



## **Consultation Statement for Climate Change Supplementary Planning Document**

**December 2022**

Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out that a consultation statement must be prepared prior to adoption by the Local Planning Authority. This should include:

- (i) the persons the local planning authority consulted when preparing the supplementary planning document;
- (ii) a summary of the main issues raised by those persons; and
- (iii) how those issues have been addressed in the supplementary planning document.

### **Persons Consulted**

The Draft Supplementary Planning Document (SPD) was taken to the Council's Overview and Scrutiny Committee for consideration and comment on 11 July 2022. Following this, the Forward Planning team used the Local Plan consultation database (which has in excess of 1,000 consultees) to email all consultees notifying them of the consultation and inviting comments.

The documents were available on-line on the Council's planning pages and the consultation was advertised on the Council's news page and social media platforms and a press release was also issued. An article appeared in the Lancashire Evening Telegraph (20 July 2022) promoting the consultation. In addition to the Council's website, in accordance with Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the documents were also made available for inspection during normal office hours at the Council's offices at Futures Park in Bacup.

As well as the individuals and groups who had asked to be kept informed of planning policy updates, the designated 'specific' and 'prescribed' consultation bodies were consulted too. These included the Environment Agency; Natural England, Historic England, National Highways, Sport England. Lancashire County Council was also contacted as were adjoining authorities. As well as Rossendale residents and businesses, contact was also made with residents from outside Rossendale who have a keen interest in development matters within Rossendale.

The SPD was consulted on for 6-weeks from 13 July to 24 August 2022. Because this fell over the summer holidays it was considered best to extend the consultation period.

In total the Council received 21 responses plus the comments made by members of the Overview and Scrutiny Committee. Of these responses, 10 were submitted by residents, with one response submitted by a resident from adjoining authorities, and one from a town councillor. A planning agent submitted two responses on behalf of two housing developers – Taylor Wimpey and Rowland Homes. The remaining responses came from statutory consultees listed below:

- National Highways
- Sport England
- United Utilities
- Natural England
- Lancashire County Council
- Two consultees responded with no comments to make: the Coal Authority and Homes England.

## **Summary of the Main Issues**

Key themes raised included:

- concerns over the number, location and efficiency of on-shore wind turbines,
- acknowledgement of the importance of peat moorlands to provide multi-benefits such as carbon storage, recreational use and visual amenity,
- the ability of well-designed Sustainable Drainage Systems (SuDS) to create developments that can adapt well to climate change (eg reduce flood risk) and mitigate carbon emissions (eg tree planting, green roofs and walls).
- the importance of Active Travel not only to reduce carbon emissions but to enhance health and well-being
- more use to be made of renewable energy and EV charging points in new housing and by the Council

- concerns were raised regarding requiring a percentage of renewable schemes to be provided on major development sites in terms of viability.

Some of the issues raised were outside the remit of this SPD, such as United Utility's request for optional water efficiency standards or changes to Local Plan policy in respect of wind farms, which were raised by a number of residents. These are matters for the Local Plan.

### **Addressing these Issues**

The table at the end of this document (Appendix A) summarises each representation received, by whom and explains how these issues are being addressed in the final version. All the original comments can be viewed at [https://www.rossendale.gov.uk/downloads/file/17729/climate\\_change\\_spd\\_-\\_combined\\_responses](https://www.rossendale.gov.uk/downloads/file/17729/climate_change_spd_-_combined_responses).

The key changes made to the document as a result of the comments received include:

- addition of reference to active travel and key documents such as Gear Change, Uniting the Movement and Active Design Guide (p8)
- strengthening wording around improving links from new developments to cycleways (p10)
- insert wording about public transport (p13)
- more references added about the Lead Local Flood Authority and its pre-application service, the 4 pillars of SuDS and inserting a link to the SuDS proforma (p21, p22, 23, and 25).
- adding the role of peat in storing carbon, supporting rare wildlife and water regulation (p33)
- more examples of how biodiversity and green infrastructure can be improved (p32 and 33)
- a new section added for monitoring (chapter 7), linking with indicators already set in the adopted Local Plan and monitored annually through the Authority Monitoring Report.

## **Appendix A**

### **Actions taken to Address Issues Raised**

Where relevant deleted text is shown strikethrough and added text is shown underlined.

Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
1 National Highways	<ul style="list-style-type: none"> <li>• General support, no aspects to challenge</li> <li>• Demand for road transport will continue &amp; developments should promote modal shift whilst minimising the need to travel.</li> <li>• LP may need to consider policies to enable infrastructure associated with 0 carbon monitoring in the future.</li> <li>• Where development may affect drainage infrastructure near a strategic road network it needs to be demonstrated that surface water run-off can be accommodated within the design capacity of any culverts affected</li> </ul>	Comments noted
2 Peter Brown	Not enough accommodation for disabled provision in the SPD.	Comments are noted but not specifically applicable to the Climate Change SPD. An Equality Impact Assessment accompanies the Report to Cabinet
3 Edith Freeman	Comprehensive, and useful for people involved in the planning process.	No action needed
4 Gill Rothwell	Objects to the Grane Village application due to wildlife impact, flood risk and climate change	All allocations were assessed during the Local Plan examination. Not applicable to the Climate Change SPD.
5 David Cooper	<ul style="list-style-type: none"> <li>• Investing in green projects is not a good use of money.</li> <li>• small particles come from other sources than diesel engines, including electric vehicles - road sweepers with dampers may help this problem,</li> <li>• household support fund is a good idea,</li> <li>• wind turbines do not provide a consistent energy supply,</li> <li>• wood burning stoves should be restricted because of pm2.5 particles and NO2 gas</li> </ul>	Comments noted, no proposed changes.

Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
6 Gary Cunliffe	<ul style="list-style-type: none"> <li>• All new housing stock should be equipped with renewable sources of energy, power storage battery and EV charging points.</li> <li>• Ensure cycling routes are separated from the main road and press on with the trailhead centre at Lee Quarry.</li> <li>• Proposals for new cycling routes on the east of the valley and near schools, linking to the other end of the Valley.</li> <li>• Increase frequency of bus service (especially 464) in the mornings at schools' time.</li> <li>• Improve Council's actions eg turning lights off, switching to EV and using solar panels and power storage battery.</li> </ul>	<p>Section 3 - Adding a paragraph about public transport on page 13: <u>3.12 Public transport</u>  <u>The Local Plan supports the use of sustainable transport solutions including public transport.</u>  <u>When recommended by Lancashire County Council, planning contributions will be sought to improve bus services such as improving bus shelters.</u></p> <p>Other points noted.</p>
7 John Newcombe	<ul style="list-style-type: none"> <li>• There should be no future extension to Scout Moor wind farm.</li> <li>• There are costs implication of a net zero policy to households (£2000/year).</li> <li>• Moors are important for recreational use.</li> <li>• Peat is important for carbon storage and must remain undisturbed.</li> <li>• Reasons for refusal of the extension of the wind farm in Rossendale by Secretary of State still apply today.</li> </ul>	<p>Section 6 - Page 33, tenth bullet point:  Measures that provide multi-benefits in terms of biodiversity gain, flood risk resilience, carbon storage, provision of shade will be encouraged. For example, actions to restore moorlands will <del>also</del> be supported in order to increase biodiversity, <u>improve carbon storage</u>, slow the flow of water downstream, improve water quality and reduce erosion. <u>Moorlands also provide recreational opportunities and visual amenity to local communities.</u></p>
8 Chris Woods	<ul style="list-style-type: none"> <li>• Blanket bog and peat should not be disturbed by developments such as wind turbines and the habitat should be restored.</li> <li>• No new wind turbines should be built in Rossendale and restoration schemes should be put in place to restore blanket bog.</li> <li>• Comments raised at the 2019 hearing also apply.</li> </ul>	<ul style="list-style-type: none"> <li>• Restoration of moorlands is included in the Climate Change SPD Section 6 (page 33).</li> <li>• Renewable energy projects are supported by the Council subject to Policy ENV7 and other policies in the Local Plan (eg Landscape Policy ENV3). The Local Plan was adopted in December 2021.</li> </ul>

Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
9 Cllr Kim Olaolu	<ul style="list-style-type: none"> <li>All new builds should have wildlife friendly fencing or preferably mixed hedgerows which have multiple benefits.</li> <li>Native tree planting should be used to assist with climate change.</li> <li>Healey Dell nature reserve should be preserved and issues relative to fly-tipping and anti-social behaviour being dealt with.</li> <li>Trees should be protected especially those with nesting birds.</li> <li>Policies have not been translated into actions.</li> <li>Countryside and green spaces are important too for combatting climate change.</li> </ul>	<ul style="list-style-type: none"> <li>Section 6 - page 32, seventh bullet point: The Council will encourage measures to manage land more effectively to increase biodiversity and new development proposals must deliver a biodiversity net gain, with demonstration possible via the latest Defra Biodiversity Metric tool. <u>Also, wildlife fencing (eg 'Hedgehog Highways') and native species mixed hedgerows will be supported whenever possible.</u></li> <li>Section 6 - page 33, ninth bullet point: Greening measures such as planting new <u>native trees species</u> and creating green roofs or green walls will also be supported as it can contribute to the storage of carbon, a reduction of the urban 'heat island' effect as well as reducing airborne pollutants.</li> <li>The fly-tipping and anti-social behaviour at Healey Dell cannot be dealt with as part of the Climate Change SPD. The protection of trees is set out in conditions accompanying the grant of planning permissions and enforcement actions can be undertaken following the receipt of complaints.</li> <li>The Council will be producing an SPD on Biodiversity</li> </ul>
10 Bev and Geoff Rigby	<ul style="list-style-type: none"> <li>There should be no future extension to Scout Moor wind farm. There are costs implication of a net zero policy to households (£2000/year). Moors are important for recreational use. Peat is important for carbon capture and must remain undisturbed. Reasons for refusal of the extension of the wind farm in Rossendale by Secretary of State still apply today. Rossendale is privileged to have areas of peat and should work with partners to develop a programme to protect the moorlands.</li> </ul>	<ul style="list-style-type: none"> <li>Section 6 - Page 33, tenth bullet point: Measures that provide multi-benefits in terms of biodiversity gain, flood risk resilience, carbon storage, provision of shade will be encouraged. For example, actions to restore moorlands will <del>also</del> be supported in order to increase biodiversity, <u>improve carbon storage</u>, slow the flow of water downstream, improve water quality and reduce erosion. <u>Moorlands also provide recreational opportunities and visual amenity to local communities.</u></li> </ul>

Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
11 Anne Marie McKown	<ul style="list-style-type: none"> <li>• Building more turbines will not achieve a reduction in greenhouse gases and slow down climate change</li> <li>• Are large battery networks planned to compensate fluctuation of energy from wind turbines and solar panels?</li> <li>• More renewable energy will lead to more reliance on other sources of energy.</li> <li>• The grid infrastructure should be improved before building new wind turbines to avoid turbines being turned off.</li> <li>• Financial aspects of de-commissioning of wind turbines should be secured at planning application stage (eg Escrow account or decommissioning bond) to avoid Council's liability.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments are noted.</li> <li>• Battery storage is likely to form part of the ancillary infrastructure of wind turbines which is dealt with the 14th bullet point of Policy ENV7 in the Local Plan.</li> <li>• The financial aspects of decommissioning wind turbines is set out in the explanation text of Policy ENV7 (paragraph 271 of the Local Plan).</li> </ul>
12 Dr Falmai Youngman	<ul style="list-style-type: none"> <li>• Object to new wind turbines at Scout Moor.</li> <li>• Planning Inspector's decision of Scout Moor Public Inquiry still applies now.</li> <li>• Peat deposits should be protected. Moorlands should be protected for their heritage, fauna and flora through AONB or SSSI status.</li> <li>• There has been enough wind energy development in Scout Moor.</li> <li>• Off-shore wind turbines are more efficient than on-shore wind turbine and wind power might be too strong at this altitude.</li> <li>• There is a strong community resistance to new wind turbines at Scout Moor.</li> </ul>	Renewable energy projects are supported by the Council subject to Policy ENV7 and other policies in the adopted Local Plan (eg Landscape Policy ENV3)
13 Coal Authority	No specific comments.	No action needed



Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
14 Dr Alan Heyworth	<ul style="list-style-type: none"> <li>• Wind turbines should be avoided on deep peat, thin peat and areas which have or could have peat-forming vegetation. The policy instead of saying "avoiding areas of blanket bog and deep peat" should say "avoiding any activity likely to damage peat or to inhibit the expansion of peat cover".</li> <li>• No new turbines should be allowed on the moors.</li> <li>• Recycling cost of glass-reinforced turbines should be included in decommissioning cost.</li> <li>• Moorland should be protected for future generations.</li> </ul>	Policy ENV7 has recently gone through an Independent Examination and been adopted in December 2021 by the Council. The policy can be amended in the future as part of a Local Plan review.

