

# Burnley Local Plan: Preferred Options Consultation: Schedule of Comments Received and Recommended Responses

---

## Summary of Preferred Options Consultation

As part of the consultation under Regulation 18, consultation on a 'Preferred Options' draft of the Local Plan was undertaken.

- A Preferred Options document was prepared and approved by the Council's Executive for consultation in July 2016.
- A 6 week consultation on the Plan ran from 15 July to 26 August 2016.
- Responses were invited on the **Preferred Options Document, Policies Map** and any supporting studies or assessments including:
  - **Sustainability Appraisal (incorporating an SEA)**
  - **Habitats Regulations Assessment (HRA)**

## The number of Comments Received

Responses were received from 450 respondents making 1,272 comments. There were also two petitions with 67 and 21 signatories.

## How the comments and recommended responses are presented

- Comments are broken down to be considered against the part of the plan, process or evidence base study to which they best relate
- Responses to comments on the SA/SEA and HRA are published separately in the Proposed Submission SA and HRA reports
- All comments from Specific, General and Other consultees are set out verbatim and a recommended response to each comment is set out
- All comments from individuals, agencies and companies not relating to specific sites or consultation issues are also set out verbatim and a recommended responses to each comment is set out

- All comments on sites from site owners/promoters and from groups of residents specifically formed to respond to the plan are also set out verbatim and a recommend responses to each comment is set out
- All comments from other individuals relating to the consultation process are grouped as are their housing site comments and the number of respondents is set out and each unique relevant point raised is set out and responded to

Only matters relating to the plan, comments which represent the consultees own views (rather than suggesting the views of others) and comments which are appropriate for publication are included.

The comments received are available to inspect in full on request.

## Section 1 - Introduction

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Huntroyde Estate	Introduction	1.2.1	For clarity para 1.2.1 of the PI&O should state the plan's time period rather just say: - 'look ahead to 2032'. We are already well into 2016 and note the original timescale for consultation was estimated as January 2016 so there has been some slippage in timing already, so we question whether there will be a clear 15 year timescale, in line with NPPF, left from the date of adoption. This could therefore impact on housing numbers required and the need for additional housing and sites to be allocated.	Text amended to clarify the Plan period 2012-2032.  The Plan period 2012–2032 is 20 years and adoption is planned for 2018 when would have another 14 years to run. It is not considered necessary or proportionate review the plan evidence base to allow a further year. It is almost certain that the Plan will be reviewed before 2032.
Junction Property Ltd.	Introduction	1.2.1	<p>Plan Period</p> <p>Paragraph 157 of the NPPF encourages Local Plans to:</p> <p>“...be drawn up over an appropriate time scale, preferably a 15 year time horizon, taking account of longer term requirements, and be kept up-to-date.”</p> <p>Section 4 of the document states that the plan period relates to 2012 – 2032; however, as stated within the most up to date Local Development Scheme (2016 – 2019), the Preferred Options document was due to be released for consultation in January 2016, with the Local Plan expected to be adopted in March 2018. The Council has already slipped a few months against the timetable for production; and even if adopted in 2018 at the earliest, the overall Local Plan would have a lifetime of less than 15 years contrary to paragraph 157 of the NPPF.</p> <p>Our Client would recommend that the plan period be extended to 2033 or 2035 to ensure the Local Plan is drawn up over an appropriate time scale. An increase in the overall plan period would then require an amendment to numerous policies within the plan, including an amendment to the housing requirement to ensure the plan meets its objectively assessed needs over the plan period, which in turn would require the allocation of additional housing land.</p> <p>As drafted, the plan period is considered unsound and is not consistent with national policy</p>	The Plan period 2012–2032 is 20 years and adoption is planned for 2018 when would have another 14 years to run. It is not considered necessary or proportionate review the plan evidence base to allow a further year and a further three years as suggested is not necessary. It is almost certain that the Plan will be reviewed before 2032.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			and would not be effective in dealing with the plans requirements.	
Burnley Wildlife Conservation Forum	Introduction	1.3.2	Section 1 Introduction 1.3 'The Preferred Options Local Plan' on page 3 para 1.3.2's first bullet, 'Section 2 provides a concise geographic, economic and social portrait' has omitted 'environmental' which needs adding in order to be consistent with it being included in the last sentence of the last bullet and in page 4's para 1.4.3.	'Environmental' has been added to the text as suggested
Lancashire Wildlife Trust	Introduction	1.4 (Local Plan Context)	Reference is made on page 5 of the Preferred Options Document (July 2016) to the Local Enterprise Partnership (LEP) for Lancashire, but there is no references to the Local Nature Partnerships (LNPs) that cover Burnley, i.e. the Lancashire LNP and the South Pennines LNP. Whilst the Lancashire LNP is not active at the moment, the South Pennines LNP is. Both LEPs and LNPs are statutory consultees, and both should be referenced in the Burnley Local Plan.	Section 1 is intended only a brief introduction to the Local Plan and its context. It is not considered necessary to add reference to the LNPs here. The LNPs have been consulted on the Local Plan.

## Section 2 – Spatial Portrait

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
National Trust	Spatial Portrait	2.6.12	<p>National Trust objects to the final bullet raised in the Issues and Challenges facing heritage, i.e. "Where necessary, balancing the care of the built heritage with the economic and social imperatives of the present".</p> <p>This approach is contrary to the pursuit of sustainable development as set out in the NPPF, especially in paras 7 to 9. Particular attention is drawn to the statement at para 8 that: "These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system".</p> <p>Accordingly it is entirely inappropriate to 'balance' the care of the historic environment with economic and social imperatives; rather the approach should be one that finds ways whereby Burnley's heritage assets can be safeguarded and enhanced in a manner that will also secure economic and social benefits.</p> <p>Heritage led regeneration and promoting the role of heritage based tourism are both ways in which economic gains can be secured alongside the safeguarding and enhancement of the historic environment. In plan making such a strategic approach is advocated in the final bullet point of para 157 of the NPPF.</p>	<p>Whilst the comment and the content of the NPPF is noted, it remains a challenge on a practical level to balance these issues and as such it is a key issue for the plan and its policies to address. The words 'where necessary' have been removed.</p>
Cllr Cosima Towneley	Spatial Portrait	2.7 (Natural Environment)	<p>Key Issues &amp; Challenges:</p> <ul style="list-style-type: none"> <li>• Need for Bridleway provision and other formal sports, other than football, not acknowledged or provided for.</li> <li>• walking/cycling is written down – horse riding / equestrian use be added to make the statement fully inclusive and clear.</li> </ul>	<p>Whilst all sporting and leisure activities which support health and quality of life are important, it is not considered that this is a key issue in the context of this section.</p>
Burnley Wildlife Conservation Forum	Spatial Portrait	2.7.16 Local Nature Reserves	<p>Local Nature Reserves</p> <p>In the part of the Biodiversity section devoted to Local Nature Reserves, page 24 para 2.7.16 states 'the land area of LNRs in Burnley totals 8.27 ha.' However, the Natural Environment section devoted to LNRs, page 159 para 5.5.10, refers to Burnley's two LNRs (the Deerpond and Lowerhouse Lodges) totalling 12.3 hectares, referencing the figure used in Lancashire Wildlife Trust's 'Assessment of Community nominated LNR sites' 2008 report. For comparison, the</p>	<p>The total land area for LNRs has been revisited and is now consistently referenced within the relevant sections.</p> <p>For clarification, Lowerhouse Lodges LNR boundary is larger than that its BHS boundary and measures 10.12 ha. Deer Pond is 1.35ha. The total land area of LNRs is 11.47ha making a shortfall of 75.5ha when considered against Natural England's</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			Deerpond and Lowerhouse Lodges, both also being designated Biological Heritage Sites, their BHS areas are 1.3ha and 7.7 ha respectively, totalling 9ha. The correct hectare totals for each of the Deerpond and Lowerhouse Lodges LNRs need to be established and then totalled in order that the resultant shortfall LNR figure is accurate.	recommended target.
Burnley Wildlife Conservation Forum	Spatial Portrait	Para 2.8.19	Sports and Leisure Facilities Regarding the Borough's most important angling waters listed, page 28 para 2.8.19, Lowerhouse Lodges, Cornfield and Swinden Reservoir need to be added.	The text has been amended accordingly.
Highways England	Spatial Portrait	Para 2.8.4	<p>The Strategic Road Network (SRN) in Burnley Consists of the M65 Motorway between Junction 8 and Junction 10. The M65 provides an east-west link through Lancashire. It is noted that the section from junction 10 to the M65's eastern terminus at junction 14 is operated and maintained by Lancashire County Council.</p> <p>It is stated in paragraph 2.8.4 of the Burnley Local Plan Preferred Options report that capacity is constrained on the M65, particularly on the junction approaches and on the eastbound carriageway between junctions 9 and 10. The M65 Corridor Study indicated that the morning and evening peaks are predicted to approach capacity throughout the assessment period up to 2025. The build out of the Plan's development aspirations is likely to increase traffic demand at these already constrained locations.</p> <p>There are some highway safety concerns for the M65. The Route Safety Report for the M65 indicates the number of collisions at Junction 8 and Junction 9 is sufficient to require further investigation. There have been fewer collisions at Junction 10 and it has not been recommended for further study. It is noted that the M65 Route Safety Report identifies that the percentage of collisions occurring at these three junctions is reducing, compared to the previous study period.</p> <p>The A56(T) also forms part of the SRN, however the only section that falls within Burnley is between the M65 Junction 8 and the junction with A679.</p> <p>The M65 Route Safety Report has identified a number of collision clusters. However, with the exception of the junction with the M65 which is discussed above, the remaining clusters are all situated beyond the Burnley border.</p>	The Council has been liaising with Highways England with regard to impacts on the SRN and has commissioned via LCC a updated Highways Impact Assessment with input from Highways England to support and inform the Plan and the IDP.

<b>Organisation or Consultee</b>	<b>Preferred Options Plan Section</b>	<b>Preferred Options Policy Para</b>	<b>Preferred Options Comments</b>	<b>Recommended Response</b>
Canal & River Trust	Spatial Portrait	Section 2.7	Section 2 Spatial portrait and key issues  We welcome that the Leeds & Liverpool Canal is fully referenced as Green Infrastructure within section 2.7 'Natural Environment'.	Support noted.
Lancashire Wildlife Trust	Spatial Portrait	Section 2.7	The Trust is pleased to see, and supports the inclusion of, section 2.7 on the Natural Environment, in particular the section on Biodiversity on page 24 and the references to the site of International significance, County Biological and Geodiversity Sites, Ecological Networks, and Local Nature Reserves.	Support noted.
Natural England	Spatial Portrait	Spatial Portrait	Natural Environment and Landscape  Natural England welcomes the reference at to the National Character Areas, No. 35 Lancashire Valleys (2013) and No. 36 Southern Pennines (2012).	Support noted.

## Section 3 - Vision and Objectives

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Junction Property Ltd.	Vision & Objectives	Vision	<p>The development strategy for Burnley should support and facilitate sufficient employment and housing growth across the Borough. This will be essential in maintaining and enhancing the Borough’s competitiveness as a key location for commerce and industry in what has become an increasingly competitive market.</p> <p>Our Client has the following objections to the Vision which would ensure greater consistency with the wider development strategy contained in the Preferred Options document and the NPPF.</p> <p>Paragraph 47 of the NPPF requires Local Plans to meet the full objectively assessed needs for market and affordable housing.</p> <p>The third paragraph of “The Vision” currently states that the Vision for Burnley is by 2032:</p> <p>“The borough is a desirable place to live offering a choice of affordable high quality homes as well as a diverse range of high quality employment opportunities.”</p> <p>The housing stock in Burnley currently comprises a high percentage of poor quality terraced housing. Whilst there is a need to replace this housing stock with affordable high quality homes, the Vision should also seek to rebalance the housing market encouraging more aspirational market housing including detached and semi-detached properties. This will allow Burnley to compete against wealthier housing markets nearby and stem out migration of more affluent residents.</p> <p>Our Client would recommend amending the wording to read as follows:</p> <p>“The borough is a desirable place to live offering a choice of high quality family , aspirational and affordable homes, rebalancing the Borough’s housing market , meeting the needs of residents and supporting economic growth.”</p> <p>As drafted the Vision is considered unsound because it has not been positively prepared. The important of delivering new housing in Burnley to support its job-led strategy is significantly understated. This needs to be explicitly stated as part of the Vision to ensure greater consistency</p>	<p>The Vision is considered to reflect the points made by the respondent. Mentioning specific target groups such as families is considered too detailed a matter for the Vision but the word 'and' has been added as there are two separate but overlapping housing issues being addressed (quality and affordability) and the word 'aspirational' has also been added to strengthen this point. Objective 2 picks up this matter in more detail.</p>



Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			with the wider development strategy.	
Lancashire Wildlife Trust	Vision & Objectives	Vision	Whilst there are Objectives for The Natural Environment in section 3.2, the Vision for Burnley in section 3.1, does not make reference to, or have a vision for, The Natural Environment. Objectives are required to deliver a vision, hence the vision should include the elements that the objectives are delivering.	The Vision does make reference to the Borough's attractive countryside, network of green spaces and seeks significant improvements to the quality of the environment. The words 'natural and built' have been added to make clear the contribution green spaces make to both.
Natural England	Vision & Objectives	Vision	Natural England recommends the vision for the Burnley Local Plan includes reference to the natural environment and landscape. Also that they will be protected, enhanced and maintained. Links to greenspaces are mentioned and this is welcomed, although it is suggested that green infrastructure is specifically referred to in the vision given the importance of it throughout the rest of the plan.	The phrase 'attractive countryside' is used in the Vision rather than landscape and whilst this could be added it is not considered it would materially alter the Vision or related Objectives and as such is not necessary.  Green Infrastructure is more of a planning/technical term/concept and the language of the Vision is intended to be non-technical.
Home Builders Federation Ltd	Vision & Objectives	Vision	The HBF generally supports the vision and associated objectives.	Support noted
University of Central Lancashire	Vision & Objectives	Vision	UCLan support the vision of creating the borough as a hub of educational excellence and welcome the recognition of the University of Central Lancashire as part of this.	Support noted.
United Utilities Property Services	Vision & Objectives	Objective 1, 2 3	We fully support Objective 1 'Delivering Sustainable Growth' through the building of homes close to services, employment and shops and in areas accessible by public transport. This objective is fully in accordance with the NPPF aims and objectives of creating sustainable development. We would also highlight that new housing can also help to support existing rural communities and aid	Support for Objective 1 noted. The suggested additional text is considered unnecessary being too specific and detailed for this high level Objective.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>the retention of rural services, shops and facilities to the benefit of existing and future residents. Therefore, we would also suggest that such reference should be included as a means of delivering sustainable development within Objective 1.</p> <p>We also fully support Objective 2 Population and Housing: ‘To revitalise the housing market by encouraging a well-integrated mix of high quality, aspirational and affordable homes of different types and tenures to meet the needs of a wide range of households and support economic growth’.</p> <p>Currently within the Authority area there is a dominance of terraced properties as identified within the Council Strategic Housing Market Needs Assessment (May 2016) in comparison with other types. In order for the Council to achieve their vision for Burnley as a ‘place of choice’ a wider range of residential housing across various locations must be provided within the Authority to attract and retain a range of residents. To this end we also strongly support the various ways in which the Council identify that Objective 2 can be achieved by encouraging the range of housing mix to meet the needs of a wide range of households and support economic growth.</p> <p>In regards to economic development, we support Objective 3 Economy and Employment, creating an environment of prosperity, growth and entrepreneurship with a diverse business base’, particularly in regards to developing Burnley Town Centre as a sub-regional centre.</p>	Support for Objectives 2 and 3 noted.
University of Central Lancashire	Vision & Objectives	Objective 10	UCLan support the objective of establishing the borough as a centre of educational excellence. It is considered that this should be extended to include reference to retaining graduates within the borough.	Support noted. Whilst the retention of graduates, be they local residents educated at UCLan or elsewhere or graduates moving to learn or live and work in the borough, is very much in line with the Vision, it is not considered that this issue sits fully within Objective 10 as this objective focuses on educational infrastructure and opportunities. Other Objectives seek to provide the wider quality of life which will encourage and retain graduates.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Home Builders Federation Ltd	Vision & Objectives	Objective 2	The HBF generally supports the vision and associated objectives. Particular support is provided for objective 2 and the changes made since the Issues and Options consultation, which closely relate to our previous comments.	Support noted
Natural England	Vision & Objectives	Objectives	Objective: 5. To protect and enhance the borough's distinctive landscape character and high quality network of habitats and open spaces necessary for people and wildlife to thrive, is welcomed however it is recommended it is expanded to state the plan should protect and enhance habitats and species and help promote them as a key to sustainable development. Natural England recommends that this should be revised to reiterate the importance of the natural environment and include the commitment to protect, maintain and enhance.  Natural England recommends the inclusion of a specific Green Infrastructure (GI) objective or at least incorporated within the natural environment objectives within the Local Plan; this would link well with the associated GI policy.	This change of wording is not considered necessary as the Objective as drafted is felt to cover these points adequately and succinctly without going into unnecessary detail about the particulars of the policy approach of the Plan.
National Trust	Vision & Objectives	Objectives	In most respects the Objectives are welcomed and supported. But as with the section on issues and challenges a less than positive approach is adopted to the historic environment with unwarranted caveats being included. The Objectives should to a degree be aspirational and at the same time should take a positive approach to the role of the historic environment and the wider benefits that it brings to Burnley's residents, employees and visitors – not least in making Burnley an attractive and distinctive place in which to live, work and invest.  It is notable that phrases such as 'where possible' are introduced into Objective 8 but equally apply (or dis-apply) to all the Objectives.  Suggested changes are set out below:  "8 To ensure that the intrinsic qualities and character of the historic environment and its built heritage are protected, enhanced and promoted and that these assets are used positively to support regeneration and recreation and stimulate' pride of place'"	Support noted. Objective 8, unlike many of the other Objectives uses the word 'ensure' which is a strong intention and as such the words 'where possible' are considered necessary to recognise the limitations of the planning system
Junction	Vision &	Objectives	To achieve the Council's Vision Section 3.2 of the Local Plan sets out eleven 'Strategic Objectives' relating to sustainable growth, population and housing, economy and employment, the natural	Support noted

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Property Ltd.	Objectives		<p>environment, the built environment, accessibility, transport and other infrastructure and community involvement.</p> <p>In particular, Objective 2 seeks to revitalise the housing market by encouraging a well - integrated mix of high quality, aspirational and affordable homes of different types and tenures to meet the needs of a wide range of households and support economic growth.</p> <p>Our Client supports the Strategic Objectives, particularly Objective 2 as they are consistent with national policy, in particular the core principles outlined within paragraph 17 of the NPPF.</p>	
The Eshton Group	Vision & Objectives	Objectives	<p>It is an objective of the Local Authority that the Local Plan helps "to create an environment that supports economic prosperity, growth, entrepreneurship and a diverse business base".</p> <p>This statement is supported by The Eshton Group who recognise the opportunity that lies in front of the Council given its excellent position and connectivity to the wider areas. The Eshton Group are committed to bringing forward quality development which enhances the economic vitality and viability of Burnley as a whole.</p>	Support noted. The Council welcomes the commitment to bringing forward quality development within the borough.

## Section 4 - Strategic Policies

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Recommended Response
1473	Highways England	Strategic Policies	General	<p>Whilst the target growth in housing and employment has been quantified spatially, Highways England is keen to understand how this equates to increased traffic on the M65 and key junctions. Highways England would like to see the Local Plan present the Council's strategy for monitoring and accommodating this future growth so that we may understand its potential impact on the SRN. It would also be appropriate to comment upon the distinction between the expected natural growth and the borough's aspirational growth.</p> <p>The Local Plan has been prepared in cognisance of an evidence base. We have some concerns that the evidence base does not include technical transport studies. The Local Plan requires a sound evidence base to demonstrate whether the transport infrastructure measures will address the cumulative impact of the Plan's development aspirations and whether these measures are viable and deliverable. Highways England would like to see further evidence in the Local Plan so that it is possible to forecast the impact of proposed development aspirations on the existing highway network.</p> <p>Highways England would also like to consider what evidence is included in the accompanying Infrastructure Delivery Plan (IDP). The IDP is intended to identify the infrastructure requirements that arise out of the Local Plan's development aspirations. This 'living document' is periodically reviewed and monitored. The most recently published IDP, the Infrastructure Delivery Plan Baseline Report, sets out a high level baseline portrait of the existing transport network in Burnley. In future iterations of the document, Highways England would expect to see an expanded IDP to include a discussion on the interrelation with other transport network plans and strategies, including the Local Transport Plan, Growth Plans and Route Based Strategies. The expanded IDP should also seek to identify what transportation infrastructure schemes are needed to deal with the consequences of this aspirational growth. Modelling work should also be undertaken understand baseline and future year conditions, factoring in natural growth, the potential for behaviour change, the consequences of the aspirational growth and the impact of the mitigation schemes.</p> <p>We would welcome working with the Council as the Local Plan progresses in order to understand any implications for the SRN and how these impacts may be minimised and mitigated.</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.</p>
1470	Highways	Strategic	General	Highways England is overall supportive of the strategy and objectives set out in the	Support noted.

	England	Policies		Plan and the aspirations to support economic prosperity and deliver sustainable growth alongside housing and employment growth. We are also welcome the aspiration to improve connectivity to major cities and provide infrastructure that supports sustainable economic growth and travel patterns.	
1958	Canal & River Trust	Strategic Policies	Green Infrastructure Key Diagram	Green Infrastructure key Diagram We welcome the inclusion of the Leeds & Liverpool Canal within the figure 6.1. (Figure 5)	Support noted
1539	Junction Property Ltd.	Strategic Policies	SP1	The delivery of sustainable development is at the heart of national planning policy set out within the NPPF. Our Client continues to support the need for high-quality sustainable development.  The wording of Policy SP1 largely reflects the wording of paragraph 14 of the NPPF in relation to the presumption in favour of sustainable development for decision taking; however, Part 3b) of the policy fails to clarify the specific policies in the NPPF which indicate that development should be restricted. Our Client therefore recommends that Part 3b) of Policy SP1 is altered to reflect Footnote 9 of the NPPF.	A footnote has been added to Policy SP1 3(b) which reflects the wording of Footnote 9 of the NPPF.
1760	Lord Shuttleworth	Strategic Policies	SP1	We agree with the Council in that the purpose of planning is to achieve the delivery of positive sustainable development. As such, we support the inclusion of Policy SP1, as this is in accordance with the presumption in favour of sustainable development which is a Core Principle of the National Planning Policy Framework (NPPF).	Support noted.
2156	Coates / Mulbury Land	Strategic Policies	SP1	PWA Planning act on behalf of Messers Coates and Mulbury Land, in respect of land at Crow Wood, Burnley.  The Local Plan preferred options document is (therefore) not considered to be “sound”, and in particular Policy SP1 is considered to be unjustified in that it seeks to pursue a strategy which is unlikely to result in sufficient housing development to meet the identified housing needs of the borough. It is therefore considered that the plan has not been “positively prepared” as the strategy will not meet the objectively assessed need for development. Moreover it is not “justified”, when considered against reasonable alternatives, as there is a clear opportunity to release further land from the Green Belt and to allocate a number of additional appropriate sites, which can help to meet the requirements set out in the Plan and in particular the types of aspirational housing identified within the SHMA.	The wording of Policy SP1 reflects the wording of the NPPF. Inclusion of such a policy has been requested by other Inspectors at Local Plan Examinations.
1942	Burnley, Pendle and Rossendale Green Party	Strategic Policies	SP1	Achieving Sustainable Development.  Paragraph 4.1.5 of the Plan states that “policies in Local Plans should follow the approach of the presumption in favour of sustainable development”. The implementation of the term ‘sustainable development’ within the Plan is heavy on the development and light on the sustainable, rendering the use of the term	Whilst the NPPF does not specifically use the term 'balance' in reference to the three roles of the planning system in relation to sustainable development (economic, social and environmental) and seeks gains for all three, it is considered that the plan is consistent with the NPPF and clearly seeks gains for all three but it recognises the these can, on an issue

				<p>misleading. Without a serious interpretation and use of the term ‘sustainable development’ the Plan does not comply with the NPPF.</p> <p>Paragraphs 4.1.1 and 4.1.2 of the Plan respectively set out UN resolutions defining ‘sustainable development’ and the NPPF’s adherence to them. Yet in paragraph 4.1.3, the Plan undermines the interpretation and spirit of the definition without explanation by suggesting that environmental and social protections are to be ‘balanced’ with economic competitiveness. The narrative of the Plan then equates ‘balancing’ economic competitiveness with ‘compromising’ on environmental and social sustainability, thereby overruling the presumption of ‘sustainable development’. This makes a mockery of planning for a future based on ecological and social justice whilst also letting developers off the hook and providing an economic trump card for unlimited growth on a planet with finite resources. The absence of logic is stark.</p>	<p>by issue or site by site basis, pull in different directions so they do need to be balanced. It is not accepted that the plan provides an economic trump card for unlimited growth. The Plan does need to be consistent with the NPPF which seeks to significantly boost the supply of housing.</p>
1511	Huntroyde Estate	Strategic Policies	SP1	<p>Policy SP1 on achieving sustainable development which reflects the wording of NPPF para 14 is supported by our client.</p>	<p>Support noted.</p>
1854	Mrs Joanne Regan	Strategic Policies	SP2	<p>Contextural Information/comment on Issues and Options and Burnley Local Plan:</p> <p>Whilst acknowledging that the Burnley Local Plan must and should act within the context of national Planning policy (Local Plan 1.4.2), it cannot be overemphasised that Burnley’s policies cannot be straightjacketed into those of other regions. “The NPPF and National Planning Practice Guidance (NPPG) both indicate that the latest population and housing projections should be used as the starting point for assessing the future housing needs through the SHMA” (Local Plan 4.2.5).</p> <p>Two factors in particular mean that Burnley’s housing priorities are radically different from, for example, London and the South East. The population figures confirm the population decrease. ‘Between 1991 and 2011 Burnley’s population fell by 4.5% in stark contrast to a 12.7% rise in England as a whole’.(Local Plan 2.2.1) Moreover the projected population by 2032 indicates that the figures remain static or show a modest fall (Local Plan 2.2.2) while the population of the country of a whole is likely to rise considerably. The second factor is in the significant number of empty houses in the Borough (2458 Or 6.03% of the overall housing stock) compared to 2.62% in England as a whole (Local Plan 2.3.5). Therefore I contest the need for the large increase of property. I would encourage the council to continue with demolishing substandard old terraced property and the building of new property on Brownfield sites within the areas closer to the town centre and employment opportunities, as for example in Burnley Wood, particularly since 32% don’t own a car. This is what Burnley needs to reduce deprivation and make it more sustainable. The council should concentrate their efforts here and not on Greenfield sites and increasing rural development.</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan’s Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such this does not need to be expressed as a minimum.</p> <p>National policy requires Local Plans to meet the identified OAN in full. Local Plans need to be consistent with national policy.</p> <p>The bringing back into use of empty homes is very much supported in the Plan. This has the benefit of reducing development pressures on the countryside and open spaces and helping to address environmental social and economic issues in areas affected by high vacancies. In terms of formally counting a specific number of these as part of the plan’s land supply, experience at other Plan examinations has shown that these figure have to be based on specific programmes/actions. The figures used may therefore be conservative estimates as it</p>

					<p>is hoped and anticipated that the market will respond to the Plan's wider aspiration for improved economy and environment and address a greater number of these.</p> <p>A vacancy rate of around 3% is generally accepted as being a normal rate to allow the market to function or 'churn'. It would be inappropriate to rely predominantly on the refilling of vacant stock above this 3% figure to meet the housing requirement. These will often be smaller or poorer quality properties and will not meet the need of all residents e.g. energy efficient, adaptable housing or 'family' housing with off road parking and gardens consistent with national policy and the Plan's vision and objectives.</p> <p>Development is ongoing within the Borough's inner urban areas to replace some older terraced housing stock with new housing. This development forms an important part of the Borough's housing supply during the Plan Period.</p>
1316	Mr Roger Wheeldon	Strategic Policies	SP2	<p>The proposed housing policy which purports to flow from the Nathaniel Lichfield housing study does not in fact do so in a clear and demonstrable way. They reach an assessment of housing numbers based on demographic changes both historic and recent together with projections and reach a mid scale number of net new houses needed. However the number of new houses they determine is needed is then almost doubled as they apply a growth factor based on the idea of growing the number of working age people who can in some way be persuaded to stay in or migrate to the borough based on a jobs growth projection from Amion. The employment study which supposedly supports that conclusion does not anywhere show a historic precedent in the borough for such growth , in fact they are projecting job growth figures never achieved in the last 20 years and claiming these levels can be achieved and sustained for the next 15 years +. Nowhere is it shown how employment in the borough can be grown by anything like the numbers they claim , just providing or allocating additional employment land will have little influence on the locational decisions of companies in a region which has little shortage of employment sites. There is no appreciable government assistance available to encourage such incoming companies or for established ones to grow and following the decision to leave the EU the region as a substantial beneficiary of aid from them can expect to be a net loser of employment assistance for the foreseeable future. If as I believe it to be the employment projections are based on an utterly unproven wildly optimistic figures then as a consequence 50% of the net housing needs that are claimed to support the allocations disappear. This is further exacerbated by the EU exit as the net migration from EU countries can be expected to go into reverse now as new EU migrants into the borough substantially decrease</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>Providing allocations for employment development is one very important way that development can come forward. This is evidenced by the site acquisition and consequent development of the Burnley Bridge Business Park which was an employment allocation in the 2006 Local Plan.</p> <p>It is not yet possible to predict the impacts of Brexit on the Proposed Submission Local Plan.</p> <p>The Proposed Submission Local Plan includes a mix of brownfield and greenfield sites, and whilst the new</p>



				<p>and the chance of none UK residents returning to their countries of origin increase.</p> <p>The housing allocation policy which is based on this flawed employment policy also leads to a discrepancy in the type and location of sites being proposed. As there is no demonstrable need in the town itself and substantial incomplete allocated or consented sites there just adding more town centre brownfield sites will not assist with this employment growth policy because the "stakeholders" claim what is needed are large 3/4bedroom homes in edge of centre , urban / greenfield fringe sites. This leads to this policy document with a strikingly disproportionate number of greenfield sites being proposed in complete contradiction to one of the overarching requirements that the plan as a whole and site allocations be sustainable one arm of which is to reuse existing brownfield sites before turning to greenfield ones. In effect the whole employment and housing policies are based on a concept of socially engineering the demographic profile of the borough to increase the income profile of its residents. The argument seems to be that if enough attractive greenfield sites are allocated and in due course large 3 4 bedroom houses built in these attractive fringe locations this will retain or attract a certain bracket of resident the borough are currently either losing or not attracting. To substantiate this a circular argument has to be entered into whereby wildly optimistic employment figures are projected and at a skill and salary level sufficient to purchase these large houses , it is unclear however as it is circular and based on very long complex "evidence" documents whether the policy justification is that the jobs will come first and demand arise from the workers or if the new big houses will attract the managers and entrepreneurs who will create the business's. What will happen however is that the policy will further exacerbate the hollowing out of the town with the more difficult less profitable sites in the town centre standing empty indefinitely while house builders</p>	<p>development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary, the focus of the Plan's housing sites remains on brownfield land and on land within the urban areas.</p>
2103	Mrs Sue Goodfellow	Strategic Policies	SP2	<p>Regional Planning and its Impact on Burnley</p> <p>I challenge the assertion that Burnley has an increasing housing need.</p> <p>Many houses in the town are empty, property prices and the annual increase rate lags the national average because of low demand in this area. The council has recently been demolishing housing in Burnley. Adding to the housing stock in the hope that this will drive employment into the area appears to be flawed logic. In November 2012 news reports stated that Burnley had the highest empty house percentage in England. Almost 3000 properties (7.36%) were empty. This came from a report by the charity Empty Homes. I understand that this still stands at around 2000, partly due to demolition of some of the properties and undoubtedly due to the council's rehousing initiatives.</p> <p>Priority should be given to property renovation in areas with empty houses and</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>National policy requires Local Plans to meet the identified OAN in full. Local Plans need to be consistent with national policy.</p>

				<p>new-build on the bulldozed land. This is required before developing outside the confines of the heart of the town</p> <p>Burnley has low house prices, appropriate for the high number of low income families in the area. I question whether Burnley needs more higher priced houses, that would be required until the area grows its base of higher paid jobs. Currently many skilled and high paid jobs have left the area and yet more are doing so. I challenge the assertion that commuters will come to Burnley to commute to Manchester, Preston and Leeds, etc.</p> <p>Burnley has lost the higher paid, skill based jobs, eg: in Finance and Precision Engineering. Increasing the wealth in an area is driven by the employment base rather than the high quality of the housing. Burnley need to stop people leaving the area. Not simply attract new people to use it as a commuter town. That kills the character of the town.</p> <p>Why build aspirational homes when Burnley offers little in the way of retail shopping, cultural venues, restaurants, sports facilities, etc. that would appeal to higher paid residents.</p> <p>The Local Plan states that Burnley has had a falling population, the national average is rising, particularly in London and the South East. The plan for Burnley should not be driven by government measures to address housing issues in London and the South East, rather it should be driven by local needs. The proposed Local Plan will detrimentally impact on the rural community around Burnley. The Localism Act of 2011 puts an onus on planning authorities to consider the needs and wishes of local communities.</p>	<p>The bringing back into use of empty homes is very much supported in the Plan. This has the benefit of reducing development pressures on the countryside and open spaces and helping to address environmental social and economic issues in areas affected by high vacancies. In terms of formally counting a specific number of these as part of the plan's land supply, experience at other Plan examinations has shown that these figure have to be based on specific programmes/actions. The figures used may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan's wider aspiration for improved economy and environment and adress a greater number of these.</p> <p>A vacancy rate of around 3% is generally accepted as being a normal rate to allow the market to function or 'churn'. It would be inappropriate to rely predominantly on the refilling of vacant stock above this 3% figure to meet the housing requirement. These will often be smaller or poorer quality properties and will not meet the need of all residents e.g. energy efficient, adaptable housing or 'family' housing with off road parking and gardens consistent with national policy and the Plan's vision and objectives.</p>
1333	Mr Kenneth Duxbury	Strategic Policies	SP2	<p>Having attended the meeting on Thursday August 11th I would like to make the following comments. As I have stated previously, I do not believe that there is any need for new housing in Worsthorne and would have many concerns if housing was built. I do, however, see the need for a local plan that makes provision for aspirational housing and affordable housing for the families of existing villagers.</p>	<p>National policy requires Local Plans to meet the needs and demands of all new and existing residents and also supports in principle the provision of new housing in villages. The Plan must be consistent with national policy.</p> <p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision</p>

					<p>and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>The provision of affordable housing would be sought on sites of over 10 units in line with Policy HS2. The Plan does not propose that the non affordable housing would be occupancy restricted.</p>
1860	Mr Michael Regan	Strategic Policies	SP2	<p>Contextural Information/comment on Issues and Options and Burnley Local Plan:</p> <p>Whilst acknowledging that the Burnley Local Plan must and should act within the context of national Planning policy (Local Plan 1.4.2), it cannot be overemphasised that Burnley’s policies cannot be straightjacketed into those of other regions. “The NPPF and National Planning Practice Guidance (NPPG) both indicate that the latest population and housing projections should be used as the starting point for assessing the future housing needs through the SHMA” (Local Plan 4.2.5).</p> <p>Two factors in particular mean that Burnley’s housing priorities are radically different from, for example, London and the South East. The population figures confirm the population decrease. ‘Between 1991 and 2011 Burnley’s population fell by 4.5% in stark contrast to a 12.7% rise in England as a whole’. (Local Plan 2.2.1) Moreover the projected population by 2032 indicates that the figures remain static or show a modest fall (Local Plan 2.2.2) while the population of the country of a whole is likely to rise considerably. The second factor is in the significant number of empty houses in the Borough (2458 Or 6.03% of the overall housing stock) compared to 2.62% in England as a whole (Local Plan 2.3.5). Therefore I contest the need for the large increase of property. I would encourage the council to continue with demolishing substandard old terraced property and the building of new property on Brownfield sites within the areas closer to the town centre and employment opportunities, as for example in Burnley Wood, particularly since 32% don’t own a car. This is what Burnley needs to reduce deprivation and make it more sustainable. The council should concentrate their efforts here and not on Greenfield sites and increasing rural development.</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan’s Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such this does not need to be expressed as a minimum.</p> <p>National policy requires Local Plans to meet the identified OAN in full. Local Plans need to be consistent with national policy.</p> <p>The bringing back into use of empty homes is very much supported in the Plan. This has the benefit of reducing development pressures on the countryside and open spaces and helping to address environmental social and economic issues in areas affected by high vacancies. In terms of formally counting a specific number of these as part of the plan’s land supply, experience at other Plan examinations has shown that these figure have to be based on specific programmes/actions. The figures used may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan’s wider aspiration for improved economy and environment and address a greater number of these.</p> <p>A vacancy rate of around 3% is generally accepted as being a normal rate to allow the market to function or ‘churn’. It would be inappropriate to rely predominantly on the refilling of vacant stock above this 3% figure to meet the housing requirement. These will often be smaller or poorer quality</p>

					<p>properties and will not meet the need of all residents e.g. energy efficient, adaptable housing or 'family' housing with off road parking and gardens consistent with national policy and the Plan's vision and objectives.</p> <p>Development is ongoing within the Borough's inner urban areas to replace some older terraced housing stock with new housing. This development forms an important part of the Borough's housing supply during the Plan Period.</p>
1761	Lord Shuttleworth	Strategic Policies	SP2	<p>2.3 Policy SP2 'Housing Requirement 2012-2032'</p> <p>2.4 It is considered that the Council should look to adopt a pro-growth scenario when considering the housing requirement for the Borough. This will enable the Council to boost significantly the supply of housing which is a Core Principle of the National Planning Policy Framework (NPPF).</p> <p>2.5 In line with the NPPF (paragraph 47), local planning authorities should use an evidence base "to ensure that their Local Plan meets the full, objectively assessed housing needs for market and affordable housing in the housing market area" in so far as this is consistent with the other policies in the NPPF.</p> <p>2.6 We note that the Burnley Borough SHMA (June 2016), prepared by NLP, is the most up to date assessment. The study identified an OAN range from within the overall scenario range as 2,344 to 4,308 net additional dwellings over the plan period, the equivalent of 117 to 215 dwelling per annum (dpa).</p> <p>2.7 As the NPPF promotes to boost significantly the delivery of housing it is important for the Council to plan positively and to plan for growth. Whilst we acknowledge that the Council has identified a housing requirement figure which sits towards the top of the OAN range, it is considered the Local Plan could be even more positive to attract investment into the local economy, creating new jobs in construction and the supply chain and improving community infrastructure.</p> <p>2.8 It is important that the Local Plan provides for sufficient housing to meet the need and demand for housing and to attract and retain economically active residents who will contribute to the long term economic growth and social wellbeing of the borough.</p> <p>2.9 It is therefore proposed that the annual housing delivery should be increased from 209 to 215 net dwellings. This slight increase only increases the rate by 6 dwellings per annum but provides an additional 120 dwellings over the Plan period. This is considered to pursue a pro-growth agenda which is in compliance with the</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>The requirement is 209 per annum rather than 215 to take account of the fact that the council considers that the levels of vacancy in new housing delivered during the Plan period will be lower than in the existing housing stock.</p> <p>The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all sites put forward for development or identified from what are known as 'desk top' sources. All of these sites were assessed for their availability, suitability and achievability to see if they are 'developable'. The SHLAA found that there were more than sufficient developable sites outwith the Green Belt to meet the proposed housing land requirement set out in Policy SP2 and the release of Green Belt land for housing is not therefore justified.</p>

				<p>NPPF.</p> <p>2.10 In line with this slight annual increase, we therefore suggest that Policy SP2 should be amended so that “over the 20 year period from 2012 to 2032 provision will be made to deliver around 4,300 net additional dwellings, equating to an indicative average of 215 dwellings per annum”. The Residual Requirement to be met by site allocations should therefore be amended to 2,873. Following this change, there will be a requirement to allocated a further 120 dwellings.</p> <p>2.11 It is considered this amendment is still realistic and deliverable and is a scenario that will help meet the vision and objections of the Plan which promotes a thriving economy. It will also help meet the current shortfall of affordable housing.</p> <p>2.12 This amendment should be replicated throughout the document; not just at Policy SP2.</p> <p>2.38 Furthermore, we do have concerns over the identified OAN. As set out above, to Policy SP2, we suggest that the housing requirements should be amended so that “over the 20 year period from 2012 to 2032 provision will be made to deliver around 4,300 net additional dwellings, equating to an indicative average of 215 dwellings per annum”. The Residual Requirement to be met by site allocations should therefore be amended to 2,873. Following this change, there will be a requirement to allocated a further 120 dwellings.</p> <p>2.36 As such, to ensure the most deliverable sites are identified for allocation and that the most appropriate OAN is met, we suggest the Council undertakes a more detailed Green Belt Review and looks to allocated the following two sites for housing:</p> <ul style="list-style-type: none"> <li>· Land at Bullions Close (north Burnley)</li> <li>· Land at Cornfield Grove (north Burnley)</li> </ul> <p>Please see Appendix A for site location plans.</p> <p>2.37 Both the above sites are within the sole ownership of our client’s, Lord Shuttleworth, Tom Kay-Shuttleworth and Lord Shuttleworth’s 2011 Discretionary Settlement. According to the Proposals Map the two sites at Cornfield G</p>	
1495	Home Builders Federation Ltd	Strategic Policies	SP2	<p>Policy SP2: Housing Requirement 2012-2032</p> <p>The policy identifies a net housing requirement of around 4,180 dwellings over the plan period at an average rate of 209 dwellings per annum. It is considered that the policy would be more positively worded if ‘around’ were replaced by ‘at least’. This would also fulfil the NPPF requirements for plans to be positively prepared and</p>	In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.

