchards as well as hedgehog highways among the many measures taken to ensure wildlife thrives throughout the area. Wildlife should be considered at the start of the design process. https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing/#tT2Opik4Wy9MC1Ex.99 This should be linked to the Local Plan as the template for the future large housing developments (and indeed current).</p>	<p>These wildlife issues will be addressed through policies in the Local plan. IA objective IA11 sets out the assessment criteria in relation to enhancing biodiversity. No amendment required.</p>	<p>Only minor amendments to the baseline info made.</p> <p>No amendments to the objectives required.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Accessibility - Para 5.2 on page 13 Does not mention the introduction of trams in Preston, for example.</p> <p>Para 5.2.1 (Central Lancashire Baseline) There is no mention of the re-opening of Midge Hall Railway Station near Leyland and Coppull Railway Station in the Chorley area for passenger use (closed as a result of the Beeching report in the 1960s) creating railway hubs in their localities, considerably reducing car use/traffic congestion/air pollution and generally speaking improving the quality of life for local people (in the case of Midge Hall, providing for new devt at Leyland Test Track). There should be cycle hubs at both stations when they are re-opened.</p> <p>5.2.12 (Public Transport) Overall the Scoping report is not ambitious nor innovative enough in terms of 21st century ideas for sustainable transport.</p>	<p>Should trams in Preston become a realistic proposal this would be picked up through the Local Plan and through the IA scoping report.</p> <p>The scoping report sets out the baseline. The Local Plan will pick up the need for public transport including bus and rail networks. Cycle provision will also be addressed in the Local Plan.</p> <p>This is not the purpose of the Scoping report. The scoping report sets the baseline for which policies will be assed against and identifies issues which the</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Trams can ease congestion and parking problems and provide cleaner and greener travel.</p> <p>Para 5.2.18 The proposed HS2 might never go ahead.</p> <p>Para 5.2.30 Congestion and air quality will not be solved by road building.</p> <p>Paras 5.2.36, 37 & 38 Need to provide greatly improved bus services; introduce trams and re-open Coppull and Midge Hall Stations. But no more road building as it is too damaging to the natural environment.</p> <p>Housing - Para 5.3. Relevant aims and objectives require a true definition of affordable housing, the key trends in the affordability of different tenure types. Local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, including affordable housing,</p>	<p>Local Plan needs to address. All the points above have been picked up through this process.</p> <p>Noted.</p> <p>Noted.</p> <p>Public transport, highway infrastructure, and the natural environment are all covered in the IA scoping report.</p> <p>IA objective IA1 addresses the need for affordable housing. Detailed info on affordable housing will be set out in the Local Plan. A policy will be developed to address this requirement.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>and planning for different age groups and family groupings. This should include all types of dwellings, especially true bungalows, as in Longton, there is a waiting list for them.</p> <p>Para 5.3.19 Among nomadic communities, there is a shortage of authorised sites for them to set up. A 2018 report by the charity Friends, Families and Travellers found that there had been only a 2% increase in socially rented pitches up to 2017, so they had nowhere to stop and access to basic water and sanitation.</p> <p>Biodiversity and Ecology In relation to rivers and tributaries in the Central Lancashire region, it is important for all interested parties in development matters, to be aware of Riparian Responsibilities in relation to protection of wildlife species in and around rivers; flood risk and protection of watercourses during any development process.</p>	<p>The need for nomadic communities is identified in the scoping report, through the review of the GTAA (2019). The Local Plan will have a policy to address this.</p> <p>This will be addressed in the Local Plan, where there will be a policy about biodiversity net gain. There is reference to biodiversity net gain in the IA scoping report. However, it is noted that the Environment Bill has not become law yet.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
			Most of the comments made relate to issues that will need to be picked up by the Local Plan. The IA sets out the assessment criteria by which the policies of the Local Plan will be assessed. The majority of issues raised will be used to help develop policies in the Local Plan.	