<p>15 Sport England</p>	<ul style="list-style-type: none"> <li>• Suggest to strengthen the objective of section 3 to include 'Active Travel' eg walking, cycling and running with reference to the government agency 'Active Travel England' and to Sport England's 'Uniting the Movement' Strategy 2021.</li> <li>• Also reference to TCPA's 20-minute neighbourhood and Sport England's 'Active Design' guidance would be helpful to highlight the 10 principles to achieve an Active Environment.</li> <li>• Welcomes that green infrastructure is included as a means to mitigate climate change. Any proposals to increase cycling/ walking links or biodiversity on playing fields should be discussed with Sport England. There should be no loss of functional playing field and no impact on pitch provision. Council's Playing Pitch and Outdoor Sport Strategy (2021) can help inform appropriate climate change mitigation proposals affecting playing fields.</li> </ul>	<ul style="list-style-type: none"> <li>• Paragraph 3.2: Given the Net-Zero target and the fact that UK transport emissions have not decreased since the 1990s, developments must encourage greener and more active transport alternatives. <u>Active travel is championed by the Government agency 'Active Travel England' which objective is "for 50% of trips in England's towns and cities to be walked, wheeled or cycled by 2030".</u> <u>Linked to this is the policy paper 'Gear Change – A bold vision for cycling and walking' which sets out the Government's vision to deliver actions to encourage cycling and walking. As stated above active travel has health and well-being benefits and this is highlighted by Sport England's 'Uniting the Movement' strategy. In addition, an Active Design guide including 10 planning principles to increase active lifestyle in towns, neighbourhoods, streets and open spaces has been published by Sport England.</u> <ul style="list-style-type: none"> <li>• Insert footnotes: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf</a>; <a href="https://www.sportengland.org/about-us/uniting-movement">https://www.sportengland.org/about-us/uniting-movement</a> ; <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#the10principlesofactivedesign-5656">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#the10principlesofactivedesign-5656</a></li> <li>• Add footnote on page 9: Encouraging 'liveable neighbourhoods' (see Figure 1), where services are close and the need to use the car is reduced, will bring a variety of benefits, including cleaner air, healthier communities, and better resilience to climate change. Footnote: TCPA(2021) 20-minute neighbourhood: <a href="https://tcpa.org.uk/resources/the-20-minute-neighbourhood/">https://tcpa.org.uk/resources/the-20-minute-neighbourhood/</a></li> </ul> </li> </ul>
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<p>16</p> <p>Arup (on behalf of United Utilities)</p>	<ul style="list-style-type: none"> <li>• Pre-response: Advise to direct developers to use United Utility (UU) free pre-application service.</li> <li>• No development will normally be permitted over or in close proximity to UU asset.</li> <li>• Consideration of UU assets to be undertaken at masterplanning stage including consideration of landscaping proposals in the vicinity of the assets and any changes in level.</li> <li>• Response: Suggest following amendment in 'Energy Efficiency and Renewables' section: "Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are located on catchment land used for public water supply, careful consideration should be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures."</li> <li>• Request amendment in the Water section including adding definition of flood risk from PPG, highlighting risk of flooding from sewers and importance of consulting with sewerage undertaker; development should not displace surface water flood risk in particular to existing properties or highway;</li> <li>• reference to 4 pillars of SuDS; surface water hierarchy should have water re-use as priority; optional water efficiency standard of 110 litres per day per person; non domestic building to achieve BREEAM rating of Excellent; new wordings for multi-functional SuDS. Sewerage network in Rossendale dominated by combined sewers, any proposal to reduce surface water entering the sewer network is welcomed to reduce flood risk form sewers. Request further details to be</li> </ul>	<ul style="list-style-type: none"> <li>• Add text to signpost to UU's free pre-app service and relevant documents.</li> <li>• It is not appropriate to show details of water supply catchment land as this does not specifically relate to the purpose of this SPD, albeit it should be considered as a constraint on development in determining planning applications.</li> <li>• The LPA will encourage applicants to consult with UU at pre-app stage, and UU will be consulted on a planning application.</li> <li>• Much of the SUDs data has been added - eg from LLFA comments, and we will add risk of flooding from sewers - see LLFA comments below.</li> <li>• We cannot add optional standards for water efficiency as this has not been considered through Local Plan examination. Look to reference with opportunities for surface water management such as bio-retention tree pits and landscaping with SUDS - this is discussed in an example. Discussion with UU re. Biodiversity Net Gain to take place later this year.</li> <li>• Paragraph 6.11: Greening measures such as planting new <u>native tree species (including new tree-lined streets)</u> and creating green roofs or green walls will also be supported as it can contribute to the storage of carbon, a reduction of the urban 'heat island' effect as well as reducing airborne pollutants.</li> </ul>
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	<p>provided about water quality (referenced in policy ENV9) especially for proposals in groundwater source protection zones about risk assessment, masterplanning and construction management plan.</p> <ul style="list-style-type: none"> <li>• Biodiversity: BNG should not constrained infrastructure to respond to future growth so better to provide BNG off-site. Currently evaluating land ownership for BNG and would welcome discussion with LPA. Request that tree-lining streets requirement from NPPF is referenced in SPD with opportunities for surface water management such as bio-retention tree pits and landscaping.</li> </ul>	
17 Natural England	<p>Concerned at the lack of reference to peat deposits. Want to see greater consideration given to the importance of Rossendale's peat deposits in relation to carbon storage. Would welcome further discussion.</p>	<p>Paragraph 6.2: These include threatened, rare and sensitive habitats such as hedgerows, acidic grassland, native species broadleaved woodland, blanket bogs etc. <u>In particular, the Borough comprises large areas of moorlands including peat deposits that play an important role in storing carbon and, if restored into a functioning ecosystem, can act as carbon sink. The moorlands also have a significant role for rare wildlife as well as water regulation</u></p>
18 Lancashire County Council	<p>SuDS can and should contribute to the green infrastructure of an active transport network (eg swales) or traffic calming measures or low-traffic neighbourhoods (eg rain gardens, SuDS trees)</p>	