			<p>boost significantly the supply of housing.</p> <p>The HBF notes that the proposed housing requirement is above the three options consulted upon at the Issues and Options stage. This is supported and generally conforms to our previous comments. We would, however, like to make a number of comments upon the methodology, market signals, proposed housing requirement and sources of supply. These are set out separately below.</p> <p><b>Methodology</b> The methodology undertaken to identify the objectively assessed need (OAN) for housing is provided within the 2016 Burnley Strategic Housing Market Assessment (2016 SHMA), undertaken by NLP on behalf of the Council. This methodology is recognised and generally considered appropriate. It is notable that the methodology employed by NLP has been accepted as being sound in numerous Local Plan examinations including neighbouring Pendle, with whom the Council share a Housing Market Area. Whilst recognising and supporting the methodology the HBF do make the following observations.</p> <p>The modelling utilises the 2012-based sub national household as its starting point. This was correct, as it was the most up to date at the point of publication. These projections have since been updated by the 2014-based projections. In comparison the latter 2014-based projections show a higher starting point over the plan period. These are set out in the table below.</p> <table border="0"> <tr> <td>2012-based</td> <td></td> </tr> <tr> <td>55</td> <td></td> </tr> <tr> <td>2014-based</td> <td></td> </tr> <tr> <td>65</td> <td></td> </tr> <tr> <td>Difference</td> <td></td> </tr> <tr> <td>10</td> <td></td> </tr> </table> <p>The 2014-based projections identify a 10dpa increase upon their 2012 counterparts over the plan period. Whilst it is recognised, due to the development of other scenarios, this is unlikely to significantly alter the OAN position the impact of the 2014-based projections should be modelled prior to the next stage of consultation.</p> <p>The modelling of the OAN necessarily makes a number of assumptions, these are set out at paragraph 6.4 of the 2016 SHMA. These are generally considered appropriate, although the HBF would like to see further information and justification for the proposed economic activity rates, unemployment rates and labour force ratio.</p>	2012-based		55		2014-based		65		Difference		10		<p>This study identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such it is not considered necessary to exceed this requirement; this is not a requirement of national policy.</p> <p>There is no double counting of the empty properties element of the supply. The figures used is based on specific empty homes programmes and may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan's wider aspiration for improved economy and environment and address a greater number of these.</p> <p>It is considered that the windfall element of the supply is robust being related to past tend of small brownfield windfalls only.</p> <p>It is not agreed that the NPPF requires the Sedgfield method of addressing any undersupply and a number of appeal decisions and Examination Inspector's Reports prefer the Liverpool (residual) approach. Which approach is appropriate depends on local circumstances. The rolling 5 year land supply and the method of addressing 5 year land supply in the Plan can also differ. The Liverpool method is that preferred in the Plan.</p>
2012-based																
55																
2014-based																
65																
Difference																
10																

				<p>Market signals</p> <p>The 2016 SHMA provides a comprehensive assessment of market signals within chapter 4. The HBF agree with the conclusion that they generally do not appear to warrant a significant uplift to the demographic starting point. It is, however, notable that whilst still significantly lower than the national average the affordability of housing is gradually getting worse within Burnley. The lower quartile house price to earnings ratio increased from 2.37 in 2013 to 2.71 in 2015 (CLG live table 576). The HBF recommends that in line with the PPG consideration should be given to a moderate uplift to counter this trend.</p> <p>Proposed housing requirement</p> <p>The housing requirement of 209dpa sits towards the upper end of the range suggested within the SHMA, 117 to 215dpa. The choice of a figure towards the upper end of the suggested range is supported. The HBF is, however, concerned that the requirement sits below the two key economic led scenarios, E (Experian Jobs Growth) and F (Key Job Growth Sectors). Whilst these scenarios provide housing growth figures in excess of what has been provided recently (293dpa and 359dpa respectively) the plan does provide the opportunity for a step change in delivery and the economic fortunes of the district.</p> <p>The HBF understands that scenario E (Experian Jobs Growth) represents the anticipated baseline jobs growth position over the plan period and scenario F (Key Job Growth Sectors) represents the LEP supported proposals for the area. Furthermore Policy SP3</p>	
1780	United Utilities Property Services	Strategic Policies	SP2	<p>As per Policy SP2, over the 20 year period from 2012 to 2032 provision will be made to deliver around 4,180 net dwellings, equating to an indicative average of 209 dwellings per annum. We support this target for Burnley in achieving the vision and objectives for the authority in providing choice for households and delivering both affordable and aspirational homes to support economic growth.</p> <p>We support the Council's view that in order to achieve the aims and objectives of the NPPF; we do not therefore agree that the Council's historic shortfall in housing delivery should be addressed through the Local Plan via the Liverpool approach (paragraph 4.2.25). Rather the Sedgefield approach supports the aims of delivering new housing in line with NPPF guidance in the short term and delivery of true housing choice, notwithstanding the economic constraints that may suppress housing completions in the short and medium term. The Council should identify a range of sustainable housing sites that will support the delivery of new homes within this short and medium term period. The Heckenhurst Reservoir site is one such site.</p>	<p>Support for the overall housing requirement set out in SP2 is noted.</p> <p>It is not agreed that the NPPF requires the Sedgefield method and a number of appeal decisions and Examination Inspector's Reports prefer the Liverpool (residual) approach. Which approach is appropriate depends on local circumstances. The rolling 5 year land supply and the method of addressing 5 year land supply in the Plan can also differ. The Liverpool method is that preferred in the Plan. The land supply position is kept under review.</p> <p>The Housing Trajectory included as an appendix 5 to the Proposed Submission Local Plan shows how the Plan will deliver housing over the Plan period, including a 5 year supply of deliverable sites.</p>

1540	Junction Property Ltd.	Strategic Policies	SP2	<p>Policy SP2: Housing Requirement 2012 - 2032</p> <p>The Preferred Options document identifies a housing requirement of 4,180 dwellings (equating to an indicative average of 209 dwellings per annum) over the plan period 2012– 2032. This represents an increase upon the previous Regional Strategy (RS) requirement of 130 dwellings per annum from 2003 – 2021 and the three options consulted upon at the Issues and Options stage (60 – 150 dwellings per annum). However, our Client has a number of objections to make in response to Policy SP2. Each of which will discussed in turn below.</p> <p>Objection 1 – Policy Phrasing Policy SP2 states that: “provision will be made to deliver around 4,180 additional dwellings...”</p> <p>Our Client considers the use of the word “ around” is too ambiguous, implying that not meeting the requirement would be acceptable. This is inconsistent with paragraph 47 of the NPPF - which seeks to provide for a significant boost to housing land supply , and also paragraph 157 which states Local Plans should plan positively for the development and infrastructure required in the area to meet the objective, principles and policies of the Framework.</p> <p>It is a well-established principle within recently adopted Local Plan’s, for example in the neighbouring borough of Pendle, that adopted development requirements should be considered as a minimum figures, and that development considered to be sustainable should be approved, even where these targets are exceeded.</p> <p>As drafted the wording of Policy SP2 has not been positively prepared and is not consistent with national policy. Our Client therefore recommends that the wording of Policy SP2 should be amended to read:</p> <p>“provision will be made to deliver a minimum of ... additional dwellings...”</p> <p>Objection 2 – Proposed Housing Requirement As required by paragraph 159 of the NPPF, on behalf of Pendle Council and Burnley Council, NLP produced a joint Strategic Housing Market Assessment (“SHMA”) in May 2013.</p> <p>The SHMA 2013 suggested a housing requirement of between -41 – 380 dwellings per annum for Burnley, based on a variety of demographic and economic growth scenarios .</p> <p>In May 2016, NLP produced an update to the housing scenario modelled in the</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>The SHMA identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan’s Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such it is not considered necessary to exceed this requirement; this is not a requirement of national policy.</p> <p>The Plan requirement sits within the OAN range and has not therefore been reduced as suggested.</p> <p>The error referring to 2030 has been corrected.</p> <p>The Proposed Submission Local Plan Policy SP2, Proposed Allocatons and housing trajectory are based on housing monitoring up to 31st March 2016.</p> <p>It is considered that the windfall element of the supply is robust being related to past tend of small brownfield windfalls only.</p> <p>The empty homes element of the proposed supply is considered to be robust being based on empty homes programmes and it may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan’s wider aspiration for improved economy and environment and address a greater number of these.</p> <p>It is not agreed that the NPPF requires the Sedgefield method of addressing any undersupply and a number of appeal decisions and Examination Inspector’s Reports prefer the Liverpool (residual) approach. Which approach is appropriate depends on local circumstances. The rolling 5 year land supply and the method of addressing 5 year land supply in the Plan can also differ. The Liverpool method is that preferred in the</p>
------	------------------------	--------------------	-----	--	--



			<p>SHMA 2013 for Burnley, taking into account the latest demographic data releases as well as re - base 2014 mid-year population estimates [MYE] (released in October 2015) and using updated Experian data (September 2015) to align with the updated 2015 Burnley ELDS.</p> <p>In addition, the SHMA 2016 projects a slightly extended time-frame for housing needs, given the need for plans to cover a minimum of a 15 -year period from adoption, and as such provides an assessment of housing need between 2012 and 2032.</p> <p>The SHMA 2016 suggests a housing requirement within a range of 64 to 359 dwellings per year. Consequently, the Council has sought to adopt a housing requirement of 4,180 dwelling (209 dwellings per annum) for the plan period (2012 – 2032).</p> <p>The proposed housing requirement is within the higher end of the range identified by NLP, representative of a zero net growth scenario from 2014/15, including Experian Employment growth in 2012/13 and 2013/14 (i.e. Scenario Gi presented in Table 2 of the Preferred Options document).</p> <p>For the reasons set out below, we are not convinced by the Council’s conclusions, and believe that the Council need to reconsider their housing requirement . From the information available we consider that it is likely that the adoption of a housing requirement which is higher than currently proposed by the Council is necessary to match the Borough’s economic growth aspirations. Simply put, 209 dwellings per annum will leave the Borough in a position where it is at a standstill.</p> <p>Objectively Assessed Needs An objective assessment of housing need is a test of whether the household projection based starting point can be reconciled with:</p> <ul style="list-style-type: none"> <li>- the latest demographic evidence;</li> <li>- the ability to accommodate proje</li> </ul>	<p>Plan.</p> <p>The Council disagrees that the supply identified is not deliverable. The Council considers that the site selection process, including the Strategic Housing (and Employment) Land Availability Assessment has been robust and that the sites proposed as allocations and the other elements of the supply identified are the most appropriate to meet the Borough's objectively assessed need for housing in full.</p> <p>The Council's SHLAA identifies sufficient developable housing sites outwith the Green Belt such that no release of the Green Belt for housing purposes is justified</p>	
2259	Mr Gerald Stott	Strategic Policies	SP2	<p>Is there really a proven need to have so much extra housing built because you appear to be going for the very high end of the scale suggested by the reports you have commissioned but is there actually the need or are we simply going to end up with more and more empty homes in the borough.</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the</p>

					<p>Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>National policy requires Local Plans to meet the identified OAN in full. Local Plans need to be consistent with national policy.</p> <p>The bringing back into use of empty homes is very much supported in the Plan. This has the benefit of reducing development pressures on the countryside and open spaces and helping to address environmental social and economic issues in areas affected by high vacancies. In terms of formally counting a specific number of these as part of the plan's land supply, experience at other Plan examinations has shown that these figure have to be based on specific programmes/actions. The figures used may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan's wider aspiration for improved economy and environment and adress a greater number of these.</p> <p>A vacancy rate of around 3% is generally accepted as being a normal rate to allow the market to function or 'churn'. It would be inappropriate to rely predominantly on the refilling of vacant stock above this 3% figure to meet the housing requirement. These will often be smaller or poorer quality properties and will not meet the need of all residents e.g. energy efficient, adaptable housing or 'family' housing with off road parking and gardens consistent with national policy and the Plan's vision and objectives.</p>
1203	Heather Spencer	Strategic Policies	SP2	<p>I wish to dispute the overarching assumption that Burnley needs more houses to be built.</p> <p>Our present government insists that we need new/more housing stock, but this seems to me a very London-centric view and it does not necessarily apply in all boroughs around the nation. I believe that 6% of homes in Burnley currently stand empty and in my opinion for as long as this remains the case it would be scandalous to build on green field sites. House prices are already low in this borough compared with nationally, and houses often take a long time to sell. Even in my neighbourhood, which is considered "good", I have noticed many houses being for sale for many months and in some cases years. There is clearly not a demand for additional housing in Burnley at the moment.</p>	<p>National policy requires that "Local Plans proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs". It seeks to "boost significantly the supply of housing". It requires Councils to ensure that their Local Plan meets the full, objectively assessed needs and demands for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. The Local Plan needs to be consistent with this policy. The Council's SHMA, which has been carried out in line with national planning practice guidance, objectively assessed need and demand and clearly found a need for new housing equivalent to between 117 and 215 dwellings per annum over</p>

				<p>I realise that the Burnley Local Plan is a long-term plan, but can Burnley Borough Council guarantee that it will grant planning permission for new homes to be built only if it can be shown that there is a shortage of housing?</p> <p>Can the Council guarantee that it will only build more housing once business, manufacturing and employment in the borough have all increased?</p> <p>I would like to know if every brown site within the borough has been considered for development. If all such sites have been considered, which any been rejected for development and why? If not all brown sites have been considered, why not?</p> <p>Can Burnley Borough Council guarantee that any new homes built from now on will all include solar panels and large windows to minimise use of electricity, and extensive insulation to minimise heating? The most recent housing developments that I have seen in the borough are in fact the opposite of this, with no solar panels and tiny windows which must surely necessitate lights to be on even in the daytime.</p> <p>Point 2.3.2 of the Plan states that "an oversupply of small two bedroomed [...] housing without gardens" is a key driver of housing market failure. I dispute this. Two-bedroomed houses without gardens are precisely what young people wish to live in as their starter home - adequate living space without the burden of maintaining a garden.</p> <p>My view is that there is no need to use green field sites for development, and if the Council cannot provide satisfactory answers to my comments and questions it will be an absolute travesty if they take the irrevocable step of building on such sites.</p>	<p>the Plan period.</p> <p>The bringing back into use of empty homes to meet some of the identified need is very much supported in the Plan. This has the benefit of reducing development pressures on the countryside and open spaces and helping to address environmental social and economic issues in areas affected by high vacancies. In terms of formally counting a specific number of these as part of the plan's land supply, experience at other Plan examinations has shown that these figure have to be based on specific programmes/actions. The figures used may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan's wider aspiration for improved economy and environment and address a greater number of these.</p> <p>A vacancy rate of around 3% is generally accepted as being a normal rate to allow the market to function or 'churn'. It would be inappropriate to rely predominantly on the refilling of vacant stock above this 3% figure (c 1,235 dwellings) which in any event would not be sufficient to meet the housing requirement of 4,180 dwellings . These will often be smaller or poorer quality properties and will not meet the needs and demands of all residents e.g. energy efficient adaptable housing or 'family' housing with off road parking and gardens consistent with national policy and the Plan's vision and objectives.</p> <p>The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all sites put forward for development or identified from what are known as 'desk top' sources. All of these sites were assessed for their availability, suitability and achievability to see if they are 'developable'.</p> <p>Whilst the Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary, the focus of the Plan's housing sites remains on brownfield land and on land within the urban areas.</p>
2361	Coates /	Strategic	SP2	PWA Planning act on behalf of Messers Coates and Mulbury Land, in respect of land	The SHMA identifies the Objectively Assessed Need (OAN) for

	Mulbury Land	Policies	<p>at Crow Wood, Burnley ( a site shown approximately by red-edging on the plan attached at Appendix 1).</p> <p>The National Planning Policy Framework (NPPF) states that Local Authorities should significantly boost the supply of housing land. Paragraph 47 of the Framework sets out a number of requirements to be undertaken by local authorities to help activate this aim; bullet points 1-3 are worthy of consideration:</p> <p>“47. To Boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> <li>• use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;</li> <li>• identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;</li> <li>• identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.”</li> </ul> <p>The Burnley Local Plan Preferred Options Document Policy SP2 indicates a housing target of 4,180 dwellings over the plan period, inferring an annual target of 209 dwellings. In order to meet the requirements of Paragraph 47 on NPPF this figure should be identified to be a minimum requirement, rather than a loose target, which the use of the word “around” would suggest.</p> <p>Of the 4, 180 dwellings, over 65% is to come from development of allocated sites with a further 9% allowed for through brownfield windfall sites. PWA planning consider that there is insufficient evidence detailed within the document, and the associated evidence base, to demonstrate that the strategy being proposed will achieve the scale and mix of housing required. In particular it is considered that the housing delivery strategy is over-reliant upon a number of large urban brownfield sites, the delivery of which is at best uncertain. Moreover the lack of allocation of high quality greenfield sites, including suitably located Green Belt land release, in areas where people want to live and developers want to build, will prevent development of the types of housing which are identified within the 2016 SHMA, namely the need to “diversify the current stock away from terraced properties</p>	<p>housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan’s Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such this does not need to be expressed as a minimum.</p> <p>Whilst the focus of the Plan's housing sites remains on brownfield land and on land within the urban areas consistent with national policy, the Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and new development boundaries for Burnley, Padiham, Worsthorne and Hapton to include sites outside of the 2006 Burnley Local Plan urban boundary.</p> <p>The Council’s Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all sites put forward for development or identified from what are known as ‘desk top’ sources. All of these sites were assessed for their availability, suitability and achievability to see if they are ‘developable’. The SHLAA found that there were more than sufficient developable sites outwith the Green Belt to meet the proposed housing land requirement set out in Policy SP2 and the release of Green Belt land for housing is not therefore justified.</p>
--	--------------	----------	--	--

				<p>towards larger, more aspirational detached and semi-detached dwellings”</p> <p>Section 4.2.25 of the documents details that, since the beginning of the plan period (1st April 2012) the number of dwelling completions has been significantly lower than that of the annual target of 209. Between the years 2012 and 2015 there was in fact a cumulative shortfall of 412 dwellings (nearly two years’ requirement). Although this has been attributed to poor economic conditions, the economic and political climate remain unpredictable and such concerns are unlikely to soon be alleviated. This places significant importance on the Plan delivering a very wide range of attractive, developable and deliverable sites for inclusion in the housing supply.</p> <p>The Local Plan preferred options document is therefore not considered to be “sound”, and in particular Policy SP1 is considered to be unjustified in that it seeks to pursue a strategy which is unlikely to result in sufficient housing development to meet the identified housing needs of the borough. It is therefore considered</p>	
2201	Burnley Wildlife Conservation Forum	Strategic Policies	SP2	<p>The Housing section’s page 13 para 2.3.5 states that there are 2,458 empty dwellings located in Burnley’s older terraced housing areas where they are significantly contributing to housing blight and thus mitigate against the restoration and rejuvenation of these areas of older terraced housing which according to the 2011 Census contribute 50.1% of Burnley’s housing stock, p.13 para 2.3.1. Policy SP2’s ‘Housing Requirement 2012-2032’, table 1 page 41, presents a ‘residual requirement to be met by site allocations’ of 2753 dwellings. This figure takes into account a re-occupation of 120 empty properties targeted in the Council’s ‘Vacant Property Initiative’ for the 2016/17 to 2018/2019 period, an average of 40 properties to be re-occupied per year. Reducing the 2458 empty homes figure by this 120 properties to be re-occupied leaves a large number of 2338 presently empty houses remaining so in 2019. Because at this present re-occupation rate of 40 properties per annum it would take at least 58 years to re-occupy these 2338 empty houses it is a reasonable conservative estimate that during the remaining 13 years of the New Local Plan period from 2019-2032 at this average of 40 re-occupations per annum that at least a further 520 empty properties will become re-occupied, reducing the residual requirement from 2753 to at the most 2233 dwellings.</p> <p>The most important housing objective for the 20 year period of the New Local Plan will surely be to halt the blight in the old terraced housing areas because these comprise just over half of Burnley’s housing stock and to rejuvenate and make these inner urban areas in to neighbourhoods which will become once again attractive places to live. The New Local Plan needs a foremost vision and/or aspiration to aim to achieve this rejuvenation of the inner urban half of the Borough by 20132 with a commitment priority to deal with the 2458 empty dwellings by way</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan’s Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>National policy requires Local Plans to meet the identified OAN in full. Local Plans need to be consistent with national policy</p> <p>The bringing back into use of empty homes to meet some of the identified need is very much supported in the Plan. This has the benefit of reducing development pressures on the countryside and open spaces and helping to address environmental social and economic issues in areas affected by high vacancies.</p> <p>In terms of formally counting a specific number of these as part of the plan’s land supply, experience at other Plan examinations has shown that these figures have to be based on</p>

			<p>of an accelerated programme of restoration or demolition clearance of plots to be used for new build replacement housing schemes. This will accommodate most if not all the remainder of the residual requirement for 2233 dwellings during the 20 years New Local Plan period to 2032.</p> <p>The 209 net additional dwellings per annum figure, page 41 para 4.2.17, is substantially more, plus 39.3%, than the 'high' growth option of 150 dwellings per annum on page 42. By contrast the cumulative 2012/2013 to 2014/2015 deficit of 412 dwellings, page 43 para 4.2.25, means there was a net coverage of only 72 dwellings per annum in that period and with the following para 4.2.26 stating 'economic constraints are likely to continue in the short to medium term and may continue to suppress housing completions', taken together with Burnley's population projected to reduce by 242 by 2032, all point to a stable or even a slightly reduced overall aggregate demand for extra housing. As a consequence, avoiding housing development on greenfield or Green Belt land, which would engender further urban sprawl into Burnley's rural countryside, should be a realistically achievable aim of the New Local Plan.</p> <p>Summary For the reasons outlined above we do not accept the Preferred Options case for either housing or employment developments to be located outside the 'Issues and Options' urban boundary on greenfield and Green Belt land in the countryside of the rural area because this would increase urban sprawl, exacerbate climate change, mitigate against environmental sustainability and adversely affect biodiversity. Whereas keeping housing and employment developments within the present urban boundary is the only way that the 'Spatial Vision and Objectives' for 'Delivering Sustainable Growth,' page 33 para 3.2.1's No 1, and 'The Natural Environment,' page 33 para 3.2.1 Nos 5 and 6 can be mutually compatible and achievable and that 'focusing development on urban areas' as outlined in 'The Development Strategy' page 47 para 4.4.2 is complied with.</p>	<p>specific programmes/actions. The figures used in the Plan may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan's wider aspiration for an improved economy and environment and address a greater number of these vacancies.</p> <p>A vacancy rate of around 3% is generally accepted as being a normal rate to allow the market to function or 'churn'. It would be inappropriate to rely predominantly on the refilling of vacant stock above this 3% figure (c 1,235 dwellings) which in any event would not be sufficient to meet the housing requirement of 4,180 dwellings. These will often be smaller or poorer quality properties and will not meet the needs and demands of all residents e.g. energy efficient adaptable housing or 'family' housing with off-road parking and gardens consistent with national policy and the Plan's vision and objectives.</p> <p>The Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and whilst the new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary, the focus of the Plan's housing sites remains on brownfield land and on land within the urban areas.</p>
1260	Cllr Cosima Towneley	Strategic Policies	<p>SP2</p> <p>Table 2: Burnley SHMA scenario summaries 2012-2032 Table amalgamation of data for Pendle &amp; Burnley – what is the projection for Burnley only. Table contradicts population projections by LCC and Household Interim Projections from the Dept. of Communities &amp; Local Gov which suggests stagnation at best or a loss of population of 0.2% between 2012 – 2037, the life span of this plan; which begs the question for whom is this land for housing/employment being earmarked or brought forward and questions the validity of the statistics in this document.</p> <p>4.2.8 All these scenarios are hypothetical, and it would appear the Council is simply justifying the amount of building included in this option.</p>	<p>Table 2 only shows the figures for Burnley. The Household projections from CLG are the starting point for the SHMA. The SHMA undertaken by NLP on behalf of the Council follows the recommended methodology in the Government's national planning practice guidance. The SHMA sets out comprehensive background information on population and household formation.</p>

			<p>4.2.13 Bourne out by this statement which implies building for building sake to keep the local economy going and not due to need.</p> <p>Policy SP2: Housing Requirement 2012-2032 Not convincing unless broken down into Burnley needs &amp; Pendle needs.</p> <p>Delivering the Housing Requirement – Already over subscribed mentions a growing network of high quality off-road routes / greenways to promote walking /cycling but ignores the large equestrian interest within the Borough. Suggest they be added to prevent confusion, especially as they already have access along these routes.</p> <p>Table 2: Burnley SHMA scenario summaries 2012-2032 Table amalgamation of data for Pendle &amp; Burnley – what is the projection for Burnley only. Table contradicts population projections by LCC and Household Interim Projections from the Dept. of Communities &amp; Local Gov which suggests stagnation at best or a loss of population of 0.2% between 2012 – 2037, the life span of this plan; which begs the question for whom is this land for housing/employment being earmarked or brought forward and questions the validity of the statistics in this document.</p> <p>4.2.8 All these scenarios are hypothetical, and it would appear the Council is simply justifying the amount of building included in this option.</p> <p>4.2.13 Bourne out by this statement which implies building for building sake to keep the local economy going and not due to need.Policy SP2: Housing Requirement 2012-2032 Not convincing unless broken down into Burnley needs &amp; Pendle needs.</p> <p>Delivering the Housing Requirement – Already over subscribed</p> <p>Development of all kinds to include an element of 'green infrastructure' gain as a condition of planning, either though a payment to the Council for specific and ring fenced use for the development of 'Greenways' or, where possible, through the upgrade and dedication of at least one route to link the development into the wider public Rights of Way network. All such gains to be open to all non-motorised users.</p> <p>Monetary contribution to be assessed by number of houses / potential worth or, in the case of employment area, worth of site.</p>	
--	--	--	---	--

1512	Huntroyde Estate	Strategic Policies	SP2	<p>Our client supports the need for significant housing and employment growth in the borough and that such growth be focussed on the 2 main urban areas of Burnley and Padiham.</p> <p>Policy SP2 on housing requirements 2012-2032. There is concern with this policy. The opening line states ...' provision will be made to deliver around 4,180 net additional dwellings, ...' and thus it is not consistent with national policy (para 47 NPPF) nor has it been positively prepared. Housing numbers are minima not absolute so the word 'around' should be replaced by ' a minimum of 4180..'</p> <p>It is not consistent with National Policy.</p> <p>There is also a typo in section 1 line a) as it refers to 2012-2030 though the figure shown does relate to 2012-2032.</p> <p>Para 4.2.12 of the PI&amp;O recognises the need to ensure there is sufficient housing and range of housing to attract and retain economically active residents which would be in line with the vision of growth being economic led so it is unclear why the chosen housing target figure of 209 dpa is lower than the figure of 215dpa stated in the SHMA as required for the economic led scenario. Not justified.</p> <p>Para 4.2.25 of the PI&amp;O notes there has been an under delivery on the housing trajectory. It flies in the face of NPPF and subsequent appeal decisions by rejecting the Sedgefield method in favour of the Liverpool method when it states:</p> <p>'This under-delivery needs to be addressed by the Local Plan, either in the next five year period ('Sedgefield' approach) or over the remaining plan period ('Liverpool' approach). The latter approach is preferred. '</p> <p>This is not consistent with national policy.</p> <p>Furthermore, this means additional housing land will be needed over the plan period and specifically in the first 5 years to make up the shortfall so the number of sites and the timing of those coming forward will need to be revised.</p>	<p>The reference to 2030 has been corrected.</p> <p>The SHMA identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such it is not considered necessary to exceed this requirement; this is not a requirement of national policy.</p> <p>It is not agreed that the NPPF requires the Sedgefield method of addressing any undersupply and a number of appeal decisions and Examination Inspector's Reports prefer the Liverpool (residual) approach. Which approach is appropriate depends on local circumstances. The rolling 5 year land supply and the method of addressing 5 year land supply in the Plan can also differ. The Liverpool method is that preferred in the Plan.</p> <p>The Housing Trajectory included as Appendix 5 of the Proposed Submission Local Plan sets out how the Plan will deliver the required level of housing.</p>
2246	Mr Simon Kent	Strategic Policies	SP2	<p>Regional Planning and its Impact on Burnley</p> <p>I challenge the assertion that Burnley has an increasing housing need.</p> <p>Many houses in the town are empty, property prices and the annual increase rate lags the national average because of low demand in this area. The council has recently been demolishing housing in Burnley. Adding to the housing stock in the hope that this will drive employment into the area appears to be flawed logic.</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215</p>



			<p>In November 2012 news reports stated that Burnley had the highest empty house percentage in England. Almost 3000 properties (7.36%) were empty. This came from a report by the charity Empty Homes. I understand that this still stands at around 2000, partly due to demolition of some of the properties and undoubtedly due to the council's rehousing initiatives.</p> <p>Priority should be given to property renovation in areas with empty houses and new-build on the bulldozed land. This is required before developing outside the confines of the heart of the town</p> <p>Burnley has low house prices, appropriate for the high number of low income families in the area. I question whether Burnley needs more higher priced houses, that would be required until the area grows its base of higher paid jobs. Currently many skilled and high paid jobs have left the area and yet more are doing so. I challenge the assertion that commuters will come to Burnley to commute to Manchester, Preston and Leeds, etc.</p> <p>Burnley has lost the higher paid, skill based jobs, eg: in Finance and Precision Engineering. Increasing the wealth in an area is driven by the employment base rather than the high quality of the housing. Burnley need to stop people leaving the area. Not simply attract new people to use it as a commuter town. That kills the character of the town.</p> <p>Why build aspirational homes when Burnley offers little in the way of retail shopping, cultural venues, restaurants, sports facilities, etc. that would appeal to higher paid residents.</p> <p>The Local Plan states that Burnley has had a falling population, the national average is rising, particularly in London and the South East. The plan for Burnley should not be driven by government measures to address housing issues in London and the South East, rather it should be driven by local needs. The proposed Local Plan will detrimentally impact on the rural community around Burnley. The Localism Act of 2011 puts an onus on planning authorities to consider the needs and wishes of local communities.</p>	<p>dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>National policy requires Local Plans to meet the identified OAN in full. Local Plans need to be consistent with national policy.</p> <p>The bringing back into use of empty homes is very much supported in the Plan. This has the benefit of reducing development pressures on the countryside and open spaces and helping to address environmental social and economic issues in areas affected by high vacancies. In terms of formally counting a specific number of these as part of the plan's land supply, experience at other Plan examinations has shown that these figure have to be based on specific programmes/actions. The figures used may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan's wider aspiration for improved economy and environment and address a greater number of these.</p> <p>A vacancy rate of around 3% is generally accepted as being a normal rate to allow the market to function or 'churn'. It would be inappropriate to rely predominantly on the refilling of vacant stock above this 3% figure to meet the housing requirement. These will often be smaller or poorer quality properties and will not meet the need of all residents e.g. energy efficient, adaptable housing or 'family' housing with off road parking and gardens consistent with national policy and the Plan's vision and objectives.</p>	
2253	Miss Deborah Stott	Strategic Policies	SP2	<p>Apparently the scale for the proposed amount of new housing in the borough, which was in the commissioned SHMA report, was between 117 and 215 dwellings per annum and according to your figures, the council has opted for the very top end of the scale at 209 dpa, even going above the 150 dpa in the third of the three options saying that this was not aspirational enough. Yet according to the NPPF, local plans should be aspirational BUT realistic. Is there really such a proven need for so much new residential development? The housing land in Burnley records for 2015 are not available, despite being due to be published in March 2016, because the report has not been done so we cannot get a true picture of what has already</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>This study identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the</p>

				happened since 2012.	<p>Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>The Preferred Options Local Plan was based on housing monitoring up to 31st March 2015.</p> <p>The Proposed Submission Local Plan Policy SP2, Proposed Allocations and housing trajectory are based on housing monitoring up to 31st March 2016.</p>
2377	John Gough	Strategic Policies	SP2	<p>Why build new houses on a Greenfield site in an area where the population has fallen recently by 4.5%, is expected to fall even further by 2032, and already has 6% of its' housing stock empty?</p> <p>There are fewer jobs than residents in the area. Surely the greatest need is to create more jobs and so keep people in the area and encourage more to come to fill the current vacant housing. Or if a different range of property types would be better, then remove some of the excess (terraced type) housing and replace them with ¾ bed homes. Just adding 3/4 bed 'dormitory' housing for commuters to Greater Manchester will add to rush hour congestion and cause further decline in Burnley centre as these commuters will undertake their shopping and leisure activities close to their workplace where they have a greater choice.</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment. This study set out the Objectively Assessed Need for housing up to 2032. The level of development proposed during the plan period aligns with the Plan's vision and objectives to provide housing at levels to support growth.</p> <p>The Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and whilst the new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary, the focus of the Plan's housing sites remains on brownfield land and on land within the urban areas.</p> <p>Surface water flooding on the proposed allocations has been considered during the production of the Level 1 Strategic Flood Risk Assessment.</p> <p>In Proposed Policy CC5, for major developments, SUDs will be required and surface water discharges from developed sites should be restricted to Qbar rates (mean annual greenfield peak flow).</p>
1638	Metacre Ltd.	Strategic Policies	SP2	<p>2. Policies SP2 'Housing Requirement 2012-2032' and HS1 'Housing Allocations' fail the test of soundness as they are not 'consistent with national policy' in so far as they fail to allocate sufficient housing land to deliver the housing requirement for the first five years of the Plan period. They also fail the test of being 'positively prepared' in the context of the NPPF requirement to boost significantly the supply of housing.</p> <p>3. NPPF paragraph 14 confirms that Local Plans should positively seek opportunities to meet the development needs of their area and should be able to meet</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment. This study set out the Objectively Assessed Need for housing up to 2032. The level of development proposed during the plan period aligns with the Plan's vision and objectives to provide housing at levels to support growth.</p> <p>The Proposed Submission Local Plan Policy SP2, Proposed</p>

			<p>objectively assessed needs with sufficient flexibility to adapt to rapid change. NPPF 17 also identifies one of the core planning principles of the planning system, which it states should underpin both plan-making and decision- taking, being to proactively drive and support sustainable development to deliver the homes that the county needs, with every effort made objectively to identify and then meet these needs. Moreover NPPF 47 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years-worth of housing against their requirements.</p> <p>4. Local Plans should therefore aspire to deliver the identified housing requirement at the rate planned and should comply with the policies of the NPPF, including the need to boost significantly the supply of housing. Indeed under the terms of NPPF 49 if a Local Plan cannot demonstrate a five year supply it will be out-of date the moment it is adopted and NPPF 14 will be triggered with regards to decision taking. This undermines the purpose of Local Plans and is at odds with the requirement in the NPPF for plans to be kept up-to-date.</p> <p>5 For the Local Plan to be sound it is therefore necessary for it to be able to demonstrate that there is a deliverable supply of housing to meet the first year five years of the Plan period, to be positively prepared in terms of the clear NPPF steer to “boost significantly the supply of housing” and to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing. The current draft Local Plan, and in particular policies SP2 and HS1, fail with regards to these requirements.</p> <p>Five Year Housing Supply</p> <p>6 At the time of writing this representation it was unclear where the Council’s actual five year housing supply methodology and calculation is provided. However based on the Council’s Strategic Housing Land Assessment (SHLA) and the evidence in policy SP2, it is evident that the Local Plan is not allocating sufficient housing land to deliver the first five year requirement.</p> <p>7 Policy SP2 confirms that the housing requirement over the Local Plan period equates to 209 dwellings per annum and that in the 3 years between the start of the Plan (April 2012) and 31st March 2015 there had been an undersupply of 412 dwellings. It is understood that the Council are in the process of updating their housing information to a 31st March 2016 base date, but until this is published the only data available relates to the 2015 position .</p> <p>8 When calculating the five year housing requirement (1st April 2015 – 31st March 2020) there are two key issues which need consideration, the first relates to how</p>	<p>Allocatons and housing trajectory are based on housing monitoring up to 31st March 2016.</p> <p>It is not considered that in using the Liverpool rather than the Sedgefield method, the Plan is inconsistent with the NPPF. The Liverpool method of addressing any undersupply is supported by a number of appeal decisions and Examination Inspector’s Reports prefer the Liverpool (residual) approach. Which approach is appropriate depends on local circumstances. The rolling 5 year land supply and the method of addressing 5 year land supply in the Plan can also differ.</p> <p>The Housing Trajectory included as an appendix 5 to the Proposed Submission Local Plan shows how the Plan will deliver housing over the Plan period, including a 5 year supply of deliverable sites.</p> <p>It is considered that the windfall element of the supply is robust being related to past tend of small brownfield windfalls only.</p> <p>The empty homes element of the proposed supply is considered to be robust being based on empty homes programmes and it may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan’s wider aspiration for improved economy and environment and address a greater number of these.</p>
--	--	--	--	--

				<p>the 412 dwelling undersupply is to be dealt with and the second relates to whether a 5% or 20% buffer should be applied. These are considered below.</p> <p>Previous Undersupply</p> <p>9 One approach of dealing with a housing shortfall, referred to as Sedgefield, is to deliver the entire shortfall within five years, in which case the entire 412 dwelling shortfall would be added to the five year housing requirement. The other approach, referred to as Liverpool, is to spread the shortfall across the remaining plan period meaning that only a proportion of the shortfall would be delivered within 5 years. The remainder would be delivered later in the plan period. If the Liverpool approach</p>	
1709	H F Eccles & Sons	Strategic Policies	SP2	<p>There is support for the identification in paragraph 4.2.11 of the Preferred Options Document (POD) that in determining the housing requirement consideration should be given to the need to significantly boost the supply of housing, a requirement of the National Planning Policy Framework (NPPF).</p> <p>2.2. Paragraph 4.2.13 (POD) acknowledges the importance of having a wide choice of new housing in order to attract investment and retain economically active residents.</p> <p>2.3. However, we do not support policy SP2 (Housing Requirement 2012 -2032) and policy HS1 (Housing Allocations) in terms of how the Council intends to deliver housing to meet the Objectively Assessed Need (OAN), for the following reasons:</p> <ul style="list-style-type: none"> <li>• The housing target should be higher to reflect the full OAN;</li> <li>• The final adopted housing target should be an “at least” figure; and</li> <li>• The anticipated yield of dwellings from the proposed allocations is only just sufficient to deliver the housing target.</li> </ul> <p>Higher Housing Target</p> <p>2.4. Although the housing target currently suggested in the POD (209 dwellings per annum) is towards the top end of the OAN range, if Burnley is serious about achieving economic growth and trying to reverse the trend of outward migration of the skilled workforce and economically active , then it should, as a minimum, strive to meet the full OAN.</p> <p>2.5. However, we would argue that due to the significant decrease in Burnley’s population and the ambitious employment growth strategy presented in the POD that in order to achieve the Council’s vision for the Borough a housing target above the OAN should be adopted.</p> <p>2.6. Over the past fifteen years Burnley has experienced a significant fall in</p>	<p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>The SHMA identifies the Objectively Assessed Need (OAN) for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan’s Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such this does not need to be expressed as a minimum; this is not a requirement of national policy.</p> <p>It is not agreed that the Sedgefield method of addressing any undersupply is necessary and a number of appeal decisions and Examination Inspector’s Reports prefer the Liverpool (residual) approach. Which approach is appropriate depends on local circumstances. The rolling 5 year land supply and the method of addressing 5 year land supply in the Plan can also differ. The Liverpool method is that preferred in the Plan.</p> <p>The proposed policies and allocations set out how the Council meet the OAN in full. The Housing Trajectory included as Appendix 5 of the Proposed Submission Local Plan sets out how the Plan will deliver the required level of housing.</p> <p>It is considered that the windfall element of the supply is robust being related to past tend of small brownfield windfalls only.</p>

				<p>population levels. As set out in paragraphs 2.2.1 and 2.2.2 of the POD, between 1991 and 2011 Burnley's population fall be 4.5% compared to a rise of 12.7% across England as a whole. Furthermore, the latest 2012-based ONS sub-national population projections released in 2014 anticipate that at the end of the plan period (i.e. 2032) Burnley's population will be lower by 242 people than in 2012.</p> <p>2.7. Whilst not as significant a decrease as between 1991 and 2011, the latest data still suggests that Burnley is going to continue to see a decrease in population.</p> <p>2.8. In order to address this issue Burnley needs to increase the level of choice in the housing market by having a greater range of different sized and tenures of properties, in a mix of areas across the Borough including low and high value areas.</p> <p>2.9. Large parts of Burnley are characterised by high proportions of pre-1919 two bedroomed terraced housing compared to the rest of England. This constrains choice in the housing market and based on the evidence of past population trends is not resulting in retention of people.</p> <p>2.10. Adopting a higher housing target, above the OAN, demonstrates a drive to reverse the out- migration trend and take real steps in changing the growth strategy of the Borough, as previous growth strategies have not resulted in preventing population decline. It will also allow greater flexibility for a wider choice of housing to be provided across the Borough.</p> <p>2.11. The Council is proposing to adopt an ambitious employment growth strategy, seekinto deliver 90ha of employment land over the plan period.</p> <p>2.12. This high employment growth strategy is disjointed from the Borough's aspirations for housing growth, which is aiming to achieve just below the OAN.</p> <p>2.13. Furthermore, the proportion of older people within the Borough is increasing. Older people are less likely to be economically active and contribute less to GDP. Therefore, an increase in the ageing population will not assist the Borough in growing its economy.</p> <p>2.14. The focus has to be on attracting new and retaining skilled workers, which can only be achieved by adopting an ambitious housing growth strategy.</p> <p>2.15. At paragraph 4.2.15 of the POD the Council confirms that no assistance is needed from adjace</p>	<p>The empty homes element of the proposed supply is considered to be robust being based on empty homes programmes and it may therefore be conservative estimates as it is hoped and anticipated that the market will respond to the Plan's wider aspiration for improved economy and environment and address a greater number of these.</p>
1940	Burnley, Pendle and	Strategic Policies	SP2 and SP4	Residential building	In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of

	Rossendale Green Party		<p>Existing Approach</p> <p>Much of the Local Plan focuses on residential building projects. This is presented as a significant, if not the only, route to stimulating economic activity and prosperity in Burnley and Padiham. Although this strategy may sit comfortably within the ideological framework of neoliberal capitalism, it should not be adopted as a fate a compli.</p> <p>Many other options exist, for instance cultural regeneration in the forms of arts and tourism investment, to encourage revival of towns. These have been almost completely overlooked.</p> <p>Even if we accept the premise that these houses are needed, there is no indication - other than through a piecemeal attempt to appeal to developers' sense of 'good' design - to attempt anything approaching a socially driven, community lead, architecturally stimulating and environmentally acceptable housing plan. Instead we are presented with a strategy whose only aspiration appears to be to build as much and as quickly and cheaply as possible. For the sake of the image and self respect of the town and its future inhabitants, we can only hope it fails in its only ambition.</p> <p>Concerns raised for green areas (Green Belt or Greenfield sites and areas with Lancashire Ecological Network designation) are dealt with by being flagged as concerns for developers to take into consideration: this is not adequate. Such 'flags' are too easily avoided, ignored or countered by developers with vested interests, and as such the environment is at too much risk and not sufficiently protected. The Plan, and the Council in general, needs to make greater and more effective effort to protect these areas.</p> <p>The Plan does not adequately assess why people from outside the Borough would want to move to here and gives the impression that incoming residents want to buy suburban properties with parking. However, there is no analysis as to whether people desire these cheaply made, poor quality, new build suburban properties which could be purchased in almost any town or city. More emphasis needs to be placed on Burnley's attractiveness and uniqueness – it is surrounded by beautiful countryside and has many stunning views, the town is picturesque with its terraced houses, stone buildings in the town centre and bespoke properties including large Georgian, Victorian and Edwardian properties which are desirable, affordable and have the ability to add value. The Leeds and Liverpool Canal is also already a jewel in the crown.</p> <p>The Plan says we need to build 4,180 houses and so concludes that 209 houses</p>	<p>need and demand from an updated Strategic Housing Market Assessment. This study set out the Objectively Assessed Need for housing up to 2032. The level of development proposed during the plan period aligns with the Plan's vision and objectives to provide housing at levels to support growth.</p> <p>To accommodate the level of development identified in policies SP2: Housing Land Requirement 2012-2032 the Strategic Housing and Employment Land Availability Assessment provides evidence that these requirements cannot be met in full on previously developed sites, or on sites within the Urban Boundary as set out in the 2006 Burnley Local Plan. With this in mind, the Preferred Options Local Plan includes a mix of brownfield and greenfield sites and the new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary.</p> <p>The Proposed Local Plan includes policies to ensure high quality housing is provided, with the most stringent policy requirements set out for greenfield housing sites.</p> <p>The assumes included in the Local Plan with regard to addressing the number of vacant homes are tied to the Council Vacant Property Initiative and the programme currently underway. Making assumptions above and beyond this ongoing work would be unrealistic and without basis in evidence.</p>
--	------------------------	--	--	---

				<p>need to be built each year. The plan does not take into account that at its creation the UK has entered its 6th consecutive year of austerity and many public services are failing. Putting aside the questionable figures and methods used to conclude the housing requirements, strategically the bulk of the house building should be loaded towards the latter stages of the plan so that there are funds to build them and residents to live in them (such residents flowing from successes in respect of other areas of the Plan).</p> <p>Burnley, Pendle and Rossendale Green Party's canvassing consistently confirms that there is a lack of 1 bed properties and yet the focus of the Plan, without justification is on 3 and 4 bed properties. This appears to be catering for hypothetical purchasers as part of a social engineering exercise. There is no evidence to suggest a lack of 3 and 4 bedroom properties vis a vis the needs of the existing residents.</p> <p>The Plan's empty housing regeneration figures are uninspired, aiming to bring back less than 10 properties per annum. This represents less than 10% of the available empty properties over the life of the Plan. Bringing these properties back into habitable condition will improve the sustainability of the developments and the desirability of the town. This should be a priority. Simply repeating that there is an oversupply of terraced houses and that these properties are har</p>	
1141	Mrs Kathleen Askew and Mr Mark Askew	Strategic Policies	SP3	<p>We think the selection of 90 hectares as the amount of land to be allocated for new employment sites between 2012 &amp; 2032 is far too much for this area: there is already a lot of industrial land/units etc in surrounding areas that are surplus to requirements and not in use.</p>	<p>The Council commissioned an updated Employment Land Demand Study (ELDS) in 2016 to inform the Local Plan and this identified the amount of employment land required in the borough over the plan period, taking into account existing stock availability and vacancies as being between 68-104Ha. One of the Council's Strategic Priorities is to increase and encourage economic prosperity consistent with the NPPF. 90Ha is therefore considered an appropriate figure sitting within the OAN range. As part of developing the ELDS, discussions were held with neighbouring authorities to determine whether any of Burnley's employment requirement could or should be accommodated within their respective borough's or vice versa and no evidence or justification for this approach was found.</p>
2200	Burnley Wildlife Conservation Forum	Strategic Policies	SP3	<p>Rationale for objections to proposed housing and employment developments outside of the present Urban Boundaries.</p> <p>Employment The Population section, page 12 para 2.2.2, projects a population at the end of the new Local Plan of 86,885 in 2032, a fall of 242 from 2012. Therefore Burnley will have a flatlined working age population which will stabilize at around the present level during the twenty years of the new Local Plan so this can be accommodated</p>	<p>In preparing its Local Plan the Council has prepared a Strategic Housing Market Assessment in accordance with NPPF (paragraph 159). The SHMA sets out a range of housing targets for the borough, including a Population Based Scenario and a number of Employment led growth scenarios. The 2012 population based scenario would result in a future projected population decline of 242 people. The Council does not agree that a scenario of on-going population decline is sustainable</p>