9.	The Coal Authority 07/10/19	No specific comments to make.	No amendments required.	No amendments required.
10.	Natural England 07/10/19	<p>Table 10: Past and Present Condition Report for Central Lancashire SSSI Sites We note there is no reference to Wrightington Bar Pasture SSSI. This runs along/within the Chorley LPA boundary line and should be included.</p> <p>Marine Conservation Zones (MCZs) There is no reference to the need for a MCZ assessment. If any Local Plan proposals are put forward in Marine Conservation Zones or near to them, screening exercises may be required to assess any likely effects on the</p>	<p>Table 10 can be updated to include the Wrightington Bar Pasture SSSI.</p> <p>Text relating to MCZ's can be added to the baseline.</p>	<p>Amendments made to the baseline where appropriate, using the suggested/additional text.</p> <p>Table 10 updated to include the Wrightington Bar Pasture SSSI.</p> <p>Appropriate alterations made to the assessment criteria of objectives IA6, IA10, IA11, IA12, IA16 and IA17.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>protected area, as part of a MCZ assessment.</p> <p>Lancashire Key Species We welcome the reference to steppingstone habitats and avoiding loss of fragmentation, however we would ideally like to see these networks mapped, so that any impacts and enhancements can be quantified.</p> <p>Threats to the Natural Environment Natural England has published a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs). This helpful GIS tool can be used by LPAs and developers to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. Further information and guidance on how to access and use the IRZs is available on the Natural England website. The IRZs are available on the Magic Map tool which we</p>	<p>Noted. Mapping of a habitats network is something that can be developed.</p> <p>Noted. The GIS facility can be a useful tool further along the process for site allocations, and also at the planning application stage.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>advise you utilise in order to aid your screening of any proposed allocations as there is a vast array of information that is relevant to the environment including designated sites, protected species licences, priority habitats to name a few.</p> <p>Some of the designated sites within the Central Lancashire plan boundary are sensitive to some of the following; recreational disturbance, air quality, water quality, water quantity, and impacts on functionally linked land. We suggest that the threats to the environment section is updated to include these.</p> <p>For example regarding West Pennine Moor SSSI it supports an array of upland breeding birds including Twite, Curlew, Redshank and Golden plover as well as nationally important numbers of breeding Black-headed gulls and Mediterranean gulls. The diverse mosaic of upland habitats includes vast expanses of blanket bog, fens, heathland, wet woodlands, wet flushes, upland hay meadows and wet grassland.</p>	<p>Additional text can be added to the baseline info to reflect the threats to the environment.</p> <p>Additional text can be added to refer to threats to designated sites such as the WPM SSSI, including Recreational Disturbance, Hydrological Impacts and Air Quality.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>The lower slopes also include reservoirs, streams and ponds. Therefore the Local Plan needs to consider the following key areas for the WPM SSSI; Recreational Disturbance, Hydrological Impacts and Air Quality.</p> <p>Peat is an important habitat within your local plan area. All deep peat (40cm or deeper) is understood by Natural England to be Blanket Bog. Blanket bog is an irreplaceable habitat and should be carefully considered when preparing your Local Plan.</p> <p>We advise that additional assessment criteria should be included:</p> <p>Objective IA6 We advise that the assessment criteria is updated to include access to the natural environment as a key indicator of health and wellbeing.</p> <p>Objective IA10</p>	<p>Additional text can be added to the baseline info to refer to peat and blanket bog.</p> <p>Reference to the importance of access to the natural environment can be added to the assessment criteria of IA6.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>The assessment criteria currently only covers human health, it is of note that some of the designated sites are air quality sensitive and therefore we advise this is updated to include the natural environment.</p> <p>Objective IA 11 We would like to see the inclusion of biodiversity net gain in the assessment criteria.</p> <p>Objective IA12 The assessment criteria for this objective does not provide enough detail on what basis resilience to climate change will be assessed. We advise that some additional assessment criteria is added.