<ul style="list-style-type: none"> <li>• Need more robust links between local plan policies and SuDS pro-forma.</li> <li>• Would be useful to provide links to relevant flood risk maps in footnotes for bullet point 3 on page 18 and correct typo about LLFA.</li> <li>• Bullet point 4: link should be made to SuDS pro-forma that sets out evidence required to meet drainage hierarchy.</li> <li>• Bullet point 5: makes it appear SuDS not expected at detailed design stage which would be contrary to NPPF. LLFA expects sites to be designed with a "drainage first" approach as per SuDS manual, does RBC also expect this?</li> <li>• Should natural and artificial drainage features be mapped to be protected and integrated with SuDS and wider green infrastructure?</li> <li>• Natural features can also help meet Biodiversity Net gain targets and LLFA advise that site layout should be designed around these features.</li> <li>• Suggests the addition of the following to paragraph 1 on p19: "Policies, guidances and standard for managing surface water flood risk and the design of SuDS, or nay future replacements of the following, must be complied with when designing for and managing surface water: SuDS Pro-Forma and associated guidance; NPPF; PPG; The SuDS Manual (C753), Defra Technical Standard for Sustainable Drainage Systems; The LLFA Planning Advice."</li> <li>• Bullet point 2 p19: replace by "All applicants are advised to access the LLFA Planning Advice Service for technical advice on surface water and SuDS."</li> <li>• Provide specification on how development should not increase the risk of flooding elsewhere especially in relation to not displacing surface water flood risk.</li> <li>• Paragraph 1 p21 how SuDS will manage pollution for urban runoff? Should they provide an appropriate treatment train as per the SuDS Manual and Pro-Forma? A link to BNG could be added there.</li> </ul>	<ul style="list-style-type: none"> <li>• Page 23: The footnote 49 on flood risk maps is provided</li> <li>• Page 21, paragraph 5.2 third bullet point: Proposals should include the most up-to-date Flood Risk available from the Environment Agency, the Strategic Flood Risk Assessment, the Lead Local Flood Risk Authority and the sewage undertaker.</li> <li>• Page 22, paragraph 5..2 modify fourth bullet point: Development proposals are required to manage surface water using the drainage hierarchy in Figure 7. Applicants wishing to discharge surface water into a public sewer will need to submit evidence demonstrating why alternative options are not possible. <u>Please refer to SuDS Pro-Forma available on the LLFA website..</u></li> <li>• Page 22, fifth bullet point: In <del>early</del> <u>all</u> design phases, applicants will have to incorporate sustainable drainage systems and consider surface water management.</li> <li>• Page 22, paragraph 5.3: New developments shall incorporate appropriate Sustainable Drainage Systems (SuDs) in accordance with the <u>National Planning Policy Framework, Planning Practice Guidance, National Standards for Sustainable Drainage Systems, the SuDS Manual (C753), the SuDS Pro-forma and the LLFA Planning Advice.</u></li> <li>• Modify second bullet point on p23: Use should be made of the EA's pre-application planning service and the Lancashire LLFA Planning Advice Service. <del>Future planning advice on surface water by the LLFA is also expected this summer and should be considered before the submission of a planning application.</del></li> <li>• Page 23, fourth bullet point: As stated, preference should be to develop in lower risk areas (eg flood zone 1 and areas identified as at very low risk of surface water flooding 42). Please note that risks may increase with climate change. Where unavoidable, development should be safe through its lifetime and not increase risk elsewhere (<u>including not displacing surface water flood risk elsewhere</u>).</li> <li>• Page 25, paragraph 5.5: SuDS are designed to both manage the flood and pollution risks resulting from urban runoff, reducing pressure on the sewerage network,</li> </ul>
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	<ul style="list-style-type: none"> <li>• Provide examples of the multi-functionality and multiple benefits of SuDS (Susdrain). What are the exceptional circumstances a heavily contaminated site)?</li> <li>• Rephrase the second paragraph of p21 as LLFA should be taken into consideration when designing SuDS.</li> <li>• Part of Policy ENV9 relating to greenfield rate runoff should be expanded on in SPD.</li> <li>• Provide reference to The Flood Hub which is specific to the North West.</li> </ul>	<p>and to contribute wherever possible to environmental enhancement and place making. With this in mind, the multi functionality and multiple benefits of SuDS must always be considered <u>including their important for amenity and biodiversity.</u></p> <ul style="list-style-type: none"> <li>• Page 25, paragraph 5.6: .Also, <del>Lancashire County Council</del> as the LLFA recommendations on surface water management given via the <del>offers a surface water</del> planning advice service should be incorporated into new developments.</li> </ul>
	<ul style="list-style-type: none"> <li>• Stronger links with SuDS and surface water management should be made.</li> <li>• Green-blue infrastructure should be considered rather than just green infrastructure.</li> <li>• Bullet 3 p26 - no development shall occur within 8m of any ordinary watercourses culverting of watercourses should be avoided to ensure access for maintenance and reduce residual risk to adjacent properties. This buffer could be used to expand clough woodland and provide GI and water quality improvements, habitat creation, amenity.</li> </ul>	<ul style="list-style-type: none"> <li>• The term Green Infrastructure used in the SPD is the one defined in the Glossary of the NPPF and therefore it includes blue infrastructure <a href="https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary">https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary</a>.</li> <li>• Paragraph 6.1: For example, <u>the 8m buffer around waterways offers opportunity to plant native tree species to enhance amenity, biodiversity and improve water quality.</u></li> </ul>