			<p>by the present level of employment capacity and therefore there is no need to plan for an increase in Burnley's employment capacity which would exacerbate climate change, reduce environmental sustainability and adversely affect biodiversity.</p> <p>In particular with the new Burnley Bridge Business Park estimated to have a capacity to generate 1500 jobs, the new Vision Park at Princess Way, spare capacity on existing business parks, plus business development opportunities on urban brownfield sites, there is no need to provide extra capacity in the form of new business parks or extensions to existing business parks on greenfield or Green Belt land which will achieve the 4.4 Development Strategy's 'focusing development on urban areas' on page 47 para 4.4.2.</p> <p>Summary For the reasons outlined above we do not accept the Preferred Options case for either housing or employment developments to be located outside the 'Issues and Options' urban boundary on greenfield and Green Belt land in the countryside of the rural area because this would increase urban sprawl, exacerbate climate change, mitigate against environmental sustainability and adversely affect biodiversity. Whereas keeping housing and employment developments within the present urban boundary is the only way that the 'Spatial Vision and Objectives' for 'Delivering Sustainable Growth,' page 33 para 3.2.1's No 1, and 'The Natural Environment,' page 33 para 3.2.1 Nos 5 and 6 can be mutually compatible and achievable and that 'focusing development on urban areas' as outlined in 'The Development Strategy' page 47 para 4.4.2 is complied with.</p> <p>In the context of the above development rationale our specific objections to the 'Preferred Options' proposals for individual sites are as follows:</p>	<p>and has chosen an economic lead housing target of 209 dwellings per annum. This figures is necessary to stabilise the working age population and the economy and will result in a population increase of approximately 7000 people. It should also be noted that the Borough is already a net out commuter with approximately 664 commuters leaving the borough every day.</p> <p>In preparation of the Local Plan the Council also commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS as are the housing and population projects produced in the SHMA.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to</p>
--	--	--	---	---



					the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.
1820	Padiham Community Action	Strategic Policies	SP3	<p>We challenge the selection of 90 hectares as the amount of land to be allocated for new employment sites between 2012 &amp; 2032.</p> <p>A figure of not more than 80 hectares is more appropriate. Even this is very aspirational and allows for a level of growth that might not be achievable in, for example, a post Brexit economy.</p> <p>80 hectares is based on selecting Scenario 3 and Experian Baseline Scenario from the seven scenarios used in the Employment Land Demand Study [ELDS] .</p> <p>We accept, as fact, the figure of 16.63 hectares for completions etc between 2012 &amp; 2015. Using our figure of 80 hectares as the total land requirement we recommend that Policy SP3, on page 46, should be amended. SP3 (1.a) should now read 80 Ha, and at (1.d) the residual amount to be met between 2016 &amp; 2032 will now be, in the order of, 60 Ha.</p> <p>If required we can explain and justify the amendments. The variables and judgments made in projecting demand are very wide and allow for considerable interpretation. The conversion from 'net' to 'gross' land requirement is based on subjective judgments that skew the land required by up to 17 times the original net figure. In addition the Councils projected demand does not take into account the surplus of industrial land in adjoining boroughs or the pull of regional sites such as the BAE Samesbury Enterprise Zone and to a lesser extent Whitebirk.</p>	<p>The Council commissioned an updated Employment Land Demand Study (ELDS) in 2016 to inform the Local Plan and this identified the amount of employment land required in the borough over the plan period as being between 68-104Ha.</p> <p>The Council has identified the preferred requirement/target figure of 90Ha over the Plan period as the figure which will best support the Plan's vision and objectives and support economic growth and housing market renewal. This figure sits midway between the three jobs-led scenarios; the Experian Baseline scenario of 82.49Ha (which is a reflection of recent job growth trends) scenario 3 Job Stabilisation at 76.98Ha and the Key Growth Sectors scenario of 103.81Ha (which factors in the number of jobs expected to be provided by new/planned developments in the borough which are not taken into account in the Experian Baseline forecasts). One of the Council's Strategic Priorities is to increase and encourage economic prosperity. As part of developing the ELDS, discussions were held with neighbouring authorities to determine whether any of Burnley's employment requirement could or should be accommodate within their respective borough's or vice versa and no evidence or justification for this approach was found.</p>
1752	Ribble Property Developments	Strategic Policies	SP3	<p>At the Issues and Options stage of the Local Plan, BBC identified a need for an additional 30 to 60Ha of employment land, whilst the Employment Land Review Demand Update (ELRDU) identified a range of 45 to 100Ha of employment land need. The Council's Preferred Option for the Local Plan is now to provide 90Ha of employment land. As discussed within the alternative options section of the policy, this is the highest level of requirement considered by BBC.</p> <p>Burnley is identified as the key employment and service centre in Pennine Lancashire and has the opportunity to benefit from and play a role in the government's "Northern Powerhouse" agenda. An article by the Joseph Rowntree Foundation (JRF) in February 2016 identifies Burnley as the 2nd most struggling city in the UK (taking city to be places with a population of above 100,000). Full time job creation was found to be at -2.1% for Burnley whilst the national average is +1.9%. It is important for growth as a result of the Northern Powerhouse to reach beyond the Core Cities and that places such as Burnley capitalise on these opportunities.</p>	<p>The Local Plan identifies 90 hectares of employment land as an appropriate figure to deliver sustainable economic growth. As stated in the Local Plan, the Council has identified the preferred requirement/target figure of 90Ha over the Plan period as the figure which will best support the Plan's vision and objectives and support economic growth and housing market renewal. This figure sits midway between the three jobs-led scenarios; the Experian Baseline scenario of 82.49Ha (which is a reflection of recent job growth trends) scenario 3 Job Stabilisation at 76.98Ha and the Key Growth Sectors scenario of 103.81Ha (which factors in the number of jobs expected to be provided by new/planned developments in the borough which are not taken into account in the Experian Baseline forecasts). In addition, during the plan period there is potential for new non-identified 'windfall' sites to come</p>

				<p>BBC should, therefore, be seeking higher levels of growth with the strategy set at the upper level of employment land required, ie at least 100Ha, rather than opting for a lower figure in the forecast range. This will ensure the plan is positively prepared and is consistent with the NPPF and its desire to promote growth. This will allow flexibility if sites do not come forward as quickly as envisaged and help to address the issues raised in the JRF report. The plan must be positively prepared to be found sound by the Inspector.</p> <p>As per our comments on Policy SP3, RPD supports BBC's decision to provide a higher level of employment land than that previously suggested at the issues and options stage but consider that a further 10Ha minimum of employment land should be included within the plan.</p> <p>As a proposed allocation the Shuttleworth Mead South site can contribute to meeting this demand.</p>	forward for employment uses if the market requires within the identified development boundaries.
2337	Huntroyde Estate	Strategic Policies	SP3	<p>We concur with Para 5.2.10:</p> <p>'In order to meet the identified requirement however, a further 19 hectares of employment land needed to be identified and the Council undertook a Green Belt Review to inform a decision on the effects of releasing any land within the Green Belt for development.'</p>	Support noted.
1267	Cllr Cosima Towneley	Strategic Policies	SP3	<p>Major impediment to employment growth – m'way access, bridges which are simply too narrow for the amount of traffic using the route:</p> <ul style="list-style-type: none"> <li>• Bridge at Jct. 9 M65 - single lanes</li> <li>• Central round-a-bout and round-a-bout at Parliament St/Todmorden Rd - complicated by pedestrian crossing outside Towneley</li> <li>• Princess Way pedestrian crossing and Asda round-a-bout.</li> <li>• The access to the new Aldi &amp; Lyndhurst Rd lights</li> </ul>	<p>The Local Plan must have regard to the Local Transport Plan prepared by Lancashire County Council and has liaised with the County Council and Highways England throughout the plan-making process. The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 9. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Development Plan on which HE have been consulted and provided comments.</p> <p>Lancashire County Council has provided extensive comments regarding the potential need for highway improvements in</p>

					connection with site specific proposals. LCC have not raised any concerns about the junctions listed here.
1513	Huntroyde Estate	Strategic Policies	SP4	<p>Our client supports the need for significant housing and employment growth in the borough and that such growth be focussed on the 2 main urban areas of Burnley and Padiham.</p> <p>Policy SP4 Settlement Hierarchy we note that Burnley and Padiham are to be the main focus for development which includes economic and housing growth. In broad terms this is supported. Given the opening sentence of SP4 'Development will be focused on Burnley and Padiham' we suggest the following amendment, that both are then listed as 'main settlements' rather than seeming to imply by the categories that Burnley is more important than Padiham, especially as the details of role and function and development scale for both state the same requirements.</p> <p>On the issue of development boundaries and the criteria set down in SP4 section 2. Whilst we concur with the principles set down we must question the logic of choosing to allocate EMP1/13 over Land South of Blackburn Rd, Padiham (HEL/160).</p> <p>The criteria listed in SP4 Section 3 are unduly onerous as it says '...development will be expected to: ', and then lists a host of criteria all of which seemingly must be met. Given Burnley BC area is noted in the PI&amp;O to score poorly and be below even the national and county average for housing and employment this adds another layer of challenge which would mean developers look elsewhere as the listed criteria could undermine the viability and deliverability of sites. There has to be a realistic balance to ensure development of sustainable sites as noted in NPPF. Not justified or consistent with National Policy.</p> <p>Paras 4.7.6 and 4.7.7 of the PI&amp;O note the need to release Green Belt land to enable the employment land targets to be met. Whilst we agree with this in principle we disagree with the logic and approach taken to the site selection when bearing in mind NPPF and the 5 purposes of Green Belt and the need to ensure the openness of Green Belt is preserved and that the boundary amendment have longevity. Para 4.7.14 then concludes that only 2 sites met these criteria and are suitable for release from the Green Belt. The selection of EMP1/13 as previously noted defines logic especially when tested against the criteria and tests in NPPF for the purpose and release of Green Belt and thus boundary amendments.</p>	<p>Support for Settlement hierarchy noted.</p> <p>The criteria are not considered to be unduly onerous. The Borough should be aspiring for high quality development. It is important to note that the Council could have sought to rely more heavily or even exclusively on brownfield sites but recognised that, setting aside cumulative delivery and viability issues, these would not deliver the full range of quality and choice required; as such the release of greenfield sites is only justified on the basis that these would deliver schemes that brownfield sites may struggle to. Therefore the approach of SP4 to effectively set the bar higher for greenfield sites is justified. The requirements are not unduly onerous. Developers only need pick one of the options listed in 3)c) and as such the Optional Technical standards for internal space referred to are not compulsory.</p> <p>The Blackburn Road site has not been taken forward into the Proposed Submission Document due to the site being in a prominent position in terms of its proximity to existing residential properties and its topography. Development on the site would have a greater impact on the residential amenity of local residents and landscape than the site at Shuttleworth Mead South. In addition, development at Blackburn Road could have a detrimental impact on the Padiham Greenway, as identified by the many opposition comments received during the Issues &amp; Options stage.</p>
1496	Home Builders Federation Ltd	Strategic Policies	SP4	<p>Part 3 of the policy is considered unsound on a number of grounds. Firstly criteria (a, b and c) would lead to a differentiation between previously developed land and greenfield land, whether allocated or not. This is inappropriate and contrary to NPPF paragraph 111 which specifically seeks to encourage the re-use of previously developed land. The Government is seeking to provide encouragement through mechanisms such as Permission in Principle and Brownfield Registers.</p>	<p>The thrust of the HBF argument is not accepted. The NPPF supports the prioritising of previously developed land. In situations such as in Burnley where both brown and greenfield sites are identified to meet need and demands simply allocating some PDL sites or even granting planning permission in principle for these via legislation will not prioritise their</p>

			<p>Criterion c then places additional burdens upon greenfield land, whether they are allocated or not. Surely the point of allocation is to consider the acceptability of a site. Therefore if a site is an allocated greenfield site it should not be subject to 'in principle' considerations, this would also appear to contradict the wording in Policy HS1. Furthermore there is no justification for placing greater burdens upon greenfield sites compared to those on previously developed land.</p> <p>These additional burdens include going beyond the energy efficiency requirements set out within the Building Regulations and the provision of on-site renewable or low carbon energy generation. These requirements are completely unjustified and contrary to the Government's Housing Standards Review. The Council will be aware of the ministerial statement dated 25th March 2015. This statement sets out that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations. The requirement to go beyond the Building Regulations and require the inclusion of renewable or low carbon technologies should be deleted. The HBF also consider the requirement for two or more of the 'Optional Housing Technical Standards' to be unjustified. The methodology to introduce the optional standards is clearly set out within PPG. This is recognised within the consultation document at paragraph 4.5.6 but there is no supporting evidence to justify their introduction. For example in terms of the internal space standard the PPG (reference ID: 56-020) requires LPAs to identify need and establish a justification considering;</p> <ul style="list-style-type: none"> <li>- need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>- viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>- timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.</li> </ul> <p>As it stands, the Council has not provided any specific evidence in relation to the internal space standard or any other optional standard either within its evidence base or as part of the policy justification. It is therefore unjustified and contrary to national policy to introduce the standards through the plan at this stage. To introduce the optional standards the Council should assess whether they should</p>	<p>development.</p> <p>The Council has prioritised brownfield sites to an extent through its SHLAA, SEA/SA and site selection process. However this will not ensure these are prioritised by developers. Other Councils have tried an approach of phasing to seek to ensure all or a proportion of brownfield land takes place before releasing greenfield sites. This approach has not proved effective and has been rejected by some Inspectors and is unlikely to be supported by the HBF.</p> <p>It is important to note that the Council could have sought to rely more heavily or even exclusively on brownfield sites but recognised that, setting aside cumulative delivery and viability issues, these would not deliver the full range of quality and choice required; as such the release of greenfield sites is only justified on the basis that these would deliver schemes that brownfield sites may struggle to. Therefore the approach of SP4 to effectively set the bar higher for greenfield sites is justified. The requirements are not unduly onerous. Developers only need pick one of the options listed in 3)c) and as such the Optional Technical standards for internal space referred to are not compulsory.</p>
--	--	--	--	---

				<p>be applied across the board, covering general market family housing, affordable housing, student housing and flats and apartments. The Council should demonstrate an understanding of the likely effect of their adoption on these differing housing models before applying the standards for consideration of planning applications. Further in specific regard to the optional space standard this is likely to have implications upon the deliverability of policies HS3, density and mix, and HS4 minimum distances.</p> <p>The Council will either need to</p>	
1598	Lancashire Wildlife Trust	Strategic Policies	SP4	<p>The Trust notes that there have been several changes made to the Local Plan from the Issues and Options documentation in 2009 and the current Preferred Options consultation, and has concerns about the following items in particular:</p> <p>2. The Development Boundary has been changed to include, by default, the site allocations. The Trust has objected to a planning application for the Former William Blythe Site at Hapton and has concerns over the sites at Shuttleworth Mead South, the Former Ridgeway High School and Higher Saxifield</p>	It is sensible to include allocations within revised development boundaries, otherwise estates when built would technically still sit in the open countryside which would not lead to a sensible application of future policy.
1750	Ribble Property Developments	Strategic Policies	SP4	<p>Padiham is identified as the only Key Service Centre in the borough. RPD supports the acknowledgement of the important role that Padiham plays in delivering key services. In particular RPD supports the acknowledgement that a variety of new employment sites will be needed, including large scale sites and that the development scale for employment is given as: "Large scale, medium and a variety of smaller sites to deliver a comprehensive range of units for new and existing businesses and employment opportunities for new and existing residents."</p>	Support noted.
1639	Metacre Ltd.	Strategic Policies	SP4	<p>Policy SP4 'Development Strategy' criterion 3c) indicates that where proposals use greenfield land, development will be expected to meet a range of additional requirements which includes the proposals clearly and demonstrably contributing to increasing choice and be of the highest quality possible; or demonstrating the highest sustainability standards by achieving BREEAM 'Very Good' or Building for Life 12 accreditation, or two or more of the Optional Housing Technical Standards, or achieving fabric energy efficiency levels above the Building Regulations such as Passivhaus or equivalent, or including significant on-site renewable or low carbon energy generation (a minimum of 10% of the predicted annual energy requirements) etc. It also states that development should avoid BMV agricultural land.</p> <p>Whilst the NPPF encourages the effective use of land by re-using land that has been previously developed it does not preclude greenfield development, nor does it suggest that for greenfield development to be sustainable it must deliver the types of measures identified in policy SP4 criterion 3c). Similarly it does not automatically precluded development within BMV agricultural land, particularly on smaller sites. This has been confirmed by the Secretary of State in numerous appeal decisions.</p>	The requirements of SP4 referred to are not considered to be unduly onerous. Developers only need pick one of the options listed in 3)c). Requiring the highest design quality and sustainability standards for greenfield developments (eg. housing or employment development) is considered fully justified and consistent with the NPPF.

				Accordingly there is no justification to place unnecessary and onerous restrictions on greenfield development. This is particularly the case given that the Local Plan acknowledges the need for greenfield development to deliver the Borough's housing need and the clear NPPF key objective to "boost significantly" the supply of housing. In its current form the policy is not positively prepared nor consistent with national policy and it is considered that criterion 3c) should be deleted. Indeed the entire criterion 3 is considered unnecessary.	
1711	H F Eccles & Sons	Strategic Policies	SP4	<p>There is strong support for the identification of Worsthorne as a Main Village in the settlement hierarchy set out at policy SP4.</p> <p>Policy SP4 acknowledges Worsthorne as a place for future housing growth accepting that medium and small scale sites will deliver quality and choice to deliver aspirational housing and to support existing service provision.</p> <p>Worsthorne contains a number of local services and facilities and is a sustainable settlement to accommodate future growth. It is a high value area that is capable of providing a mix of family housing and also some larger aspirational housing to attract and maintain a skilled workforce. It is also an accessible location having good public transport linkages to Burnley Town Centre.</p> <p>Policy SP4: Development Strategy and SP5: Development Quality and Sustainability</p> <p>Ensuring developments are delivered to a high quality and promote sustainable development is important.</p> <p>The need to respond to climate change is also acknowledged, however, any policy requiring certain renewable energy or energy efficiency targets to be met should be sufficiently flexible to take into account site specific circumstances and scheme viability.</p>	<p>Support for Policy SP4 and comments noted.</p> <p>The renewable energy and energy efficiency options for greenfield sites as set out are considered to be realistic and sufficiently flexible to take into account site specific circumstances and scheme viability. Developers only need pick one of the options listed in 3)c) and as such renewable energy and energy efficiency standards are not compulsory.</p>
1692	Burnley Civic Trust	Strategic Policies	SP4	<p>The trust recognises that many houses are now occupied by single or smaller families but having said that the population of Burnley is reducing and the demand for new houses is not now and in the future will not be serious. The trust feels that wherever possible Greenfield sites should not be used. In view of Brexit it seems to us more likely that more food will have to be produced in this country especially as imports are likely to be expensive. The further use of Greenfield sites is also of necessity to have an effect of an adverse nature on the climate.</p> <p>Whilst it can easily be observed that sites for development appear to be logical when looking at a map the situation on the ground locally is often vastly different.</p> <p>The trust is unhappy with the following specific proposals.</p> <p>It would be appreciated if these views could please be taken into account and the</p>	<p>The Plan is required to meet the Objectively Assessed Need for housing in full.</p> <p>It is considered that there is a need to allocate both brownfield and greenfield land to improve choice, quality and mix, but the Plan proposes a range of brownfield sites. It is difficult to predict the impact of Brexit at this moment in time. The Civic Trust's comments on specific proposals (responded to separately) will be taken into account.</p>

				Trust would be prepared to expand where necessary upon request. It may be that the trust may wish to add further comments at a later date	
1507	Stuart Hoyle	Strategic Policies	SP4	<p>Strategic Policy SP1 states that " the Council will grant permission unless material considerations indicate otherwise - taking into account whether a) any adverse impacts of granting permission would significantly outweigh the benefits, when assessed against the policies in the NPPF document as a whole or that NPPF indicates that development should be restricted." ...</p> <p>.. It also says that we should protect the boroughs distinctive landscape character, " yet we are it seems more than happy to use 104.49 ha of Greenfield sites to build over half of our proposed new housing. Doing this will change the character and the Borough completely and go against NPPF guidelines where it says that we should "Try and conserve and enhance natural environments by halting the decline in biodiversity and helping species adapt to climate change....."</p>	<p>Policy SP4: Development Strategy sets out a settlement hierarchy for the towns and villages identifying their respective role and function, and the scale of development for housing, employment and retail. Development will be focussed on Burnley and Padiham with development of an appropriate scale supported in the main and small villages. To accommodate the level of development identified in policies SP2: Housing Land Requirement 2012-2032 and SP3: Employment Land Requirement 2012-2032 the Strategic Housing and Employment Land Availability Assessment provides evidence that these requirements cannot be met in full on previously developed sites, or on sites within the Urban Boundary as set out in the 2006 Burnley Local Plan. With this in mind, the Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and the new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary. The focus of the Plan however remains on brownfield land and on land within the urban areas.</p>
1329	Dunnockshaw Parish Council	Strategic Policies	SP4	<p>The subject of the Council's comments, is the proposed housing development outlined in Policy SP4 (Development Strategy), on page 50, item 4, under the heading of Dunnockshaw and located at Burnley Road, Clowbridge. It is also listed in Appendix 6, under the heading of small villages (tier 4), Dunnockshaw page 238, of the above document.</p> <p>The Parish of Dunnockshaw, consists of the two adjoining villages of Clowbridge and Dunnockshaw. Bordering the Borough of Rossendale, they can be classed as First Approach villages to the Borough of Burnley, and they are both situated on the A682 which is shown as a Corridor Greening area in fig 5, page 60.</p> <p>The Council wish to object to the inclusion of this development for the following reasons.</p> <p>The village of Clowbridge is very linear in nature, with Victorian terraces on either side of the main road. The area proposed for development, between the two main terraces in the centre of the village, bordering the A682, would be visually damaging and conflict with the character of the area. It would also take away the open aspect of width which not only makes the village more attractive but would destroy the only open grassed area the village has, apart from one small children's playground.</p>	<p>SP4 draws a development boundary around Clowbridge, which does include the land in question between the two blocks of terraces, to allow for, or indicate where some development of a small scale may be appropriate. Policy SP4 also stipulates that the scale of development for housing in Tier 4 (small villages) should be "small scale schemes to deliver high quality and choice". At the time of writing, there has been no application submitted to the council to develop the site. Development wishing to deviate from the requirements of Policy SP4 would have to robustly prove why it would be necessary to do so. Land beyond the development boundaries is open countryside and will be strictly controlled. The council wish to retain the rural and village nature of this and other villages in the area, and so policy SP4 seeks to retain this, and ensure any small development is carefully controlled and of appropriate quality.</p>

			<p>This is an area planted with hundreds of daffodil bulbs and mature and semi mature trees which are greatly admired. It is also a public open space, with an attractive flower planter and bench, enjoyed and used by residents, for recreation. Therefore this proposal would take away an important amenity used by the villagers.</p> <p>The site is only approx 1/2 acre (0.2 hectares) and 24 houses seems too high a density, on this small piece of land, bearing in mind the document's policies concerning private space, gardens, amenity and car parking.</p> <p>The view from one house will particularly be badly affected, as it has a double frontage, overlooking, and only a few feet from the site area. To mitigate this a further 20 metres (minimum) would have to be taken off the land available and with a gable of another house affected, at the opposite end of the site, this would reduce the space available by at least another 15 metres (minimum): a total of 35metres.(Policy HS4 page 95)</p> <p>Each house would require, at least one or two car parking spaces; 24 spaces, or if two bedroom dwellings were built 48.</p> <p>It is difficult to see how this proposal of 24 houses with car parking facilities, could comply with some of the policies in HS3 and HS4, pages 91-95 of the preferred options document, because the site area is so small.</p> <p>The A682, a commuter link to Rossendale and Greater Manchester, is a busy, dangerous road and the speed limit here is 40mph, but many exceed this limit, after leaving the more built up areas of Rossendale and Burnley.</p> <p>The extra number of cars exiting and joining the main road, at this point, would increase both the danger to pedestrians and car users alike.</p> <p>There are two designated car parking areas, one provided by Burnley Borough Council, on the proposed development area, which residents of the two rows of houses on either side, have used for at least 15 years, if not longer.</p> <p>One of the terraced rows, using these car parks, has a single white line in front of the properties and therefore the residents could not park on the road. This development would take away their right to park near their homes. In fact there would be no where for them to park, unless provision was included in the development plan. This would again result in less space for houses on the site or another important amenity would be lost to residents of both terraces.</p> <p>As it states, in the new Local Plan (appendix 6), local services are scarce, there is very little employment in the area, and the nearest retail outlet (a small general store) is over 2 miles away, as is the nearest primary school. In fact residents have to travel to Crawshawbooth, Burnley or Rawtenstall for all services and basic shopping items.</p>	
--	--	--	--	--



				The main s	
1101	Mr & Mrs F Perry	Strategic Policies	SP4	<p>My husband and I Mr F and Mrs J Perry moved to 88 Burnley Road Clowbridge in April of this year because of the amazing views and surrounding rural area , we are amazed at the proposed plans to build 24 houses on the grass mounds at the side of these 19th century cottages. Surely this will spoil the green entrance into Burnley and will create untold problems with parking for existing residents. We cannot express enough our sheer disgust at this prospect .</p>	<p>Policy SP4 proposes a development boundary around Clowbridge, which does include the land in question between the two blocks of terraces, to allow for, or indicate where some development of small scale (not sepcifically for housing) may be appropriate. Policy SP4 stipulates that the scale of development for housing in Tier 4 (small villages) should be "small scale schemes to deliver high quality and choice". The 24 houses referred to is assumed to be the number indicated in the SHLAA. The SHLAA is a study and is caveated to make clear that it does not determine whether a site should be allocated for a specific use or be granted planning permission for housing or employment development. Land beyond the development boundaries is open countryside and development here will be strictly controlled.</p>
2343	Mr Kenneth Duxbury	Strategic Policies	SP4	<p>Having attended the meeting on Thursday August 11th I would like to make the following comments.</p> <p>As I have stated previously, I do not believe that there is any need for new housing in Worsthorne and would have many concerns if housing was built. I do, however, see the need for a local plan that makes provision for aspirational housing and affordable housing for the families of existing villagers.</p>	<p>SP4 identifies Worsthorne as a tier 3 settlement where medium and small scale sites will be expected to deliver quality and choice and modern adaptable stock for existing and new residents and to deliver aspirational housing and support and enhance existing service provision. Sites such as those proposed for allocation in Worthorne can contribute towards this.</p>
2342	Junction Property Ltd.	Strategic Policies	SP4	<p>Our Client supports the need for significant employment and housing growth in Burnley and the Local Plan should adopt a positive and pro-growth approach to development. However, our Client does not agree that the development strategy has been positively prepared. We amplify these concerns below.</p> <p>Policy SP4 defines the Council’s proposed settlement hierarchy and is seeking to establish new development boundaries as part of their emerging Local Plan. The Council has produced a Proposals Map which shows the Council’s revised approach, taking account of proposed housing allocations.</p> <p>Settlement Hierarchy</p> <p>Our Client supports the identification of Burnley as the “Principal Town” within the Borough. It is agreed that Burnley is the most sustainable location for growth as it is the ‘Principal Service Centre’ in the Borough, with sub-regional importance for leisure and retail and excellent public transport links.</p> <p>Development Boundaries</p>	<p>It is not considered that the requirement of Policy SP4 3) are unduly onerous. Developers only need pick one of the options listed in 3)c). Requiring the highest design quality and sustainability standards for greenfield developments (eg. housing or employment development) is considered fully justified and consistent with the NPPF.</p> <p>It is important to note that the Council could have sought to rely more heavily or even exclusively on brownfield sites but recognised that, setting aside cumulative delivery and viability issues, these would not deliver the full range of quality and choice required; as such the release of greenfield sites is only justified on the basis that these would deliver schemes that brownfield sites may struggle to. Therefore the approach of SP4 to effectively set the bar higher for greenfield sites is justified. The requirements are not unduly onerous. Developers only need pick one of the options listed in 3)c) and as such the Optional Technical standards for internal space referred to are</p>

			<p>The Council recognises that future development in Burnley will involve development on greenfield sites adjacent to and beyond the settlement edge and therefore, development boundaries will need to be redefined.</p> <p>As drafted the development boundary has been tightly drawn around the site boundary of our Client’s land at Higher Saxifield (HS1/10). Our Client supports the inclusion of this land within the settlement boundary; however, as discussed above, objects to the overall proposed housing requirement. It therefore follows that more suitable, available and deliverable sites need to be identified within the Plan to meet the boroughs objectively assessed housing need. This may include the release of suitable Green Belt sites.</p> <p>Development Criteria</p> <p>Part 3 of the Policy goes on to lists a set of 11 criteria that development proposals on allocated and unallocated sites within the Development Boundaries are expected to meet.</p> <p>Part C (iii) states consideration will be given to:</p> <p>“Whether the proposals use greenfield land and are otherwise in accordance with the policies in the Plan. In such cases, development will be expected to:</p> <p>iii. Demonstrate the highest sustainability standards, through:</p> <p>A BREEM Assessment or equivalent to achieve ‘Very Good’;  Building for Life 12 accreditation;  Two or more of the Option Housing Technical Standards; or  Achieve fabric energy efficiency levels above the Building Regulations such as Passivhaus or equivalent; or  Include significant on-site renewable or low carbon energy generation; and  Avoid the Best and Most Versatile Agricultural Land.”</p> <p>Our Client objects to Part C (iii) of Policy SP4 as meeting the requirements of even at least one of the listed sustainability standards has the potential to render a scheme unviable.</p> <p>The Council does not appear to have thoroughly assessed the implications of this for other parts of the Local Plan, including the delivery of market and affordable housing. Additional costs associated with going above and beyond Building Regulation requirements can have a major impact on the viability of housing</p>	<p>not compulsory.</p>
--	--	--	---	------------------------

				<p>schemes and their ability to deliver affordable housing. The Council has provided no evidence to demonstrate that achieving certain design levels over and above Building Regulations requirements is viable.</p> <p>On this basis, our Client objects to this part of the policy as it is ineffective and unjustified.</p> <p>Open Countryside</p> <p>Part 4 of Policy SP4 goes on to state that development in the "Open Countryside" is defined as land beyond any development boundary where development will be strictly controlled. Our Client objects to this part of Policy SP4 as it has not been positively prepared and is inconsistent with policies contained within the NPPF.</p> <p>Paragraph 55 of the NPPF is clear that whilst local planning authorities should avoid new isolated homes in the countryside special circumstances can exist where residential development is allowed. This includes essential need for a rural worker; or enable</p>	
2261	Mrs Joanne Pickering	Strategic Policies	SP4	<p>I applaud the view of the Burnley Council Planning Team with the key objective of retaining Worsthorne as a village, ensuring the continuation of the greenbelt around its perimeter and I acknowledge the reduction of proposed sites in the preferred options and the reduction in number of dwellings.</p>	<p>Support noted.</p> <p>The countryside around Worsthorne is not Green Belt but is greenfield land. Land beyond the proposed development boundaries is open countryside where development will be strictly controlled.</p>
2226	Cliviger Parish Council	Strategic Policies	SP4	<p>As regards to other areas of Cliviger, we accept small infill, but where this is in an agricultural setting, we feel that only in traditional stone steadings should any rural development take place and this should be confined to the farm yard.</p>	<p>Comments noted. Through policy SP5: Development Quality and Sustainability the Council will seek high standards of design, construction and sustainability in all types of development.</p>
1379	The Eshton Group	Strategic Policies	SP4	<p>The Local Authority has determined that around 90 hectares of employment land should be identified and allocated within the Local Plan, Preferred Options document.</p> <p>This figure is supported and is considered to be a reasoned and rational response to the needs and future ambitions of the District going forward.</p> <p>Para 4.4.3 (page 47) recognises that the Council cannot provide the future growth of the District on previously developed sites and on that basis, additional greenfield sites will need to be identified and allocated if the District is to meet its spatial vision and objectives. The Plan states that "...a number of sites outside of the 2006 urban boundary will be required to meet the housing and employment land requirements and to deliver housing quality and</p>	<p>Support noted.</p>

				<p>choice to support economic growth."</p> <p>The approach outlined in Para 4.4.3 is then reiterated within 4.4.16 is supported. For the District to become a place of choice in 2032 it is the case that a positive approach to the allocation of land must be undertaken.</p>	
2104	Mrs Sue Goodfellow	Strategic Policies	SP4	<p>Page 33 ref: 3.1.1 defines the vision for 2032 with Burnley in "its attractive countryside setting". Page 34 Objective 3.2.1 item 5 addresses the "The Natural Environment". The proposal HS1/15 directly conflicts with this objective. Building on the hills around Burnley will blight the view and create further sprawl on the rural landscape. Development should be in the core of the town and its existing suburbs.</p>	<p>To accommodate the level of development identified in policies SP2: Housing Land Requirement 2012-2032 the Strategic Housing and Employment Land Availability Assessment provides evidence that these requirements cannot be met in full on previously developed sites, or on sites within the Urban Boundary as set out in the 2006 Burnley Local Plan. With this in mind, the Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and the new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary. The focus of the Plan however remains on brownfield land and on land within the urban areas.</p>
1781	United Utilities Property Services	Strategic Policies	SP4	<p>SP4 Settlement Boundary</p> <p>Overall we support the growth aspirations of this Local Plan, seeking to deliver a range of housing and employment sites that allow for choice for residents and businesses within Burnley.</p> <p>We support the review of the existing settlement boundaries within the authority, particular to the area around Brownside, Burnley which is a sustainable location for residential development, with good access to services, and can help to support infrastructure within the rural parish of Worsthorne, without compromising the character of the area or Conservation Area. However we argue that the whole of the former Heckenhurst Reservoir site should be included within the settlement boundary given the sustainable and well related nature of the site to the settlement in accordance with the policy requirements of SP4.</p> <p>We comment that a greater size of the site should be allocated for residential development as this supports economic growth on a currently redundant brownfield site. However, we would like to see the urban boundary extended to incorporate the whole of the site in order to provide opportunities for additional community uses which could include POS/recreational space and future residential development, subject to assessment in line with adopted policy.</p> <p>UUPS welcomes the opportunity to be involved in the preparation of the Burnley Local Plan. We trust that the comments outlined above will be duly considered in the formation of the Local Plan. As stated in previous discussions, UUPS consider their surplus former reservoir at Heckenhurst Avenue, Brownside to be wholly suitable for future residential development and would welcome the opportunity to discuss the potential of the site with the Council.</p>	<p>Brownside is not identified as a separate settlement in the Local Plan but as a suburb of Burnley.</p> <p>The site referred to is in a sustainable location and is well related to the Brownside area of Burnley and existing housing and would offer high quality and aspirational housing to meet the plan requirements. This was one site with Land west of Smithyfield Avenue at Preferred Options and was split into two for the Proposed Submission Local Plan.(See HS1/36) albeit with an amended boundary.</p> <p>The Council does not agree within the inclusion of the whole site within the Development Boundary and when considered through the Strategic Housing (and Employment) Land Availability Assessment this larger site was considered unsuitable due to the fact that the larger boundary did not relate well to existing development.</p>

				<p>I would be grateful if you would confirm receipt of this letter and would like to be kept informed of the progress of this Local Plan. If you have any queries regarding the above comments then please do not hesitate to contact me.</p> <p>We support the Council's acceptance that there is a shortfall in the developable employment and housing land that is required to deliver the employment and housing land requirement within the existing urban boundary or on previously developed sites (para 4.4.3) and therefore sites outside the urban boundary will be required to meet the housing and employment land requirement. We also agree that sites adjoining and well related to the main towns of Burnley and Padiham should be the focus of development. The Heckenhurst Reservoir site is one such well related site given the connectivity of the site to the Brownside area of Burnley but also the proximity to the rural settlement of Worsthorne and close relationship with services, in particular bus services that the development of this site would also support.</p> <p>Policy SP4 identifies the Development Strategy, focusing development within Burnley and Padiham, and then in accordance with the hierarchy of development. We agree with the Council view that directing development to the main settlement of Burnley and sustainable locations within the main village of Worsthorne. This would include the settlement of Brownside as part of the Burnley urban area and supporting the rural settlement of Worsthorne.</p> <p>Section two of SP4 covers development boundaries. We would contend that the Development Boundary for Brownside, Burnley should be extended to include the whole of the brownfield former Heckenhurst Reservoir site as it satisfies the criteria of Policy SP4 as well as other relevant policies of the emerging Local Plan:</p> <ul style="list-style-type: none"> <li>a) It makes efficient use of land and buildings;</li> <li>b) It is well located in relation to service and infrastructure and is, or can be made, accessible by public transport, walking or cycling; and</li> <li>c) It does not have an acceptably detrimental impact on residential amenity or other existing land users.</li> </ul> <p>The site therefore comprises sustainable development, close to areas of good services in terms of employment, commercial and education.</p>	
1934	Mrs Linda Smith	Strategic Policies	SP4	<p>I strongly object to more houses being built in the Worsthorne area for many reasons including social, environmental and economic. There are enough houses in this area. The local school is oversubscribed and is not able to accommodate the children who already live in thle village.</p> <p>There is limited access to the village and an increase in traffic would necessitate a lot of investment being put into updating the transport links and other utilities to accommodate an increase in the number of people living in the village (in which I would include Brownside and the 2 estates to the left and the right). Health and safety would also be a major concern.</p>	SP4 identifies Worsthorne as a tier 3 settlement where medium and small scale sites will be expected to deliver quality and choice and modern adaptable stock for existing and new residents and to deliver aspirational housing and support and enhance existing service provision. Sites such as the three proposed in Worthorne can contribute towards this.

				<p>The Heckenhurst estate is a safe area for the many children who live there. The access road to the proposed area would not be able to cope with the heavy goods traffic. Since the reservoir was filled in there has been a substantial increase in flora and fauna in the countryside. Deer have been sighted and bats regularly fly around the top of Riddings in appropriate seasons.</p> <p>The proposed plan would take away Worsthorne's village ethic and the close community spirit which pervades at the moment, recently acknowledged with the new playground next to the school.</p> <p>Save our village and do not place unsustainable limitations on it!!! Many of the people who live in the area are already seeing their civic rights eroded, particularly with the decrease in the service of the buses to the village in the evenings and at weekends. This has got to stop we are proud and feel privileged to live in such a beautiful village on the edge or the countryside and this plan will result in its urbanisation and the many challenges and disadvantages that brings. Preserve our heritage. Our council taxes are already high and the benefits this should bring are being gradually taken away. These proposals are just another nail in the coffin!!!!</p>	
1762	Lord Shuttleworth	Strategic Policies	SP4	<p>2.14 We support the suggested settlement hierarchy whereby Burnley is identified as a Principal Town which will accommodate large scale, major and a variety of smaller housing sites to deliver a comprehensive range of choice of housing types and tenures. We support this proposal as we agree that Burnley is a principal service centre for the Borough and home to the majority of the borough's population and a town of a subregional importance for retail, leisure and public administration and services with excellent public and private transport links. Burnley is therefore a sustainable settlement to accommodate significant future growth.</p> <p>2.15 We therefore support the proposed changes to the Development Boundary around housing allocation 'Site H1/2 - Land at Hollins Cross Farm (South Burnley)' so that the allocation will fall within the Development Limits of south Burnley. Please see our comments to Policy HS1 'Housing Allocations' for further detail.</p> <p>2.16 However, there is some concern over the criterion listed at point 3 c). Whilst we acknowledge that development should be built to a sustainable standard, a lot of the requirements are set out in Building Regulations and therefore it is not considered necessary for these requirements to be included / repeated within Policy SP4. The Policy needs to be prepared to adapt to change; particularly any national changes which could happen. If policy wording is too restrictive then it could lead to the Local Plan being out of date. Flexibility is therefore key.</p>	<p>Support for settlement hierarchy is noted.</p> <p>With regard the the criterion included with SP4 3c) the Council considers that the criteria are justified to ensure that the release of greenfield land for housing development delivers the highest quality development which is essentially the justification for its release as proposed over further brownfield sites in the inner urban areas. The options set out from which developers can choose are not currently building regulations requirements.</p>
1920	Mr David Brindle	Strategic Policies	SP4	<p>Site Allocation section, page 72, HS1/4 Policy Requirements 2) refers to Policy SP4 2)c)i and ii.</p>	<p>This has been corrected to state Policy SP4 2)c)i and iii as was intended.</p>

				Can you confirm this wording is correct and if so what ii (provision of an important community facility) would mean ?	An "important community facility" could include a local sporting facility, play area, village hall, health care facility or perhaps a convenience shop where none existed in the area.
1874	Mrs Kathleen Askew and Mr Mark Askew	Strategic Policies	SP4	[Support] SP4 5) 'Development proposals should not lead to the coalescence of settlements.'	Support noted.
1467	Mr Francis Hibbert	Strategic Policies	SP4	I am concerned about the proposed plans for the small strip of land NE of the A682 At Clow Bridge.  The area is marked for development but not marked specifically as for housing development. I am aware of the fact that, historically, the present grassed and seating area was the site of a number of houses but if new housing were to be built there this would be distant (far in excess of 500mtrs) from any amenities ie shops, schools etc.  I feel that clarification is needed make residents understand just what is planned there.	SP4 proposes a development boundary around Clowbridge, which does include the land in question between the two blocks of terraces, to allow for, or indicate where development (not specifically housing) of a small scale may be appropriate. Policy SP4 also stipulates that the scale of development for housing in Tier 4 (small villages) should be "small scale schemes to deliver high quality and choice". Land beyond the development boundaries is open countryside and will be strictly controlled.
1824	Padiham Community Action	Strategic Policies	SP4	[Support] SP4-5) 'Development proposals should not lead to the coalescence of settlements.'	Support noted.
1802	Mr Lee Ashton	Strategic Policies	SP4	The village of Worsthorne and surrounding areas do not have the infrastructure for further development. The vast majority of residents do not want our village to disappear. This is a village and not a town. Development would have adverse effects on our way of life and on some businesses alike. Development would inhibit our already over-stretched accesses and create chaos from plant machinery and the like. My family and I moved into the area three years ago, putting our life savings and everything into our home, in order to enjoy a rural setting for life. We are totally opposed to the plan and propose that the fallow land that the Burnley Borough own, i.e., Burnley Wood, Accrington Road, Daneshouse, should be used for this development, according to the government directive, and leave our village alone.	Policy SP4 defines Worsthorne as a main village, and as such seeks to control development with a view to maintaining the intrinsic nature of the area. Policy SP2 explains the rationale behind the site selections, including why a range of sites in a range of locations are required, to improve housing mix and offer in the borough. The site allocation policies for sites in Worsthorne also specify the development quality that would be expected on these sites...
2199	Burnley Wildlife Conservation Forum	Strategic Policies	SP4	New development boundaries replacing the present Urban Boundaries: Reasons for objection  The 'Preferred Options' proposes changing the 'Issues and Options' three Urban Boundaries of Burnley Hapton and Worsthorne to a new series of twelve Development Boundaries. The main Development Boundary for Burnley proposes to expand the existing 'Issues and Options' main Urban Boundary for Burnley to	Policy SP4: Development Strategy sets out a settlement hierarchy for the towns and villages identifying their respective role and function, and the scale of development for housing, employment and retail. Development will be focussed on Burnley and Padiham with development of an appropriate scale supported in the main and small villages. To accommodate the level of development identified in policies

				<p>accommodate all the new housing and employment plots of land proposals contained in the 'Preferred Options' which are located outside of the 'Issues and Options' main Urban Boundary for Burnley, which are on greenfield sites and form part of the open countryside of the present rural area, and also proposed is the creation of a series of 9 new Development Boundary areas located within the existing rural area in the countryside of the eastern part of the Borough at Lane Bottom, Hurstwood, Mereclough, Overtown and the Cliviger Valley between Walk Mill and Holme Chapel and in the south at Dunnockshaw.</p> <p>The 'Issues and Options' three Urban Boundaries provide a straightforward and clear distinction in the Borough between what is the present urban areas of Burnley, Hapton and Worsthorne and what is the present rural area whereas the 'Preferred Options' proposed new Development Boundaries shrink the rural area adjacent to the 'Issues and Options' main Urban Boundary for Burnley and in addition creates 9 new separate outlying Development Boundary areas in the countryside of the 'Issues and Options' rural area which would also shrink the rural area. We object to the proposed 12 new Development Boundary areas because they will facilitate new housing and employment land developments on greenfield sites in the open countryside of the present rural area of the Borough which would have adverse effects on Burnley achieving sustainability, reducing climate change and providing a net gain for nature, and consequently the 'Issues and Options' 3 Urban Boundaries need to be reinstated.</p>	<p>SP2: Housing Land Requirement 2012-2032 and SP3: Employment Land Requirement 2012-2032 the Strategic Housing and Employment Land Availability Assessment provides evidence that these requirements cannot be met in full on previously developed sites, or on sites within the Urban Boundary as set out in the 2006 Burnley Local Plan. With this in mind, the Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and the new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary. The focus of the Plan however remains on brownfield land and on land within the urban areas.</p>
1119	Sport England	Strategic Policies	SP5	<p>Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design. <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a></p> <p>Sport England would wish to see the principles contained within the document 'Active Design' referenced in the Local Plan to ensure all new housing and employment sites are designed in such a way that it encourages physical activity and to accord with Section 8 (Healthy Communities) of NPPF.</p> <p>We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.</p> <p>Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.</p>	<p>Reference to the Active Design Guidance has been added to the supporting text for Policy SP5: Development Quality and Sustainability.</p>
1957	Canal & River Trust	Strategic Policies	SP5	<p>We acknowledge that the draft policy seeks to promote development quality and sustainability especially in relation to the design and layout of new development.</p>	<p>There are many successful ways of setting out a Local Plan. The Burnley Local Plan is a comprehensive Local Plan and not a</p>



			<p>We note that 2c aims to ‘maximise the benefits of waterfront locations’ and welcome this general approach.</p> <p>However, as the Leeds &amp; Liverpool Canal forms such a key component of the natural and built environment that connects the areas communities and neighbouring authority’s, we recommend that the Council consider the inclusion within the Plan of a separate policy solely relating to canals which seeks to address the issues associated with canalside development. Canalside locations are unique and new development needs to fully reflect their settings in terms of heritage, environmental and infrastructure impacts.</p> <p>As such, we wish to highlight as an example of good practice Policy A6 of Hyndburn Borough Councils Adopted Core Strategy which has also been incorporated, on our recommendation, in Policy SP34 of the Publication Draft of Rotherham Council’s Sites and Policies DPD which is now at the Examination stage.</p> <p>Policy A6 of Hyndburn Borough Councils Adopted Core Strategy states that development adjacent to, or in the vicinity of, the Leeds and Liverpool Canal in Clayton-Le-Moors will be expected to:</p> <ul style="list-style-type: none"> <li>Be of a high quality design that integrates the canal into the development proposal in a way that treats the waterway as an area of usable space;</li> <li>Integrate the waterway, towing path and canal environment into the public realm in terms of the design and management of the development;</li> <li>Improve access to, along and from the waterway and improve the environmental quality of the waterway corridor;</li> <li>Optimise views of water and generate natural surveillance of water space through the siting, configuration and orientation of buildings, recognising that appropriate boundary treatment and access issues may differ between the towing path and offside of the canal, and;</li> <li>Improve the amenity of the canal. Development that would have an adverse impact on the amenity of the canal by virtue of noise, odour or visual impact will not be supported. When off-site improvements to the canal are required these will be delivered by the developer through the use of Grampian conditions or planning obligations.</li> </ul>	<p>Core Strategy. In the drafting of the Local Plan officers were mindful of the need to keep the Plan as succinct and focussed as possible. It is considered that Policy SP5 and the Historic Environment Policies adequately protect the unique character of the Canal and that a separate policy is not required.</p>
2347	The Eshton Group	Strategic Policies	<p>SP5</p> <p>Policy SP5, on page 55, requires that a BREEAM assessment must be carried out on all non-residential developments over 1000m2.</p> <p>In this instance the size of the buildings and indeed the requirements that exist within the market place for Burnley Bridge and land to the South of Network 65 will be in excess of this threshold.</p> <p>When delivering significant general industry and storage and distribution buildings</p>	<p>The requirement set out is not considered to be unduly onerous. The Council's Plan Viability Study concludes that the impact of meeting the requirements for BREEAM set out in SP5 would not be over and above the costs reflected within the BCIS costs.</p>

				<p>of the scale that is envisaged, it would be more difficult to deliver buildings that achieve the requirements within Policy SP5.</p> <p>Recommendation : Policy SP5 is amended under stem 1.b to read "will be encouraged".</p>	
1718	H F Eccles & Sons	Strategic Policies	SP5	<p>Policy SP4: Development Strategy and SP5: Development Quality and Sustainability</p> <p>Ensuring developments are delivered to a high quality and promote sustainable development is important.</p> <p>The need to respond to climate change is also acknowledged, however, any policy requiring certain renewable energy or energy efficiency targets to be met should be sufficiently flexible to take into account site specific circumstances and scheme viability.</p>	Comments noted. The renewable energy and energy efficiency requirements set out are considered to be realistic and sufficiently flexible to take into account site specific circumstances and scheme viability.
1090	United Utilities	Strategic Policies	SP5	In addressing this policy, United Utilities is pleased to see the Council seek measures to minimise water consumption.	Support noted.
1763	Lord Shuttleworth	Strategic Policies	SP5	<p>Similar to the concerns which are set out above in respect of Policy SP4, there is some concern over the criterion listed within Policy SP5. Whilst we acknowledge that development should be built to a sustainable standard, a lot of the requirements are set out in Building Regulations and therefore it is not considered necessary for these requirements to be included within Policy SP5.</p> <p>The Policy needs to be prepared to adapt to change; particularly any national changes which could happen. If policy wording to too restrictive then it could lead to the Local Plan being out of date.</p>	Whilst national policy can and does change, the plan still needs to be aspirational but realistic. The Policy seeks to achieve both. The requirements set out are considered to be justified and only one of the criteria relates to a specific current standard BREEAM which is not covered by the current building regulations. The Government has no current plans to amend Part L of the building regulations other than the keep the building regulations "under review".
2436	Heather Spencer	Strategic Policies	SP5	Can Burnley Borough Council guarantee that any new homes built from now on will all include solar panels and large windows to minimise use of electricity, and extensive insulation to minimise heating? The most recent housing developments that I have seen in the borough are in fact the opposite of this, with no solar panels and tiny windows which must surely necessitate lights to be on even in the daytime.	<p>The Council can not require all new housing to have solar panels. Policy SP5: Development Quality and Sustainability expects proposals to seek opportunities for on-site energy supply from renewable and low carbon energy sources.</p> <p>Policy SP4 requires higher design and sustainability standards for greenfield sites and one way of helping to meet these requirements is through the inclusion of on-site renewable or low carbon energy generation (a minimum of 10% of the predicted annual average energy requirements.</p>
1825	Padiham Community Action	Strategic Policies	SP5	[Support] SP5-3a) Key Gateways.	Support noted.
1875	Mrs Kathleen Askew and	Strategic Policies	SP5	[Support] SP5 3a) Key Gateways.	Support noted.