</p> <p>Objective IA16</p>	<p>The threats to designated sites which are air quality sensitive can be added to the assessment criteria of Objective IA10.</p> <p>The Environment Bill has not yet become law. The Local Plan policies will ensure the delivery of biodiversity net gain.</p> <p>There is some overlap here with IA13, IA14, and IA15, which refer to flood risk, water quality & availability, and energy efficiency / low carbon generation, etc. However, additional assessment criteria can be added to encourage appropriate masterplanning, and to strengthen the natural environment including enhancement of the existing green infrastructure and introducing new spaces and features in urban areas and buildings.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>We advise that reference to The Forest of Bowland AONB is included in the assessment criteria.</p> <p>Objective IA17 We advise that the assessment criteria is updated to include the conservation of peat.</p> <p><u>Indicators:</u> The following indicators may be considered appropriate:</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> - Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. - Percentage of major developments generating overall biodiversity enhancement. - Hectares of biodiversity habitat delivered through strategic site allocations. <p>Green infrastructure:</p>	<p>Additional text relating to The Forest of Bowland AONB can be added to Objective IA16.</p> <p>Additional text relating to the conservation of peat can be added to Objective IA17.</p> <p>All suggested indicators noted. These will be picked up when developing indicators for the Local Plan.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>- Length of greenways constructed.</p> <p>- Hectares of accessible open space per 1000 population.</p> <p><u>Monitoring:</u> As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current Local Plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p>	<p>The Local Plan will ensure a detailed set of monitoring indicators are established. The suggested indicators will be picked up when developing indicators for the Local Plan. The Local Plan will ensure that detailed set of monitoring indicators are established.</p>	
11.	Gladmans 07/10/19	The IA must follow the appropriate legal requirements, in accordance with the	Noted.	No amendments required.

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives. The results of the SA process must clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Councils' decision making, and scoring should be robust, justified and transparent. Specifically, it should be clear from the SA process why some policy options have been progressed and others rejected. The Councils must take account of all reasonable alternatives when assessing and selecting their preferred policy choices. It is integral that each reasonable alternative is</p>	<p>The SA will inform the policies and allocations made through the Local Plan, and the process will be undertaken in a clear and transparent manner.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>assessed to the same degree of detail as the preferred option and should only be rejected after a fair and comparable assessment of its sustainability credentials.</p> <p>The Local Plan needs to consider matters which affect demographic behaviour including employment growth and affordability. This is acknowledged in paras 5.3.5 – 5.3.6 which recognise that household projections do not reflect the levels of growth expected as part of the delivery of the City Deal for Preston and South Ribble. The Local Plan must ensure that the housing requirement aligns with the growth ambitions of the area to ensure continued and sustained economic growth over the plan period.</p>	Noted.	
12.	LCC Highways 07/10/19	No comments.	No amendments required.	No amendments required.
13.	Homes England 07/10/19	Agree in principle with the objectives and sub-objectives.	Noted.	National Design Guide (MHCLG, October 2019) added

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Consideration could be given to the new National Design Guide (MHCLG, October 2019); referenced as an additional national policy guidance document relevant to the assessment whilst adding further weight to the ambitions for design set out within the Central Lancashire Design Guide SPD.</p>	<p>Reference to the Design guide can be added to the scoping report baseline and to Annex 1: PPSIs. The PPSIs will continue to be updated as and when necessary.</p>	<p>to the baseline information and to Annex 1: PPSIs.</p> <p>No amendments required to the objectives.</p>