<b>Ref No and Name</b>	<b>Key Issues Raised (Officer Interpretation of Comments)</b>	<b>Actions</b>
	<ul style="list-style-type: none"><li>• SuDS Pro-Forma should be updated to meet local requirements eg multifunctional SuDS.</li><li>• Better as separate appendix in order to update it more easily.</li><li>• Pro-Forma should be added to validation checklist.</li></ul>	Link to SUDs proforma added to footnote 43. It will be added to Validation Checklist too, when it is next updated, which is expected in the near future.

Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
<p>19</p> <p>Pegasus (on behalf of Taylor Wimpey)</p>	<ul style="list-style-type: none"> <li>• Welcome the Council’s proactive stance.</li> <li>• Refer to Taylor Wimpey’s interests in the housing allocations at Edenfield and Grane Village.</li> <li>• Recognise the scale of the environmental crisis and published an Environment Strategy in 2021, looking at climate change, nature, and resources and waste</li> <li>• Concerned that there are prescriptive requirements over and above current adopted Local Plan policy: <ul style="list-style-type: none"> <li>○ 10% on site renewable on all schemes above 10 dwellings and</li> <li>○ requiring minimum of equivalent Code for Sustainable Homes level 4 / 19% improvement on dwelling emission rate over the target emission.</li> </ul> <p>These are above requirement in local plan policies and have not been tested during the Local Plan Examination. Some requirements will also be superseded by changes to Building Regulations.</p> </li> <li>• Clarification needed on whether the checklist in appendix C will become an application validation requirement or will it be dealt as a condition.</li> <li>• Also clarification is needed as to whether schemes should demonstrate full compliance with checklist points or a demonstration on how the applicant has sought to meet them.</li> <li>• Criteria above local plan policies should be removed if full compliance is requested.</li> <li>• Also will Pro-Forma become requirement in validation checklist? Several requirements related to detailed design which might only become available later through the course of the application determination process or via condition.</li> </ul>	<ul style="list-style-type: none"> <li>• The Council considers that this requirement accords with the NPPF, the Local Plan objectives and the aspirations of the Council to reduce greenhouse gas emissions.</li> <li>• The Checklist is intended as a guide for developers to show how they've addressed these issues. It may be that questions are raised about why they haven't addressed certain items during determination of the planning application.</li> <li>• The Council will be updating its Validation Policy which will address issues such as surface water flooding from the LLFA's concerns. A statement setting out how the design will be adaptable to climate change will be required at validation stage (policy ENV1(q)).</li> </ul>



Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
20 Pegasus (on behalf of Rowland Homes)	<ul style="list-style-type: none"> <li>• Welcome the Council’s proactive stance.</li> <li>• Refer to Rowland Homes’ interests in the housing allocations at Edenfield and Grane Village</li> <li>• Concerned that there are prescriptive requirements over and above current adopted Local Plan policy:               <ul style="list-style-type: none"> <li>○ 10% on site renewable on all schemes above 10 dwellings and</li> <li>○ requiring minimum of equivalent Code for Sustainable Homes level 4 / 19% improvement on dwelling emission rate over the target emission.</li> </ul> </li> </ul> <p>These are above requirement in local plan policies and have not been tested during the Local Plan Examination. Some requirements will also be superseded by changes to Building Regulations.</p> <ul style="list-style-type: none"> <li>• Clarification needed on whether the checklist in appendix C will become an application validation requirement or will it be dealt as a condition.</li> <li>• Also clarification is needed as to whether schemes should demonstrate full compliance with checklist points or a demonstration on how the applicant has sought to meet them.</li> <li>• Criteria above local plan policies should be removed if full compliance is requested.</li> <li>• Also will Pro-Forma become requirement in validation checklist? Several requirements related to detailed design which might only become available later through the course of the application determination process or via condition.</li> </ul>	see above
21 Homes England	No comment	No action needed

Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
RBC Overview & Scrutiny Cmtee	<ul style="list-style-type: none"> <li>• Use of stronger language to require measures be undertaken.</li> <li>• The Council would be guided by LCC in relation to cycling plans and would work to identify where connections were needed. These would be recorded as formal comments on the SPD.</li> <li>• Rewording road safety figure, from footnote 12 – to be recorded as a formal comment.</li> </ul>	<p>Where appropriate the wording has been strengthened. Paragraph 3.8: "It will be important that cycleways and walkways integrate with the pre-existing local routes, rather than the traditional cul-de-sacs and winding roads" (see Figure 2). <u>Improving the links from new developments to existing and proposed cycleways must be considered by developers to encourage more cycling.</u></p> <p>This will result in areas that would naturally calm traffic and create more visibility for residents. The latter is particularly important, given that 24% of people do not cycle due to road safety concerns <u>and a further 16% note there is too much traffic or it is too fast.</u></p>