	Mr Mark Askew				
1117	Sport England	Strategic Policies	SP6	<p>Playing Fields are an integral part of the Green Infrastructure network and that is clearly identified within the reasoned justification for policy SP6. However, the evidence base for Playing Fields is contained within the Council's recently completed Playing Pitch Strategy.</p> <p>Sport England would welcome inclusion of the following words within para 4.6.9:</p> <p>"For major developments and/or those requiring an Environmental Impact Assessment (EIA) an audit taking account of the Council's GI Strategy, Playing Pitch Strategy and Green Spaces Strategy will be expected."</p> <p>The reason for the inclusion is because the Council along with external partners including Sport England and the pitch sport national governing bodies will be updating the baseline data and site by site Action Plan of the Playing Pitch Strategy (PPS) on an annual basis. This is because seasonal changes happen to pitch provision and the numbers of teams that alter the demand/supply balance on an annual basis. Other Green Space typologies do not have the same rapid changes so there is no need to update the baseline data as regularly.</p>	General support for the policy approach is noted.
2398	Lancashire County Council	Strategic Policies	SP6	<p>SP6 Green Infrastructure</p> <p>The LLFA supports the Environment Agency's comments on the above policies.</p>	Support noted. See response to EA comment ref 1359.
2225	Burnley Wildlife Conservation Forum	Strategic Policies	SP6	<p>Green Infrastructure</p> <p>The final sentence of page 58's para 4.6.9 needs to be more specific and in this respect especially needs to remove the phrase 'light touch audit' which has a flippant connotation. A more appropriate final sentence needs to be on the following lines: For other development proposals, GI audits, Environmental Impact Assessments and Wildlife Surveys/Habitat Impact Assessments will be required as appropriate, commensurate with the extent of a development proposal's impact on the environment.'</p>	It is not considered that such a phrase is flippant. The Plan is relevant to many types of development from small householder development to major development such as housing estates and it needs to make clear wherever possible how policies will be applied. Their requirements must be proportionate. The suggested wording does not give applicants any clarity in respect of requirements.
1268	Cllr Cosima Towneley	Strategic Policies	SP6	<p>Additional suggestions:</p> <ul style="list-style-type: none"> <li>• That a presumption that all green routes be inclusive and open to all non-motorised users, including equestrians in the light that Burnley has a particularly large number of urban riders and stabling facilities.</li> <li>• That this presumption be specifically noted in the plan.</li> <li>• That new development, both housing &amp; employment, add to the development of non-motorised 'green' routes, either through the dedication of routes through the proposed development or as a financial contribution to specific projects</li> </ul>	Part 2) of Policy SP6 is concerned with development affecting GI. Part 1) supports the Council's wider strategic actions with its partners to protect, support and enhance the GI network. It doesn't not address specific projects of the type mentioned. Contributions for GI to support specific projects of the type mentioned could be sought under Policy IC4.

				<ul style="list-style-type: none"> <li>• That these contributions be proportional to the size/value of the development.</li> <li>• That these contributions/dedications be specified and agreed as an integral part of the planning application and not as ancillary to the plans.</li> </ul>	
1359	Environment Agency	Strategic Policies	SP6	We support the policy as it provides additional mitigation for the negative effects of development of greenfield sites on biodiversity and flood risk.	Support noted.
1826	Padiham Community Action	Strategic Policies	SP6	[Support] SP6-2b) Requires an audit of the Green Infrastructure functions in and adjoining the site.	Support noted.
1673	Natural England	Strategic Policies	SP6	Natural England welcomes the suite of policies in particular the inclusion of a specific Green Infrastructure (GI) strategic policy within the Local Plan. The importance of GI is clearly recognised within this policy and throughout the plan.	Support welcomed and noted.
1571	Lancashire Wildlife Trust	Strategic Policies	SP6	The Trust is pleased to see, and supports the inclusion of, Policy SP6: Green Infrastructure in section 4 Strategic Policies, in particular that the Council will, in partnership with other agencies and stakeholders, seek to protect, enhance and extend the borough's multifunctional green infrastructure network in order to maintain and develop the wider public health, ecological and economic benefits it provides and to ensure that there is an overall net gain.	Support noted.
1876	Mrs Kathleen Askew and Mr Mark Askew	Strategic Policies	SP6	[Support] SP6 2b) Requires an audit of the Green Infrastructure functions in and adjoining the site.	Support noted.
1566	Lancashire County Council Property Services	Strategic Policies	SP7 Green Belt	<p>Lancashire County Council support the revision of the Green Belt as set out in Para. 4.7.11 for the reasons set out below:</p> <p>The Green Belt within Burnley was first defined in the Burnley District Local Plan of 1985 and as such is largely unchanged in 31 years, reflecting the permanence which is one of the Green Belt's principal characteristics. However, it is considered that the land at Ridgewood now does not fulfil any of the five purposes of the Green Belt and would therefore be an appropriate location to remove from the Green Belt without harm to the role of the Green Belt in Burnley as a whole.</p> <p>The five purposes of the Green Belt are set out as follows (paragraph 80 of the NPPF):</p> <ul style="list-style-type: none"> <li>• to check the unrestricted sprawl of large built-up areas;</li> <li>• to prevent neighbouring towns merging into one another;</li> <li>• to assist in safeguarding the countryside from encroachment;</li> <li>• to preserve the setting and special character of historic towns; and</li> <li>• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>Furthermore, when defining Green Belt boundaries these should be clear and use</p>	Support for the Green Belt revision at Ridgewood is welcomed. The Green Belt Review prepared by LUC highlighted that this site could potentially be removed from the green belt with minimal impact on the wider function of the green belt in the borough.

				<p>physical features that are readily recognisable and likely to be permanent (paragraph 85 of the NPPF).</p> <p>Using these policy requirements as a basis for consideration of the land at Ridgewood, given the containment provided by the very physical barrier of the M65, development in this location would not result in unrestricted sprawl nor does the land constitute a countryside area. Furthermore, there are no neighbouring towns in this location into which the town could merge. The Green Belt clearly does not preserve the setting and special character of a historic town. In respect to Urban Regeneration there have been difficulties in encouraging development in the local area and the opportunity for limited new development on the urban fringe will help to instil general confidence in the local area which will help to promote urban regeneration overall.</p> <p>The site itself also contains existing built development and extant planning consents for parts of the land undermining any role as Green Belt. For this reason, it is considered that the most firm and recognisable feature in this location is the M65 and that land to the east of the M65 could be removed from the Green Belt without detrimentally impacting upon the five purposes of the Green Belt or resulting in unrestricted development. There are other land constraints present such as the presence of playing fields which would hinder further development in this location and ensure the entire area was not built out. However, the mix of land uses and planning consents mean that it is difficult to define a firm and defensible boundary that will endure through the heart of the site. The proposed revised boundary is therefore supported.</p>	
1764	Lord Shuttleworth	Strategic Policies	SP7 Green Belt	<p>2.19 Policy SP7 'Protecting the Green Belt'</p> <p>2.20 As set out in the consultation document, on page 61, the NPPF (para 79) states that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence."</p> <p>2.21 The NPPF sets out five purposes of the Green Belt:  1) To check the unrestricted sprawl of large built up areas;  2) To prevent neighbouring towns from merging into one another;  3) To safeguard the countryside from encroachment;  4) To preserve the setting and special character of historic towns; and  5) To assist urban regeneration by encouraging the recycling of derelict and other urban land.</p> <p>2.22 The NPPF states that: 'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the</p>	<p>The Council's Strategic Housing Land Availability Assessment identifies that there are sufficient developable sites without needing to consider sites currently in the Green Belt. As this is the case there are no exceptional circumstances which would require or justify the Council to alter the Green Belt to allocate sites for housing development.</p>

			<p>Local Plan'. As such, we fully support the opportunity to review the Green Belt boundaries at this time to help address the development needs of the Borough, particularly as Burnley's Green Belt remains unchanged for over 31 years.</p> <p>2.23 However, it is considered that, in line with our comment to Policy SP2, additional housing sites need allocating (in addition to those already identified as preferred housing sites) and these may be best located within land which is currently identified as Green Belt but no longer fulfils Green Belt purposes.</p> <p>2.24 Our client has land within the Green Belt along the immediate edge of the northern boundary of Burnley which could accommodate new housing development. The sites include:</p> <p>1) Land at Bullions Close (north Burnley)  2) Land at Cornfield Grove (north Burnley)</p> <p>Please see Appendix A for site location plans and further site details under our comments to Policy HS1.</p> <p>2.25 It is considered that the shortfall of sites to meet the requirements for employment land and the additional housing numbers (as set out in our comments to Policy SP2 above) does constitute the exceptional circumstances required to justify an alteration to the existing Green Belt boundaries.</p> <p>2.26 Whilst the Green Belt still fulfils its purpose and its general extent should be maintained we consider that the above two sites should be deleted from the Green Belt to help meet the housing requirements of the Borough during the Plan period.</p> <p>2.27 It is considered these could be released for development without undermining the overall integrity of the Green Belt, and that they could be developed in an acceptable manner addressing other Plan requirements.</p> <p>2.28 The deletion of 1) Land at Bullions Close (north Burnley); and, 2) Land at Cornfield Grove (north Burnley) from the Green Belt and allocated for housing development would not: lead to unrestricted sprawl of large built up areas; would not lead to neighbouring towns from merging into one another; would continue to safeguard necessary countryside from encroachment which addressing the housing requirements; would preserve the setting and special character of historic towns as the sites are not in close proximity to any historic or heritage assets; and would continue to assist urban regeneration by encouraging the recycling of derelict and other urban land as other brownfield land (as part of other allocations allocated through the Plan process).</p>	
--	--	--	--	--

				2.29 Upon additional amendments to the Green Belt in respect of the two sites identified above, we would be in a position to support, in principle, Policy SP7 as the text of Policy SP7 is considered to comply with the NPPF.	
2154	Lancashire Wildlife Trust	Strategic Policies	SP7 Green Belt	The Trust objects to the removal of the Former Ridgewood School at Stoneyholme (Parcel 30, as delineated on the Preferred Options Map) from the Green Belt. The Trust may be prepared to withdraw its objection if the boundary change was revised.	The 2016 Green Belt Review indicated that this area of land no longer fulfilled the purposes of Green Belt and identified that the Green Belt parcel which includes this site as one which could be released from the Green Belt. The Council agrees with this recommendation.
2181	Coates / Mulbury Land	Strategic Policies	SP7 Green Belt	<p>1.1 PWA Planning act on behalf of Messers Coates and Mulbury Land, in respect of land at Crow Wood, Burnley ( a site shown approximately by red-edging on the plan attached at Appendix 1).</p> <p>The Burnley Local Plan Preferred Options Document Policy SP2 indicates a housing target of 4,180 dwellings over the plan period, inferring an annual target of 209 dwellings. In order to meet the requirements of Paragraph 47 on NPPF this figure should be identified to be a minimum requirement, rather than a loose target, which the use of the word “around” would suggest.</p> <p>1Of the 4, 180 dwellings, over 65% is to come from development of allocated sites with a further 9% allowed for through brownfield windfall sites. PWA planning consider that there is insufficient evidence detailed within the document, and the associated evidence base, to demonstrate that the strategy being proposed will achieve he scale and mix of housing required. In particular it is considered that the housing delivery strategy is over-reliant upon a number of large urban brownfield sites, the delivery of which is at best uncertain. Moreover the lack of allocation of high quality greenfield sites, including suitably located Green Belt land release, in areas where people want to live and developers want to build, will prevent development of the types of housing which are identified within the 2016 SHMA, namely the need to “diversify the current stock away from terraced properties towards larger, more aspirational detached and semi-detached dwellings”.</p> <p>1.5 Section 4.2.25 of the documents details that, since the beginning of the plan period (1st April 2012) the number of dwelling completions has been significantly lower than that of the annual target of 209. Between the years 2012 and 2015 there was in fact a cumulative shortfall of 412 dwellings (nearly two years’ requirement). Although this has been attributed to poor economic conditions, the economic and political climate remain unpredictable and such concerns are unlikely to soon be alleviated. This places significant importance on the Plan delivering a very wide range of attractive, developable and deliverable sites for inclusion in the housing supply.</p> <p>The Local Plan preferred options document is therefore not considered to be</p>	Paragraphs 1.2 - 1.4 of the Green Belt Review clearly set out the Purpose of the Study. It specifically states that the Review will inform the preparation of the emerging Local Plan. Any parcels identified for release will not necessarily be allocated for development and consequently, land that is recommended to be retained within or added to the Green Belt may still be considered appropriate for development should insufficient 'developable' and 'deliverable' sites be identified outside the Green Belt. The recommended removal or addition of any parcel of land from or to the Green Belt, will, if appropriate, be included in the proposals set out in the Local Plan and subjected to the rigours of the plan-making process and public consultation.

				<p>“sound”, and in particular Policy SP1 is considered to be unjustified in that it seeks to pursue a strategy which is unlikely to result in sufficient housing development to meet the identified housing needs of the borough. It is therefore considered that the plan has not been “positively prepared” as the strategy will not meet the objectively assessed need for development. Moreover it is not “justified”, when considered against reasonable alternatives, as there is a clear opportunity to release further land from the Green Belt and to allocate a number of additional appropriate sites, which can help to meet the requirements set out in the Plan and in particular the types of aspirational housing identified within the SHMA.</p> <p>It is clear from the above that we believe that the strategy of the plan needs to be altered so as to look to identify a number of appropriate greenfield sites in attractive locations which can help to meet the identified needs and the overall minimum target. Moreover we believe that the Burnley Green Belt review document has failed to properly assess the importance of sites against relevant criteria. In particular we are concerned that much of the evidence is extremely subjective and that in many cases there are contradictions which could call into question the manner in which some of the sites have been assessed and ranked. Moreover the stage 2 assessment is insufficiently objective and it seems inappropriate for the Green Belt review to have identified sites for release from the Green Belt. The function of the review should have simply been to rank sites in terms of their importance to the Green Belt (the stage 1 assessment) and to then leave any decision on the re</p>	
1751	Ribble Property Developments	Strategic Policies	SP7 Green Belt	<p>RPD supports the council’s decision to review its Green Belt through the preparation of its emerging plan. This approach is consistent with National Planning Policy Framework paragraph 83, and therefore meets the test of soundness. It is also an effective and deliverable strategy that will assist in meeting objectively assessed development requirements through the delivery of much needed additional employment land. Re-defining the green belt boundary to release this site meets the tests of soundness and will still enable the Green Belt between Burnley/Padiham and Accrington and Nelson to continue performing the five key purposes.</p> <p>Paragraph 4.7.13 of the emerging Local Plan identifies that Shuttleworth Mead South can be released from the Green Belt without undermining the integrity of the overall Green Belt.</p> <p>Given the site does not contribute to maintaining the purposes of the green belt, the various economic, social and environmental benefits of the site’s allocation as employment land presents a strong case for its release from green belt. This is also the approach taken by BBC and is supported by RPD.</p>	Support noted. Whilst Green Belt Review identifies that the site at Shuttleworth Mead South can be released from the Green Belt without undermining its overall integrity, the Review does conclude that the land still fulfills a number of green belt purpose. The Council considers that the exceptional circumstances have been demonstrated to justify the release of the site for employment development.
2348	The Eshton	Strategic	SP7 Green	Para 4.7.13 states that;	Support noted.



	Group	Policies	Belt		
				<p>"...land to the west of the Burnley Bridge Business Park and land to the south of Shuttleworth Mead. It is considered these could be released for development without undermining the overall integrity of the Green Belt, and that they could be developed in an acceptable manner addressing other Plan requirements. These sites would form extensions to particularly successful business parks and are located close to the M65 motorway and would provide for important and beneficial additions to the employment land portfolio."</p> <p>This statement is welcomed, and the conclusions supported. The Burnley Bridge Business Park has been a beacon of success within the District, and has led to a significant number of new direct and indirectly related employment opportunities.</p>	
1514	Huntroyde Estate	Strategic Policies	SP7 Green Belt	Policy SP7 Protecting the Green Belt, is not positively planned, not justified and not consistent with national policy.	Policy SP7 sets out the Council's policy approach to protecting the Borough's Green Belt, in line with section 9 of the National Planning Policy Framework. Protection of the Borough's Green Belt from inappropriate development whilst setting out the forms of development that would be supported is positive planning in a green belt context, wholly justified and entirely consistent with national policy.
1161	Mr Barrie Sharpley	Strategic Policies	SP7 Green Belt	The local plan argues for retention of the green lung / green belt (p.22) which some adjacent towns have lost e.g. Bolton and again, such considerations should overrule large scale housing development in our green and pleasant land, which is a precious legacy i.e. sustainable development p.37.	<p>Chapter 4.7 explains that it is considered appropriate to allocate three sites which currently lie in the Green Belt - HS1/18 (previously partly developed), EMP1/12 &amp; EMP1/13 (greenfield ).</p> <p>Policy SP7 seeks to protect the remaining Green Belt from inappropriate development.</p> <p>With regard to greenfield sites in general, the plan does propose to allocate a number of these within and immediately adjoining existing settlements for development, to help provide for the amount, range and quality of housing sites to meet the identified need. On most greenfield sites in the countryside, the plan stipulates inter alia that proposals must be of "the highest quality" and contribute to increasing housing quality and choice in the borough. The focus of the Plan however remains on brownfield land and on land within the urban areas.</p>
2430	Burnley, Pendle and Rossendale Green Party	Strategic Policies	SP7 Green Belt	With climate change and sustainability at its heart, the Plan should put forward ambitious proposals to create an actual Green Belt around Burnley and Padiham - recognising the importance of the Ecological Network Grasslands to the south of Burnley and increasing the desirability of the town as a place to live and visit. At the	Green Belt boundaries should only be reviewed in Exceptional Circumstances. The Council has already undertaken a Green Belt Review to support the Local Plan. Land is included within the Green Belt which fulfils one or more of the five purposes of

			<p>very least, an independent study should be undertaken to identify the extent to which the Lancashire Ecological Network for Woodland could be incorporated into the Green Belt.</p>	<p>Green Belt. Identification of land within the Lancashire Ecological Network for Woodland would not be a sufficient justification on its own for including land within the Green Belt.</p>
--	--	--	--	--

## Section 5.1 – Housing Policies (not including HS1 Housing Allocations)

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Home Builders Federation Ltd	Policies - Housing	HS2	<p>The HBF does not dispute the need for affordable housing, this is adequately demonstrated by the 2016 SHMA, and we support its provision where viable.</p> <p>The policy does not set out any specific target for affordable housing but rather suggests that it will be provided upon viability grounds on schemes of greater than 10 dwellings. The HBF does not support this policy stance and considers it unsound.</p> <p>Our key concern is that the policy provides no certainty for a developer to assess the investment potential of a site. The policy therefore places the delivery of housing at risk. The NPPF (paragraphs 17 and 154) state that local plan policies must be clear so that applicants know what they must do to submit an application that is likely to be approved, and decision-takers know how to react to that application. The NPPF is also clear (paragraph 174) that local plans must set out the burdens that will be placed upon the development industry. The policy clearly does not provide this.</p> <p>To provide a viable affordable housing target the Council will need to undertake a whole plan viability assessment, as described in paragraph 6.1.4 of the plan. This will need to consider the cumulative impacts of policy standards and burdens, including affordable housing. This should be provided prior to the next stage of consultation. Without this information the Council cannot justifiably set an affordable housing target or request affordable housing from sites.</p> <p>The policy also does not consider the potential implications of the impending introduction of Starter Homes. If a requirement is introduced by Government prior to the next stage of consultation this should be incorporated into the policy and viability evidence.</p>	<p>The Policy was written, as the text stated, before the Government's Starter Home intentions were made clear. This is still the case and the Government have recently altered their previously announced position and are consulting on further changes. The amended Plan text explains the difficulties this lack of certainty has created for plan-making. Whilst the the HBFs point made about having a set % is understood, the Council's experience and viability evidence confirms that this standardised approach just is not effective in Burnley. To set a specific % requirement and then to waive it consistently would not be sensible or give the certainty sought. Instead, a more nuanced approach is required which recognises the viability challenges sites may face and how in needing to seeking to diversify the housing offer and provide for more aspirational housing, an off site approach to affordable housing delivery may be preferred.</p> <p>The Council is intending to prepare an SPD on Planning Contributions where further detailed advice and information will be developed in consultation.</p>
Huntroyde Estate	Policies - Housing	HS2	<p>Section 3 of this policy setting out the types and percentages is too restrictive and the last 2 lines should therefore be removed. A mix of tenure types is acceptable but needs to be flexible to accommodate needs which over the plan period will undoubtedly change. Not justified, not effective, not consistent with national policy.</p>	<p>Section 3 of Policy H2 makes it clear that the tenure mix proposed is to be used as a guide. This is considered to gives applicants sufficient flexibility.</p>
Metacre Ltd.	Policies - Housing	HS2	<p>Criterion 3) of policy HS2 'Affordable Housing Provision' states that affordable housing should be 80% social rent and 20% intermediate. This is concerned too prescriptive as there are often occasions where flexibility is required in order to get Registered Social Landlords to take on respective affordable properties. The tenure of housing required may also change over the 20 year period of the Local Plan, or may differ on a site by site basis. The need for flexibility is all the more necessary given that Starter Homes have recently been introduced via the Housing and Planning Act</p>	<p>Section 3 of Policy H2 makes it clear that the tenure mix proposed is to be used as a guide. This is considered to gives applicants sufficient flexibility.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			2016 and Regulations may soon be enacted which requires or permits them to form part of an affordable housing mix. The policy is therefore not positively prepared or justified as criterion 3 is too prescriptive, un-flexible and unnecessary. It should be deleted as a reasonable alternative would be to allow the tenure of affordable housing to be considered on a site by site basis.	
Junction Property Ltd.	Policies - Housing	HS2	<p>Our Client accepts that whilst Burnley is in theory an affordable place to live, the quality of some of the older private sector stock at the lower or modest incomes is poor and can present challenges for those on modest incomes. There is therefore a need to provide new affordable housing within the Borough.</p> <p>Whilst the Council is committed to providing affordable housing, they recognise due to viability considerations, the approach of requiring developers to contribute monies through Section 106 Agreement for off-site provision has rarely been successful.</p> <p>Our Client supports the principle of delivering affordable housing for developments of over 10 dwellings, on a site by site basis, as it provides flexibility to adapt to changes market signals. The policy also allows developers the opportunity to provide an off-site contribution if required. This might be appropriate when the Council have requested other local infrastructure to be delivered on the site or alternatively, if there is a low affordable housing demand in a particular settlement. It is crucial that the economic viability of any scheme is taken into account when agreeing the amount of affordable housing to be provided on site.</p>	Comment noted.
Junction Property Ltd.	Policies - Housing	HS3	<p>Density</p> <p>Paragraph 47 of the NPPF allows local planning authorities to set out their own approach to housing density to reflect local circumstances. Part 1 of Policy HS3 requires new development to make efficient use of land and be built at a density appropriate to its location and setting.</p> <p>Part 2 of the policy requires residential development within Burnley to achieve a minimum density of 25 dwellings per annum. Part 3 of the policy requires higher densities of at least 40/50 dwellings per annum within or close to the town and district centres.</p> <p>Whilst the Council are allowed to set their own approach to housing density, requiring a generic density does not take into account the character of different surrounding area and the physical, ecological or landscape constraints of individual sites that prevent the site from delivering this housing density. A density standard presents an onerous requirement on applicants at a time when the Council should be actively encouraging new development.</p> <p>As drafted Parts 2 and 3 of the policy are ineffective and inconsistent with national policy. To create greater flexibility the wording of the policy should be amended as follows:</p>	<p>The minimum densities set out in the policy are very much lower than historically in Burnley and balance the need to ensure the efficient use of land with the need to increase housing quality and choice and meet the other relevant policy requirements.</p> <p>The wording has been amended to refer to gross rather than net densities and a 40 dph (rather than 40/50) minimum in clause 3).</p> <p>The policy as worded is considered sufficiently flexible to take account of site characteristics and marketability.</p> <p>Density expectations for specific allocations are set out in Policy HS1 through indicative numbers.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>“New housing should make efficient use of land and be built at a density appropriate to its location and setting. As a guide, development should seek to achieve 25 dph (dwellings per hectare net) and up to 50 dph in highly accessible locations. In more sensitive locations the priority will be to develop at a density that reflects the surrounding form and layout.”</p> <p>Mix</p> <p>To deliver a wide choice of high quality homes, paragraph 50 of the NPPF requires local planning authorities to identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p> <p>The policy states that all housing schemes should consider a mix of housing types using indicative proportions outlined within the policy. The policy goes on to state that the precise mix should be informed by the sites size, characteristics, context and townscape and likely marketability of the dwellings.</p> <p>Our Client supports the need to deliver a mix of house types within Burnley. Our Client recognises that the Borough has an oversupply of high density housing, particularly, poor quality two bed terraced housing and there is a need for larger family homes, including semi-detached and detached properties. However, the need to diversify the existing housing stock is understated within the wording of the policy and does not reflect the Council’s Vision and Objectives.</p> <p>Our Client suggests that the wording of Part 4 of policy is amended as follows:</p> <p>“The types and sizes of new dwellings to be provided should help to diversify the existing housing stock and achieve a better, more balanced mix of dwellings in the borough. This includes the provision of higher value homes. All housing schemes should consider a mix of housing types using indicative proportions set out in the table below. The precise mix should be informed by the following site specific considerations:</p> <p>Its size;  Its characteristics;  Its context and townscape setting; and  The likely marketability of the dwelling.”</p>	
Huntroyde Estate	Policies - Housing	HS3	The density figures shown do not seem to be justified by the supporting text. The policy needs to have the flexibility to deal with individual site constraints when setting density levels. Parts 2 and 3 should be removed as not consistent with national policy. As the borough has a high proportion of terraced homes then to secure a wider mix is recognised.	The minimum densities set out in the policy are very much lower than historically in Burnley and balance the need to ensure the efficient use of land with the need to increase housing quality

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				<p>and choice and meet the other relevant policy requirements.</p> <p>The wording has been amended to refer to gross rather than net densities and a 40 dph (rather than 40/50) minimum in clause 3).</p> <p>The policy as worded is considered sufficiently flexible to take account of site characteristics and marketability.</p> <p>Density expectations for specific allocations are set out in Policy HS1 through indicative numbers.</p>
H F Eccles & Sons	Policies - Housing	HS3	<p>Policy HS3: Housing Density and Mix</p> <p>5.7. There is support for the acknowledgement from the Council that there is a need for aspirational housing (paragraph 5.1.19 of the Preferred Options Local Plan) in Burnley. Paragraph 5.1.24 (Preferred Options Local Plan) refers to the findings of the Strategic Housing Market Assessment 2016 in that there is a need to move away from terraced properties within Burnley and ensure there is an offer of “larger, more aspirational detached and semi-detached dwellings”. Ensuring there is a mix of housing to meet the different needs of the community is a requirement of the NPPF (paragraph 50).</p> <p>5.8. The Brownside Road and Butcher Farm sites are ideally placed to deliver a mix of good quality family housing and provide an opportunity for Burnley to deliver the aspirational housing it is seeking.</p> <p>5.9. It is important that the draft policy does not impose specific densities to be achieved by new housing schemes. There should be sufficient flexibility for sites to be delivered at densities that take account of size, location, surrounding characteristics and local need/demand. Similarly, the housing mix should only be a suggestion or a guide and not be imposed.</p> <p>5.10. Schemes will need to ensure that the housing provided meets local need and demand.</p>	<p>The minimum densities set out in the policy are very much lower than historically in Burnley and balance the need to ensure the efficient use of land with the need to increase housing quality and choice and meet the other relevant policy requirements.</p> <p>The wording has been amended to refer to gross rather than net densities and a 40 dph (rather than 40/50) minimum in clause 3).</p> <p>The Policy as worded is considered sufficiently flexible to take account of site characteristics and marketability.</p> <p>With regard to housing mix, improving quality and choice is a fundamental part of the whole plan strategy and has informed the choice of housing allocations.</p> <p>Density expectations for specific allocations are set out in Policy HS1 through indicative numbers; and housing mix requirements for these specific allocations are also set out in Policy HS1.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Metacre Ltd.	Policies - Housing	HS3	<p>Criterion 4) of policy HS3 'Housing Density and Mix' refers to residential schemes comprising 20% detached 3 or more bedroom dwellings, 35% semi-detached 2-4 bedroom dwellings; 15% terraced 2-3 bedroom dwellings; 20% bungalows / accessible flats with 1 to 3 bedrooms, and 10% other 1 to 2 bedroom flats.</p> <p>The appropriate mix of dwellings for a site is dependent on a variety of factors, including the size of the site, the location and character of the site and surrounding area, the particular market in the location of the site and viability matters etc. It simply isn't appropriate, possible or even necessary to try and identify a dwelling mix to be applied to all residential development in the whole of the Borough for the 20 year Plan period.</p> <p>The policy is therefore not positively prepared or justified as criterion 3 is too prescriptive, un-flexible and unnecessary. It should be deleted as a reasonable alternative would be to allow the dwelling mix to be considered on a site by site basis.</p>	<p>The minimum densities set out in the policy are very much lower than historically in Burnley and balance the need to ensure the efficient use of land with the need to increase housing quality and choice and meet the other relevant policy requirements.</p> <p>The wording has been amended to refer to gross rather than net densities and a 40 dph (rather than 40/50) minimum in clause 3).</p> <p>The Policy as worded is considered sufficiently flexible to take account of site characteristics and marketability.</p> <p>With regard to housing mix, improving quality and choice is a fundamental part of the whole plan strategy and has informed the choice of housing allocations.</p> <p>Density expectations for specific allocations are set out in Policy HS1 through indicative numbers; and housing mix requirements for these specific allocations are also set out in Policy HS1.</p>
Rossendale Road Urban Plan Residents	Policies - Housing	HS3	<p>Density</p> <p>A sustainable development requires around 40 houses per hectare to support public transportation and facilities like shops and schools. However, the average density on brownfield sites is currently 28 houses per hectare (it's 22 on greenfield sites). That means the real need is for greater-density, mixed use sites, where houses, shops and business can co-exist, and there remains room for urban greenspace, in order for a community to be properly sustainable. Burnley has a policy of 25 dpa for Rural areas and 30 dpa for Urban areas.</p> <p>In the Gorbals area of Glasgow, a 1990 development with 64 houses per hectare used mainly three storey terrace houses and four storey flats, some with shops on the ground floor and offices above. The streets were well-defined, and park space, and roads separated from pavements by a barrier of trees. The development had buses connecting with underground and suburban rail services. It's proved so successful that there have been attempts to reproduce it in Manchester, Leeds and</p>	<p>The densities achieved on the proposed allocations take account of site characteristics and constraints and as such may differ from the minimum densities set out in Policy H3. However, the densities set out for the proposed allocations are all intended balance the need to ensure the efficient use of land with the need to increase housing quality and choice and deliver and meet the other relevant policy requirements e.g. on mix, landscaping SUDS etc.</p> <p>It is not clear where the density figures quoted in the comments have come from and the examples given may not be appropriate for</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>London.</p> <p>If Burnley made their urban sites sustainable, and met the criteria for Rural sites, then there would be a reduction in land need of 33 hectares [Preferred Options Local Plan Trajectory Table included]</p> <p>The housing allocations for the above sites are NOT all within the 25-30 dpa.</p> <p>If the minimum is 25 dpa then there would be a saving of 14 hectares of land needed If the Urban areas dpa were 40 then there would be a further saving of 19 hectares. A total saving of 33 hectares could be achieved by re-assessing the density in line with the 'sustainable development' strategy. We therefore conclude that 103 hectares of land is excessive and this should be reduced to 70 hectares. This would have a massive impact on the need to move the Urban Boundary, reducing the need by 33 hectares. The areas we are objecting to are less than 9 hectares and could therefore easily be removed from the Urban Boundary extension proposal.</p>	<p>many sites in Burnley, but the point about achieving higher density and mixed use developments in more central locations is well made. The Plan's brownfield allocations in more central area do propose higher densities.</p>
James Pollard and Sons (Worsthorne) Ltd	Policies - Housing	HS3	<p>We object to Policy HS3: Housing Density and Mix, which we consider to be an unnecessarily prescriptive policy that could seriously hinder the delivery of housing sites and put developers off investing in the Borough. Part one of the policy should be sufficient to direct design of new housing schemes, with the remainder of the policy being indicative only, if necessary.</p>	<p>The minimum densities set out in the policy are very much lower than historically in Burnley and balance the need to ensure the efficient use of land with the need to increase housing quality and choice and meet the other relevant policy requirements .</p> <p>The wording has been amended to refer to gross rather than net densities and a 40 dph (rather than 40/50) minimum in clause 3).</p> <p>The Policy as worded is considered sufficiently flexible to take account of site characteristics and marketability.</p> <p>With regard to housing mix, improving quality and choice is a fundamental part of the whole plan strategy and has informed the choice of housing allocations.</p> <p>Density expectations for specific allocations are set out in Policy HS1 through indicative numbers; and housing mix requirements for these specific allocations are also set out in</p>



Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Home Builders Federation Ltd	Policies - Housing	HS4	<p>The plan proposes to place a significant number of space requirements upon housing developments. These include the internal space standard, open space standards, accessibility standards, density and mix policies and within part 3 of this policy separation distances. Whilst the HBF does not dispute the need for adequate separation between properties the cumulative impact of all of the proposed standards will require consideration to ensure that there are no internal conflicts within the plan and that policy compliant sites can be delivered. It should also be noted that the topography of Burnley may make variation upon these distances appropriate in certain instances.</p> <p>Part 4 requires 20% of dwellings in schemes of more than 10 to meet optional Building Regulation Part M4(2). The PPG (ID 56-007) identifies that to introduce the optional standard the Council should consider the following;</p> <ul style="list-style-type: none"> <li>- the likely future need for housing for older and disabled people (including wheelchair user dwellings).</li> <li>- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example</li> <li>- retirement homes, sheltered homes or care homes).</li> <li>- the accessibility and adaptability of existing housing stock.</li> <li>- how needs vary across different housing tenures.</li> <li>- the overall impact on viability.</li> </ul> <p>Whilst the SHMA does provide some of the evidence required to introduce the optional standard significant elements are missing, not least the overall impact upon viability. The HBF wish to hold our position upon the introduction of the optional standard until all of the relevant evidence is available.</p>	<p>Policy HS1.</p> <p>The Plan does not propose to require the optional national internal space standard.</p> <p>The Proposed Accessibility Standard only relates to 20% of units on schemes of over 10 units, or, if chosen as one way of helping to meeting the higher sustainability standards for greenfield sites under Policy SP4 it would apply to the whole scheme.</p> <p>The open spaces standards are largely in line with the tried and tested approach of the saved Local Plan.</p> <p>The density policy HS3 is considered to be acceptable as a minima.</p> <p>The mix requirements of HS4 are flexible; but on greenfield sites which have specifically been supported for allocation because of the greater quality and choice they provide, certain minimum percentages will be insisted upon and this approach is considered to be fully justified. Meeting the needs and demands for housing, which they plan is required to do, is not just about the quantity of housing provided.</p> <p>The implications of the combined Local Plan policies on viability has been the subject of detailed assessment as part of the Plan's evidence base (Plan Viability Assessment March 2017). Where viability considerations mean that the meeting of policy requirements is not possible, then the Council would need to decide whether the development in question could be supported when assessed against the Local Plan as a whole.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				Schemes would always be considered on their merits against all relevant policy requirements and the benefits they offer.
Huntroyde Estate	Policies - Housing	HS4	<p>Section 5 sub paras b) and c) refer to payment of commuted sums for offsite POS in lieu of onsite provision. Whilst this flexibility is welcomed it should not lead to undermining the viability of a scheme. Also the Council have not indicated evidence of a set formula for calculating such contributions without this the policy is not effective.</p> <p>Section 8 of this policy is not justified and not consistent with national policy in regard to smaller sites where such contributions could undermine viability and thus site deliverability. Section 8 should only apply to the largest sites.</p>	<p>The implications of the combined Local Plan policies on viability has been the subject of detailed assessment as part of the Plan's evidence base (Plan Viability Assessment March 2017).</p> <p>Policy IC4 states that where contributions are requested or unilaterally proposed and the viability of development proposals is in question, applicants should provide viability evidence through an 'open book' approach to allow for the proper review of evidence submitted and for reason of transparency. Where viability considerations mean that the provision of infrastructure (either directly by a developer or through contributions towards its provision) or the meeting of other policy requirements is not possible then the Council would need to decide whether the development in question could be supported.</p> <p>The Council is intending to prepare an SPD on Planning Contributions where further detailed advice and information will be developed, in consultation</p>
James Pollard and Sons (Worsthorne) Ltd	Policies - Housing	HS4	Policy HS4 part 2 is incredibly prescriptive of the requirements of planning applications. The Local Plan is not the correct vehicle for these matters, which should be included within a validation checklist.	It is not considered that HS4 2) is unduly prescriptive. Larger developments should be properly phased for the reasons set out in the policy - this can be done at outline or reserved matters stage. The Policy does not propose to restrict preferred phasing providing each phase is delivered in a safe and sensible manner. Larger schemes which can be built out over many years can result in unacceptable living conditions for early occupants and neighbours if

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				<p>not properly managed; or worse still if development stalls.</p> <p>The Policy clause in question has now been amended to require this only for schemes of over 50 dwellings</p>
Junction Property Ltd.	Policies - Housing	HS4	<p>Policy HS4 set out a series of additional design criteria specific to residential development.</p> <p><b>Residential Amenity</b> Part 2 of the policy requires planning applications for ‘larger schemes’ to include a phasing plan which should include details of the proposed phasing, temporary works and security measures which should demonstrate an acceptable standard of development and amenity for early residents and existing residents. As drafted, neither the policy nor supporting text defines a threshold for what constitutes a ‘larger scheme’.</p> <p>Notwithstanding this, whilst there is a need to protect the amenity of existing residents, this level of detail is not always available at the time of submission, especially for outline applications or in situations when the applicant will not be the company/person developing a site. The Council should be actively encouraging development without delay, as drafted Part 2 requires a level of detail that has the potential to slow down the application process. Our Client would suggest that this detail is secured via condition rather than planning policy to reduce the policy burden on the applicant.</p> <p><b>Lifetime Homes</b> Part 4 of Policy HS4 requires 20% of dwellings on development over 10 dwellings should be designed to be adaptable to support the changing needs of occupiers over the lifetime, complying with the optional technical standards at Part M4(2) of the Building Regulations.</p> <p>The Council should be actively encouraging new development without delay, particularly given the need to deliver significant new family and affordable housing. Dependent on the scale of the development, Lifetime Homes Standards can add £545 to £1,165 to the cost of a dwelling. This alone can prohibit the deliverability of a scheme, restrict sustainable development and create a shortfall in the overall housing supply.</p> <p>Accordingly, there is no justification for the need to deliver Lifetime Home. There is no evidence that Lifetime Homes actually help to meet the long-term needs of the older population. In our experience, Lifetime Homes can even deter potential purchasers, as these standards can require a different utilisation of floorspace (for example an over-sized room downstairs for a toilet).</p> <p>This comparative increase in size is not usually reflected in sales revenue. The net result is a</p>	<p>The Policy does not propose to restrict a developers preferred phasing providing each phase is delivered in a safe and sensible manner. The phasing plan could be submitted at outline or reserved matters stage.</p> <p>As pointed out, there was no specific definition of what constitutes ‘larger schemes’ for the purpose of this policy and this was deliberate. This phasing plan requirement would only be relevant to schemes which are likely to be built out over a number of years and would also depend on the proposed dwelling types e.g. it would not normally be necessary for schemes or flats. However, the Policy has been amended to require this only for schemes of over 50 dwellings to give greater clarity.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>reduction in revenue as build costs increase; sales revenue remains static and the quantity of housing delivered decreases. This issue does not appear to have been addressed within the assumptions made. Accordingly, it is our Clients consideration that Part 4 of the Policy imposes unnecessary requirements on applicants as drafted; it is not justified by evidence, and objects.</p> <p>Open Space and Play Provision in New Housing Developments Part 5 of the Policy requires proposals for 50 dwellings or more will be expected to incorporate recreational public open space to a minimum standard of 0.3 hectares per 50 dwellings or a proportion thereof, in accordance with the Fields in Trust of 2.4 hectares per 1,000 population; or in exceptionally, provide or pay a contribution in lieu of part or all of the open space provision for the creation and benefit of existing public open space nearby. As part of this overall space requirement, Part 6 requires developments comprising main family homes to provide 0.09ha of equipped children's play space per 50 dwellings, or proportion thereafter.</p> <p>In accordance with paragraph 73 of the NPPF the Council needs to undertake a robust and up-to-date assessment of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area.</p> <p>Neither the policy nor supporting text is clear as to whether the Council has an up-to-date evidence base. It appears the requirements set out in Parts 5 and 6 of Policy HS4</p>	
Metacre Ltd.	Policies - Housing	HS4	Policy HS4 'Housing Developments' states that for schemes over 10 dwellings 20% of the houses should be to lifetime homes standard. This is considered unjustified. If national policy considered it necessary for residential development to have to meet this standard in order to be found acceptable then it would state so. The policy is therefore placing unnecessary and onerous requirements on new development.	National policy makes clear the plans can introduce this standard where it is justified by evidence. That is what these optional standards were introduced for. There is considered to be strong evidence in Burnley including as set out in the SHMA that there is not only an issues with an ageing population, as elsewhere, but the borough's residents have poorer health outcomes. The nature and choice of housing (i.e. a high proportion of smaller pre-war terraced homes which are particularly difficult to adapt) can be a particular issue in helping people stay for as long as possible in their own homes.
H F Eccles & Sons	Policies - Housing	HS4	5.11. With regards to public open space provision (POS), there is support that the policy is drafted to allow smaller schemes to make a financial contribution to improve areas of POS in the vicinity rather than insisting this is provided on-site. It is important that site specific circumstances and constraints are considered in determining how best to make provision for POS and the policy wording needs to	Comment noted.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>reflect this.</p> <p>5.12. If a financial contribution towards off-site POS is to be provided in-lieu of on-site provision, policy needs to be flexible to take account of scheme viability to ensure that the proposal remains deliverable.</p>	
Cllr Cosima Towneley	Policies - Housing	HS7	<ul style="list-style-type: none"> <li>• Considering the small number of pitches - is such a site truly necessary or viable?</li> <li>• It would appear difficult to define 'travelling'. Does this relate to people using the site whilst schooling children, in which case does this relate to staying on site for the school term, year or years. Those remaining on site for a period longer than a few months or for a specific reason - education - are surely not classed as travelling and so resources put in to this area could be better used housing local Burnley families.</li> <li>• The siting of a Traveller facilities in the vicinity of a Biological Heritage site and in the heart of the ecological network for woodland &amp; grassland would seem to be encouraging friction between the settled and travelling communities.</li> <li>• Whilst acknowledging proper facilities will be available on site, it is a truth that such sites invariably become eye sores and a source of local friction. What courses of action are to be deployed to prevent these problems.</li> <li>• As there is little need for the development of such a site would it not be better to incorporate the small number of Travellers into empty houses than creating a 'getto'. Integration in this way would, of course, present its own problems!</li> </ul>	<p>National Policy set out in the Government's 2015 'Planning Policy for Traveller Sites', requires Councils to meet the assessed Gypsy, Traveller and Travelling Showpeople for pitches and plots.</p> <p>The 2012 Burnley and Pendle GTAA and its 2016 Addendum identifies the need for 5 Gypsy and Traveller pitches and the Council must provide for this need in the Local Plan.</p> <p>National policy defines Gypsies and Travellers as 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'</p> <p>Whilst the Council has assessed through the GTAA whether people meet this definition, it is not open to the Council to say that those who do and who want a pitch should not have their needs provided for .</p> <p>Policy HS9 ensure occupants have a local connection to qualify for a pitch on the site.</p> <p>Contrary to concerns about location, it is felt that a site can offer the right mix of community integration and privacy / screening, and its location is sustainable.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				<p>The Policy HS7 requirement an ecological survey to support any planning application to identify and address ecology issues and requires hard and soft landscaping and screening to be considered.</p>
Mr John Nottingham	Policies - Housing	HS7	<p>SUPPORT FOR DRAFT POLICIES HS7 AND HS8 – GYPSY AND TRAVELLER SITE ALLOCATIONS AND GYPSY AND TRAVELLER SITE CRITERIA</p> <p>I refer to the above Preferred Options consultation and write to express support for Draft Policies HS7 and HS8 on behalf of our client. The preferred strategy promotes sustainable development that is in line with current guidance contained within the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (2015). Further detail is provided below in relation to each of the draft policies.</p> <p>An assessment of all the suggested gypsy and traveller site allocations was submitted to the Environment and Policy department in May 2015. A copy of this report is enclosed for your reference, which ranked the sites in order of their sustainability when assessed against the NPPF and Planning Policy for Traveller Sites document. In particular the report identified the very poor suitability of an unauthorised site at Spa Wood Farm, by virtue of the:</p> <ul style="list-style-type: none"> <li>- Isolation from the main urban area that would lead to the segregation of the Gypsy and Traveller community from other people living in Burnley;</li> <li>- Distance from local services and public transport links that would not promote sustainable patterns of development;</li> <li>- Poor accessibility via Billington Road, an unadopted dirt track which serves local rural businesses. Beyond the industrial estate, it is single-track, heavily pot-holed, liable to flooding and falls within a number of different ownerships. Crucially, it does not provide suitable access for the emergency services;</li> <li>- Insufficient capacity to drain foul water from the site, which is not connected to a mains sewer; and</li> <li>- High risk of surface water flooding.</li> </ul> <p>I am very heartened to see that the Council has stated a Preferred Option for the allocation of Oswald Street, Burnley, as the most appropriate site for gypsy and traveller use. Of the five sites</p>	<p>Support for the allocation in HS7 noted. The site referred to at Spa Wood Farm is not unauthorised. This site has a lawful use as a residential caravan site for up to 6 households residing there.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>under consideration, Oswald Street offers the most sustainable and integrated site, accessible for schools, shops, community services, employment and public transport. This reflects the spirit of prevailing national planning policies and guidance.</p> <p>Whilst the preferred allocation of Oswald Street may provoke some opposition from the existing residential community, it is apparent that the assessment by Burnley Borough Council has been made on robust planning grounds. In anticipation of what may be a controversial proposal, I would like to reiterate that Spa Wood Farm remains a totally inappropriate option which should not be reconsidered in the event of local opposition. Full support is offered for the approach taken by Burnley Borough Council towards the allocation of sites for gypsy and traveller use.</p> <p>[Additional file attached]</p>	
Pennine Lancashire Community Farm	Policies - Housing	HS7	<p>Re EMP1/14 Stoneyholme Gas Works we welcome this overall development but would suggest the following actions:</p> <ul style="list-style-type: none"> <li>• More specific and diverse consultation is required with the local community prior to any development of traveller's site.</li> <li>• Re-investigate the possibility of development of community orchard / forestry area in respect to the interconnected associated land.</li> </ul>	<p>Comment noted. The local community has had the opportunity to comment on the site proposal at Preferred Options consultation stage when a drop in session in Stoneyholme. Should a planning proposal come forward, people would have an opportunity to comment on the detail of ay proposal at that stage.</p> <p>The land to the north of the gasholder site is Green Belt and subject to the landowners agreement could be developed, a community orchard or woodland could be developed.</p>
Mr John Nottingham	Policies - Housing	HS8	<p>SUPPORT FOR DRAFT POLICIES HS7 AND HS8 – GYPSY AND TRAVELLER SITE ALLOCATIONS AND GYPSY AND TRAVELLER SITE CRITERIA</p> <p>I refer to the above Preferred Options consultation and write to express support for Draft Policies HS7 and HS8. The preferred strategy promotes sustainable development that is in line with current guidance contained within the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (2015). Further detail is provided below in relation to each of the draft policies.</p> <p>Support is equally offered in relation to Draft Policy HS8, which sets out criteria for the assessment of further provision of transit and permanent pitches for gypsy and traveller use; although it is suggested that a minor alteration is required to improve the effectiveness in dealing with retrospective applications for unauthorised development.</p> <p>The criteria set out for assessing proposals under Parts 1 and 2 of Policy HS8 clearly reflect current</p>	<p>National policy requires the Council to assess need. Whilst this has until recently been done through a separate GTAA, in future this will be included in the Council's SHMA where the needs and demand of all communities are assessed. If the need identified by the Council (having been tested through the Local Plan Examination) has been provided for in full for at least the first 5 years and kept up to date, the onus would then fall on the applicant to demonstrate newly arising need which could not be met on existing or allocated sites. The change suggested is not therefore considered appropriate.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>national policies and guidance. Through its implementation, future proposed developments would be focused towards locations that promote co-existing communities and where capacity exists in terms of local infrastructure, access and utilities. The Policy furthermore currently acknowledges the sensitivity of the land use by deterring development from areas that are in Flood Zones 3a, 3b or 2, as well as locations that are susceptible to problems of drainage and surface water flooding. These issues are fundamental to Policy B within the Government’s Planning Policy for Traveller Sites document (2015) and also the consideration of sites against the three strands of sustainability (economic, social and environmental) at Paragraph 7 of the NPPF.</p> <p>Part 1 of the Draft Policy currently states that the criteria will apply where there is an identified need for further provision of transit and permanent pitches. Unless a need has specifically been identified through subsequent updates to the Gypsy, Traveller and Travelling Showpeople’s Accommodation Assessment (GTAA), JWPC seek for amendments which places the onus on the Applicant to demonstrate a need through the provision of evidence. It should be proven within any application that capacity does not exist within allocated (or any other authorised sites), before an assessment is made against the criteria within the Policy.</p> <p>JWPC therefore suggest an addition below the Criteria at Part 2 of the Policy to the effect of:</p> <p>Where a future need for the further provision of transit and permanent pitches for the Gypsy or Traveller use, or plots for Travelling Showpeople is claimed, this must be conclusively demonstrated by the Applicant through evidence.</p> <p>The alterations to the Policy will help Burnley Borough Council to achieve a greater understanding of the actual level of need over the period of the emerging Local Plan. Moreover, the requirement for specific evidence of need will help the Council to effectively determine retrospective applications and where necessary, pursue enforcement against unauthorised developments.</p> <p>It is trusted that the above support and recommendations will be attributed material weight in continuing to move forward with the Local Plan. I shall look forward to hearing of the Council’s progress towards the Publication version of the Local Plan. However, please do not hesitate to contact me if you need to discuss the content of this letter.</p>	
Lancashire Wildlife Trust	Policies - Housing	HS8	<p>The Trust is pleased to see, and supports the inclusion of the following criteria in Policy HS8:</p> <p>1.h. The proposal does not have an adverse impact on a locally important nature conservation site in accordance with Policy NE1.</p> <p>2.c. The development of new Gypsy or Traveller sites will not be permitted “Within or adversely affecting an SSSI/SAC/SPA).</p>	Support noted.