14.	Whittingham Parish Council 07/10/19	<p>Strongly support the objective in Para 5.3, page 25 requiring that the local plan must ensure that the infrastructure is in place or planned for alongside any future housing developments so it is provided for at the right time in order for communities to thrive.</p> <p>-This is a serious problem with current planning policy in Preston and Whittingham PC would support the development of an infrastructure masterplan for NW Preston to support housing development in the area.</p> <p>Support the objective that the local council should be responsive to local circumstances and plan housing development to reflect local needs. Concerned that this will be an</p>	<p>Noted.</p> <p>Noted.</p>	<p>No amendments required.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>aspiration only - without addressing the 5yr housing supply issue, the wrong housing will be built in the wrong areas, such as rural villages like Whittingham.</p> <p>Para 5.3.16 This quotes the 5yr supply in Preston at 3.8yrs using the figure 507 per year. This target remains unsustainable and is causing rural villages like Whittingham to be swamped by unsustainable housing development applications.</p> <p>How and why has the joint approach with Preston, Chorley and South Ribble been determined?</p> <p>Whittingham Parish has close ties with Longridge (in Ribble Valley). There is unplanned increase in new housing</p>	<p>Noted.</p> <p>The commitment of the Central Lancashire Authorities to produce a single Local Plan was first made at the meeting of the Joint Advisory Committee on 30th January 2018, where a commitment was made to work in collaboration on a single Central Lancashire Local Plan and to share the staffing and non-staffing costs to support this.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>development on the Whittingham / Longridge boundary.</p> <p>Para 5.26 and 5.27 (page 16) Refers to the high number of commuters between the existing 3 Central Lancs authorities.</p> <p>- Given the above development and the growth of the East Preston employment area, what research has been carried out to assess the commuter demographics between Longridge and Preston?</p> <p>Objective 1A1 (Table 14, p126) Talks about the need to ensure an appropriate mix of types, tenures and sizes of properties in relation to the respective levels of local demand and relevant to community requirements and ensure adequate infrastructure is planned alongside this.</p> <p>-Whittingham PC believes that Preston CC will not be able to adhere to this objective based upon current planning practice and the unsustainable housing supply target.</p> <p>Objective 1A3</p>	<p>Relevant research that has been undertaken has been specified in the IA scoping report.</p> <p>New evidence will come forward in future studies and the IA and the Local Plan will take this into consideration.</p> <p>Noted.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Talks of the need to ensure that the transport network can support and enable the anticipated scale and spatial distribution of developments. -Whittingham PC believes that the current scale of housing development proposed and in progress in Whittingham already makes this objective unachievable.</p> <p>Objective 1A9 Wishes to promote sustainable modes of transport. -Whittingham PC again forms the view that this is unachievable due to the scale of proposed development in the area.</p> <p>Objective 1A16 Talks of the need to respect, maintain and strengthen the local character and distinctiveness -Whittingham PC believes that the current scale of housing development across Whittingham will have destroyed the local character of the village area by the time the local plan comes into effect.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Objective 1A17 Talks of the need to support the development of previously developed land and other sustainable locations -Whittingham PC strongly supports this and believes the Whittingham Hospital site more than fulfils this objective for Whittingham.</p>	Noted.	
15.	Woodplumpton Parish Council 07/10/19	<p>Query how all 3 Local Plans can be incorporated into one document and whether this will lead to the loss of Policies protecting the rural nature of Individual villages.</p> <p>Concerned that the new Central Lancashire Local Plan will create further delay and confusion regarding when and where Traveller sites should be located.</p> <p>All 3 authorities have different housing targets - if a Central Plan is proposed, will all</p>	<p>The commitment of the Central Lancashire Authorities to produce a single Local Plan was first made at the meeting of the Joint Advisory Committee on 30th January 2018, where a commitment was made to work in collaboration on a single Central Lancashire Local Plan and to share the staffing and non-staffing costs to support this.</p> <p>The Central Lancashire authorities now have an up-to-date evidence base on the need for Gypsy and Traveller sites across the sub-region.</p> <p>Further detail in terms of housing requirements for the sub-region will be</p>	No amendments required.