## Section 5.2 – Economy and Employment (not including EMP1 Employment Allocations)

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
NFU North West	Policies - Employment	EMP5	The NFU welcomes policies that facilitate rural development and diversification that help farmers remain competitive, meet regulations, scheme compliance and standards and to keep the farm business viable.	Support noted.  Whilst the comment did not specifically refer to Policy EMP5 this policy addresses the point made.
Lancashire Wildlife Trust	Policies - Employment	EMP5	Policy EMP5: Rural Business & Diversification does not mention the need to conserve and enhance biodiversity, and to ensure that there are net gains in nature, as required by the NPPF.	The Local Plan should be read as a whole and Policy NE1 is the primary policy for seeking to conserve and enhance biodiversity and it is not considered necessary to repeat the requirements in Policy EMP5. Repetition can weaken rather than strengthen policies.
Mr Barrie Sharpley	Policies - Employment	EMP5	As part of the South Pennine Moors and the local rural economy (p. 128), emerging businesses include café's and B&B's indicating the opportunities for attracting more visitors to the area for unique experiences. [Worsethorpe and Brownside are the areas referred to]	Noted. It is not considered that specific business uses need to be referenced in the policy.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Cllr Cosima Towneley	Policies - Employment	EMP6	<p>Access Provision. - It has been noticeable that in several cases where a rural building(s) has/have been divided that a new driveway has been added at a later date. There is no provision in the present policy to prevent further urbanisation to the countryside by the prohibition of the creation of these alternative entrances.</p> <p>Driveway/Entrance lighting of Converted Rural Buildings - Light pollution from the conversion of Rural buildings adds considerably to the urbanisation of the Green belt and wider countryside. The deployment of Policy EMP7: Equestrian Development across the gamut of rural development would make this particular policy more equitable and enforceable.</p>	<p>Councillor Towneley's concern about the potential suburbanising effect of the conversion of rural building on rural landscape is shared.</p> <p>Any layout and design issues for new developments in rural areas will be assessed against Policy SP5: Development Quality and Sustainability and, where they involve the conversion of rural buildings also Policy EMP6. This Policy allows consideration of the impact of ancillary buildings and works and the character if the countryside side can be further protected by appropriately defining new residential curtilages and /or withdrawing permitted development rights.</p> <p>In terms of policy EMP7, this policy is applicable across the borough, not just in rural areas and is therefore not just included within a rural section of the Local Plan.</p> <p>In respect of light pollution, Policy NE5 requires development proposals as appropriate to their nature and scale, to demonstrate that environmental risks have been evaluated and appropriate measures have been taken to minimise the risks of adverse impacts to air, land and water quality, whilst assessing vibration, heat, energy, light and noise pollution.</p>

## Section 5.3 – Town Centre, Retail and Leisure

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Burnley, Pendle and Rossendale Green Party	Policies - Town Centres, Retail and Leisure	General	<p>Retail</p> <p>Burnley, Pendle and Rossendale Green Party is supportive of investment in Burnley town centre. The creation and maintenance to the highest standards of public space at the hearts of Burnley and Padiham are indeed essential elements of the towns' social and commercial offers. We believe the Plan is a missed opportunity to go further.</p> <p>The Plan, in referring to retail and business areas appears to be entirely centred around and indeed biased towards, the traditional zoning of high value retail frontages with no particular attention paid to a diversifying use of town centre space. The next 20 years are not about to see a sudden re-energizing of town centre high street shopping trends and Burnley should lead the way in recognizing this – as other nearby towns have done.</p> <p>Currently the Plan will do nothing beyond continuing to court chain retail and food outlets which, if successful, would only create another identikit town centre offer with rows of chain stores damaging what is an exceptional collection of well-preserved Victorian buildings.</p> <p>The Plan needs to be flexible here. An urban renaissance whereby underused car parks in the centre become pocket parks, micro food growing projects are run by residents, independent retailers open and outdoor markets flourish is far more likely to deliver a more attractive, unique, green and pleasant retail environment that draws in local residents and tourism.</p> <p>Diversifying retail space to attract small creative businesses will require new progressive policies written by those businesses themselves, who need to be encouraged into the process now. Current footfall in the town is limited and does not attract many visitors. The reliance on private cars means many of those living in the borough are simply able to drive to a more attractive retail district.</p> <p>Without a unique 'Burnley' offer of public art projects, events, markets and meanwhile spaces for popular pop-up activities the town centre will continue to look like every other declining town centre. It is simply not enough to add little more than a footnote suggesting alternative shopping spaces can be limited to Padiham.</p> <p>The Plans contradictions around office space provision are stark – providing an expanded business park at Burnley Bridge will only serve to exacerbate the drain of office demand</p>	

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			away from the traditional town centre, creating yet more vehicle traffic and an even smaller town centre retail footfall.	
Royal Mail - Burnley	Policies - Town Centres, Retail and Leisure	TC2	<p>Town Centre Policies</p> <p>The protection of existing operations and amenity is a crucial issue for Royal Mail, particularly where there is potential for sanctions to be placed upon them when uses of a sensitive nature are introduced in close proximity to their existing Delivery Offices. For example, due to the nature of their delivery requirements and targets, Delivery Offices are operating early mornings and often late evenings, generating large volumes of vehicular movements and associated mail sorting and loading activity, all of which result in noise, light and other associated impacts that are not expected to be experienced in a residential environment.</p> <p>The issue of neighbouring land uses and their compatibility, including potential environmental / amenity impacts is therefore fundamental to the Royal Mail, particularly where Local Planning Authorities are assessing the suitability of future land use allocations and development sites. This particular issue is clearly recognised within the National Planning Policy Framework (NPPF) at paragraphs 123 and 109. These paragraphs support the protection of existing businesses and their operations, and paragraph 123 in particular states that planning policies and decisions should aim to recognise that existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p>The current wording of Policy TC2 Development within Burnley and Padiham Town Centres states that:  “Proposals for other main town centre uses will be supported where they are located within the defined Town Centres and accord with other policies elsewhere in the Plan”;  and  “Proposals for residential development, including new build, conversion or change of use on appropriate sites within the Town Centres will be considered favourably subject to meeting the other policy requirements of the Plan where:</p> <ul style="list-style-type: none"> <li>• In Burnley Town Centre outwith the Primary Shopping Area, they do not lead to a concentration of residential uses which undermines the overall mix of main town centres uses.”</li> </ul> <p>We respectfully request that Burnley Council insert additional supporting text in Policy TC2 and TC4 to ensure any land that is developed for main town centre uses or housing within close proximity to the aforementioned properties does not adversely affect Royal</p>	The importance of protecting existing businesses in the Town Centre is recognised and additional text has been added to Policy TC2 8 c) to that effect.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>Mail's operations. An example is provided below:  "Proposals for residential development, including new build, conversion or change of use on appropriate sites within the Town Centres will be considered favourably subject to meeting the other policy requirements of the Plan where:</p> <ul style="list-style-type: none"> <li>• In Burnley Town Centre outwith the Primary Shopping Area, they do not lead to a concentration of residential uses which undermines the overall mix of main town centres uses and do not detract from the employment use of the existing sites in the area.</li> <li>• Where new developments or changes of use impact on existing businesses, adequate mitigation measures should be designed into the new site.</li> </ul> <p>Additionally, approximately 250 metres from the Burnley Delivery Office is a site allocated as a Town Centre Development Opportunity which is also where the Burnley Vehicle Park is located.</p> <p>Policy TC4 Development Opportunities in Burnley Town Centre states that residential development would be acceptable on this site as an ancillary part of a mixed use scheme. Our client is therefore concerned that the policies will allow sensitive land uses to come forward within close proximity to Royal Mail properties.</p> <p>We respectfully request that Burnley Council insert additional supporting text in Policy TC2 and TC4 to ensure any land that is developed for main town centre uses or housing within close proximity to the aforementioned properties does not adversely affect Royal Mail's operations. An example is provided below:</p> <p>"Proposals for residential development, including new build, conversion or change of use on appropriate sites within the Town Centres will be considered favourably subject to meeting the other policy requirements of the Plan where:</p> <ul style="list-style-type: none"> <li>• In Burnley Town Centre outwith the Primary Shopping Area, they do not lead to a concentration of residential uses which undermines the overall mix of main town centres uses and do not detract from the employment use of the existing sites in the area.</li> <li>• Where new developments or changes of use impact on existing businesses, adequate mitigation measures should be designed into the new site." <p>Proposed Land Use Allocation</p> <p>The Burnley Vehicle Park falls within a site to be allocated as a Town Centre Development Opportunity (TC4/1) and the Preferred Options document proposes that this land will be prioritised for a comprehensive retail and leisure development (Paragraph 5.3.34). Royal Mail currently utilise a proportion of the Brown Street car park for parking their delivery</p> </li></ul>	

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>vans and have been issued with formal parking permits from the Council. As the site has been allocated as a Development Opportunity, Royal Mail's parking spaces will likely be displaced in the near future. Royal Mail must remain to be informed about proposals for this location to allow sufficient time to identify and secure new parking spaces for the affected vehicles</p>	
<p>Saint James Street Development Group</p>	<p>Policies - Town Centres, Retail and Leisure</p>	<p>TC2</p>	<p>St. James Street West has recently been the focus of a reasonable amount of private investment. This includes the conversion of what was the Garden Bar, situate at the corner of Brown Street/St. James Street into retail units, a restaurant and flats above. The restoration of 144-148 St. James Street (the old Citizens Advice Bureau) which is now complete and open as a quality antiques and interiors retailer. Howarth Gallery has recently refurbished and continues to be the anchor in the area.</p> <p>We also have other prestigious retailers in this area such as Originals and Clarkeys along with quality hairdressers Robert Brannon. Also not forgetting that Marks and Spencer's main frontage is on West St. James Street.</p> <p>It is of concern, therefore, that the proposed new town plan designates the west end of St. James Street as a secondary shopping area with a caveat that up to 40% of frontage can be non-retail use. We have been working very hard over the last 18 months to turn this area around and have had some success in doing so as stated above. It is imperative that this investment is protected and future investment encouraged. The West end of St. James Street 30 years ago was almost entirely retail and we are striving to achieve this again. It is an area that lends itself to occupation by independent retailers and small businesses. We have been asked by Pam Smith, chief executive, to put together a plan for the whole of the West end of the town centre and it is proposed that St. James Street West, together with Brown Street, could provide such accommodation for independent retailers.</p> <p>As things stand in the new proposals there is no protection for this concept. The 40% non-retail frontage designation is exactly the designation that led to the decline of West St. James Street 30 years ago when taxis and night-time takeaways occupied 40% plus of the area. If we are to be successful in realising our ambitions for this area as a whole it is essential to protect against the causes of decline in the future. Let us not forget that the terms Lower St. James Street and St. James Street West are epithets of recent origin and in reality do not exist. St. James Street is and always has been St. James Street along its length and starts at the roundabout at the bottom of Westgate and goes to Hall Street at the top. It is not and never has been designated on any map as West St. James Street or Lower St. James Street. These terminologies have been used locally to identify that part of St. James Street which was not subject to pedestrianisation. We should also remember</p>	<p>The Council is supportive of ongoing work on St James's Street. The Council has undertaken a re-survey of the secondary shopping frontages to re-assess the appropriateness of the percentages proposed in the Plan. On a number of frontages, particularly St James's Street West, current non retail use levels are above 40% and so reducing them over time to 40% as the policy would do, would be a significant improvement. A further lowering of the percentage is not considered appropriate.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>that this end of St. James Street, linked by Westgate is one of the main gateways into Burnley and thus significantly adds to the importance of this area.</p> <p>We would suggest therefore that the whole of St. James Street be afforded the same designation and protection of no more than 20% non-retail use and indeed if further protective measures can be added to encourage and safeguard future development so much the better.</p> <p>This will give planning committee a justifiable reason for refusing non-retail uses in the area which would be detrimental thus protecting the council against appeals whilst allowing flexibility by consent should an attractive non retail usage be sought for a particular property. This may also assist in finding a way to reduce the current percentage non-retail use by way of a non-replacement policy.</p> <p>We cannot overstate the importance of this matter, both in relation to safeguarding recent investment and in encouraging future enterprise in the area.</p>	
Tesco Stores Ltd	Policies - Town Centres, Retail and Leisure	TC2	<p>Tesco Stores Ltd (TSL) object to the current preferred option Policy TC2 and, specifically, the draft Padiham Town Centre Inset Map which excludes the existing Tesco store from the town centre and primary shopping area boundary.</p> <p>Background As the Council will be aware, the Tesco store was granted permission on appeal in September 2010 (Appeal Ref. APP/Z2315/A/10/2125190) with the store opening in October 2012. The original aim of the store was to claw back convenience goods trade and turnover spent outside of Padiham, including from stores in Burnley, Accrington and Clitheroe, by providing a main food shopping facility immediately adjacent to the (as then) defined town centre. It was viewed that a new foodstore would have knock on positive impacts for the rest of the town centre by increasing footfall and promoting linked trips. This was highlighted in the Padiham Retail, Office and Leisure Assessment (2009), prepared as part of the Padiham AAP evidence base, which stated at Paragraph 13.50:</p> <p>‘A new foodstore located on the Wyre Street site would effectively function as part of the town centre and could significantly assist in increasing market share performance through clawing back expenditure which is presently being lost to competing destinations. New provision could increase linked shopping trips within the town centre and would primarily compete with surrounding mainstream foodstores on a like-for-like basis.’</p>	The Council considers that the two Town Centre boundaries proposed are consistent with the NPPF and in the case of Burnley Town Centre it is based on the boundary recommended in the Retail, Office and Leisure Study. Whilst the Council is aware of and has considered the case to include the Tesco Store and Car Park within the Padiham Town Centre Boundary, it is considered that this would run counter to the Council's and other partners efforts to maintain the focus of town centre uses along the Burnley Road Frontage.



Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>At the time of the planning application and subsequent appeal, Padiham town centre was a centre in decline and was not considered a vital and viable town centre. In the determination of the planning appeal Inspector Gray highlighted this issue concluding that;</p> <p>'10. ...The decline of the town centre has been recognised for some considerable time but there is no indication of anything which might turn the tide (except, in the appellants' view, the appeal proposal) and bring about the AAP vision. I was surprised at the sheer absence of people in the town centre when I made my inspection on a Friday, mid-afternoon. That underscores the evidence of a declining centre.</p> <p>26. ...As it is, Padiham town centre does not look to me at all like a vital and viable one – quite the reverse. The Council's evidence says that, despite its definition as a town centre, it clearly performs a much more limited role in the retail hierarchy. That appears correct at the present time. But the Local Plan seeks to improve the role and function of the town centre and the AAP to protect and enhance it. Both are concerned with a town centre role – not a local services role'</p> <p>There was much discussion throughout the application and appeal process regarding how the proposed store would impact Padiham Town Centre. The Planning Committee report (04/03/10) concluded that:</p> <p>'The new foodstore would effectively function as part of the town centre and could significantly assist in increasing market share through clawing back expenditure presently being lost to competing destinations. New provision could increase linked shopping trips within the town centre and would primarily compete with surrounding mainstream foodstores on a like-for-like basis.</p> <p>The new foodstore would deliver significant qualitative benefits and address existing deficiencies in convenience provision in Padiham by providing a full range of goods and enhancing quality and choice for local residents. The existing convenience offer in Padiham meets top-up shopping needs only and there is a lack of a supermarket facility stocking a full range of goods.'</p> <p>In the determination of the appeal, Inspector Gray also considered the potential impact of the Tesco store on the</p>	

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>town centre stating:</p> <p>'27. In my opinion, based on the evidence to the inquiry, the only way to achieve the adopted and emerging policy objectives is by a supermarket large enough to cater for main food shopping requirements and thus able to compete with and draw trade back from supermarket</p>	
Sapphire (Burnley) Nominee Limited	Policies - Town Centres, Retail and Leisure	TC2	<p>Sapphire (Burnley) Nominee Limited supports the general policy approach set out in Policy TC2.</p> <p>As discussed within the supporting text, there are a number of key issues concerning the continued development and improvement of Burnley town centre. These were identified and discussed in the Council's 'Retail, Office and Leisure Assessment' 2013.</p> <p>Of particular note, the Council's 'Retail Office and Leisure Assessment' noted high vacancy levels, particularly in more peripheral areas of the town centre. Accordingly, it suggested that the Council reduce the extent of the town centre boundary in order to provide greater focus.</p> <p>Furthermore, to consolidate the vitality and viability of the town centre, it was advised that improvements to Charter Walk should be promoted before 'main town centre uses' were allowed to come forward in less central sites: only limited scope for additional floorspace was identified.</p> <p>We would concur with this general approach, and the application of the sequential test and assessment of impact set out in Policy TC2 is consistent with the provisions in the National Planning Policy Framework in broad terms.</p>	<p>Support noted.</p> <p>The wording of Policy TC2 in respect of the sequential test has been revised to ensure the Primary Shopping Area is the focus of A1 retail development.</p>
Sapphire (Burnley) Nominee Limited	Policies - Town Centres, Retail and Leisure	TC3	<p>Sapphire (Burnley) Nominee Limited objects to the approach set out in Policy TC3.</p> <p>Policy TC3 identifies the primary and secondary retail frontages within Burnley. Charter Walk Shopping Centre is within the Primary Retail Frontage and we would agree that this classification is appropriate. However, the policy goes on to present a prescriptive approach concerning proposals for changes of use: uses other than retail will only be permitted where they would not result in a concentration of non-retail uses, cumulatively amounting to more than 20% of the length of the relevant Primary Frontage.</p> <p>The supporting text to the policy suggests that (Preferred Options §5.3.28): " ... Primary Frontages contain the greatest concentration of shops, attract the greatest</p>	<p>It is accepted that within the Town Centre and the Primary Shopping Area there is a need to allow for flexibility of uses to reflect the changes in shopping patterns and the wider role of Town Centres. To reflect this, in the case of Burnley, the Local Plan proposes both Primary and Secondary frontages.</p> <p>The Council remains of the opinion that the Primary Frontages should be protected for A1 retail use. On frontages with non A1 uses already above the threshold, A1 uses would be allowed</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>number of customers and underpin the vitality and viability of the town centre. Retail should remain the principal and dominant land use within these areas. The Council will not support uses that do not complement or support their predominantly retail character and will seek to retain retail and maintain a continuous ground floor retail frontage with a limited range of associated and complementary uses such as cafes, banks and pubs ... "</p> <p>We consider this approach to be unduly restrictive and contrary to national guidance. The National Planning Policy Framework (NPPF Glossary) simply advises that Primary Shopping Frontages are only "likely to include a high proportion of retail uses", and goes on to suggest that these may include food and drink as well as household goods. The Framework does not identify any specific level or proportion of retail use that should be achieved.</p> <p>Since the publication of the National Planning Policy Framework, the Government has gone even further to promote a more flexible approach to changes of use in town centres, not least through the introduction of additional permitted development rights in 2015. These measures followed the publication of various documents (e.g. the 'Portas Review' 2011, DCLG's 'The Future of High Streets' 2013 and the 'Grimsey Review' 2013) that consistently identified the need to deliver a greater diversity of uses within town centres, and to ensure the integration of leisure uses directly alongside traditional retail activities. This advice reflected changing patterns in Internet retailing, and increase leisure spend amongst other things.</p> <p>The approach suggested in the emerging Policy TC3 runs entirely counter to this advice. Elsewhere, the emerging Local Plan notes that Burnley town centre contains a lower than average proportion of food and drink uses. It is also noted that the proportion of retail units has decreased by 15% while the number of vacant units increased (Preferred Options §2.5.3). In this context, a restrictive approach to changes of use in the primary frontages may well prove counterproductive, perpetuating the reduced food and drink offer and high vacancy rate to the detriment of the town centres overall vitality and viability. Moreover, it is quite possible that the threshold in Policy TC3 is already breached, and there does not appear to be any quantitative or qualitative assessment to support the restriction or identified threshold.</p> <p>Taking account of the above, it is considered that a more flexible approach should be adopted and that reference to any specific threshold within Policy TC3 should be removed.</p>	<p>which over time would bring the percentage down in line with the policy threshold. On those blocks where the proportion of non A1 uses already exceeds or would through the development would exceed the threshold, changes from A1 units would not be supported.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Royal Mail - Burnley	Policies - Town Centres, Retail and Leisure	TC4	<p>Town Centre Policies</p> <p>The protection of existing operations and amenity is a crucial issue for Royal Mail, particularly where there is potential for sanctions to be placed upon them when uses of a sensitive nature are introduced in close proximity to their existing Delivery Offices. For example, due to the nature of their delivery requirements and targets, Delivery Offices are operating early mornings and often late evenings, generating large volumes of vehicular movements and associated mail sorting and loading activity, all of which result in noise, light and other associated impacts that are not expected to be experienced in a residential environment.</p> <p>The issue of neighbouring land uses and their compatibility, including potential environmental / amenity impacts is therefore fundamental to the Royal Mail, particularly where Local Planning Authorities are assessing the suitability of future land use allocations and development sites. This particular issue is clearly recognised within the National Planning Policy Framework (NPPF) at paragraphs 123 and 109. These paragraphs support the protection of existing businesses and their operations, and paragraph 123 in particular states that planning policies and decisions should aim to recognise that existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p>The current wording of Policy TC2 Development within Burnley and Padiham Town Centres states that:  “Proposals for other main town centre uses will be supported where they are located within the defined Town Centres and accord with other policies elsewhere in the Plan”;  and  “Proposals for residential development, including new build, conversion or change of use on appropriate sites within the Town Centres will be considered favourably subject to meeting the other policy requirements of the Plan where:  · In Burnley Town Centre outwith the Primary Shopping Area, they do not lead to a concentration of residential uses which undermines the overall mix of main town centres uses.”</p> <p>We respectfully request that Burnley Council insert additional supporting text in Policy TC2 and TC4 to ensure any land that is developed for main town centre uses or housing within close proximity to the aforementioned properties does not adversely affect Royal Mail’s operations. An example is provided below:  “Proposals for residential development, including new build, conversion or change of use</p>	Royal Mail's position with regard to existing and future parking requirements is noted.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>on appropriate sites within the Town Centres will be considered favourably subject to meeting the other policy requirements of the Plan where:</p> <ul style="list-style-type: none"> <li>· In Burnley Town Centre outwith the Primary Shopping Area, they do not lead to a concentration of residential uses which undermines the overall mix of main town centres uses and do not detract from the employment use of the existing sites in the area.</li> <li>· Where new developments or changes of use impact on existing businesses, adequate mitigation measures should be designed into the new site.</li> </ul> <p>Additionally, approximately 250 metres from the Burnley Delivery Office is a site allocated as a Town Centre Development Opportunity which is also where the Burnley Vehicle Park is located.</p> <p>Policy TC4 Development Opportunities in Burnley Town Centre states that residential development would be acceptable on this site as an ancillary part of a mixed use scheme. Our client is therefore concerned that the policies will allow sensitive land uses to come forward within close proximity to Royal Mail properties.</p> <p>We respectfully request that Burnley Council insert additional supporting text in Policy TC2 and TC4 to ensure any land that is developed for main town centre uses or housing within close proximity to the aforementioned properties does not adversely affect Royal Mail's operations. An example is provided below:</p> <p>“Proposals for residential development, including new build, conversion or change of use on appropriate sites within the Town Centres will be considered favourably subject to meeting the other policy requirements of the Plan where:</p> <ul style="list-style-type: none"> <li>• In Burnley Town Centre outwith the Primary Shopping Area, they do not lead to a concentration of residential uses which undermines the overall mix of main town centres uses and do not detract from the employment use of the existing sites in the area.</li> <li>• Where new developments or changes of use impact on existing businesses, adequate mitigation measures should be designed into the new site.” <p>Proposed Land Use Allocation</p> <p>The Burnley Vehicle Park falls within a site to be allocated as a Town Centre Development Opportunity (TC4/1) and the Preferred Options document proposes that this land will be prioritised for a comprehensive retail and leisure development (Paragraph 5.3.34). Royal Mail currently utilise a proportion of the Brown Street car park for parking their delivery vans and have been issued with formal parking permits from the Council. As the site has been allocated as a Development Opportunity, Royal Mail's parking spaces will likely be</p> </li></ul>	

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			displaced in the near future. Royal Mail must remain to be informed about proposals for this location to allow sufficient time to identify and secure new parking spaces for the affected vehicles.	
Sapphire (Burnley) Nominee Limited	Policies - Town Centres, Retail and Leisure	TC4	<p>Sapphire (Burnley) Nominee Limited objects to the approach set out in Policy TC4 .</p> <p>Policy TC4 identifies new development opportunities in Burnley town centre. Of particular note, it proposes the allocation of the Former Pioneer Site at Curzon Street. The site is over 1.5 hectares in size and lies to the north of the existing Primary Shopping Area. It is intended for a mixed-use development, including a range of retail and leisure activities. The allocation states specifically that (our emphasis):</p> <p>" ... A minimum of 1,500sqm (net) of A1 comparison retail must be included within the mix of uses ... "</p> <p>We consider that this requirement could be detrimental to the vitality and viability of Burnley Town Centre.</p> <p>The allocation seeks to draw support from the quantitative assessment provided in the Council's 'Retail, Office and Leisure Assessment' 2013, which suggested limited scope for comparison floorspace in the longer term. Specifically, it was suggested that they might be scope for approximately 3,390 sqm of additional comparison goods floorspace by 2026 (RAL 2013 §12.7).</p> <p>The 'Retail Office and Leisure Assessment' was quite clear that proposals outside the Primary Shopping Area should remain subject to the sequential test and impact assessment set out in the National Planning Policy Framework, and also that vacant units could also help accommodate the growth (RAL 2013 §12.17).</p> <p>At this point, it is appropriate to briefly review the assessment's methodology and the way in which this limited quantitative capacity was identified. The assessment first follows a fairly standard approach to identify the amount of expenditure available to support retail floorspace. This takes account of population growth and expected trends (i.e. growth) in expenditure per capita.</p> <p>It then goes on to estimate the turnover of existing town centres based on the findings of a household survey undertaken in 2012. This suggested that Burnley town centre retained 55% of the available expenditure within the study area (RAL 2013 Table 4.3). This level of expenditure is then applied to existing retail floorspace to calculate the 'existing' (i.e. 2013) 'benchmark turnover' of the town centre. To calculate the corresponding turnover in future years, a floorspace efficiency factor is applied, in the order of 1.7% per annum. This accounts for the more efficient use of existing floorspace by retailers.</p>	<p>The Retail Office and Leisure Study assessed potential sites within the Town centre and concluded that the site on Curzon Street was the most appropriate location to provide a comprehensive comparison retail and leisure extension to the Town Centre given its location in relation to the existing retail core and its availability in the short term.</p> <p>The Council do not agree that development in this location will have a detrimental impact on the Town centre's vitality and viability. In fact, it is considered that the development of this site for a mixed use development in conjunction with the opening of the new Primark store on the neighbouring site on Curzon Street will act as a catalyst for the Town Centre leading to increases in footfall not only in this location but through the centre as people travel to the new retail stores and leisure uses.</p> <p>Whilst the Council accepts that numerically the constituent parts of the potential supply are above the need identified, the three elements - better use of existing stock, new provision within the existing shopping centre and new retail as part of a mixed use redevelopment make up the most appropriate strategy for maintaining and enhancing town centre vitality and viability. In addition the total supply identified does allow for an element of flexibility to cater for those retailers who may have differing locational or floor plate requirements.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>The extent of any capacity for additional floorspace is then calculated by subtracting the benchmark turnover of existing centres, from the amount of expenditure available to support them. Having undertaken this exercise, the Retail, Office and Leisure Assessment identified capacity for 607sqm of net additional comparison goods floorspace in 2018; rising to 2,104sqm in 2023; and 3,390sqm in 2026.</p> <p>It is this calculation that appears to form the basis of the Council's allocation in Policy TC4 and the suggestion that a minimum of 1,500sqm of comparison floorspace should be provided at Curzon Street.</p> <p>The remaining balance is to be provided for within Charter Walk. In this respect, the Local Plan refers to the provision of 863sqm through works already undertaken; and the potential to deliver a further 1,800sqm of additional comparison floorspace in the centre. Together, these would provide for an additional 2,663sqm. However, this allocation would result in an oversupply of comparison floorspace, as the combined total of net additional comparison floorspace would be 4,163sqm (1,800sqm at Charter Walk + 1,500sqm at Curzon Street) exceeds the capacity (3,390sqm) identified in the Council's retail study. Given that the Council's allocation of Curzon Streets suggests a minimum of 1,500sqm floorspace, the extent of surplus provision could be even greater.</p> <p>The suggested provision of a surplus floorspace at Curzon Street will have significant implications for the vitality and viability of the town centre. Given its location to the north of the Primary Shopping</p>	
Environment Agency	Policies - Town Centres, Retail and Leisure	TC4	<p>- General comment – The Urban River Enhancement Scheme has been successful in facilitating fish movement through Burnley. We would support any proposals to continue this scheme at additional locations through the town.</p> <p>- The Old Theatre, St James Street, Burnley. This derelict site has not been identified as a proposed development site. The site is above a culverted section of the River Calder that flows round a sharp bend. Should the site be identified for demolition, it would provide the opportunity to open up the culvert, removing the current risk of blockage and associated flood risk.</p>	Comments noted.
Cllr Cosima Towneley	Policies - Town Centres, Retail and Leisure	TC4	<p>Encourage more individual shops as the town centre has little to differentiate it from countless others.</p> <p>Development of the Stanley/Curzon St area as 'specialist' small business area with a difference.</p>	The Town Centre and Business Support teams are working to try and diversify the current town centre offer, and attract a greater range of businesses into the town. Recent improvements to the public realm are one of the ways in which

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				the Council and its partners are trying to attract people and businesses into the town centre, and Policy TC4 provides support for the continuation of this work, as well as the opportunity for a range or retail, leisure and businesses uses around Curzon Street.
Environment Agency	Policies - Town Centres, Retail and Leisure	TC4/1	TC4/1 – Former Pioneer, Curzon St. We support the proposal to open up the culverted section of the River Brun. We would recommend that the developer engages with the Environment Agency at the earliest opportunity.	Support noted.
Lancashire County Council	Site Allocations	TC4/1	<p>TC4/1 Development opportunities in Burnley Town Centre</p> <p>LLFA supports the Environment Agencies comments on the above policies.</p> <p>LLFA General comments relating to all 7 sites</p> <ul style="list-style-type: none"> <li>All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>All sites have some susceptibility to surface water and ground water flooding</li> <li>NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> <li>Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are required outside of the planning framework.</li> <li>The district lead officer may wish to add further comments on his return from leave, if time permits.</li> <li>We would like to be invited to future meetings with your appointed consultants</li> </ul> <p>TC4/1 Curzon Street Burnley</p> <p>We would support the proposal of de-culverting, if possible.</p> <p>I do not believe we have had any flooding reports for this site or within the vicinity but the district lead officer would be able to confirm this on his return from leave.</p> <p>See general comments above.</p>	<p>Support for EA comments (ref 1360) in relation to this site is noted.</p> <p>Bullet point 1: Noted. This is made clear in Local Plan policy CC4 Development and Flood Risk.</p> <p>Bullet point 2: The site's susceptibility to these sources of flooding has been examined as part of the the Council's Strategic Flood Risk Assessment (SFRA) In the case of this site a more detailed Flood Risk Assessment has been undertaken.</p> <p>Bullet point 3: Noted. Local Plan policy CC5 (Surface Water Management and Sustainable Drainage Systems) sets out this hierarchy and requires it to be followed.</p> <p>Bullet point 4: Noted. Added to policy CC4 para 2: 'Any works affecting ordinary watercourses may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.' A paragraph has been added to the supporting text for this policy outlining the LLFA's Ordinary Watercourse Consenting and Enforcement Policy.</p> <p>Bullet point 5: Noted.</p> <p>Bullet point 6: The LLFA was invited to the SFRA inception meeting with consultants and EA.</p> <p>Site specific comments: Noted. Support for policy requiring deculverting to be explored is welcomed.</p>
Environment Agency	Policies - Town Centres, Retail and	TC4/2	TC4/2 Thompson Centre – See comments on EMP1/8.	Comment noted. Information relating to the culvert and contaminated land has been included



Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
	Leisure			in the site allocation policy.
Canal & River Trust	Policies - Town Centres, Retail and Leisure	TC5	We support the broad principles of the policy which seeks to revitalise a key urban location within Burnley whilst aiming to conserve and enhance the rich heritage of the area.	Support noted
Historic England	Policies - Town Centres, Retail and Leisure	TC5	<p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment.</p> <p>The NPPF requires that Plans should contain strategic policies to deliver the conservation and enhancement of the historic environment and to guide how the presumption in favour of sustainable development should be applied locally (Para 15).</p> <p>The Local Plan needs to be amended to ensure that at submission stage it is not considered unsound, as currently drafted it would fail to meet the requirements of the NPPF regarding these issues.</p> <p>It is expected that this Policy should be amended to demonstrate how it will meet the requirements of the NPPF in terms of the historic environment. The policy as drafted only makes reference to the viable future of a heritage asset and does not demonstrate how proposals will be required to conserve and enhance the significance of heritage assets and their setting.</p>	<p>The Local Plan should be read as a whole. Conservation and enhancement of heritage assets is covered by Policies HE2, HE3 and HE4. It is not considered necessary to repeat the requirements in Policy TC5 Weavers' Triangle.</p> <p>The purpose of Policy TC5 is to set out the criteria to be used to assess applications for uses within the Weavers' Triangle that depart from the sequential approach for main town centre uses. Paragraph 5.3.46 as drafted, makes clear the need to conserve and enhance the significance of heritage assets and their setting in accordance with relevant Historic Environment policies. This being the case, rather than include specific heritage criteria (which at best would repeat and can have the effect of confusing or watering down other policies), it is considered more appropriate to make explicit, within the policy the need for proposals to meet relevant historic environment and design policies.</p> <p>Whilst paragraph 5.3.48 makes explicit that the policy only addresses uses within the Weavers' Triangle, to aid clarity the policy title has been changed from "Weavers' Triangle" to "Uses Within the Weavers' Triangle".</p> <p>In addition TC5 a new clause (4) has been added which reads "In all cases proposals will be expected to be consistent with relevant design and heritage policies."</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Sapphire (Burnley) Nominee Limited	Policies - Town Centres, Retail and Leisure	TC7	<p>Sapphire (Burnley) Nominee Limited objects to the restrictive approach set out in Policy TC7.</p> <p>Policy TC7 seeks to restrict the introduction of hot food takeaways within Primary Shopping Frontage (although it is unclear whether Policy TC7(2) would allow them in the Primary Shopping Frontage subject to the various considerations referred to).</p> <p>While we recognise the need to manage such uses, a flexible approach is still be appropriate and a prohibition on such uses in primary shopping frontages may be unnecessary. As noted above, the town centre has low representation within the food and drink sector, and such uses should be allowed in order to maintain diversity and generate a healthy balance of uses.</p> <p>We would further note that many food and drink uses might combine a mix of different uses, and emerging formats do not directly correspond to the use classes order. For example, coffee shops often comprise both A1 and A3, and other uses may include both A3 and A4 uses. Similarly A5 uses may be incorporated into other restaurant formats. This should be taken into account when applying planning policies based on single use classes.</p> <p>We consider that a more flexible approach should be considered under Policy TC7, and that any absolute prohibition on hot food takeaways within the primary shopping frontage is unnecessary.</p>	<p>It is considered that the restriction of hot food takeaways within Primary Shopping Frontages is necessary to maintain an appropriate balance of uses within the Primary Shopping Frontages and allow for the proper management of such uses.</p> <p>Since the 2013 ROL study was undertaken the number of food and drink premises within the Town Centre has increased.</p>
British Sign and Graphics Association	Policies - Town Centres, Retail and Leisure	TC8	<p>These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in-response to Policy TCB and supporting text in the above draft DPD.</p> <p>The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).</p> <p>The BSGA would firstly point out that, in line with section 3 of the PPG, a local plan does not have to contain advertisement control policies; and that, if such policies are considered necessary to protect the unique character of a particular area, these should be evidence based. This is as we advised at Issues and Options stage. But even if acceptable in principle (which is doubtful), the proposed advertisement control policies and supporting text in the Preferred Options draft are significantly defective.</p>	<p>The Council considers Policy TC8 to be necessary and valid. TC8 is consistent with the controls of advertisements legislation which requires applications to be judged in terms of "amenity" and "public safety" taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors (Regulation 3). This has been clarified in the supporting text at 5.3.60 and with reference to Town and Country Planning (Control of Advertisements)(England) Regulations 2007.</p> <p>TC8(g) has been amended to reference amenity and public safety as suggested by the respondent however the overall design of individual advertisements, their size, material, illumination,</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>First, there is no mention whatsoever of "amenity" and "public safety" which are the only considerations which apply to advertisement control. There is no mention of the Control of Advertisements Regulations, the NPPF or PPG. This results in a series of statements in both Policy TCB and supporting text which are wholly at odds with both the law and national policy and practice guidance.</p> <p>We suggest that the whole section on advertisements must be reconsidered and re-written to reflect the requirements of the law and national policy. It should first state that advertisements must be considered on individual merit and on the basis only of their impact on amenity and public safety. It should introduce the requirements of national policy and practice in the NPPF and PPG. It should then explain why Burnley in particular needs other than the national requirements. We can see no reason why it should and the Preferred Options draft certainly presents no "evidence". We therefore suggest that all of Policy TC8 (g) and (h) be deleted and replaced simply by a reference to amenity and public safety and the NPPF (references to the Regulations, the PPG and the Department's advisory booklet "Outdoor Advertisements and Signs - A Guide for Advertisers" could be in a footnote). The text could simply introduce this policy.</p> <p>If, somehow, the Council can produce evidence that the Local Plan needs policies and advice over and above the national, then this should be explained in the supporting text. All the restrictions in paragraphs 5.3.62 and 5.3.63 should be deleted. Some of this advice is anyway ridiculous and without any justification. Why should signs "normally position within the fascia"? This is acceptable for a fascia sign; but what about signs on pilasters, stallrisers, windows, doors etc. And what about buildings which do not have a "fascia"? What is the difference between a "wall mounted" and a "hanging" sign.? Are they not both "wall-mounted"? What does "of the highest quality" mean? All these issues are controllable simply through the application of impact on amenity.</p> <p>As to paragraph 5.3.63, what does "considered acceptable" mean? "Considered acceptable" by whom? It is not for the Council to determine need. If illumination is proposed, then it must be considered on merit and not on some predetermined idea of "acceptability". "Halo" illumination is internal, not external! And what is wrong with suitably designed and positioned internally illuminated box signs. They are commonly seen above modern shopfronts (where a "traditional" hand-painted wooden sign would look totally out of place). Modern signs are slimline, often recessed into the fascia or contained within the projection of pilasters/console brackets. There should be no presumption against such signs on some mistaken "principle". What is a "large" spotlight? On a retail park superstore,</p>	<p>host building, positioning, surrounding local characteristics and cumulative effect are all relevant factors that determine the impact of a single advert on amenity and public safety and as such TC8(g) is considered necessary to ensure that those matters considered fundamental to amenity and public safety are met.</p> <p>Policy TC8 will be supplemented by a Shopfront and Advertisement Design Guide SPD which will elaborate on the guiding principles and provide clarity on how the Council will approach advertisement in different scenarios. The SPD will clarify many of the issues raised by the respondent such as the importance of positioning within the fascia (where one exists) and what is considered high quality.</p>



## Section 5.4 – Historic Environment

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Historic England	Policies - Historic Environment	General	<p>One of the twelve principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations (NPPF, Paragraph 17). Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a Plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness.</p> <p>Policies Local Plans should include strategic policies to conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and any Neighbourhood Plans that come forward are required to be in general conformity with the strategic policies of the Local Plan. In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a planning application.</p> <p>The policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies that concern themselves specifically with the development of types of heritage asset. But delivery of the NPPF objective may also require policies on use, design of new development, transport layout and so on. Indeed every aspect of planning conceivably can make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective.</p> <p>In the Local Plan for Burnley (Preferred Options Stage), we have the following comments to make on the policies.</p>	Introductory comments noted.
Canal & River Trust	Policies - Historic Environment	HE1	We welcome and support the policy which seeks to safeguard and enhance the heritage assets associated with and that contribute to the character of the Leeds & Liverpool Canal, including canal- related infrastructure such as bridges, wharfs and warehouses.	Support noted.

National Trust	Policies - Historic Environment	HE1	<p>Overall the Policy is supported; however, in several places in the Policy the terminology "built heritage" is used and in the Trust's view the word 'built' is, inappropriate, superfluous and confusing.</p> <p>For example, Conservation Areas can often include important open spaces with a consequent expectation that those spaces, and, for example, the views that they afford, will be protected and enhanced, e.g. they can capture designed or pleasant unintentional but now valued views, and the settings of key Conservation Area buildings such as a church or major dwelling. In addition the key significances of Historic Parks and Gardens often relate to their layout, design and planting - all elements that do not include 'built heritage'.</p> <p>The removal of the word 'built' from the Policy would not diminish, but rather would enhance, it.</p>	<p>Removal of the word "Built" when referring to "Historic Environment" and "Heritage" is agreed on the basis that this encompasses all aspects of heritage, for example designed landscapes, open spaces and the less tangible cultural heritage. The policy wording has been changed to substitute "built historic environment" and "built heritage" with "historic environment" and "heritage" to ensure the widest possible application of the policy.</p>
Historic England	Policies - Historic Environment	HE1	<p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment.</p> <p>The NPPF requires that Plans should contain policies to deliver the conservation and enhancement of the historic environment and to guide how the presumption in favour of sustainable development should be applied locally (Para 15).</p> <p>The Local Plan needs to be amended to ensure that at submission stage it is not considered unsound, as currently drafted it would fail to meet the requirements of the NPPF regarding these issues.</p> <p>It is expected that this Policy should be amended to demonstrate how it will meet the requirements of the NPPF in terms of the historic environment. The policy as drafted only makes reference to the built historic environment (paragraph 1) and does not demonstrate how proposals will be required conserve and enhance the significance of heritage assets and their setting (paragraph one only refers to recognise and reinforce the significance). Whilst the rest of the paragraph appears to be drafted as the starting point being to allow proposals to accommodate changes, without meeting the tests of the NPPF in terms of justifying harm.</p>	<p>NPPF 126 and 157 requires that the local plan, as a whole, sets out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. It is considered that the Plan as drafted has an active, positive effect in promoting the conservation and enhancement of the Historic Environment. Policies throughout the plan are considered to help deliver the conservation and enjoyment of the Historic Environment with appropriate references as necessary. At the same time a specific strategic Historic Environment policy (HE1) is considered necessary to help emphasise and implement the positive strategy required by the NPPF and to underpin the spatial vision.</p> <p>Policy HE1 sets out aspects of Burnley's historic environment that are of special importance to the distinct identity of the borough and advocates the proactive and informed management of the historic environment in a way that fully realises its contribution to regeneration and sustainable economic development. This policy is intended to provide clarification on how the Council will deliver the conservation and enhancement of the Historic Environment in ways other than taking decisions on development proposals, including issues such as Heritage at Risk and enforcement. The implementation of Policy HE1 will play a fundamental role in achieving the positive strategy for the Historic Environment.</p> <p>Policy HE1 is complemented by more detailed development management policies (HE2, HE3 and HE4) setting out how development affecting Heritage Assets will be assessed. This</p>

				<p>being the case, amending Policy HE1 as suggested is not considered appropriate to its strategic purpose. Policies HE2, HE3 and HE4 as drafted provide the level of detail required to assess proposals affecting heritage assets and their setting in accordance with the NPPF including the tests in terms of justifying harm. However given the confusion HE1 appears to have generated, for reasons of clarity and usability the policy and supporting text have been amended to reinforce the strategic purpose of Policy HE1 as follows:</p> <p>Paragraph 5.4.8, additional text as follows:  “Policy HE1 sets out aspects of Burnley’s historic environment that are of special importance to the distinct identity of the borough and advocates the proactive and informed management of the historic environment in a way that fully realises its contribution to regeneration and sustainable economic development. The implementation of Policy HE1 will play a fundamental role in achieving the positive strategy for the conservation and enhancement of the historic environment, which meets both statutory obligations and policy requirements. In addition to its development management function, the Council will continue to seek not only to protect, but to enhance and promote the historic environment, raising awareness and understanding so it can be enjoyed by residents and visitors now and in the future.</p> <p>Pargaraph 5.4.9 additional text as follows: Policy HE1 is complemented by more detailed policies (HE2, HE3 and HE4) setting out how development affecting Heritage Assets will be assessed.”</p> <p>Policy wording in HE1 (1) amended to reflect the strategic nature of the policy as follows:  “The Council will proactively manage and work with property owners and other stakeholders to ensure positive, well-informed and collaborative conservation that recognises and reinforces the significance of the historic environment, its contribution to local identity distinctiveness and its potential as a driver for economic growth, attracting investment and tourism, and providing a focus for successful regeneration”</p>
Historic England	Policies - Historic Environment	HE2	The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment.	Policy HE2 provides a development management policy for applications affecting listed buildings; conservation areas;

		<p>The NPPF requires that Plans should contain policies to deliver the conservation and enhancement of the historic environment and to guide how the presumption in favour of sustainable development should be applied locally (Para 15).</p> <p>The Local Plan needs to be amended to ensure that at submission stage it is not considered unsound, as currently drafted it would fail to meet the requirements of the NPPF regarding these issues.</p> <p><b>Title</b> The title of the policy makes reference to designated heritage assets, yet the policy itself does not cover all of them, which is quite confusing. The policy should be amended so that it is clear to the decision maker and applicant what type of asset it covers.</p> <p><b>Paragraph 2</b> Substantial harm and unsubstantial harm should be dealt with together in the policy. It is not clear why this is separate to the content of Paragraph 5. This paragraph should be combined with Paragraph 5.</p> <p><b>Paragraph 3</b> The content of this section, is not about assessing harm. Harm is assessed using the tests of the NPPF. This section includes a list of 'items' which proposals should have regard to. It is not a checklist of "harm".</p> <p>The assessment of proposals affecting registered parks and gardens, conservation areas, and listed buildings differs, and in view of the requirements of the NPPF and primary legislation on these different asset types, this policy should be amended. Preference would be for the policy to have separate sections on these.</p> <p><b>Paragraph 4</b> See comments on Paragraph 3.</p> <p><b>Paragraph 5</b> Substantial harm and unsubstantial harm should be dealt with together in the policy. It is not clear why this is separate to the content of Paragraph 1. This paragraph should be combined with Paragraph 1.</p>	<p>registered parks and gardens and their settings and sets out principles to be followed, where appropriate, in order to avoid or minimise harm to significance. The Council has tested HE2 against different scenarios for each designated heritage asset type covered and considers that the policy and supporting text, as drafted, meets the requirements of primary legislation and the NPPF in relation to the heritage assets covered by the policy and is deliverable and in line with the NPPF.</p> <p>The supporting text has been amended to provide clarity on the type of designated heritage assets covered by HE2: Conservation Areas, Listed Buildings and Registered Parks and Gardens.</p> <p><b>Paragraph 2 and Paragraph 5:</b> It is considered that the policy, as drafted, reflects the decision making process in NPPF 133 and 134 which deals with total loss of and substantial harm to significance separately from less than substantial harm. The policy deals with both types of harm in consecutive, but not combined, paragraphs.</p> <p><b>Paragraph 3 and Paragraph 4:</b> Policy relating to Conservation Areas, Listed Buildings and Registered Parks and Gardens has been consolidated and streamlined as the NPPF introduces the same principles and tests when assessing harm to or total loss of significance of such assets. As such the Council consider a combined policy is less repetitive and better aligned with the approach of the NPPF.</p> <p>HE2 and its supporting text (which deals separately with each asset type) has been carefully worded to reflect issues that are most relevant to the types of designated heritage assets covered by the policy. The Council does not agree that it is necessary to expand the policy to encapsulate more specific aspects relating to individual designated heritage asset types. It is considered that the policy should be kept succinct with the more specific aspects remaining in the supporting text.</p> <p>NPPF 133 and 134 is not a test to establish harm, this is a matter of judgement for the decision taker, but rather it is a test to be applied when it is considered that a development proposal will lead to harm to or total loss of significance to a designated heritage asset or its setting. It is not intended that Policy HE2(3)</p>
--	--	---	---



				and (4) is a test of harm rather it sets out principles that proposals should have regard to in order to avoid or minimise harm to significance. The Supporting text has been enhanced in order to provide greater clarity on the issues and considerations that are most relevant to the types of designated heritage assets covered by the policy.
Mr Barrie Sharpley	Policies - Historic Environment	HE2	<p>[Comment made in relation to 3 preferred housing sites at Worsethorpe and Brownside]</p> <p>As noted in the comprehensive Local Plan (Appendix 4) Worsethorpe-with-Hurstwood form key areas of local heritage and should be suitably protected as conservation areas. (Butchers Farm was especially unsuitable in this context).</p>	<p>Comment noted.</p> <p>The Policy for site HS1/31 specifically acknowledges the sites proximity to the Worsethorpe conservation area, and stipulates that development proposals must satisfy the requirements of Policy HE2 (Designated Heritage Assets).</p>
Historic England	Policies - Historic Environment	HE3	<p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment.</p> <p>The NPPF requires that Plans should contain policies to deliver the conservation and enhancement of the historic environment and to guide how the presumption in favour of sustainable development should be applied locally (Para 15).</p> <p>The policy could be further enhanced with an additional bullet point which would deal with the loss of an undesignated asset, which would include the need for the survey and recording of the asset including where appropriate, an archaeological investigation. The results of which should be deposited with the HER.</p>	<p>HE3(5) has been added as follows:</p> <p>“Where the loss of the whole or significant part of a non-designated heritage asset is determined to be acceptable, the applicant will be expected to secure building recording to the appropriate level which may also include archaeological investigation, the results of which should be deposited with the Council.”</p>
Historic England	Policies - Historic Environment	HE4	<p>The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment.</p> <p>The NPPF requires that Plans should contain policies to deliver the conservation and enhancement of the historic environment and to guide how the presumption in favour of sustainable development should be applied locally (Para 15).</p> <p>This policy does not provide sufficient detailed guidance to enable those proposing schemes likely to affect scheduled monuments, archaeology of national importance and undesignated archaeology in Burnley, to determine their likely degree of success.</p> <p>Historic England recommends that the policy be amended to ensure that the Plan when submitted is not unsound on these matters.</p>	<p>Policy HE4 is considered to be the most appropriate and workable approach for managing Scheduled Monuments and non-designated Heritage Assets of archaeological interest that are demonstrably of equal significance to Scheduled Monuments In the borough. It is considered that archaeology is adequately covered by the Policy HE4 and its supporting text but we are receptive to the inclusion of any elements of policy that Historic England feels have been omitted.</p> <p>Paragraph 1 and 2: NPPF 133 and 134 is not a test to establish harm, this is a matter of judgement for the decision taker, but rather it is a test to be applied when it is considered that a development proposal will lead to harm to or total loss of significance to a designated heritage asset or its setting. It is not intended that Policy HE4(1) is</p>

			<p>The NPPF considers scheduled monuments to be of the highest significance. Any development should not be permitted where it would cause unacceptable harm to the significance of a scheduled monument or a non-scheduled site of national importance or their setting.</p> <p>Paragraph 1 The opening paragraph of the policy should clearly set out the Council's position on this matter. Preservation in situ, is not normally the method of assessing an application affecting these assets, the starting point should be the tests of the NPPF in terms of justifying the harm and public benefits. This should not be the opening paragraph of the policy affecting these assets.</p> <p>Paragraph 2 This policy does not deal with less than substantial harm to a scheduled monument or that of equal significance, therefore it should be amended.</p> <p>Paragraph 3 This could be further enhanced through reference to: opportunities to promote and interpret the assets will be supported.</p>	<p>a test of harm.</p> <p>Physical in-situ preservation is considered the most appropriate means of sustaining and managing the significance of archaeological remains within a development (ie. To do no harm). As such, setting out this expectation was considered an appropriate opening paragraph for the policy, followed by the NPPF test to be applied when a development proposal is found to harm significance.</p> <p>However given the confusion HE4(1) appears to have generated, for reasons of clarity and usability the policy and supporting text have been amended to reinforce the requirements in the NPPF as follows:</p> <p>HE4(1) has been deleted and in-situ preservation included in HE4(4) and HE4(2) is now the opening paragraph and has been amended to reflect the comments received.</p> <p>Paragraph 3 The Council recognise the importance of engaging local people in discovering, presenting and conserving the borough's heritage, see HE1(3)(f). Whilst not using the form of words suggested by Historic England, the HE4(2) and the supporting text has been amended to strengthen this position.</p>
--	--	--	--	---

## Section 5.5 - Natural Environment

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Lancashire Wildlife Trust	Policies - Natural Environment	General	The Trust is pleased to see, and supports the inclusion of, section 5.5 Natural Environment, in particular reference to Sites of International and National Importance, Regional and Local Sites, Local Nature Reserves, Protected Species, Priority Habitats and Species, and Ecological Networks.	Support noted
Environment Agency	Policies - Natural Environment	NE1	8) – We support the inclusion of this Policy regarding the intention to retain and enhance features, and to provide an alternative corridor along defined Ecological Networks	Support noted
Lancashire Wildlife Trust	Policies - Natural Environment	NE1	The Trust is pleased to see, and supports the inclusion of, Policy NE1: Biodiversity and Ecological Networks, and supporting text.	Support noted
Burnley Wildlife Conservation Forum	Policies - Natural Environment	NE1	Regarding Policy NE1: Biodiversity and Ecological Networks, page 161's No 1) should be more robust by explicitly referring to compliance with NPPF's para 9 and accordingly replaced by 'to comply with the NPPF paragraph 9 requirement for sustainable development to involve moving from a net loss of biodiversity to achieving net gains for nature, all development proposals should at least maintain the present level of biodiversity and where possible enhance it'	The wording of Clause 1) is considered to be consistent the the NPPF paragraph 9. It is not national policy that each and every development must achieve no net loss of, or indeed gains in, biodiversity. This is a requirement of the Plan as whole and individual developments and actions will contribute to achieving this as appropriate to their nature and scale. The wording has however been amended to further encourage biodiversity enhancements.
Natural England	Policies - Natural Environment	NE1	Protected species is detailed in the plan. Natural England has produced standing advice that you will find helpful, it is available on our website Natural England Standing Advice to help the local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, the local planning authority may need to undertake further consultation with Natural England.  While protective wording in the policy may mitigate some adverse effects upon the environment, it will be important to ensure the potential adverse impacts of the proposed level of growth on the built and natural environment are fully understood, and that appropriate avoidance, mitigation and, where necessary, compensation measures are in place to off-set adverse impacts.	Advice noted.  The SA/SEA and HRA process assesses the environmental impacts, including cumulative impacts and 'significant effects' of the plan proposals.
Environment Agency	Policies - Natural Environment	NE2	The policy states "...should be enhanced for recreational, amenity, biodiversity or other benefits they provide". We would recommend that this policy is linked to policy SP6 – Green Infrastructure, to provide reference to "other benefits", such as GI Functions. In particular would we encourage reference to potential SUDS, slowing the flow of water and water quality benefits that may be offered in areas of open space.	Clause 2) has been amended to read "Protected Open Spaces should be maintained and enhanced for the recreational, amenity, biodiversity or other benefits they provide as an important component of Burnley's green infrastructure network"  The supporting text, cross references Policy SP6 Green Infrastructure and no further reference is considered necessary. The supporting

				text to SP6 paragraph 4.6.9 has been amended to cross reference to Policy NE2.
Perseverance Area Residents Association	Policies - Natural Environment	NE2	<p>3. Why is the Greenway not designated as Protected Open Space ?</p> <p>Other</p> <p>1. We strongly support the designations of Biological Heritage Site, Local Nature Reserve and surrounding areas of Protected Open Space in and around the area named Green Brook within Map reference square 8032. We consider that complete area to be an extremely important environmental area as it stands. While that may perhaps be beyond question insofar as the BHS and LNR designated areas are concerned, we emphasise that we believe it is equally important to preserve, at least as Protected Open Space or perhaps part of the LNR , the adjacent surrounding areas as designated in green on the plan - without which the quality and effectiveness of the BHS and LNR areas would be diminished; this whole area constitutes a very important open green-space/ amenity area for the large local resident population, users of the Greenway and general public, as well as being a relief and buffer between the surrounding Employment and housing zones</p>	LNRs are declared by a statutory process separate from the Local Plan process. The shortfall of the recommended quantity of LNRs is noted at 5.5.11. Work on identifying and declaring LNR is being led by the Council's Green Spaces Team and as this work has not yet been completed it is not considered appropriate for new LNRs to be identified on the Policies Map until such time as they exist. The areas of search identified at Issues and Options stage in early 2014 are however, all either Protected sites/Open Spaces under Policy NE1 and NE2, or are in the open countryside protected under Policy SP4; and as such they would be protected by the Plan should they be declared.
Lancashire Wildlife Trust	Policies - Natural Environment	NE2	The Trust is pleased to see, and supports the inclusion of, Policy NE2: Protected Open Space, in particular that development will not be permitted within the Protected Open Spaces, and that Protected Open Spaces should be enhanced for the benefits they provide, which includes biodiversity.	Support noted
Natural England	Policies - Natural Environment	NE2	<p>Natural England welcomes this policy and recommends protected and maintained is included in the wording below.</p> <p>2) Protected Open Spaces should be enhanced for the recreational, amenity, biodiversity or other benefits they provide.</p>	'Maintained' has been added to policy clause 2) as suggested. It is not considered necessary to add 'protect' as this is within the Policy title.
West End (Burnley)	Policies - Natural Environment	NE2	<p>1. The former car park adjacent to Hargher Clough Park is intended to be added to the footprint of the park when Keepmoat move off. This is for a major food growing project in conjunction with Burnley Community Forum. (ref Simon Goff/Bea Foster). This is a key part of our food poverty strategy and I believe the space should be protected (subject to the formal decision at Cabinet).</p> <p>2. Sports grounds like Lowerhouse Cricket Club should be protected as green spaces to restrict opportunities for development.</p> <p>3. All sites entered into the Council's register of assets of community value should be protected from development through this plan.</p> <p>4. All sites included in the Council's Green Spaces Strategy including</p>	<p>Sports grounds such as Lowerhouse Cricket Club and playgrounds are covered by policy IC5 (Protection and Provision of Community Infrastructure).</p> <p>The sites now proposed as Protected Open Space were identified using a bespoke appraisal of all the Council's greenspaces scored against criteria relating to their scarcity, quality, visual amenity and GI functions. This work will be published as an addendum to the Council's green spaces strategy. It could be used by communities to help identify Local Green Scape on non- Council owned land in Neighbourhood Plans.</p>

			playgrounds, should be protected as part of this plan.	
Lancashire County Council	Policies - Natural Environment	NE2	NE2 Protected open Space  The LLFA supports the Environment Agencies comments on the above policies.	Support noted. See response to EA comment ref 1362.
Perseverance Area Residents Association	Policies - Natural Environment	NE2	Bedford Park 1. We strongly support the designation as Protected Open Space of the area which we have marked as "Bedford Park" on our attached extract copy Map. For information, we have initiated and, in conjunction with Burnley Parks Dept, are currently progressing a scheme (for which plans and part funding are already in place) to improve this area, which is, we believe, a recognised park area owned and maintained by the Council; it currently includes a small football pitch and a childrens' play park as well as a large open park area and a woodland/stream area; it is of considerable, and increasing, importance as the principal semi-formal Park serving this end of Padiham. We would suggest that it be named on the Map as Bedford Park, which we believe is now its recognised name (please check with Parks Dept, Simon Goff).	Support noted. Individual protected open spaces are not named on the Policies Map (except where these already appear on the OS Map base). The naming suggestion has been accepted by the Council's Green Spaces Team.
H F Eccles & Sons	Policies - Natural Environment	NE3	There is support for the acknowledgement at paragraph 5.5.41 that development in the open countryside (that accords with SP4) can still respect the existing landscape character, for example by respecting, existing contours, retaining key field boundaries such as dry stone walls or hedgerows, following historic and traditional development patterns, for example, addressing village road/green or verge frontages, retaining and incorporating mature trees and avoiding overly urbanised form of development.	Support noted
Wayne Obrien	Policies - Natural Environment	NE3	Map error – gardens of nos 41/43 Lowerhouse Crescent, Burnley  I am writing to request a formal change to the Local Plan Proposals Map, which I understand is in the process of being amended by an updated Local Plan for the Borough.  I live at No. 43 Lowerhouse Crescent in Burnley and the garden of my house [] has been incorrectly included within a policy designation in the Local Plan that is not relevant to the land as it is the private garden space of our houses.  I have provided below evidence of the current and proposed Local Plan Proposals Maps that I hope shows how this error can be corrected before the new Local Plan is adopted.  The Base Map on which the Proposals Map is drawn correctly shows the boundary of the gardens of the houses at No's 41 and 43, but for some	Whilst most of the proposed Protected Open Spaces in the new Local Plan are in the Council's ownership, it is not a prerequisite for their inclusion. Protected Open Space does not need to be publicly accessible. These open spaces are Protected from inappropriate development because of their value and are not necessarily public open spaces.  The red dots referred to on the new Policies Map show the extent of the Woodland Ecological Network. The Ecological Networks run over a large number of properties as species may pass through or over them to get to other sites and is considered necessary to seek to protect these networks where they do so. This is unlikely to adversely affect homeowners and would not affect their permitted development rights.

			<p>reason they are covered by Policy designation CF3 – ‘PROTECTION OF EXISTING PUBLIC PARKS, INFORMAL RECREATION AREAS, MAJOR OPEN AREAS, PLAY AREAS AND OTHER AREAS OF OPEN SPACE’. (See the plans below).</p> <p>Policy CF3 forms part of a larger area to the north that is an appropriate designation for that land, but the designation on the Proposals Map should clearly not include my garden or that of my neighbour.</p> <p>My garden is not public open space and should never have been designated as such. I have marked the plan above to show the extent of our gardens that should be excluded from the designation.</p> <p>Draft proposals for the Local Plan from 2014 (shown below) seem to draw the CF3 designation as a new ‘Local Nature Reserve – Lowerhouse Lodges’. I have copied the map below and helpfully this proposal actually looks to exclude my garden and that of my neighbour from this designation.</p> <p>I note now that the Local Plan Preferred Option Proposals Map (shown below) shows a woodland designation on the land (red dots) so would like to formally object to this proposal. This should be amended back to the designation on the 2014 draft, so that my garden is within the urban area.</p>	
Lancashire Wildlife Trust	Policies - Natural Environment	NE4	The Trust is pleased to see, and supports the inclusion of Policy NE4: Trees, Hedgerows and Woodland and supporting text.	Support noted
The Woodland Trust	Policies - Natural Environment	NE4	<p>We welcome the strong protection given to aged or veteran trees and to ancient woodland in para 1 of Policy NE4. These habitats are irreplaceable, so it is vital that they are given the strongest possible level of protection from damage or destruction as a result of development.</p> <p>In para 6, we welcome the commitment to replace trees removed as a result of development. However, the phraseology in relation to the number of trees to be planted is a little ambiguous. We would prefer it to say that replacement of trees should be on a 2 for 1 or even 3 for 1 basis. A newly planted tree will take many decades to grow and provide the same biodiversity or amenity value as a mature tree which has been removed. Also, particularly in harsh street environments, a proportion of newly planted trees may not survive.</p> <p>The policy is deficient in that it talks about protection of trees and woods but does not make any commitment to seeking opportunities to plant new trees or create new areas of woodland or expand existing ones. We are aware of the Forest of Burnley initiative which created a large amount of new</p>	<p>Support for clause 1) noted.</p> <p>With regards to clause 6) the suggested replacement ratio for trees to be lost that are not of a type identified under clause 1), ie requiring a minimum of 2:1 or 3:1 is considered unduly onerous and prescriptive. The policy as worded allows the ratio to be lower of higher than 1:1 having regard to the age, number and size of trees or length of hedgerows to be lost. Additional wording has been added to also take into account 'their environment and likely survival rate'.</p> <p>Policy SP6, NE1 and NE3 as drafted support new woodland creation for all the benefits it can deliver. In particular woodland creation is identified as a key element of green infrastructure provision and natural open space and this is reflected in the strategic policy SP6: Green Infrastructure.</p> <p>The NPPF states at para 154 that Local Plans should 'only include policies that provide a clear indication of how a decision maker</p>

			<p>woodland in the Burnley area from 1997 onwards and it would be good if the new Local Plan could make some commitment to continuing this expansion of woodland cover. There is a reference in Policy NE3 to extending tree cover where practical but it would be good to see this included in more detail in Policy NE4.</p> <p>We would like to see the Council adopt a target for expansion of woodland cover. Woodland Trust has developed an Access to Woodland Standard which aspires that everyone should have a small wood of at least 2 hectares within 500 metres of their home and a larger wood of at least 20ha within 4km of their home. It is possible to derive from these standards targets for the amount of new woodland which is needed in a particular area and we would be pleased to discuss with your officers how to do this, if it is of interest. Currently our figures show that 45% of people in Burnley have a small wood within 500 metres of their home, so the Council is already performing quite well against the standard: the average for England is only 16%.</p>	<p>should react to a development proposal.</p> <p>Policy NE4 is a development management policy and as such it is not considered appropriate to set out aspirations or targets for the expansion of woodland cover in the policy.</p>
Canal & River Trust	Policies - Natural Environment	NE5	<p>We welcome and support the policy in relation to ensuring that new development will not be permitted to adversely affect the quality of watercourses and waterbodies which include the Leeds &amp; Liverpool Canal.</p>	Support noted
The Coal Authority	Policies - Natural Environment	NE5	<p>Representation No.1</p> <p>Site/Policy/Paragraph/Proposal – Policy Omission, Unstable Land</p> <p>[Table]</p> <p>Objection – The Coal Authority in answering questions at the issues stage identified that the most appropriate answer is was to ensure that where contamination or unstable land is suspected suitable site investigation and assessment should be carried out and remediation measures of a suitable standard proposed. We further stated that The Coal Authority had no specific preference for whether the land stability and pollution should be in a separate or combined policy within the plan.</p> <p>Unfortunately for some reason the plan does not address land instability at all. As we identify above the defined Coal Authority Development High Risk Area covers some 23.28% of the plan area. In that area coal mining legacy features pose a significant risk to new development. Land instability is a locally distinctive issue which covers a very substantial part of the plan area.</p> <p>Issues of coal mining legacy need to be adequately addressed in Local Plans line with the requirements of the NPPF, paragraphs 109 and 120-121 and Section 45 of Planning Practice Guidance. At present the Local Plan must be</p>	<p>Land instability was not included within policy NE5 (which included contamination and pollution) at Preferred Options as it should have been. This was noticed too late to be added to the Plan at that stage. The Policy and supporting text have now been amended to include this along similar lines as suggested by the Coal Authority.</p>

			<p>considered unsound.</p> <p>The text in the introduction to Policy NE5 does make reference to land instability but the matter is not contained within Policy NE5.</p> <p>Change Requested – Amend Policy NE5 to include a section on Land Instability to read as follows:  “Unstable Land  9) On sites that are known to be or potentially unstable, applicants will be expected to carry out an appropriate assessment by a suitably qualified and experienced specialist. The assessment should form an appropriate geo-technical report or a Coal Mining Risk Assessment that demonstrate that the proposed development is safe and stable or can be made so. Prior to the commencement of development (or in accordance with an alternative programme agreed), any necessary remediation, treatment or mitigation works shall be carried out to make the site safe and stable and to protect public safety.”</p> <p>Reason – To ensure that issues of coal mining legacy are adequately addressed in line with the requirements of the NPPF, paragraphs 109 and 120-121</p>	
Environment Agency	Policies - Natural Environment	NE5	<p>The policy states that, “Development will not be permitted where it would have an adverse effect on the quality or quantity of groundwater resources or watercourses and water bodies”, which we support. A reference could also be made in the policy to the role appropriate SUDS can play in protecting and improving water quality.</p>	<p>Support for clause 8) is welcomed. SUDS are dealt with in a separate policy, CC5, and paragraph 5.6.51 discusses how SUDS can help improve water quality.</p> <p>The Council has tried to avoid duplicating policy and instead highlighting important cross references in the supporting text.</p>
Lancashire County Council	Policies - Natural Environment	NE5	<p>The LLFA supports the Environment Agencies comments on the above policies.</p>	<p>Support noted. See response to EA comment ref 1363.</p>
Cllr Cosima Towneley	Policies - Natural Environment	NE5	<p>Suggested policy: Light pollution &amp; new development - Housing &amp; Employment Areas</p> <p>There does not seem to be a policy concerning the control of light pollution which is an undoubted problem in the area.</p> <p>There is no Burnley night sky whether in the urban centres or the surrounding landscape. It would be useful to develop a policy for future developments to limit the lighting of any development, but especially those taking place in the countryside or as 'add ons' to present development.</p>	<p>Applications for lighting in relation to shopfronts and advertisements will be addressed under Policy TC8 and the forthcoming Shopfront and Advertisement Design SPD. Other proposals for involving outdoor lighting will be addressed using policies SP4 and SP5 and Policy NE5 which specifically addresses light pollution. The relevant policy clause (5) has been amended and strengthened to reflect the concerns raised.</p>
Burnley Wildlife	Policies - Natural Environment	Para 5.5.24 - 5.5.25 (NE1)	<p>In the final part of the last sentence of page 161's para 5.5.24 'right for the species and the area' is too vague and should be more specific and replaced</p>	<p>The text of 5.5.24 has been amended to reflect the response.</p>



Conservation Forum			<p>by ‘appropriate for the range of habitats present and the flora and fauna species likely to be found in them.’</p> <p>In the following para 5.5.25’s last sentence it would be better to remove ‘free or paid’ from its beginning and simply state ‘advice on certain developments is available from Natural England’ so that developers are not deterred from making initial enquiries to Natural England.</p>	5.5.25 is factually correct and will not necessarily deter applicants from seeking advice.
Burnley Wildlife Conservation Forum	Policies - Natural Environment	para 5.5.43 (NE3)	In the Landscape Character section in page 165’s para 5.5.43 the following should be added to the end of the final sentence: ‘to maintain or where possible enhance biodiversity.’	The text has been amended as suggested.
Burnley Wildlife Conservation Forum	Policies - Natural Environment	para 5.5.45 (NE4)	In the Trees, Hedgerows and Woodland section, page 166 para 5.5.45, in the second sentence remove ‘can often be taken for granted but,’ a generalized assumption /impression which is too negative, out of place and not needed in a section devoted to positively valuing and protecting trees, hedgerows and woodland.	The text has been amended as suggested.
Burnley Wildlife Conservation Forum	Policies - Natural Environment	Policy Omission - Local Nature Reserves	Local Nature Reserves: Omission of Search Areas – Reasons for Objection Burnley has only 2 LNRs at the Deerpond and Lowerhouse Lodges, designated in 1997 and 2000 respectively, and further LNR designations are overdue. The Green Infrastructure Strategy, page 32 refers to Burnley’s LNR provision being below the Natural England recommendation of 1ha per each 1,000 population and identifies 4 LNR ‘search areas’ for new designations (identified on the basis that they can also form part of the biodiversity network , are of high biodiversity value and are close to areas of population) at Towneley Park/Timber Hill, River Calder washlands, River Brun and River Don including Brun Valley Forest Park and a Lowerhouse Lodges LNR extension. Although the Preferred Options ‘Natural Environment’ section devoted to LNRs, page 24 para 2.7.14 to 16, states that ‘the land area of LNRs in Burnley totals 8.27 ha, far short of the 87ha recommended for Burnley’s population,’ it fails to mention the Green Infrastructure Strategy’s 4 LNR ‘search areas’ and whilst the Issues and Options map illustrated the 4 LNR ‘search areas’ these have been removed from the Preferred Options map. Further LNR provision will contribute positively to enhancing biodiversity conservation, environmental sustainability and climate change mitigation and should be an important aspiration of the New Local Plan and the 4 LNR ‘search areas’ should be referred to and individually listed in an addition to the two LNR sections, page 24 para 2.7.14 to 16 and page 159 para 5.5.12, and these 4 LNR ‘search areas’ should be reinstated on the Preferred Options Map.	LNRs are declared by a statutory process separate from the Local Plan process. The shortfall of the recommended quantity of LNRs is noted at 5.5.11. Work on identifying and declaring LNR is being led by the Council's Green Spaces Team and as this work has not yet been completed it is not considered appropriate for new LNRs to be identified on the Policies Map until such time as they exist. The areas of search identified at Issues and Options stage in early 2014 are however, all either Protected sites/Open Spaces under Policy NE1 and NE2, or are in the open countryside protected under Policy SP4; and as such they would be protected by the Plan should they be declared.



## Section 5.6 – Climate Change

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Environment Agency	Policies - Climate Change	CC1	We support the principle of the policy in that it support renewable a low carbon energy and these will help to mitigate against the effects of climate change.	Support noted
Lancashire County Council	Policies - Climate Change	CC1	CC1 Renewable and Low Carbon Energy  The LLFA supports the Environment Agencies comments on the above policy.	Environment Agency comment 1364 supports the principle of policy CC1. LCC support noted.
National Trust	Policies - Climate Change	CC1	There is a general concern that the approach to all energy developments (i.e. also including Policies CC2 and CC3) has not adequately the addressed the potential for adverse impacts upon the historic environment, including upon the settings of heritage assets. All types of energy developments have the potential to impact upon the significances of heritage assets in a variety of ways, not least through visual impacts.  Whilst the reference to 'townscape' is noted this is not a suitable proxy for the historic environment.  It is requested that an additional is criterion is added as follows:  "do not have an unacceptable adverse effect on buildings or sites of heritage importance or their wider settings"	The suggested additional criteria wording is not consistent with the NPPF or the proposed policy wording of HE2 to HE4 which allow for harm to significance only where it is outweighed by the public benefits of a proposal.  The Local Plan should be read as a whole. Conservation and enhancement of heritage assets is covered by Policies HE2, HE3 and HE4 and it is not considered necessary to repeat the requirements in Policy CC1. Repetition can weaken rather than strengthen policies.  Policy CC1 (1) also makes explicit the need for proposals to satisfy the requirements of other relevant plan policies alongside criteria a) to e), and the supporting text in para 5.6.17 has been amended to strengthen the cross referencing of this important issue.
Burnley, Pendle and Rossendale Green Party	Policies - Climate Change	CC1 - CC5	Climate Change and Renewable Energy  The Plan has a section on climate change and renewable energy. The issue of climate change should not be sectioned off. It is not a discrete issue. It should run through the entire Plan and each section, house building, employment land requirements, transport etc should have at its core how it will tackle climate change.  The Plan does not mention COP21 or the Paris Agreement at all.  The Plan's Policies on climate change say that renewable and low carbon development will be supported where it complies with the remainder of the Plan. There is no equivalent requirement for other policies to comply with Policies CC1- CC5, even though there is significant risk of flooding at a number of the sites identified for residential development for example.	Climate change is one of many issues which are cross-cutting. The approach of addressing these cross-cutting issues in detail in each relevant policy was considered but it is felt that such repetition can weaken policy rather than strengthen it and this approach would make the Plan cumbersome.  Climate change mitigation and adaptation are however addressed throughout the Plan: In the Key Challenges, Vision and Objectives; in the Strategic Policies and other Policies on the Natural Environment, Climate Change and Infrastructure chapters.  Strategic Policies including Development Strategy (SP4) Design and Sustainability (SP5) and Green Infrastructure (SP6) influence all proposed development and are also reflected in

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>There is no mention of or investigation into public support for renewable energy. The public are generally supportive of renewable energy as opposed to fracking for example. This is particularly important where views from Pendle Hill are being considered – does that mean that no fracking sites should be in view from Pendle Hill also? Or white elephant industrial sheds? Public consultation needs improvement generally in the Plan but not more so than in relation to Renewables and fracking.</p> <p>The majority of the Renewable Energy section is focused on excluding the majority of the Borough from becoming potential sites for onshore wind. This is particularly frustrating given that the Plan is easily able to identify Green Belt which should be built on with warehouses. The Plan needs to identify proposed sites for onshore wind and take further advice as currently the Plan’s policies seem to be based on evidence from just one consultant.</p> <p>Onshore wind policy is particularly important as the current Government has moved the goal posts such that if a local plan doesn’t mention a site as suitable for onshore wind then planning can’t be granted for such site. The Plan should, therefore, make it a priority to identify as many suitable sites as possible.</p> <p>Paragraph 94 of the NPPF says that panning plays a key role in securing radical reductions in greenhouse gas emissions. The climate change and renewables policies in the Plan fall far short of radical.</p> <p>The Plan should be ambitious and aim for Burnley to lead the way so that it is the number one urban area for meeting energy demand with renewable energy by 2032.</p>	<p>the site specific allocation policies.</p> <p>The supporting text (para 5.6.1) has been updated to include reference to the Paris Agreement.</p> <p>The Plan is to be read as a whole and all relevant development proposals are subject to Policies CC4 and CC5 relating to flood risk along with other any other policies in the Plan which may apply. Sites allocated in areas at risk of flooding (from rivers or other sources eg surface water) have been subject to Strategic Flood Risk Assessment which forms part of the plan’s evidence base.</p> <p>Policies CC1 and CC2 take a positive approach to renewable and low carbon energy development, including wind energy, subject to wider environmental and amenity considerations and other relevant plan policies. Most of the borough is identified as Areas Suitable for Wind Energy Developemnt in principle. The proposed policy on wind energy development is consistent with national policy in the NPPF and Written Ministerial Statements and informed by the Council’s evidence base. Policy CC3 does state that in assessing wind energy proposals, the Council will give positive weight to community-led initiatives or where there are direct benefits to community through their involvement. The Plan has been subject to extensive consultation.</p> <p>Applications for 'fracking' development are determined by Lancashire County Council considered against the Minerals and Waste Local Plan as these are County Matters. Their potential landscape impacts would be considered by LCC. Landscape impacts of employment development are addressed in policy NE3 which requires planning applications to be supported by a landscape analysis and management plan in appropriate cases. The Plan does not seek to exclude most of the borough as a suitable area for wind energy development. On the contrary, Policy CC2 identifies the majority of the borough as a suitable area where it can be shown to be acceptable according to landscape sensitivity evidence and where it satisfies criteria set out in Policy CC3 and other local plan policies. The Local Plan</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				identifies suitable areas for wind energy development in line with the Written Ministerial Statement June 2015 which stated that wind energy development would only be permitted where it was within an area identified as suitable in Local or Neighbourhood Plans. Previous consultation responses including those from renewables industry clearly favoured criteria based policy approach over identification of suitable areas or individual sites which the developer is best placed to propose. Responding positively to the WMS, the Council's chosen approach to identification of suitable areas is based on a landscape character and sensitivity evidence base in common with neighbouring South Pennine authorities provided by leading consultants in the field.
National Trust	Policies - Climate Change	CC2	<p>There is a general concern that the approach to all energy developments (i.e. also including Policies CC1 and CC3) has not adequately the addressed the potential for adverse impacts upon the historic environment, including upon the settings of heritage assets. All types of energy developments have the potential to impact upon the significances of heritage assets in a variety of ways, not least through visual impacts.</p> <p>It is requested that an additional is criterion is added as follows:</p> <p>"2 f) in all areas avoid siting turbines in locations where they would have an unacceptable adverse effect on buildings or sites of heritage importance or their wider settings"</p>	<p>The suggested additional criteria wording is not consistent with the NPPF or the proposed policy wording of HE2 to HE4 which allow for harm to significance only where it is outweighed by the public benefits of a proposal.</p> <p>The Local Plan should be read as a whole. Conservation and enhancement of heritage assets is covered by Policies HE2, HE3 and HE4 and it is not considered necessary to repeat the requirements in Policy CC2. Repetition can weaken rather than strengthen policies.</p> <p>The supporting text in para 5.6.17 has been amended to strengthen the cross referencing of this important issue and specific reference to 'heritage' has been added to CC2 1) to make clear the need to meet the requirements of the Historic Environment Policies.</p> <p>Depending on their scale, design and prominence a wind turbine sited within the setting of a heritage asset may cause harm or substantial harm to the significance of the asset. Proposals will therefore need to assess the nature, extent and importance of a heritage asset and the contribution of its setting.</p>
Lancashire Wildlife Trust	Policies - Climate Change	CC3	The Trust is pleased to see, and supports the inclusion of item d), i.e. that "Measures are taken to avoid and where appropriate mitigate any negative effect of the development in terms of ecology, geology or hydrology,	Support noted.