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>3 Authorities still have their own housing targets - or will there be one figure for all 3 authorities to meet? How will the new Local Plan work in practice?</p> <p>No comments on the scope of the IA Objectives, which appear to cover the key issues already identified in the Core Strategy.</p>	<p>set out in the Central Lancashire Housing Study, which is currently being prepared as a key evidence document for the Local Plan.</p> <p>Noted.</p>	
16.	Grimsargh Parish Council 09/10/19	<p>The IA Framework and Objectives are welcomed by the Parish Council.</p> <p>Objective IA1 The Parish Council would like see included that where Parishes have Neighbourhood Plans, we would like to ensure that these are taken into account so that villages/areas are provided with the types of houses needed and identified in the plans.</p> <p>Objective IA9 The Parish Council would also like to see included in that section, transport which is accessible to all and fairly priced.</p>	<p>Noted.</p> <p>Neighbourhood plans can be added to Annex 1: PPPSIs. Requirements of the Neighbourhood Plan will be picked up through the Local Plan. Reference to Neighbourhood plans can be added to Chapter 4.</p> <p>Public transport improvements will be set out in the Local Plan. Transport planning is not under the control of the Local Plan,</p>	<p>Minor alterations made to the baseline info and to Annex 1: PPPSIs, to include reference to Neighbourhood plans.</p> <p>Minor alteration made to Objective IA9, to also refer to accessibility / inclusivity.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
			<p>but we are working closely with LCC preparing an updated transport plan for Central Lancs to address these issues. The price of public transport is outside the scope of the Local Plan. However, “accessible” can be added to the assessment criteria of Objective IA9.</p>	
17.	<p>Env. Agency 11/10/19</p>	<p>Paras 5.4.75-5.4.77: No reference to any United Utilities work in relation to public utilities infrastructure – is this an omission?</p> <p>Paras 5.4.76 & 5.4.87: If electricity demand is forecast to increase, are there any measures that the Local Plan could take to help reduce demand from new development (without replicating mandatory standards in Building Regs)?</p> <p>Para 5.6: Relevant Aims & objectives identified</p> <p>Bullet point 6 – doesn’t make sense and not sure what the objective relates to – is it seeking to avoid development in flood risk areas or carefully manage development in</p>	<p>A Para can be added about UU, and their Wastewater Management plan (2019) This can also be added to Annex 1: PPPSIs.</p> <p>A comment can be added to reflect these comments.</p> <p>Bullet point 6 can be amended to provide greater clarity.</p>	<p>Amendments made to the baseline information where appropriate.</p> <p>Minor alterations made to the assessment criteria of IA Objectives IA11, IA13 and IA14.</p>

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>flood risk areas? Either way, it would be better to have an objective that seeks to avoid inappropriate development in flood risk areas.</p> <p>Bullet point 7 – the production of a FRA in itself would not prevent inappropriate development in a flood zone. Developers can submit applications for development in inappropriate locations and try to justify it through a FRA (which would be a mandatory part of the application anyway). It is the application of national and local policies which will prevent inappropriate development. This objective needs to be reviewed.</p> <p>Bullet point 8 – clarification required – where the LPA has to allocate sites in a flood zone, they need to ensure compliance with the Sequential Test and Exception Test in the NPPF such that development cannot be accommodated elsewhere in the plan area and that it has wider sustainability benefits and will be safe for its lifetime.</p>	<p>Bullet point 7 can be amended to provide greater clarity.</p> <p>Bullet point 8 can be amended to provide greater clarity.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Bullet point 9 – say that SUDS will be required and that wider flood risk in the catchments should be managed using Natural Flood Management techniques to reduce flood risk downstream. Hard engineering options in surface water drainage systems should be the exception, not the rule...</p> <p>Bullet point 10 – Which new development should be able to deal with a severe flood event? Is this justifiable without being more specific?</p> <p>Para 5.8: Relevant aims and objectives identified: There is no reference to the provision of net gain in any of the objectives (as an objective of the government’s 25 yr environment plan) – preserving and halting habitat and species loss will not facilitate any net gains. Guidance on net gain delivery is likely to be forthcoming during the preparation of this plan so build it in early and be ambitious rather than delaying it and being challenged at a later date for not being bold? The value</p>	<p>Bullet point 9 can be amended to provide greater clarity.