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			including; impacts of the development on deep peat areas, nature conservation features, biodiversity and geodiversity including habitats and species”, in Policy CC3: Wind Energy Development.	
Natural England	Policies - Climate Change	CC3	<p>5.6.21 refers to Pendle Hill but it is suggested that this is widened to include the AONB and its setting rather than a specific location. It is good to see the LPA are implementing the Written Ministerial Statement and Natural England broadly welcome the approach to identifying areas suitable for wind based on landscape sensitivity.</p> <p>There is an opportunity within the policy to be more proactive around avoiding deep peat potentially, especially where there is blanket bog. For example, if there are areas of deep peat/blanket bog in Burnley, these could be identified as part of this policy. Policy CC3 could be strengthened with regard to blanket bog e.g. wind development on blanket bog would not normally be acceptable. In general nature conservation should be more prominent.</p>	<p>This paragraph (now 5.6.22) has been amended to add reference to the wider the wider Forest of Bowland AONB.</p> <p>Broad support for approach to identifying suitable areas based on landscape sensitivity is noted.</p> <p>The rationale for referring to one specific irreplaceable habitat in this Policy rather than relying on Policy NE1 is not understood. Wider ecological/nature conservation issues are addressed by Policy NE1.</p> <p>It is not considered it appropriate to identify areas of blanket bog on the Proposals Map or to exclude them from areas identified as suitable for wind energy development. Suitable Areas have been identified on the basis of landscape sensitivity evidence and it is felt that the introduction of specific ecological impacts to remove areas would conflict with this approach.</p>
National Trust	Policies - Climate Change	CC3	<p>There is a general concern that the approach to all energy developments (i.e. also including Policies CC1 and CC2) has not adequately the addressed the potential for adverse impacts upon the historic environment, including upon the settings of heritage assets. All types of energy developments have the potential to impact upon the significances of heritage assets in a variety of ways, not least through visual impacts.</p> <p>It is requested that an additional is criterion is added as follows:</p> <p>"k) the development would not have an unacceptable adverse effect on buildings or sites of heritage importance or their wider settings"</p>	<p>The suggested additional criteria wording is not consistent with the NPPF or the proposed policy wording of HE2 to HE4 which allow for harm to significance only where it is outweighed by the public benefits of a proposal.</p> <p>The Local Plan should be read as a whole. Conservation and enhancement of heritage assets is covered by Policies HE2, HE3 and HE4 and it is not considered necessary to repeat the requirements in Policy CC1. Repetition can weaken rather than strengthen policies.</p> <p>The supporting text in para 5.6.17 has been amended to strengthen the cross referencing of this important issue.</p> <p>Depending on their scale, design and prominence a wind turbine sited within the setting of a heritage asset may cause harm or substantial harm to the significance of the asset. Proposals will therefore need to assess the nature, extent and</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				importance of a heritage asset and the contribution of its setting.
The Woodland Trust	Policies - Climate Change	CC4	<p>With reference to Policies CC4 and CC5, we would also like to see some mention made of the important role which trees and woods can play in helping to reduce or alleviate certain types of flooding.</p> <p>Trees and woodland can reduce localised flooding and alleviate the effects of larger floods in a variety of ways, including:</p> <ul style="list-style-type: none"> <li>• Water penetrates more deeply into the woodland soils (higher infiltration rates) leading to less surface run-off.</li> <li>• Trees, shrubs and large woody debris alongside rivers and streams and on floodplains act a a drag on flood waters, slowing down floods and increasing water storage.</li> <li>• Trees protect soil from erosion and reduce the sediment run-off, which help the passage of water in river channels, reducing the need for dredging.</li> <li>• The greater water use of trees can reduce the volume of flood water at source.</li> <li>• Trees slow the speed at which rain reaches the ground, with some rain evaporating into the atmosphere - even in winter native deciduous trees intercept up to 12% of rainfall.</li> </ul>	<p>The supporting text in relation to Policy NE4 Trees, Woodland and Hedgerows (5.5.45) acknowledges the role of trees in helping to alleviate flood risk.</p> <p>See also response on this issue in relation to Policy CC5 below.</p>
Environment Agency	Policies - Climate Change	CC4	There may be instances where some flood risk management measures are not necessary now but may be in the future. This is a 'managed adaptive approach', for example, setting a development away from a river so it is easier to improve flood defences in the future. We would suggest that the policy is amended to reflect this.	Policy CC4 has been amended with an additional of cause at 6) b) iv) to reflect the managed adaptive approach recommended by the EA and supporting text added at para 5.6.39.
Lancashire County Council	Policies - Climate Change	CC4	<p>CC4 Flood Risk</p> <p>The LLFA supports the Environment Agencies comments on the above policies.</p>	<p>(See EA Comment 1365)</p> <p>Policy CC4 has been amended with an additional of cause at 6) b) iv) to reflect the managed adaptive approach recommended by the EA and supporting text added at para 5.6.39</p>
NFU North West	Policies - Climate Change	CC4-CC5	"At a time when farmers and landowners along the length of river catchments are being asked to play an increasing role in catchment management and 'slowing the flow,' work which will benefit communities along the catchment in reducing flood risk, the NFU feels that it is important to stress the importance of the alignment of plans, strategies and projects dealing with climate change adaptation and flood risk management. This is to ensure that increasingly vital work right along the catchment by farmers (e.g. tree planting, leaky dams, flood water storage, changed farm practices) which all work to protect communities, are not compromised or undermined by	The Plan is informed by the Council's Strategic Flood Risk Assessment which is itself informed by Environment Agency (EA) and Lancashire County Council (Lead Local Flood Authority (LLFA)) plans and strategies in relation to fluvial and other sources of flood risk. Relevant EA plans include River Basin and Catchment Flood Management Plans and the Burnley, Nelson and Colne Flood Risk Management Strategy. In terms of local flood risk the LLFA's Lancashire and Blackpool Flood Risk Management Strategy 2014-2017 forms part of the Plan's

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>planning policies and poorly designed and sited urban developments. Unsustainable development up and down the catchment as well as disconnected plans and priorities can contribute to devastating consequences caused by flooding in rural and urban communities. There should also be adequate compensation or incentive for providing these 'services'. However, it is appreciated that this is currently outwith the remit of local planning policy.</p> <p>The Preferred Options paper also references the joint Lancashire and Blackpool Local Flood Risk Management Strategy 2014-2017. This document will soon expire. The NFU feels that it is essential, given the opportunity to further strengthen planning policies at this stage of the plan process that deal with climate change adaptation, resilience and flood risk that there is alignment with any replacement strategy. It is essential that policies, strategies and plans are themselves future proofed and resilient, supportive of one another, are compatible, consistent and work in order to benefit all communities.</p> <p>The NFU has already set out its broad headline commitments dealing with flooding prior to the publication of its new Flooding Manifesto later this year. These are:</p> <ul style="list-style-type: none"> <li>- The Importance of protecting agricultural land</li> <li>-Climate Change</li> <li>- Investment in flood risk management</li> <li>- Planning for flood and coastal risk management</li> <li>- Internal Drainage Boards</li> <li>- Agriculture's role in reducing flood risk</li> <li>- Planning For Urban Runoff</li> <li>- Natural Flood Management</li> <li>- Flooding and Compensation</li> <li>- Lessons Learned from the Netherlands</li> <li>- Flood Resilience &amp; Preparedness</li> </ul>	<p>evidence base. Any future updates of these plans/strategies will be used to inform the Local Plan as it is reviewed. Plan policies CC4 and CC5 seek to ensure development contributes to reduced risk of flooding generally, including in areas where agricultural livelihoods may be impacted.</p> <p>Policies CC4: Development and Flood Risk and CC5: Surface Water Management and Sustainable Drainage Systems (SuDS) relating to flood and water management.</p>
Lancashire County Council	Policies - Climate Change	CC5	<p>CC5 Surface Water and SUDs</p> <p>The LLFA supports the Environment Agencies comments on the above policies. In addition, the LLFA are pleased to note the inclusion of a proposed maintenance regime for the lifetime of the development within the requirements of Policy CC5 however we would request that this should include the word 'management' too. This ensures that not only is the</p>	<p>Policy CC5 clause 3) has been amended to add reference to QBar (mean annual greenfield peak flow) rates as suggested by the EA (Comment ref 1366) and footnotes added with links to a government publication which explain these and a free web based tool for their calculation.</p> <p>Policy CC5 clause 3) d) has also been amended to refer to</p>



Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>maintenance plan robust and approved but also who is going to maintain the features is clearly identified. As management responsibilities can change over time some protection on how these will be managed going forward to cover the lifetime of the development is fundamental.</p>	management as suggested by LCC.
United Utilities	Policies - Climate Change	CC5	<p>United Utilities is pleased to see emphasis on the need to encourage new development to explore all methods for minimising surface water run-off. We welcome the inclusion of the text within this policy requiring all new development to discharge surface water in accordance with the surface water drainage hierarchy.</p> <p>We request that developers/applicants clearly demonstrate with evidence how they have applied the surface water drainage hierarchy as part of the consideration of development sites.</p>	<p>Support noted.</p> <p>For major development applicants are required to demonstrate how they comply with the surface water drainage hierarchy set in Policy CC5.</p>
The Woodland Trust	Policies - Climate Change	CC5	<p>With reference to Policies CC4 and CC5, we would also like to see some mention made of the important role which trees and woods can play in helping to reduce or alleviate certain types of flooding.</p> <p>Trees and woodland can reduce localised flooding and alleviate the effects of larger floods in a variety of ways, including:</p> <ul style="list-style-type: none"> <li>• Water penetrates more deeply into the woodland soils (higher infiltration rates) leading to less surface run-off.</li> <li>• Trees, shrubs and large woody debris alongside rivers and streams and on floodplains act a a drag on flood waters, slowing down floods and increasing water storage.</li> <li>• Trees protect soil from erosion and reduce the sediment run-off, which help the passage of water in river channels, reducing the need for dredging.</li> <li>• The greater water use of trees can reduce the volume of flood water at source.</li> <li>• Trees slow the speed at which rain reaches the ground, with some rain evaporating into the atmosphere - even in winter native deciduous trees intercept up to 12% of rainfall.</li> </ul>	Policy CC5 starts by emphasising that: 'In order to minimise surface water run off from sites: a) existing green infrastructure should be retained and integrated and where possible enhanced in line with Policy SP6'. The supporting text in relation to Policy NE4 Trees, Woodland and Hedgerows (5.5.45) acknowledges the role of trees in helping to alleviate flood risk.
Junction Property Ltd.	Policies - Climate Change	CC5	<p>Our Client is generally supportive of the approach to this policy and supports the need for sustainable drainage techniques in reducing the risk of flooding and harm to the environment.</p> <p>Notwithstanding this, the Local Plan should not be seek to a) unnecessarily replicate the role of the Environment Agency through its policies or b) require developers to incorporate unnecessarily onerous drainage measures that go above and beyond what is necessary for each site on its own merits. As we</p>	<p>General support noted.</p> <p>Policy CC5 reflects national policy and advice in relation to surface water and SUDS along with the advice of the Lead Local Flood Authority who have responsibility for surface water flood risk. The policy also reflects EA advice resulting from December 2015 floods in Burnley, Padiham and neighbouring boroughs, specifying 'greenfield' run off rates from development in order</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			highlighted above [see separate comments], the burdens of combined policy requirements can impact upon the viability of development.	<p>to minimise overall flood risk.</p> <p>The implications of combined Local Plan policies on development viability has been the subject of detailed assessment as part of the Plan's evidence base (Plan Viability Assessment March 2017).</p> <p>Where viability considerations mean that the meeting of other policy requirements is not possible then the Council would need to decide whether the development in question could be supported when judged against the policies in the plan as a whole.</p>
Environment Agency	Policies - Climate Change	CC5	<p>In light of the recent flooding events in Burnley, Padiham and downstream Whalley, we would recommend that Policy CC5 is changed so that major developments will not increase flood risk by increasing surface water runoff. The current wording refers to greenfield rates but does not quantify the rate. We would suggest that QBar (mean annual greenfield peak flow) is used. This is a method supported by current guidance:</p> <p>“3) In respect of major developments, SUDs will be required and surface water runoff from developed and undeveloped greenfield sites should be restricted to Greenfield Qbar rates...”</p>	<p>Policy CC5 clause 3) has been amended to add reference to QBar (mean annual greenfield peak flow) rates and footnotes added with links to a government publication which explains these and a free web based tool for their calculation.</p>

## Section 5.7 – Infrastructure and Connectivity

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Lancashire County Council	Policies - Infrastructure and Connectivity	IC1	<p>(Comments on SHLAA sites at Worsthorne and Brownside)</p> <p>Access to the village is restricted to three routes, two of which are single track in places with a 60mph (derestricted) speed limit. The third route is via Brownside Road which has a length over which traffic is restricted to one way working at two locations due to parked vehicles where residents have no alternative parking facilities. If development proposals do come forward, we would expect significant investment to overcome some of these issues in the interests of public safety, sustainable access and amenity. In view of the various sites proposed for the Worsthorne area there are concerns that the cumulative impact of multiple developments may be severe on each of the 3 possible access routes into the village, but especially impact on junction capacity at C661 Brownside Road / C660 Brunshaw Road roundabout is a major concern. Specifically 5 year growth will likely see capacity issues for any development (or group of developments) resulting in between 75-100 residential units by 2021. Any additional numbers will accelerate the capacity problem. Mitigation is likely to be required to increase junction capacity. Most likely form will be signalling the junction.</p>	In response to the County Council's response to the SHLAA, the Council has liaised with LCC to identify suitable mitigation measures. The need for a signalised junction has been agreed and contributions may be sought for sites HS1/15 HS1/20, HS1/31 HS1/36 and HS1/38 as appropriate and allowable under Policy IC4 and legislation.
Canal & River Trust	Policies - Infrastructure and Connectivity	IC1	We support the broad aims of the policy to promote sustainable travel options, especially walking and cycling. The canal towpath provides an ideal environment for such forms of travel and we welcome that the policy seeks to promote and improve sustainable travel routes.	Support noted. The canal towpath is identified as part of the borough's green infrastructure network.
Burnley, Pendle and Rossendale Green Party	Policies - Infrastructure and Connectivity	IC1	Policy IC1 (Sustainable Travel) establishes a hierarchy of sustainable modes of travel. Private vehicles are placed at the bottom of this hierarchy. This is in direct contradiction to the Plan's policies on housing, which calls for building new suburban semi detached houses with off road parking over reinstating empty housing stock without off road parking and is justified by supposed personal preference of hypothetical purchasers.	<p>The housing sites identified in the Proposed Submission Plan are all considered to be in sustainable locations where residents will not be reliant for their everyday needs on the private car. This was a key criteria in the SHLAA assessment that has been applied to all sites. As such there is not considered to be a fundamental conflict between the housing allocations and Policy IC1.</p> <p>Whilst the plan encourages the use of sustainable methods of transport for social and environmental reasons, (and also supports greater electric car use) it is not considered appropriate to allow/prevent development including adequate parking facilities. Requirements to improve opportunities for sustainable travel to and from the housing</p>

				<p>sites has been included within the housing site allocation policies where appropriate.</p> <p>The plan is required to meet the Objectively Assessed Need for housing, both in qualitative and quantitative terms. The housing requirement includes an allowance for the re-use of Empty Housing Stock as explained in Policy SP2.</p>
Highways England	Policies - Infrastructure and Connectivity	IC1	<p>Highways England is supportive of the policies (IC1 and IC2) which seek to encourage new developments to; promote sustainable travel; provide safe and convenient access; and contribute towards the provision or improvement of on or off-site infrastructure to ensure that developments will not materially reduce highway safety or reduce the highway network.</p> <p>Highways England would expect to work alongside Burnley Borough Council and Lancashire County Council to plan improvements to infrastructure where there is an interface with the SRN.</p>	<p>Support welcomed.</p> <p>The Council has been liaising with Highways England with regard to likely impacts on the SRN. The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network. The study assesses the impact of additional traffic at 11 key junctions. Mitigation proposals have been agreed with Highways England and included in the Draft Infrastructure Delivery Plan.</p> <p>Highways England have also been consulted on a draft of the IPD and their comments have been included in the Draft to be published alongside the Proposed Submission Plan.</p>
Highways England	Policies - Infrastructure and Connectivity	IC2	<p>Highways England is supportive of the policies (IC1 and IC2) which seek to encourage new developments to; promote sustainable travel; provide safe and convenient access; and contribute towards the provision or improvement of on or off-site infrastructure to ensure that developments will not materially reduce highway safety or reduce the highway network.</p> <p>Highways England would expect to work alongside Burnley Borough Council and Lancashire County Council to plan improvements to infrastructure where there is an interface with the SRN.</p>	<p>Support welcomed.</p> <p>The Council has been liaising with Highways England with regard to likely impacts on the SRN. The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network. The study assesses the impact of additional traffic at 11 key junctions. Mitigation proposals have been agreed with Highways England and included in the Draft Infrastructure Delivery Plan.</p> <p>Highways England has also been consulted on a draft of the IPD and their comments have been included in the Draft to be published alongside the Proposed Submission Plan.</p>

Metacre Ltd.	Policies - Infrastructure and Connectivity	IC3	<p>Appendix 9 'Car Parking Standards' states that electrical vehicle charging points (EVCP) will be required for every detached dwelling for schemes over 10 houses.</p> <p>NPPF paragraph 206 states that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. With regards to being necessary PPG confirms that the key question in this regard is whether it would be appropriate to refuse planning permission without the requirements imposed by the condition.</p> <p>A condition requiring EVCPs for every detached dwelling fails the tests of being necessary and reasonable for the following reasons.</p> <p>Nowhere in NPPF does it stipulate that EVCPs are necessary to make residential development acceptable and sustainable. Furthermore whilst specific electrical charging points may be beneficial in terms of reducing the time taken to recharge a vehicle and making the process easier, they are not a pre-requisite for the future occupiers of the dwellings to own and use an electrical vehicle. Furthermore these EVCP can be retrospectively fitted if a future occupier so desired and there is no basis to suggest that the absence of an EVCP would be a disincentive to persons purchasing an electric vehicle. Furthermore the fitting of EVCP to each dwelling is unlikely to provide any real incentive to purchase an electric vehicle as there are far greater influencing factors for such a purchase.</p> <p>One of the tests for conditions is that they are reasonable. It is unreasonable to require a developer to incur the costs of fitting EVCPs to every detached house as it is highly unlikely that the occupiers of all of the proposed dwellings would own an electric vehicle and it is unrealistic to suggest that the provision of EVCPs will be a strong determining factor in influencing occupiers to purchase such a vehicle.</p> <p>This requirement in Appendix 9 is therefore unjustified and should be deleted.</p>	<p>NPPGF paragraph 206 is not relevant here. Policy requirements are not conditions attached to planning permissions. The relevant issue is whether the policy requirements are 'sound'.</p> <p>The NPPF states that 'plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to incorporate facilities for charging plug-in and other ultra-low emission vehicles'.</p> <p>It is contended therefore that the NPPF does support in principle policies to encourage and or require electric vehicle charging points.</p>
Canal & River Trust	Policies - Infrastructure and Connectivity	IC4	<p>We welcome that new development will be required to contribute to address the impacts on off-site infrastructure. For example, canal infrastructure such as bridges and the towpath may require works to ensure that they fit for purpose due to increased usage associated with adjacent development. In the case of towpaths, a new residential</p>	<p>Support noted. Policy IC4 requires contributions towards the provision or improvement of off site infrastructure where necessary and reasonably related to the development in scale and kind.</p>

			<p>scheme linked to the towpath would increase usage of the towpath and lead to more wear and tear. Depending on the current state of the towpath, works to improve the towpath funded by the developer may be appropriate to ensure that it continues to fulfil its role as green infrastructure.</p>	
H F Eccles & Sons	Policies - Infrastructure and Connectivity	IC4	<p>Policy IC4: Infrastructure and Planning Contributions We would reinforce the need to ensure that any planning obligations required as part of new developments are CIL compliant and meet the tests set out at paragraph 204 of the NPPF.</p> <p>It is also important that the viability of schemes is taken into account when determining the level of contributions to be required as part of new schemes. Paragraph 205 of the NPPF re-iterates that sufficient flexibility should be provided to ensure that developments are not stalled due to onerous obligations impacting upon the deliverability of the site.</p> <p>Any future policies relating to planning obligations should be sufficiently flexible to take viability matters into account.</p>	<p>The Council has not yet committed to the introduction of CIL. Policy IC4 states that where contributions are requested or unilaterally proposed and the viability of development proposals is in question, applicants should provide viability evidence through an 'open book' approach to allow for the proper review of evidence submitted and for reason of transparency. Where viability considerations mean that the provision of infrastructure (either directly by a developer or through contributions towards its provision) or the meeting of other policy requirements is not possible then the Council would need to decide whether the development in question could be supported.</p> <p>The Council is intending to prepare an SPD on Planning Contributions where further detailed advice and information will be developed, in consultation.</p>
Metacre Ltd.	Policies - Infrastructure and Connectivity	IC4	<p>Policy IC4 'Infrastructure and Planning Contributions' criterion 4) refers to contributions being sought for the on-going running and maintenance costs of services and facilities, whilst criterion 6) refers to the types of obligations which may be sought. This policy is not 'sound' as it seeks obligations for matters which would not comply with National Policy or the Community Infrastructure Levy (CIL).</p> <p>As the policy itself notes, any obligations must pass a number of tests which includes the obligation being necessary to make the development acceptable in planning terms; being directly related to the development and being fairly and reasonably related in scale and kind to the development.</p> <p>Planning obligations should not be used to secure contributions to the achievement of wider planning objectives that are not necessary to allow planning permission to be given for a particular development. The NPPF and CIL confirm that obligations must only be requested where they are needed to make a development acceptable in planning terms. PPG confirms under the heading 'When can planning obligations be sought by the local planning authority?' that "Planning obligations mitigate the impact of unacceptable development to make it</p>	<p>Policy IC4 states that the Council will seek planning contributions where development creates a requirement for additional or improved services and infrastructure and/or address the off-site impact of development to satisfy other policy requirements. As a result, any development which creates a requirement for new or improved infrastructure will be subject to policy IC4, in line with national policy. The circumstances in which contributions will be sought are clearly set out under policy IC4, bullet point 5.</p>

			<p>acceptable in planning terms.” In other words, obligations can only be compliant with CIL and NPPF where development would have to be refused planning permission without them. Planning Practice Guidance also confirms that planning obligations should not be sought to contribute to pooled funding ‘pots’ intended to fund the provision of general infrastructure in the wider area.</p> <p>The Council have not provided any robust justification to demonstrate how seeking obligations for matters such as public realm improvements, public art, improvements to Heritage Assets, waste management, policy infrastructure etc. would meet the above tests. Similarly it is considered that obligations towards on-going running and maintenance costs of existing services and facilities which serve the wider community may not comply with the above tests.</p>	
Junction Property Ltd.	Policies - Infrastructure and Connectivity	IC4	<p>Policy IC4 of the Local Plan seeks to secure developer contributions towards the provision of infrastructure and infrastructure improvements which are necessary to make development acceptable.</p> <p>Whilst footnote 96 of the Preferred Options document refers to the restrictions placed on funds received through Section 106 contributes, this needs to be made clear within the Policy itself.</p> <p>The Government’s proposed changes to the CIL regulations outlined in paragraph 3.2 of the CIL: Consultation of further Regulatory Reforms (October, 2013) document will see a limit on the pooling of planning obligations collected through Section 106 from April 2015 or upon the local adoption of the charging schedule, whichever is sooner. The limitations will restrict the pooling of developer contributions from more than five sites for any individual infrastructure project or type of infrastructure. Any mechanism that attempted to fund significant infrastructure across more than five sites will need to be through CIL. As drafted the Policy does not make reference to this nor that Burnley do not have CIL.</p> <p>Our Client suggests that the last sentence of the second paragraph of Policy 3 should be amended as follows:</p> <p>“2) ... Planning contributions may be sought to fund a single item of infrastructure or to part of an infrastructure project or service in accordance with Circular 5/2005, Community Infrastructure Levy regulations or successor”</p>	The Council has not yet committed to the introduction of CIL. With regards to the restrictions pooling of contributions this information is referenced within the footnote and in national policy/legislation and therefore does not need to be repeated within the policy itself. It is entirely possible that these restrictions may change over the lifetime of the plan so it is important that the Policy is worded with longevity in mind.

Sport England	Policies - Infrastructure and Connectivity	IC4	Sport England welcomes and supports the inclusion of sport and open space within policy IC4. However, it is unclear whether playing fields, including Artificial Grass Pitches would be included under the sport or open space types. Sport England would welcome some clarity within the policy.	Whilst Policy IC4 lists number of appropriate matters that may be required to be funded by planning contributions, it makes clear that the list does not preclude other matters. Whilst playing fields, including artificial grass pitches are not specifically mentioned in the list they are clearly within the category of sport, leisure, recreational, cultural and other social and community facilities which are.
Sport England	Policies - Infrastructure and Connectivity	IC5	<p>Housing growth results in an increase in population with a corresponding increase in demand for sport from certain sections of that population. It is important existing sites are enhanced to create the capacity required to take that additional demand or provide new pitches where necessary. Sport England has developed a new strategic planning tool to estimate the demand for pitch sports arising from housing growth to be used alongside the Playing Pitch Strategy.</p> <p>There is a similar strategic planning tool that can be used to estimate the demand generated for other sports facilities (sports halls, swimming pools, bowling, and Artificial Grass Pitches. Please contact the Regional Sport England Planning Manager for information on its use and application.</p>	<p>The Council has prepared a Playing Pitch Strategy jointly with Rossendale and Pendle Borough Councils to provide a strategic framework for the provision, management and development of new playing pitches and ancillary facilities between 2016 and 2026. Sport England has been involved in the development of the strategy.</p> <p>An Indoor Sports Facilities Study has also been produced using the Sport England planning tool referred to and upon which Sport England were invited to comment. This concludes that existing facilities are sufficient to meet current and projected need.</p> <p>Policy IC5 seeks to protect sports provision subject to a continued need and/or require new or improved provision if a new need arises as a result of new development. Contributions for this may be sought under Policy IC4.</p>
University of Central Lancashire	Policies - Infrastructure and Connectivity	IC5	<p>UCLan do not object to the general wording of Policy IC5 and generally support the policies aim of promoting social and community infrastructure in appropriate locations. However, UCLan believe that the policy should be more positively worded in respect of the provision of, or extensions to, educational facilities within the borough. It is recommended that an additional criterion under the heading 'The Council will, where possible:' be added to read:</p> <p>'Support the provision of, and extension to, new educational facilities in sustainable locations that are able to serve the identified demand'</p> <p>Providing positive wording supporting such as this will help to deliver the vision and objectives (objective 10) of the Local Plan.</p>	Educational facilities are considered to be social/community facilities and therefore covered by the policy. This policy is concerned with facilities that are required to support new development rather than the setting out the policy against which specific proposals for new or improved social and community infrastructure would be judged. Such new or improved provision will be determined using other relevant policies of the Plan e.g. SP4.
Lancashire County Council	Policies - Infrastructure and Connectivity	Infrastructure - Education	In response to the consultation on Burnley's Local Plan to 2032 – Preferred Options, I would like to thank you for the opportunity to be involved in this process.	Comments noted and welcomed. The Council has further discussions with the LCC Education Team in preparing the Proposed Submission Document and the IDP.



			<p>Overall Summary</p> <p>Section 14 of the education act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. Some children have Special Educational Needs for which they access school provision outside of Lancashire.</p> <p>The team produces an Education Methodology document which outlines the Lancashire County Council methodology for claiming education contributions against housing developments.</p> <p>The impact of any housing development is assessed, with Primary school aged pupil accessing a school within 2 miles and a secondary school aged pupil within 3 miles. This is reflected within Lancashire County Councils Home to School Transport Policy. Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet this demand, a new development can have an adverse impact on the infrastructure of its local community.</p> <p>Planning Obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:</p> <ul style="list-style-type: none"> <li>• Already over-subscribed, or</li> <li>• Projected to become over-subscribed within 5 years</li> </ul> <p>If a large new housing development is proposed (more than 150 houses), it may not be feasible to expand existing schools. In such cases, Lancashire County Council will undertake an initial assessment on whether a site may be required, taking into account the existing provision in the area. If the development is large enough to justify the possibility of a new school, the developer may be asked to contribute a suitable school site as part of the development. The size of this site would be determined in accordance with DfE guidance.</p> <p>Within the preferred options local plan the housing trajectory showing the distribution of development planned for Burnley to 2032 is included, as follows:</p>	
--	--	--	---	--

			<p>[Table provided]</p> <p>Depending on the position and feasibility of expansion of existing schools at the time of delivery of these developments there is a potential requirement for additional primary sites and an additional secondary school site. Given the scale of development and the need to assess the feasibility of existing sites for expansion there may be a need to identify additional primary school sites.</p> <p>Given the scale of development in Burnley we would welcome the opportunity to enter further discussion with the possibility of securing additional primary school sites in these areas, or if there are any groupings of small sites which could have an impact.</p> <p>Lancashire County Council would need to assess these developments to measure the impact on the local schools within the area to ascertain whether an education contribution would be required. An education contribution could include a school site.</p> <p>However, any developments which already have planning permission or developments where a planning application has been submitted and our assessment already sought will have already been counted, therefore, this position is expected to represent our maximum requirement.</p>	
--	--	--	---	--

## Section 6 – Monitoring

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Lancashire County Council	Monitoring	Implementation	<p>Specific amendment requests to the Preferred Option document</p> <p>Chapter 6: Monitoring I note that Section 6 of the Local Plan includes a summary of the Infrastructure Delivery Plan (IDP) which is being produced alongside the Local Plan.</p> <p>The IDP will hold out of date information from when LCC last responded in 2014, therefore, please can you confirm that an updated IDP will be consulted upon in the near future, so amendments can be made?</p>	Ongoing engagement has and is taking place with Lancashire County Council regarding infrastructure and the IDP who have also been sent a draft for comment. The County Council will also be formally consulted on this at Proposed Submission stage
Lancashire Wildlife Trust	Monitoring	Monitoring	The Trust is pleased to see, and supports the inclusion of, indicators for NE1 Biodiversity and Ecological Networks in Table 10 (page 207). However, the Trust would also like to see indicators and targets for the designation of Local Nature Reserves, especially in light of Local Nature Reserve Options has been removed from the Preferred Options Map.	<p>Comment noted.</p> <p>Targets are a matter for policy not monitoring - the monitoring framework reports against the targets set out in policy. Given that the declaration of LNRs site outside of the Local Plan process it is not considered appropriate to add a policy target. The Plan, through its GI, Protected Open Space policies (SP6 and NE2) and Policy NE1 will help protect land which could be declared as further LNRs.</p>
Home Builders Federation Ltd	Monitoring	Monitoring	The monitoring section identifies a wide range of indicators against which the plan will be monitored. There is, however, no clarity upon what will happen if the plan fails to meet its targets and what would trigger a full or partial review of the plan. In terms of housing these could include the lack of a five year supply or a significant deviation away from the trajectory.	It is not proposed to set a formal trigger for a review as many different factors could signal a need for this. The Government has set out its intention in the Housing White Paper of Feb 2015 to legislate for local plans to be reviewed at least every 5 years and it is sensible await the outcome of this proposal.
Natural England	Monitoring	Monitoring and Indicators	<p>Under the Natural Environment Section in Table 10: Monitoring Framework it is recommended the following are also included:</p> <ul style="list-style-type: none"> <li>• Number of planning applications with conditions to ensure works to manage/enhance the condition of SSSI/SAC/SPA/Ramsar features of interest.</li> <li>• Area of SSSIs in adverse condition as a result of development (available from Natural England website). Information on the condition of designated sites can be obtained at SSSI unit level by selecting condition of SSSI units from County downloadable data.</li> </ul>	These have been added to the Monitoring Framework as suggested, apart from the Protected Species suggestion which would be onerous to collect and it is not considered would not give a meaningful result. Such matters are not always dealt with through specific conditions attached to

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>Relevant component SSSI Units for international nature conservation designations can be identified from the nature on the map website. There is Public Service Agreement (PSA) target for 95% of SSSIs to be in favourable or recovering condition. Development should not result in the loss/damage to features of interest, either indirectly or directly. Favourable condition should be maintained where appropriate or measures taken to enhance the units to achieve favourable condition. In relation to the PSA target the conditions are simplified into 2 categories: Favourable ('Favourable' and 'Unfavourable recovering') and 'Adverse' (the remaining unfavourable and destroyed categories).</p> <ul style="list-style-type: none"> <li>• Protected species – Quantified data might include numbers of applications where protected species are considered, numbers with conditions imposed to ensure working practices and works to protect/ enhance protected species, and numbers of planning applications which result in need for protected species licence in order to be carried out . This will indicate that protected species are being given appropriate consideration within the planning system and begin to build up information on their occurrence within the plan area. Updated information following the publication of the Conservation of Habitats and Species Regulations 2010 is available from our website.</li> <li>• BAP habitat - created/ managed as result of granting planning permission (monitored via planning obligations) and which meet Biodiversity Action Plan targets.</li> </ul> <p>Under Housing it is recommended Natural England's Accessible Natural Greenspace Standard (ANGSt) is included as a helpful measure.</p> <p>Natural England's Accessible Natural Greenspace Standard (ANGSt) provides a set of benchmarks for ensuring access to places near to where people live. ANGSt can be used as an indicator to monitor the quality of green space and is accessibility. There are also other national standards such as Green Flag for parks and open spaces and the County Park accreditation schemes.</p> <p>ANGSt outlines the following:</p> <ul style="list-style-type: none"> <li>- that no person should live more than 300m from their nearest area of natural greenspace of at least 2ha in size;</li> <li>- provision of at least 1ha of Local Nature Reserve per 1,000 population;</li> <li>- that there should be at least one accessible 20ha site within 2km from home;</li> <li>- that there should be one accessible 100ha site within 5km;</li> <li>- that there should be one accessible 500ha site within 10km.</li> </ul>	<p>planning permissions.</p>

## General Comments

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Recommended Response
2352	Burnley Civic Trust	General	General	The council is to be commended on the quality of the report which has been produced.	Comment welcomed.
1213	Burnley, Pendle and Rossendale Green Party	General	General	<p>Introduction</p> <p>Burnley has always been defined by its important role in the industrial revolution.</p> <p>The presentation of a local strategic plan for the future of the town in 2016 should be made from within this historic context. It must recognise not only the town's origins, its very fabric, but also put its shoulder to the issues we expect to face in the next 20 years as a direct consequence of the industrial development that we brought into being.</p> <p>Simply put, Burnley and its neighbours have a distinct and significant duty to address unchecked growth for the sake of growth, to lead in the repair and conservation of our shared natural heritage and, most importantly, lead the way in the fight against climate change.</p> <p>Burnley, Pendle and Rossendale Green Party have laid out how it believes this can be achieved, within the broad remit and aspirational spirit of the Council's preferred options.</p> <p>The Burnley Plan Preferred Options. The Document as it Stands</p> <p>The Burnley Plan Preferred Options document of July 2016 (the 'Plan') has a clear aspirational, dynamic and exciting tone: it sees Burnley as a place where people wish to live, where people want to work and where businesses want to invest. There is much to commend: It recognises that the environment needs improving. It recognises that housing needs to improve. It presents is nothing if not ambitious.</p> <p>As proud Burnley residents, however, we have identified that there are clear issues with the plan. Primarily, the Plan has confused aspiration with growth. This is a critical mistake.</p> <p>The Plan has failed to take into sufficient consideration both the current impact of climate change, but also the real opportunity and the imperative to reverse climate change itself. The plan mentions 'adaptation' to climate change, but has precious little to say about how this will be achieved, especially as the significance of the changes the world faces in the coming 20 years will fundamentally challenge and put pressure on every aspect of the Plan – from how we travel, where we live, to where our food comes from.</p> <p>The Plan puts developers and their profits before people and the planet.</p>	<p>It is not considered that the Plan puts developers and their profits before people and the planet. The Plan seeks to provide job opportunities and high quality energy efficient homes for people in highly sustainable locations. It is recognised that that there will be environmental impacts from the development proposes but these will be both negative and positive.</p> <p>It is one of the tests of soundness that the Local Plan is consistent with national planning policy. The National Planning Policy Framework requires the Council to plan positively for growth; the council has prepared its own evidence base to inform the emerging local plan.</p> <p>The evidence base takes into account Burnley's own unique circumstances and plans accordingly to meet demands in line with national policy. Noted. The Council wishes to preserve the unique heritage of the Borough, and as such the chapter on the Historic Environment (HE1 - HE4) sets out how this will be achieved.</p>

				<p>Many of the assumptions for growth are simply not borne out by the reality. Taking an ambitious view of the number of new dwellings required by basing assumptions on national statistics, suggests there that the preferred option is being steered to meet Government targets and assuage developer demands, rather than what is best for the town's people. The driver for this bias is a Westminster imposed National Planning Policy Framework, yet we know that Burnley's housing market is depressed, and house prices are below the national average. The NPPF is not appropriate or relevant to Burnley and so should be resisted by strong leadership.</p> <p>Final Thoughts</p> <p>The challenge to create a Local Plan should be grasped as an opportunity. Every ounce of the local population's ambition and creativity should be harnessed towards making a vision of the future that is not only deliverable – and acceptable to the Secretary of State – but that manages to break away from the constraints imposed by a national austerity agenda, the ubiquitous free market growth narrative and even the values of the NPPF itself.</p> <p>In doing this, those charged with the task of creating an acceptable plan that is achievable within limited resources and in a world facing enormous challenges like climate change, must do so against an ever present chorus of powerful voices, whose main concern is not primarily the future prosperity and sustainability of Burnley and Padiham, but their own prosperity in an ever more toxic market. This is the age old division, where northern towns are forever being beaten to the punch by nearby cities and everywhere south of Birmingham.</p> <p>Local Plans go beyond Party politics. It is in everyone's interest to make them work, not least as we'll be working to its framework for many electoral cycles to come. The</p>	
2390	Burnley, Pendle and Rossendale Green Party	General	General	<p>The Plan does not oppose fracking – in fact the entire plan is silent on it. Fracking leads to energy production from fossil fuels and will contribute to manmade climate change. It is totally inadequate to not mention it given government policy. Other Councils, such as Bury, have opposed fracking. We need to be bold and set an example for other local plans too.</p>	<p>Matters concerning the extraction of shale gas aka 'Fracking' are 'county matters' and the policy stance would be addressed in the Minerals and Waste Local Plan prepared by Lancashire County Council. Bury Metropolitan Borough Council is a unitary council and so is responsible for both district and county planning functions within its area.</p>
1943	Burnley, Pendle and Rossendale Green Party	General	Sustainable Transport	<p>Sustainable Transport</p> <p>Transport planning in Burnley and Padiham is controlled at County Council level by the transport master plan adopted in February 2014.</p> <p>However, the Plan does make a fleeting reference to the opening of the Todmorden curve (paragraph 2.8.3), improvements to Rosegrove Station and extending the car park at Burnley Manchester Road station (paragraph 5.7.5).</p>	<p>Comments noted. The Local Plan considers public transport and sustainable transport throughout the plan, and makes particular reference to it in policy IC1 and IC2. With regards to transport improvements, Lancashire County Council are the Local Highway Authority in Burnley and where opportunities arise in relation to sustainable</p>

				<p>The Plan should take the opportunity to ensure that all residents are put first and that climate change is being considered with any ancillary improvements to rail transport. For example, a bridge across the platform at Burnley Manchester Road could benefit pedestrians and cyclists as well as private vehicle owners and does not encourage residents to drive to the train station.</p> <p>Considering connectivity between Burnley Manchester Road station and Burnley Barracks and Burnley Central stations should also be prioritised, whether this is in relation to ancillary planning that is within the Plan's remit or whether it is in respect of the Council's dealings with County Council or not. In Manchester, there are free low carbon buses connecting its three main train stations and bus stations, for example.</p>	<p>travel improvements, Burnley BC will work closely with Lancashire County Council to realise these opportunities.</p>
1220	Canal & River Trust	General	General	<p>The Canal &amp; River Trust (the Trust) is a charity entrusted with the care of over 2000 miles of canals, rivers, docks and reservoirs in England and Wales. These historic, natural and cultural assets form part of the strategic and local green infrastructure network, linking urban and rural communities as well as habitats. Our waterways contribute to the health and well-being of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time.</p> <p>To meet the Trusts objectives it is of vital importance to us that all levels of planning policy and associated documents provide a robust policy framework that recognises and supports canals, rivers and docks as a cross-cutting policy theme; and acknowledges the diverse roles which they perform including:  being a form of strategic and local infrastructure performing multiple functions (including sustainable transport, open space and green infrastructure, land drainage and water supply as well as flood alleviation), which is likely to be affected by all scales and types of development;  improving the physical environment, providing opportunities for people and the wider economy;  contributing to supporting climate change, carbon reduction and environmental sustainability;  and  the public benefits that can be and are generated by our canals, rivers and other waterscape's.</p> <p>The Trust therefore broadly encourages policies which seek to:   protect the heritage, environmental and recreational value of canals, rivers and other waterscape's and to safeguard them against inappropriate development; support their ability to deliver economic, social and environmental benefits to local communities and the nation as a whole; and  secure the long-term sustainability of the inland waterway network, their corridors and adjoining communities.</p> <p>As such, we have the following comments to make in relation to Preferred Options document.  [specific comments recorded and responded to separately]</p>	<p>Comments noted.</p>

1804	CPRE	General	General	<p>I am writing from the Lancashire Branch of the Campaign to Protect Rural England. We are a rural charity whose members campaign for the reuse of brownfield land in advance of greenfield sites as we hope farmland and wildlife loss can be minimised as new needed development is planned. Importantly we want job and housing numbers to be properly planned, and if countryside land must be developed we hope a sustainable way of allocating sites is followed.</p> <p>Regretfully due to staff holiday absences we lacked capacity to submit a detailed response. However, it would be remiss for me not to highlight that I received a number of emails from local residents who expressed concern over the need to release 9 hectares of land at Shuttleworth Mead South and asked for help to engage with the local plan process. I trust these people did contact you directly to raise their concerns. CPRE shares the opinion that once farmland is developed it is gone for good, with a range of environmental, social and economic adverse consequences, so we hope there can be an alternative option found to releasing Green Belt land for warehousing at Shuttleworth Mead South.</p> <p>In carrying out our charitable work, we have attended a number of Examinations in Public to impress the importance of following the ‘two-stage’ policy on process when calculating Objectively Assessed Housing Need and translating this into the Housing Requirement. This ensures that land protected by environmental and planning designations such as Green Belt and Areas of Outstanding Beauty are adequately considered when housing numbers are identified. A downward adjustment of the OAN must occur to reflect protected land i.e ‘policy-on’ Housing Requirement. This second stage helps avoid ‘unnecessary’ Green Belt loss.</p> <p>I understand that the consultation period has now closed, but I trust it is not too late for this important comment to be considered. We will watch out for future stages of the local plan consultation when we hope to engage on time and in a more detailed way.</p> <p>Best wishes for the progression of a sound local plan to best protect the beloved countryside of Burnley.</p>	<p>See separate response to comment on Shuttleworth Mead.</p> <p>The two stage process of calculating the Plan’s housing and employment requirement has been followed. In respect of housing OAN this can be met in full outwith the Green Belt. With respect to employment land it cannot. In such circumstances, Councils are required to consider, having explored whether their neighbours, particularly Pendle who share a housing market area and FEMA can or should accommodate part of the borough’s requirement, and whether there exist the exceptional circumstances for a green belt review. Both Pendle and Hyndburn Councils have already released their own green belt land for employment development so there is no justification for asking them to release further areas of their Green Belt in preference to Burnley – or vice versa.</p>
1338	Equality and Human Rights Commission	General	General	<p>Thank you for your email and accompanying flyer.</p> <p>The Commission does not have the resources to respond to all consultations, and it is not our practice to respond to consultations on local plans or infrastructure projects unless they raise a clear or significant equality or human rights concern.</p> <p>Local, Parish and Town Councils and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance here.</p>	Noted.



				<a href="http://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england">Http://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england</a>	
1471	Highways England	General	General	<p>We are satisfied to see reference to the East Lancashire Highways and Transport Masterplan and the schemes identified in the Hyndburn-Burnley-Pendle Growth Corridor strategy. These schemes have been proposed in part to improve the operation and safety of the M65. It is essential that Highways England are fully involved in the consultation and planning process to understand the impacts of the schemes and their potential impact upon the M65.</p>	<p>Comment noted.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network. The study assesses the impact of additional traffic at 11 key junctions. Mitigation proposals have been tested and agreed with Highways England and are included in the Infrastructure Delivery Plan (IDP).</p> <p>Highways England have also been consulted on a draft IDP and their comments have been taken on board in in the Draft to be published for consultation alongside the Proposed Submission Plan.</p>
1480	Historic England	General	Evidence Base	<p>A requirement of the NPPF (Paragraph 169) is that a sound local plan should be based on a strong, up-to-date evidence base which includes reference to the historic environment. The evidence base published on the consultation webpage (<a href="http://www.burnley.gov.uk/residents/planning/planning-policies/burnleys-emerging-local-plan/evidence-base/heritage-appraisals">http://www.burnley.gov.uk/residents/planning/planning-policies/burnleys-emerging-local-plan/evidence-base/heritage-appraisals</a>) appears to be very limited and does not help identify/demonstrate the following:</p> <ul style="list-style-type: none"> <li>• What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities;</li> <li>• What issues and challenges is it facing and likely to be facing in the future;</li> <li>• What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area.</li> </ul> <p>When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the Borough and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being</p>	<p>The evidence base for the Historic Environment was published in Appendix 2 of the Preferred Option Local Plan. It is accepted that only a limited number of the documents were available online. The published evidence base was not fully representative of the actual evidence base that was used to inform the preparation of the Local Plan. In addition to Heritage Appraisals this evidence base included:</p> <ul style="list-style-type: none"> <li>• National Heritage List for England</li> <li>• Lancashire Historic Environment Record</li> <li>• Local List of buildings of heritage interest</li> <li>• National Heritage at Risk Register</li> <li>• Lancashire EUS Historic Town Report for Padiham</li> <li>• Lancashire EUS Historic Town Report for</li> </ul>

			<p>discovered in the future. It may also be necessary to identify heritage assets outside the Council's area where there are likely to be setting impacts caused by any development proposals put forward in the area. It is also important to bear in mind that some asset types are not currently well recorded. For example, the Register of Parks and Gardens of Historic Interest in England, is thought to represent only around two thirds of sites potentially deserving inclusion. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list.</p> <p>Potential sources of evidence that should be included in the Local Plan evidence base could include:</p> <ul style="list-style-type: none"> <li>• National Heritage List for England</li> <li>• Historic Environment Record</li> <li>• Conservation Area Appraisals and Management Plans</li> <li>• Local Lists</li> <li>• National and Local Heritage At Risk Registers</li> <li>• Historic Characterisation Assessments</li> <li>• In house and local knowledge expertise</li> </ul> <p>Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan. It is expected that the evidence base be amended before the next round of consultation to ensure that the Plan will be considered sound in terms of the historic environment.</p>	<p>Burnley</p> <ul style="list-style-type: none"> <li>• Weavers' Triangle Public Realm Strategy SPD</li> <li>• Burnley Town Centre Public Realm Strategy SPD</li> <li>• Lancashire Historic Landscape Characterisation Report</li> <li>• Lancashire Textile Mills Rapid Assessment Survey</li> <li>• Draft Conservation Area Appraisals</li> <li>• Canalside Conservation Area Management Plan</li> <li>• Local List of Lancashire's Unregistered Historic Designated Landscapes</li> </ul> <p>Preparation of the Local Plan was also informed by National guidance including a wide range of HE publications including Good Practice Advice Notes and Guides.</p> <p>This evidence base was fundamental in informing the spatial portrait and identifying key issues and challenges at sub-section 2.6. The historic environment evidence base is considered to be proportionate and appropriate, in line with NPPF 169, providing a good level of baseline information on the character and historic context of the borough. The component parts of the heritage evidence base have been updated in Appendix 2 and on the Council's website.</p> <p>The Council has also Commissioned a Rapid Heritage Assessment from Lancashire Archaeology using the HER of all the proposed Plan allocations and any recommendations have been incorporated into the Policies of the Proposed Submission Plan. The Plan has been prepared by and with the input of experienced conservation planners.</p>
--	--	--	--	---

1479	Historic England	General	General	<p>Thank you for consulting Historic England on the above. This response details the expectations of the Local Plan for Burnley (Preferred Options Stage) and the historic environment.</p> <p>Historic England is the Government’s statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England’s historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (<a href="http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/">http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/</a>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a>) may be useful in the production of your Plan.</p> <p>The Local Plan for Burnley will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.</p> <p>[specific comments responded to separately]</p>	Introductory comments noted
1487	Historic England	General	Site Allocations	<p>In the Local Plan for Burnley, there does not appear to have been any robust assessment of the sites identified in Policies HS1 Housing Allocations and EMP1 Employment allocations of the Burnley Local Plan: Preferred Options. The individual policies for each site allocation makes reference to the need to consider the impact on the historic environment including setting but there does not appear to be any evidence to demonstrate how the Plan addresses the issue of whether the principle of development and allocation of the site is acceptable.</p> <p>The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that ‘special regard’ should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.</p>	<p>All sites proposed for allocation has been assessed for their potential impacts on heritage assets including through their setting. This assessment has been done through a number of processes.</p> <p>Through the Council's Strategic Housing and Employment Land Assessment (SHLAA) each potential site was assessed through a desk top appraisal of known constraints and planning considerations. This included the identification of heritage assets on or off site which might be affected by development. Where this was the case all sites were visited by experienced conservation planners.</p>

				<p>Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:</p> <ol style="list-style-type: none"> <li>1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution.</li> <li>2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets.</li> <li>3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level.</li> <li>4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?</li> </ol> <p>The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.</p> <p>The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.</p> <p>Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.</p> <p>Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the Council to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the policies, in the allocation of any site and in the preparation of the</p>	<p>These assessments were supplemented by reference to conservation area appraisals, heritage appraisals, examination of planning histories where relevant, and importantly reference to consultation responses at earlier round of Plan consultation. Each proposed site and reasonable alternative site was also assessed through the Sustainability Appraisal against the SA Objectives. Objective 12 of the SA focuses on the historic environment.</p> <p>For any sites that were identified as potentially having an impact on heritage assets, this was indeed a central issue of whether or not the principle of development was acceptable.</p> <p>Officers were able to draw conclusions regarding the significance of the potential impacts. It can be seen from the Site Allocation profiles set out under Policies H1 and EMP1 that heritage asset considerations and key design principles have been considered. In order to ensure nothing was missed for the Council's own records and knowledge, following Preferred Options the Council commissioned a Rapid Heritage Assessment from Lancashire Archaeology using the HER of all the proposed Plan allocations and any recommendations made have been incorporated into the policies in the Proposed Submission Plan.</p> <p>Further information on the site selection process is being prepared for the proposed submission consultation in the form of a Site Allocations Background Paper.</p>
1510	Huntroyde Estate	General	General	Our clients have a number of land holdings within Padiham, which have been previously submitted for consideration:	Noted. The respondent's specific comments on the Plan are recorded and responded to

				<p>1. Land north of Blackburn Rd, Padiham  2. Land south of Blackburn Rd, Padiham (HEL/160)  3. Craggs Farm, Padiham (HEL/028)  4. Grove Lane, Padiham (HEL/040)  5. Land at Cemetery Rd, Padiham (HEL/082)</p> <p>[The comment included a number of quotes from the NPPF which are not reproduced here. The respondent's specific comments on the Plan are recorded and responded to separately.]</p>	separately.
2356	Huntroyde Estate	General	General	Also there are a number of references to 'Burnley' or 'within Burnley' where it is not always clear whether it is referring to Burnley BC or just the town of Burnley.	These references have been checked and in general the word 'borough' is added where the whole borough is being discussed unless this is already clear from the context.
1412	Jonathan Gibbon	General	General	I visited the consultation at Worsthorne School and met your very helpful planning officers. I wish to express my support for the plans for the developments as recommended in the local plan.	Support and comment noted
1533	Junction Property Ltd.	General	General	<p>These representations are submitted on behalf of Junction Property Limited (hereafter referred to as our "Client"), in response to the Burnley Local Plan Preferred Options document published in July 2016.</p> <p>It is understood the Local Plan will set out the Council's strategy for the growth for new jobs, homes and infrastructure in Burnley between 2012 and 2032. This will replace the adopted Burnley Local Plan (2006).</p> <p>Our Client controls two parcels of land in the Borough, this includes land at Higher Saxifield, Burnley proposed to be allocated for housing within the Local Plan, referenced HS1/10 and Land at Ightenhill Park Road, Burnley which is designated as Green Belt land and not proposed for allocation within the Local Plan.</p> <p>The representation made reflect the general views of our Client, and our knowledge and experience of national policy requirements and local planning issues.</p> <p>We trust that these representations will be afforded full consideration by the Council in the ongoing preparation of the Local Plan.</p> <p>SUMMARY OF REPRESENTATIONS</p> <p>In these representations we have sought to provide our comments on the robustness of the evidence base, the deliverability of the planning strategy, and the soundness of the proposed policies of the Burnley Local Plan. As published, we do not consider that the Local Plan can be considered sound for the reasons set out below.</p>	This is respondent's summary comment - the specific comments are recorded and responded to separately.