</p> <p>Bullet point 10 can be deleted.</p> <p>Para 5.8 can be amended to reflect these comments and in particular to refer to biodiversity net gain.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>of an undeveloped site before development could be quantified such that net gains proposed through development can be demonstrated. If on-site provision is not possible, provision off-site options for small sites or sites where on-site net gain cannot be delivered is an option?</p> <p>Para 5.8.33: The mitigation of harm to plants, animal and habitats as a consequence of development should not be confused with the provision of net gain. Development must still ensure that any impacts it may have on the natural environment are adequately mitigated in addition to the provision of environmental net gain as part of the development. The end result should be the creation of a better environment than that that existed prior to the development commencing.</p> <p>Para 5.9.4: While water demand has tended to reduce, will climate change have any potential impacts on this and in particular,</p>	<p>An additional para can be added after para 5.8.33 to clarify that development must still ensure that any impacts it may have on the natural environment are adequately mitigated, in addition to the provision of environmental net gain as part of the development.</p> <p>Text can be added to refer to the uncertainty over climate change and whether this could impact water resource availability.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>water resource availability? Is this something that needs to be accounted for?</p> <p>Objective IA11: there is no sub-objective that refers to securing net gains to the environment through development. The NPPF and NPPG promote net gain now, and an ambitious local plan should be looking to secure net gains through policies. Need to include an objective that references net gain.</p> <p>Objective IA13: Suggest rewording sub-objective from “Restrict the development of property in areas of flood risk, or ensure sufficient mitigation measures are put in place?” to two separate sub-objectives, i.e. “Has any inappropriate development been allowed in areas of flood risk?”; ..Prevent inappropriate devt taking place? and “Where no alternative sites are available, does development in an areas of flood risk have sufficient mitigation measures in place?”</p>	<p>Text can be added to the assessment criteria of Objective IA11 to refer to net gain.</p> <p>The wording of the assessment criteria of Objective IA13 can be amended as suggested.</p>	

	Consultee & Date received	Summary of comments / issues raised	Council response	Proposed change
		<p>Further, suggest re-wording of “Ensure that development does not increase flood risk due to increased run-off rates?” to “Ensure that development does not increase flood risk due to increased run-off rates and the use of SUDS are prioritised?”</p> <p>Objective IA14: compliance with WFD is mandatory where it applies, so this sub-objective needs to be reworded, i.e. “Ensure development complies with the Water Framework Directive”</p> <p>Further, the sub-objective relating to protecting water sources should be tightened up, i.e. “Promote management practices that will protect surface and groundwater from pollution?”</p>	<p>The wording of the assessment criteria of Objective IA14 can be amended as suggested.</p>	

Appendix 1

Full list of bodies consulted on the IA Scoping Report

Env. Agency	Theatres Trust
Historic England	Lancashire Gardens Trust
Natural England	Highways Agency
DEFRA	National Rail
Lancashire County Council	Northern Rail
Chorley Council	United Utilities
Preston Council	Npower
South Ribble Council	National Grid
West Lancs Council	Electricity North West
Wigan Council	Virgin
Bolton Council	Eon
Blackburn with Darwen Council	O2
Ribble Valley Council	UCLAN
Wyre Council	Lancaster University
Fylde Council	Runshaw College
Blackpool Council	Newman College
Lancaster Council	Blackburn College
Hyndburn Council	National Farmers Union
CBC Councillors	Wyre Rivers Trust
PCC Councillors	Ribble Rivers Trust
SRBC Councillors	Forest of Bowland AONB
Parish Councils	Centre for Ecology and Hydrology
RSPB	Marine Management Organisation
Groundwork	Mersey Rivers Trust
Cumbria Local Nature Partnership	Groundwork
The Wildlife Trust for Lancashire, Manchester & North Merseyside	Wyre Council Coast and Countryside Service
Ribble Rivers Trust	Yorkshire Dales National Park Authority
Wildfowl and Wetlands Trust	
Forest of Bowland AONB Partnership	
Centre for Ecology and Hydrology	
Marine Management Assoc	
West Penning Moors Partnership	
Canal and Rivers Trust	
Churches Conservation Trust	
Railway Heritage Trust	
Prince's Regeneration Trust	
The Landmark Trust	
The War Memorials Trust	
Royal Society of Arts	