				<p>Our Client is not convinced that the adoption of a housing requirement of 4,180 dwellings over the plan period represents the full, objectively assessed, housing needs of the Borough. We believe that the adoption of a higher requirement is justifiable. The adoption of a higher housing requirement would, in our view, provide for a significant boost to housing land supply in response to national policy requirements, allow for a response to market signals, enable the delivery of economic investment projects and maximise affordable housing delivery. We set out our reasoning to this in Section 4 of this report.</p> <p>Our Client has major concerns over the deliverability of a number of the allocated sites identified within Policy HS1. In particular the reliance placed on the delivery of a high number of clearance and industrial sites in the existing urban area. The Council is also unable to demonstrate a five year supply of deliverable housing sites and, consequently, should seek to allocate additional sites within the Local Plan which are sui table, available and deliverable and will help to achieve the borough's objectively assessed housing need.</p> <p>Policy HS1 of the Local Plan seeks to allocate land for housing. Our Client supports the allocation of their land at Higher Saxifield (Site Ref: HS 1/10) and its inclusion within the proposed settlement boundary. The site is suitable, available and deliverable for residential development.</p> <p>A number of policies within Section 5 of the Preferred Options document seek to introduce unnecessary policy burdens that have the potential to restrict the delivery of the Site. In a Borough like Burnley where the viability of sites is marginal, the Council should be actively encouraging new development without delay, particularly given the need to deliver significant new aspirational housing. As drafted a number of policies have the potential to restrict sustainable development and create a shortfall in the overall housing supply. There is need for a substantial revision to these policies.</p> <p>[The response including a series of extracts from the NPPF which are not reproduced. These are available to inspect on request]</p>	
1550	Junction Property Ltd.	General	General	<p>This section summarises our Client's representations to the Preferred Options document of the Burnley Local Plan 2032.</p> <p>In these representations we have considered whether the strategy and policies proposed by the Council are consistent with the policies of the NPPF, commenting on their deliverability, effectiveness and justification, and providing recommendations how issues identified may be overcome in moving forward with the Plan.</p> <p>As published, we do not consider the Burnley Local Plan can be considered to be sound. This is because the plan and supporting evidence is not:</p> <p>Positively Prepared: The Plan does not in our view provide for a significant boost in housing land</p>	This is the respondent's summary comment - the specific comments are recorded and responded to separately.

				<p>supply. Setting the housing requirement at 209 dwellings per year may restrict economic investment in the Borough. The Plan does not respond to the economic growth aspirations of the Borough;</p> <p>Justified: The requirements set out within Policies SP4, HS1/10, HS3, HS4 and CC4 are considered to be unjustified as the Council has provided no evidence to corroborate that the cost of combined policy requirements of the Local Plan are necessary or viable;</p> <p>Effective: The Council has failed to identify sufficient land to meet its objectively assessed housing need and to demonstrate a five year supply of housing land the Plan is therefore ineffective. The policy burden also presented by Policies SP4, HS1/10, HS2, HS3, HS4 and CC4 has the potential to risk the viability of development and restrict future development in the Borough. This will continue to create a shortfall in the overall housing land supply as sites become undeliverable rendering the Local Plan ineffective; and</p> <p>Consistent with national policy: For the reasons set out above, as published we do not consider that the Burnley Local Plan will achieve the delivery of sustainable development.</p> <p>In order to address the above matters it is considered that the Council should seek to adopt a housing requirement that supports projected job growth. The allocation of further sites will be fundamental in securing a sound and deliverable Plan. This may include the release of Green Belt land.</p> <p>Substantial revisions are also required to supporting evidence, particularly in relation to viability. The Council need to ensure the proposed allocations are deliverable and the costs of requirements likely to be applied to a development, such as requirements for affordable housing, standards and financial contributions or other requirements do not render schemes unviable. This is a particularly prevalent issue in a Borough like Burnley where the deliverability of sites can be marginal.</p> <p>Notwithstanding this, our Client supports the identification of Burnley as the “Principal Town” within the Borough and supports the allocation of our Clients land at Higher Saxifield. The site is suitable, available and deliverable for residential development.</p> <p>Overall, our Client does not consider the Preferred Options document to be sound. As a result, our Client objects to the Local Plan as drafted.</p>	
2419	Lancashire County Council	General	General - Health	<p>As you are aware, I was intending to submit to you an initial audit of the Burnley Local Plan Preferred Options/SA using best practice health planning guidance. This was an additional piece of work to complement the health comments provided by colleagues in the LCC Public Health Wider Determinants team, on 2nd November 2016, as per the email below.</p> <p>The proposed health planning audit was primarily focusing on TCPA guidance but having now</p>	Comments noted. See also SA response (within the SA Report)

			<p>reviewed work to date, I have decided that the document methodology needs revision in order for any outcomes to be of beneficial use. In light of this, I have decided to not issue the draft audit at this point. I therefore recommend that in addition to taking account of the previously submitted LCC Public Health comments and recommendations, that you review the plan to ensure that it accords with the health guidance contained within the National Planning Policy Framework and the accompanying Planning Practice Guidance note on Health and Wellbeing.</p> <p>With regard to the SPD work, this project is ongoing and has been broadened to include an emphasis on hot food takeaway policy/SPD analysis. A draft report is timetabled to be produced in the new year.</p> <p>I have been working alongside colleagues in LCC Public Health, Wider Determinants team to provide feedback on behalf of Director of Public Health and Wellbeing, which you can use to help inform the ongoing preparation of the local plan Publication Version. We have considered the following:</p> <ol style="list-style-type: none"> <li>1. Burnley Health Considerations</li> <li>2. Burnley Local Plan Sustainability Appraisal</li> <li>3. Burnley Preferred Options, July 2016</li> <li>4. SPD Health review</li> </ol> <p><b>Burnley Health Considerations</b>  With support from LCC Planning, the LCC Public Health Wider Determinants team have prepared a brief report (as attached) for your consideration on behalf Director of Public Health and Wellbeing. Please be mindful that the content of the report is restricted by the short timescale within which they have been able to draft it, but it is hoped that the document will be useful and informative. Influencing the content of local plans is a significant opportunity for LCC Public Health to work in partnership with you to influence how the planning processes can address some of the wider determinants of health, contributing to improvements in health and wellbeing and reductions in health inequalities.</p> <p><b>Sustainability Appraisal (SA)</b>  In the absence of sufficient time to undertake a Health Impact Assessment (HIA) of the draft Publication Plan, LCC officers have examined the SA methodology used by your consultants LUC, in the Burnley Local Plan: Preferred Options Draft, Sustainability Appraisal Report, July 2016. The SA appraisal objectives include deprivation reduction, economic inclusion, sustainable transport, improving mental and physical health and reducing health inequalities, housing range and quality, crime reduction, increasing social inclusion, access to services, amenities and jobs, and environmental objectives including those relating to air quality and asset protection. At initial scanning the SA methodology appears to be satisfactory with regard to assessing effects of the Preferred Options local plan site and policy options. However a couple of points are worth consideration with regard to Appendix 4</p>	
--	--	--	---	--



				<p>Appendix 4, Assumptions Applied During the SA of Site Options in Table A4.1: Assumptions applied in the SA of site options</p> <ul style="list-style-type: none"> <li>- Objective 6, the assumption does not provide detail on the effect of a site increasing access to opportunities for safe walking and cycling. It currently refers to public transport with regard to access to bus stops and train stations only. Instead the SA assumptions with regard to cycle path access are referred to in objective 7.</li> <li>- Objective 7, the assumptions provided do not directly relate to the sub-objective questions presented for objective 7 with regard to improving p</li> </ul>	
1759	Lord Shuttleworth	General	General	<p>1.1 Savills on behalf of Lord Shuttleworth, Tom Kay-Shuttleworth and Lord Shuttleworth’s 2011 Discretionary Settlement submit the following representations as part of the Burnley Local Plan Preferred Options consultation (July 2016).</p> <p>1.2 Burnley’s Local Plan will cover the whole of Burnley borough up to 2032. It will provide the statutory planning framework for the borough. The Plan will be used to guide decisions on planning applications and areas where investment should be prioritised. Once adopted, it will replace the ‘saved’ 2006 Burnley Local Plan Second Review.</p> <p>1.3 Our client’s landholding is located in and around the Principle Town of Burnley. This representation is therefore made in respect of the following four sites under the ownership of Lord Shuttleworth, Tom Kay-Shuttleworth and Lord Shuttleworth’s 2011 Discretionary Settlement:</p> <ol style="list-style-type: none"> <li>1. Land at Hollins Cross Farm (South Burnley) –Site HS1/2 proposed for circa 216 dwellings on a site size of 8.65 hectares;</li> <li>2. Land at Bullions Close (north Burnley);</li> <li>3. Land at Cornfield Grove (north Burnley); and,</li> <li>4. Land at Broadhead Moor (south Burnley).</li> </ol> <p>Please see Appendix A for Site Location Plans for the four sites listed above.</p> <p>1.4 Our clients are committed to working alongside Burnley Borough Council to bring forward deliverable sites under their ownership. As such, technical work can be undertaken and provided when deemed necessary.</p>	Comments noted. The respondent’s specific comments are recorded and responded to separately.
1637	Metacre Ltd.	General	General	<p>Our client Metacre Ltd wishes to make a number of representations to policies contained within the Local Plan Preferred Options. As confirmed in NPPF paragraph 182, Local Plans must be “sound” in so far as they must be positively prepared, justified, effective and consistent with national policy. For reasons set out below the following policies fail one or more of these tests and thus in its current form the Local Plan is not considered to be sound. Recommendations are also made in this statement as to what alterations are considered necessary to resolve these concerns.</p>	Comments noted. The respondent’s specific comments are recorded and responded to separately.
1659	National Grid	General	General	<p>We have reviewed the above consultation document and can confirm that National Grid has no</p>	Comments noted.

				<p>comments to make in response to this consultation.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p>	
1818	Padiham Community Action	General	General	<p>#1 The members of our Padiham Community Action group would be pleased if the council members could consider the following :</p> <p>We have over 500 members. Our Facebook page has currently over 2000 likes . A significant number of shops and small businesses in Padiham support our objectives. Local schools, environmental, angling and walking organisations have also expressed strong support. We have also secured support from Padiham , Simonstone, Whalley, and Altham councils.</p> <p>#2 Introduction. We write in response to the consultation on the Burnley Local Plan: Preferred Options Document and in particular to the proposal to take land out of the Green Belt and develop it as employment sites.</p> <p>Padiham Community Action is a non political community action group with over 500 adult members drawn from Padiham and adjoining areas. This statement should be read together with our response to the previous consultation in 2014 and statements made at various meetings with the planning team and councillors during the last two years.</p> <p>This submission by Padiham Community Action is in addition to any submission by individual members and reflects the views of Padiham Community Actions wider membership.</p>	Comments noted. Officers are aware of the concerns of Padiham Community Action in particular to the proposals to take land out of the Green Belt for employment development. See separate response.
1744	Pendle Borough Council	General	General & Evidence Base	<p>Thank you for offering Pendle the opportunity to comment on the Preferred Option Consultation.</p> <p>I first of all confirm that Pendle does not object to the Preferred Option. We also confirm that our view is that we have worked collaboratively with Burnley on the evidence base and that our view is that you have fulfilled your duty to co-operate obligation with Pendle.</p>	<p>Pendle Borough Council's' support is welcomed and the comments with regard to the OAN and the wording of the SHMA are noted.</p> <p>The viability study undertaken by Colliers</p>

				<p>Although we do not overall object to the Plan there are a number of matters that we wish to raise relating to the evidence base that in our view, once addressed, will reinforce the soundness of the Plan.</p> <p>The Strategic Housing Market Assessment has been updated from that jointly prepared with Pendle. It uses statistical information from the 2012 SNHP issued in February 2015. You will be mindful that these in turn have been updated by the 2014 household projections published on 12th July 2016, which the SHMA will not have had time to assimilate into the projected figures.</p> <p>The SHMA makes reference in several places (1.10 &amp; 7.5) to Pendle meeting its needs in isolation. The conclusions however, at 13.4, rightly recognise that the Pendle OAN (in the adopted not emerging CS) was adopted as part of an update to the SHMA which covered the whole HMA. In reaching the OAN for Pendle recognition was taken of the role Burnley would play in satisfying the housing requirement for the whole HMA not simply in Pendle. The Pendle OAN was not at any point considered in isolation but had regard to the whole HMA.</p> <p>In this respect the updated SHMA for Burnley should consider any implications for the HMA beyond the area defined in figure 1.2 which limits the HMA effectively to Burnley. A brief assessment of any implications should be added to the final report to ensure that any impacts of the options do not have implications for the whole HMA.</p> <p>The evidence base that has been provided, which looks at site viability, does not readily tie into the findings of the viability study undertaken by Colliers International and Aspinall Verdi for Pendle. We were not able to find the actual viability appraisals in the evidence base which you will need to have going to the EIP. We would welcome working with you on better understanding the viability modelling you have undertaken so that we can ensure that our findings are robust across the HMA.</p> <p>I trust these comments are of assistance to you and we look forward to continuing to work with you on our cross boundary issues and the evidence base supporting our Plan preparations.</p>	<p>International and Aspinall Verdi for Pendle is dated 2013 and there will have been changes in the intervening period that have an impact on site viability. Following preferred options the Council commissioned HDH Planning and Development to undertake a whole plan viability assessment.</p>
1755	Royal Mail - Burnley	General	General	<p>Background</p> <p>Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK. Royal Mail's services are regulated by Ofcom.</p> <p>Royal Mail Properties</p> <p>Royal Mail owns the following property within the Borough of Burnley:</p>	<p>Comments noted. The respondent's specific comments are recorded and responded to separately.</p>

				<p>- Burnley Delivery Office, Bank Parade, Burnley, BB11 1DY (BE2586)</p> <p>Additionally, Royal Mail have been issued with 20 parking permits by the Council to park at the following location:  - Burnley Brown Street Vehicle Park, Brown Street, Burnley, BB11 1PJ (BE3811)</p> <p>Representations  The subject of this representation is to make Burnley Council aware of Royal Mail's operations within the Burnley area and to briefly comment on the emerging policies within the Burnley Local Plan Preferred Options Document July 2016. Royal Mail's representations are made in reference to the following three key issues:  1) Town Centre Policies  2) Proposed Land Use Allocation  3) Transport Proposals</p> <p>Royal Mail would welcome further engagement with Burnley Council, particularly with regards to future transport proposals and where allocations/sites next to or adjacent to Delivery Offices and / or Vehicle yards are coming forward for development. Royal Mail wish to emphasise the need to protect the above properties from development that may adversely affect mail services provided from it.</p> <p>Royal Mail also wish to ensure any highways works do not impact on the efficiency of their existing operations and that a new location for the Burnley Vehicle Park can be identified and secured should the current site come forward for development. This will ensure that Royal Mail's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000.</p> <p>We formally request that this letter is given full consideration in the preparation of the Burnley Local Plan and we would appreciate it if you could keep Cushman &amp; Wakefield informed of the plan making process to ensure we are able to respond appropriately.</p> <p>I trust this representation is of assistance and should you have any queries to discuss Royal Mail's position further, please don't hesitate to contact me.</p> <p>[specific comments are recorded and responded to separately]</p>	
1757	Royal Mail - Burnley	General	Transport Proposals	<p>Transport Proposals  It is clear from the Local Plan Preferred Options document that Burnley Council has positive ambitions in relation to transport and highways improvements across the Borough, which aim to provide additional capacity on the highway network and reduce congestion.</p> <p>The Hyndburn-Burnley-Pendle Growth Corridor strategy is identified in the East Lancashire Highways and Transport Masterplan as a key opportunity to improve transport infrastructure</p>	<p>Comments and concerns noted.</p> <p>The Council will be publishing a draft of its IDP for comment alongside the Proposed Submission Document and this will include an updated list of highway schemes identified to support the growth set out in the Plan</p>

				<p>and connectivity across Burnley. The Preferred Options document sets out several highways improvement schemes in and around the town centre which are planned for delivery by March 2018. A number of these schemes involve the signalisation of existing roundabouts and several also involve upgrades to allow MOVA operated traffic control which aims to reduce delays.</p> <p>However, it is our opinion that the highways proposals set out in the Preferred Options document may have implications for Royal Mail in the context of their statutory duty to provide efficient mail sorting and delivery for the Burnley administrative area. Any transport proposals could impact on delivery times across the Borough particularly during the construction phase in terms of road closures, restrictions or Traffic Regulation Orders. We respectfully request continued liaison on all future transport proposals and to be notified as planning applications and Traffic Regulation Orders are submitted for the highway works to allow Royal Mail to plan ahead and adapt and respond to any changes on the highway network to avoid disruption.</p>	
1705	The Coal Authority	General	General	<p>Background on The Coal Authority</p> <p>The Coal Authority is a Non-Departmental Public Body sponsored by the Department for Business, Energy &amp; Industrial Strategy. The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.</p> <p>The main areas of planning interest to the Coal Authority in terms of policy making relate to:</p> <ul style="list-style-type: none"> <li>• the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework &amp; Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales &amp; MTAN2 in Wales;</li> <li>• the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework &amp; Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales &amp; MTAN2 in Wales; and</li> <li>• ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework &amp; Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales &amp; MTAN2 in Wales.</li> </ul> <p>As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.</p>	Information noted. The specific comments are recorded and responded to separately.

				<p>Background on Coal Mining Issues in Burnley Surface Coal Resources, Development and Prior Extraction</p> <p>As you will be aware, the Burnley area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 90.13% of the Plan area.</p> <p>The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.</p> <p>Coal Mining Legacy</p> <p>As you will also be aware, the Burnley area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.</p> <p>Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas.</p> <p>Within the Plan area there are approximately 761 recorded mine entries and around 60 coal mining related hazards have been reported to The Coal Authority. A range of other mining legacy features are present, in total The Coal Authority High Risk Development Area covers approximately 23.28% of the Council area.</p> <p>Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. No development should take place over mine entries even when treated.</p> <p>Although mining</p>	
1376	The Eshton Group	General	General	<p>The National Planning Policy Framework (NPPF) was published on 27th March 2012.</p> <p>Paragraphs 150 to 185 of the NPPF relate to plan-making. Paragraph 151 advises that local plans must be prepared with the objective of contributing to the achievement of sustainable development and therefore they should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development.</p>	Noted. The specific comments are recorded and responded to separately.

				<p>Paragraph 154 requires plans to be aspirational but realistic. Paragraph 178 advises that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities.</p> <p>The Local Plan will in due course be examined by an independent Inspector the document will be assessed on the basis of whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Paragraph 182 of the NPPF states:-  "A local planning authority should submit a plan for examination which it considers is "sound" - namely that it is:</p> <ul style="list-style-type: none"> <li>• Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</li> <li>• Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</li> <li>• Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> <p>The Burnley Local Plan seeks to positively prepare the District for its growth and enhancement through to 2032. Once this round of consultation is closed on the 26th August 2016, the Council will look to then publish its Proposed Submission Plan at the start of 2017.  Whilst this Representation is based primarily on the proposed allocation of three sites, comments and responses will be offered on associated and linked wider issues which affect the future development of the District more generally.</p> <p>This Representation will now respond to the Consultation in the order to which the Preferred Options Document is formed.</p>	
1087	United Utilities	General	General	<p>Thank you for your consultation seeking the views of United Utilities as part of the development plan process.</p> <p>United Utilities aims to facilitate sustainable development whilst safeguarding our service to customers; assist in the development of sound planning strategies; identify future development needs; and secure the necessary long-term infrastructure investment.</p> <p>We wish to build a strong partnership with all stakeholders to aid sustainable development and growth within the North West. We aim to proactively identify future development needs and share our information. This helps:</p>	<p>Comments noted. The Council will continue to consult with United Utilities as a specific consultee on the Local Plan and with regard to the IDP.</p>

			<ul style="list-style-type: none"> <li>- ensure a strong connection between development and infrastructure planning</li> <li>- deliver sound planning strategies; and</li> <li>- inform our future infrastructure investment submissions for determination by our regulator.</li> </ul> <p>Water and wastewater services are vital for the future well-being of your community and the protection of the environment. When developing your future planning policies and supporting documents it is important to consider the impacts on its community and environment and ensure infrastructure capacity is available.</p> <p>United Utilities can most appropriately manage the impact of development on its infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.</p> <p>United Utilities has provided comments during previous consultations of the Draft Local Plan Strategy. Please note that our previous comments are still valid and should be taken into consideration.</p> <p><b>GENERAL COMMENTS</b></p> <p>United Utilities wishes to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations.</p> <p>United Utilities will be able to better understand the impact of development on our network as more information becomes available on development proposals such as the approach to surface water drainage, points of connection, and the timing for the delivery of development, which is often only available at the planning application stage. In some cases it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure.</p> <p>We would therefore ask future developer(s) to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure. United Utilities currently offer a free pre-development enquiry service.</p> <p><b>SPECIFIC COMMENTS</b></p> <p>Site Allocations</p> <p>We note that the Local Plan is proposing a number of additional large development sites.</p> <p>Please note that the proposed allocated sites may have United Utilities assets running through them. All United Utilities resources will need to be afforded due regard in the masterplanning</p>	
--	--	--	--	--



			<p>process for a site. We would ask any future developer(s) to contact United Utilities to explore options for addressing this as early as possible. Plans of our assets are available from Property Searches (Tel No: 08707 510 101)</p> <p>We trust the above comments will be afforded due consideration by the Council in the preparation of the Burnley Local Plan.</p> <p>In the meantime, if you have any queries or would like to discuss the representation, please do not hesitate to contact me.</p>	
--	--	--	---	--

## Other Comments

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Reccomended Response
2397	Lancashire County Council	Other	Evidence Base	<p>I refer to your emails to Rachel Crompton, Flood Risk Manager regarding the LLFA's input into the SFRA in relation to the developing Local Plan for Burnley.</p> <p>I am afraid our lead officer for your district is currently on leave and will not be back in the office until 28th November. Due to the urgency of your request I can offer some high-level information which may be of use to you and I would also like to inform you that you have representatives within your organisation that attend the Making Space for Water meetings. They may be able to give you further information in the absence of our officer.</p> <p>I have had sight of the Environment Agency's comments on the Preferred Options and support their comments in relation to the sites they have commented on and the comments made on the proposed policies. However, some of the sites do not involve Main River and this would be for us, as LLFA, to provide comments regarding surface water and groundwater influences and concerns.</p> <p>LLFA General comments relating to all 7 sites [see separate comments entries]</p> <ul style="list-style-type: none"> <li>• All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>• All sites have some susceptibility to surface water and ground water flooding</li> <li>• NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> <li>• Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are required outside of the planning framework.</li> <li>• The district lead officer may wish to add further comments on his return from leave, if time permits.</li> <li>• We would like to be invited to future meetings with your appointed consultants</li> </ul>	Comments noted.
1745	Pendle Borough Council	Other	Evidence Base	<p>Indoor Sports Facilities Review</p> <p>On page 6 the reference to Pendle Wavelengths suggests that it is a private facility. It's a public facility operated on behalf of the Council by Pendle Leisure.</p>	The error is noted and the wording will be corrected when the Review is updated.
1670	Natural England	Other	Evidence Base	<p>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 to help consider whether a proposed development is likely to affect a SSSI and determine whether they</p>	Advice noted.

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Recommened Response
				<p>need to consult Natural England to seek advice on the nature of any potential SSSI impacts, their avoidance or mitigation.</p> <p>The dataset and user guidance can be accessed from the gov.uk website.</p>	
1672	Natural England	Other	General	We welcome recognition of the requirements of the NPPF, including the need to protect and enhance biodiversity, including designated sites, landscape and open space, water quality, air quality and to address climate change. The NPPF also includes requirements to protect and enhance public access and best and most versatile soils, and recognition of this is also in the plan.	Support noted and welcomed.
1690	Georgina Ormrod	Other	IDP	<p>A lady from the one of the teams phoned me with regards to my questions about how the issues that the 5 closest primary schools to the Briercliffe area are over subscribed, in relation to the proposals to build additional housing in the area. She reassured me that as part of the planning process LCC are consulted and they provide a report on the schools and advise developers if additional funding is needed to increase school capacity.</p> <p>However I would just like to reiterate my concern about this issue after I have discovered that for a housing application in Pendle, this process did not happen. LCC failed to submit a schools assessment towards this. I would just like to highlight the importance that I feel in LCC providing their assessments towards the plans. I appreciate that many teams are very short staffed and pressured within LCC and that deadlines may not always be met in the current economic climate. I would hope that no plans for further housing are passed without the impact on local schools being addressed.</p>	Lancashire County Council have been engaged with the plan making process and responded to the Preferred Options consultation with respect to school places. The Council has continued to engage with the County Council over this issues in preparing the Proposed Submission Plan.
2353	Cllr Cosima Towneley	Other	Key Diagram	<p>Figure 4: Key Diagram</p> <p>Correction to include the Pennine Bridleway National Trail and the inclusion/acknowledgement of equestrian use where only cycle symbol shown on what appears to be depiction of Pennine Bridleway, National Trail.</p>	The Key Diagram is used to illustrate a small number of key sites, routes and proposed uses. Increasing the number of elements shown may lead to a more cluttered and confusing Key Diagram. The omission of elements from the Key Diagram does not affect how Policies of the Proposed Submission Local Plan are implemented.
1956	Canal & River Trust	Other	Key Diagram	<p>Section 4 Strategy</p> <p>Key Diagram</p> <p>We note and welcome that the Plan makes strong and positive references to the Leeds &amp; Liverpool Canal as an important heritage asset that has shaped the growth of Burnley and is a key component of green infrastructure. Therefore, we assume that the failure to make reference to the canal in figure 4 'Key diagram' is an oversight and ask that the key diagram is amended to include the canal to ensure consistency within the Plan as a whole.</p>	The Leeds Liverpool Canal is identified on the Key Diagram and in line with the rivers shown is named in blue text.
1538	Junction	Other	Key Diagram	Our Client supports the identification of our Client's land at Higher Saxifield as one of the	The sizes of the icons refer to the relative

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Reccomended Response
	Property Ltd.			<p>'main housing site' for the Borough; however, it is unclear why the site has been given smaller icon than other housing sites. It is also difficult to distinguish the icon on the key diagram.</p> <p>Our Client would recommend that the Council use a larger icon of the same scale to identify all of the 'main housing sites'. The Key Diagram would then accord with bullet 4 of paragraph 157 which states that Key Diagrams should indicate broad locations for strategic development.</p>	size of the housing sites capacity. All sites shown are considered to be main housing sites.
1493	Home Builders Federation Ltd	Other	Plan period	The HBF supports the plan period, particularly the amended end date of 2032. This accords with our previous comments. Providing the plan can be examined in 2017, this should ensure a 15 time horizon, post adoption, in conformity with the preference set out within the NPPF, paragraph 157.	Support noted.
2351	Lancashire Wildlife Trust	Other	Policies Map	<p>The Trust notes that there have been several changes made to the Local Plan from the Issues and Options documentation in 2009 and the current Preferred Options consultation, and has concerns about the following items in particular:</p> <p>1. Local Nature Reserve Options has been removed from the Preferred Options Map in the absence of targets being set for working towards the government's target of 1 hectare per 1,000 population</p>	LNRs are declared by a statutory process separate from the Local Plan process. The shortfall of the recommended quantity of LNRs is noted at 5.5.11. Work on identifying and declaring LNR is being led by the Council's Green Spaces Team and as this work has not yet been completed it is not considered appropriate for new LNRs to be identified on the Policies Map until such time as they exist. The areas of search identified at Issues and Options stage in early 2014 are however, all either Protected sites/Open Spaces under Policy NE1 and NE2, or are in the open countryside protected under Policy SP4; and as such they would be protected by the Plan should they be declared.
2340	Perseverance Area Residents Association	Other	Policies Map	<p>The Map incorrectly states "Allotment Gardens" on the south-east part of this area; these no longer exist and this is part of the general Park area; we suggest that an notation on the Map is removed.</p> <p>However, there is a line of Allotment Gardens beside one edge of this area, to the rear of Beech St, as coloured blue on the attached extract copy Map. In line with other similar allotment areas on the Map we suggest that this should be incorporated into the Protected Open Space area coloured green.</p> <p>For the avoidance of doubt, we do also support and consider to be beneficial to the area</p>	The map base used for the Local Plan Policies Map is provided by the Ordnance Survey. The Council is not able to make changes to this base map.

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Reccomended Response
				the other Protected Open Space and Green Belt areas designated in our area as appearing on the extract copy map attached.	
2257	Mr Gerald Stott	Other	Policies Map	NB. I did also notice that there was no scale on the large Preferred Options Map and I had to bring it to your attention at the drop in meeting at the Town Hall as nobody seemed aware of its omission.	Noted. A scale will be added to the new maps.
2254	Miss Deborah Stott	Other	Policies Map	NB. We did have to point out to you at the drop-in meeting at the Town Hall that there was no scale on your large glossy Preferred Options Map, a fact that you did not seem to be aware of.	Noted. A scale will be added to the new maps.
2236	Mrs Ann Eddleston	Other	Policies Map	I don't know what you mean by 'document' 'policy/paragraph ref or page number' all I have is this form and a map which is mainly illegible (probably relates to your website).	The points referred to are an opportunity for residents to list specifically what policies or sites they are commenting on.
2146	Mrs Andrea Johnson	Other	Policies Map	The map was difficult to see	For residents/stakeholders who are struggling with the maps provided the Council can provide larger scale map extracts if requested.

## Consultation

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
Residents Against Hollins Cross Farm Development	Consultation	Consultation	<p>4.0 – Statement of Opposition to the Development of Hollins Cross Farm Site</p> <p>4.4 "We the Residents" require that Burnley Borough Council provide answers to ALL our questions in this document about what surveys and investigations have been done, with accompanying proof and documentation in writing to be submitted to our appointed representative Coun. Gordon Birtwistle and made available online for public viewing along with this opposition document, this assures transparency.</p> <p>4.5 - If the Council ignore any part of this document, fail to answer satisfactorily any query, question or request for information or if it is deemed by the "Residents" that that there is still reason for proof or clarification on any point relating to the Hollins Cross Farm site. Then "We the Residents" require that the Hollins Cross Farm site be struck off the list of sites in the Burnley for development.</p> <p>4.6 Should the council refuse to remove the Hollins Cross Farm Site after failing to satisfy all and everything in this document then 'We the Residents' demand there be an extension to the consultation period and "We the Residents" give notice that we demand the council provide funds to us to employ independent experts or bodies to assess the viability of the Hollins Cross Farm Site. Upon the results of such surveys we will then abide by the information supplied by the relevant experts and appointed bodies.</p> <p>4.12 - Should the Council refuse to remove the Hollins Cross Farm Site from the list of viable development sites in Burnley after failing to or refusing to satisfy all and every question in this document and this includes nondisclosure of information, avoidance of direct answers, claims of not the councils responsibility to provide resources/allocate funding or any noncommittal political answer then "We the Residents" will Take Legal Action through a Judicial Review to stop the sanctioning of this land as viable for development.</p> <p>21 - Comments and conclusions</p> <p>Local Residents attended a meeting with Council Staff and Planning Staff at Cog Lane Methodist Church 20/07/16.</p> <p>Can the Council comment on why has there has been no advertisement of these plans to build on Green Field Sites? No Leaflets through doors.</p> <p>Can the Council comment on why the Councils Communications Officer</p>	<p>The council has endeavoured to answer all the relevant points and questions raised in the opposition document in so far as they are reasonable and relevant.</p> <p>The decision not to send correspondence to every home and business in the borough as set out in the SCI was taken .based on a balance between the substantial costs of doing this at each plan-making stage, the level of interest/response and the availability of information issued by other means.</p> <p>Information was put in the annual Council magazine in both 2015 and 2016, sent to every household in the borough. Additionally, press releases were issued in July 2016 to the Burnley Express, Lancashire Telegraph, Radio Lancashire, 2BR, BBC NW TV and Granada TV. Front page articles appeared in the Burnley Express (01/07/16) and the Lancashire Telegraph (27/07/16), listing all the preferred housing sites and consultation events. There were subsequent newspaper articles on sites included in the Preferred Options. Although it is recognised that not all people have access to the internet, the Council notified the public of the consultation via a variety of media.</p> <p>Additionally, copies of the preferred options we made available to parish council's and libraries, who were also given leaflets to display which contained consultation information. Comments forms were also made available to parish councils to be distributed as seen fit (resources permitting). The Council does rely on 'word of mouth' to spread news of the consultation.</p> <p>For those who do have access to the internet, information was also put on the Council's website and social media accounts.</p> <p>The consultation generated a good level of response overall from residents through a variety of mediums, which indicates some level of success in reaching out to people; although we may not have been able to reach everyone who may have been interested in the plan.</p> <p>It is important to remember that there is no requirement to prepare or consult on a preferred options draft of the local plan.</p> <p>Given the tight deadlines that the Council has to meet in preparing the plan, there was little option but for the consultation period to take place when it did, which largely coincided with the school holiday period. However, the public had six weeks to comment on the plan, and were able to do so via a number of means. The Council held seven 'drop-in' consultation events spread throughout the consultation period where the public could meet Council staff to discuss the plan, including one at the town hall to allow those who could not attend more localised</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>openly admitted to residents that he needs to improve communications. Do they need to get a new communications officer?</p> <p>Can the Council comment on why the consultancy period was not openly advertised?</p> <p>Can the Council comment on why the consultancy period was planned in the school holidays when most people will be away and unable to respond?</p> <p>Can the Council comment on why the consultancy period started on a Friday so loosing at least 3 days off the consultancy period before people found out about it?</p> <p>Can the Council comment on council staff being asked at the Cog Lane Methodist Church why planners with local knowledge were not employed on the decision to include the Hollins Cross farm?</p> <p>Can the Council comment on being asked at the Cog Lane Methodist Church - are these Green Field Sites being used to try and attract young professional "Manchester Money" to live here and commute back to Manchester?</p> <p>Can the Council comment on being asked at the Cog Lane Methodist Church what surveys have they done to think that Young Professional Manchester Money would entertain living North of Manchester when they really would want to be in the South of Manchester in places such as Didsbury, Alderly Edge and Stockport that have better communication links?</p>	<p>meetings another chance to meet staff. Additionally, there were two public meetings held in the evening at Cog Lane Burnley and at Worsthorne. Considering the reasonable levels of attendance at these meetings, and the volume of responses the Council has received, it is not felt that the timing of the consultation period has been detrimental to people's ability to comment on the plan.</p>
Padiham Community Action	Consultation	Consultation	<p>Procedural Issues.</p> <p>PCA is concerned and disappointed that the six week consultation period coincided with the July/August holiday season when people are away on holiday and organisations do not meet. This will have reduced the number of comments/objections made and limited the content of those that were submitted. This is especially disappointing given that it was a lengthy twenty-eight months since the consultation on the Issues and Options Document.</p> <p>PCA requests that any comments/objections, especially those from organisations, received after the deadline be given due consideration and reported in the Responses Report for the Preferred Options Consultation or similar document. The plan making process is not static and public participation and stakeholder consultations cannot be frozen in time.</p> <p>PCA has reviewed the Issues and Options Consultation: Schedule of Comments and Recommended Responses Document. This only includes comments/objections raised during the six week consultation. To our knowledge important submissions were made within days of the deadline</p>	<p>The Council has undertaken consultation in excess of the statutory requirements by undertaking three rounds of consultation with the public prior to the formal Proposed Submission Stage (Issues and Options, Issues and Options Additional Sites and Preferred Options) and has held multiple drop-ins and public meetings at each stage. At Preferred Options, the Council held seven drop-in seasons and two public meetings. These are always spread throughout the consultation period to give people many opportunities to attend.</p> <p>It is necessary to have set consultation periods to effectively manage the process and this would be the case even if the Council did not have the limited resources it has. Any comments received late or in-between consultations are always considered by officers but are not responded to formally as duly made comments within the consultation period are. The Proposed Submission Consultation starting on 31 March will allow people another opportunity to comment but they must make comments within the 6 week period for these to be sent to the Inspector.</p> <p>The Preferred Options Comments :</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>and other significant submissions have been made over the last 28 months from statutory organisations, such as Simonstone Parish Council, Padiham Town Council, etc, and others objecting to various suggested proposals.</p> <p>The process is not transparent. We do not know what has been submitted and what account, if any, has been taken of the issues raised. The public, elected members and other interested parties are being denied a fuller view of the reaction to the issues, options and suggested sites.</p> <p>Submissions listed in the Responses Report generally are of two types; those from individuals and those from named organisations. Those from individuals are more generally amalgamated, and extensively summarised but those for organisations are listed individually and are more verbatim. PCA, with a membership in excess of 500 adults, should be given more significance and not just listed and lost with those made by individual people.</p>	<p>All comments from Specific, General and Other consultees and from groups of residents specifically formed to respond to the plan are also set out verbatim and a recommend responses to each comment is set out</p> <p>All comments from individuals, agencies and companies not relating to specific sites are also set out verbatim and a recommended responses to each comment is set out</p> <p>All comments on sites from site owners/promoter are also set out verbatim and a recommend responses to each comment is set out</p> <p>All comments from other individuals relating to sites are grouped by site and the number of respondents is set out and each unique relevant point raised is set out and responded to</p>
Cllr Cosima Towneley	Consultation	Consultation	<p>It should be noted that residents in general felt this has not been an open or transparent consultation. The Community keenly felt they have been 'railroaded' through the brevity of the consultation process and the lack of time in which they could have clear sight of the documentation and time to discuss and digest it.</p> <p>Hard copies of the document have not been easily available to those, of which there are many in Cliviger and Worsthorne, who are not computer literate or have other problems which prevent them from accessing the document online.</p>	<p>It is disappointing that people feel the consultation hasn't been transparent. Whilst there has been criticism of particular aspects of the process (responded to separately) it is not accepted that the process was not open or transparent.</p> <p>Officers are acutely aware of how impenetrable and complicated the Plan making process is and that development proposal can generate fear, anger and distress. They make themselves available throughout the consultation period to answer questions and help people understand the Plan.</p> <p>The Council has undertaken consultation in excess of the statutory requirements by undertaking three rounds of consultation with the public prior to the formal Proposed Submission Stage (Issues and Options, Issues and Options Additional Sites and Preferred Options) and has held multiple drop-ins and public meetings at each stage. At Preferred Options, the Council held seven drop-in seasons and two public meetings. These are always spread throughout the consultation period to give people many opportunities to attend. Due to the anticipated level of interest and undertakings given at the last plan-making stage in 2014 (at a packed public meeting at the Thorntons Arms) a drop in and public meeting were held in Worsthorne on 11 August 2016. The drop-in and public meeting were well attended. Officers remained at and after the public meeting until all the questions 'dried up'. A drop-in was also held in Cliviger.</p>
Home Builders Federation Ltd	Consultation	Duty to Cooperate	<p>Thank you for consulting with the Home Builders Federation (HBF) on the Local Plan. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.</p>	<p>A Duty to Cooperate Background Paper is being prepared for the Proposed Submission Consultation due to start on 31 March 2017.</p>



Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>The HBF is keen to work with the Council in order to achieve an adopted local plan which enables an increase in the rate of house building across Burnley. It is pleasing to note that the Council has modified the plan since the last stage of consultation in response to some of our previous concerns.</p> <p>There are, however, a number of key areas where our concerns remain and it is considered that the plan would benefit from further evidence prior to the next stage of consultation. The following comments are provided based upon our substantial experience of local plan examinations across the country.</p> <p><b>Duty to Co-operate</b> The plan, paragraph 1.4.6, identifies that Burnley has undertaken joint working with neighbouring authorities. The primary concern of the HBF is in relation to housing matters. In this regard it is noted that work upon a joint Strategic Housing Market Assessment was undertaken with neighbouring Pendle. This is considered a positive step.</p> <p>To ensure that the Council adequately demonstrate its compliance with the duty it is recommended that consideration be given to the production of a background paper prior to the next stage of consultation. This paper should identify the issues of cross boundary significance, the engagement which has taken place and the material actions which have effected plan preparation.</p>	
Lancashire County Council	Consultation	Duty to Cooperate and General	<p>As part of the ongoing consultation on the emerging Burnley Local Plan we acknowledge the attendance of Burnley officers at a number of meetings as part of the Duty to Co-operate. These meetings have proved very informative for both parties and we thank Burnley officers for taking the time to visit.</p> <p>As part of these meetings there have been discussions relating to potential highways impacts on the strategic road network, in light of the housing proposals presented in the emerging Local Plan. We acknowledge that work is currently underway with a number of partners to resolve these matters and officers at Lancashire County Council will work with partners to provide the evidence needed.</p> <p>I am pleased to note that the East Lancashire Highways and Transport Masterplan is referenced throughout the draft Local Plan and the objectives of both documents are firmly aligned.</p> <p>At all meetings there has been support for the proposals outlined in the emerging Local Plan and I can confirm that Lancashire County Council is in broad support for the aspirations presented. In this regard we look forward</p>	<p>Comments and support noted.</p> <p>The Council will continue to liaise with Lancashire County Council as the plan progresses.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
			<p>to working with officers at Burnley throughout the lifespan of the Local Plan to bring these aspirations to fruition.</p> <p>Colleagues from Education, Flood Risk Management and Health have been asked if they have any comments and they may respond separately to the consultation directly.</p> <p>Thank you again for inviting comments and we look forward to further discussions as your Local Plan progresses.</p>	
Home Builders Federation Ltd	Consultation	General	I would be pleased to be kept involved in the Local Plan preparation process as well as the development of other planning documents. I trust the Council will find the comments useful and the HBF would be happy to discuss them further prior to the next stage of consultation.	The Home Builders Federation will be notified at the next stage of the plan and invited to comment
Rosendale Road Urban Plan Residents	Consultation	HS1/ 4 and HS1/28 Consultation	The Objectors wish to point out that although the consultation period is set by statute, Rosendale Road Urban Plan Residents Group believe that a 6 week period is not only insufficient for quantified objections to be raised by people who work full time and have no experience of planning but is actually discriminatory, adding additional stress and workload to residents. We would like this comment bringing to the attention of the Full Council.	<p>Whilst the Council is sympathetic to the stress caused to Local residents who are concerned by the location of proposed housing allocations, it does not consider that the consultation period was discriminatory.</p> <p>The Council has undertaken consultation in excess of the statutory requirements by undertaking three rounds of consultation with the public prior to the formal Proposed Submission Stage (Issues and Options, Issues and Options Additional Sites and Preferred Options) and has held multiple drop-ins and public meetings at each stage. At Preferred Options, the Council held seven drop-in sessions and two public meetings. These are always spread throughout the consultation period to give people many opportunities to attend.</p> <p>It is necessary to have set consultation periods to effectively manage the process and this would be the case even if the Council did not have the limited resources it has. Any comments received late or in-between consultations are always considered by officers but are not responded to formally as duly made comments within the consultation period are. The Proposed Submission Consultation starting on 31 March will allow people another opportunity to comment but they must make comments within the 6 week period for these to be sent to the Inspector.</p> <p>The consultation generated a good level of response overall from residents through a variety of mediums, which indicates some level of success in reaching out to people; although we may not have been able to reach everyone who may have been interested in the plan.</p> <p>It is important to remember that there is no requirement to prepare or consult on a preferred options draft of the local plan.</p>
There were	Consultation	Consultation	Insufficient notification of consultation; adjoining residents not specifically	The arrangements for public consultation on the local plan are set out in the

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
<p>approximately 76 comments from individual member of the public on the Plan consultation 74 critical and 2 supportive</p>			<p>contacted; no leaflets sent out; reliance on internet which not everybody has</p>	<p>Council's Statement of Community Involvement (SCI). In line with this, letters and emails were sent to all those on the consultation database, including all who had commented at earlier consultation plan stages, notifying them of the new round of consultation.</p> <p>The decision not to send correspondence to every home and business in the borough as set out in the SCI was taken .based on a balance between the substantial costs of doing this at each plan-making stage, the level of interest/response and the availability of information issued by other means.</p> <p>Information was put in the annual Council magazine in both 2015 and 2016 which is sent to every household in the borough. Additionally, press releases were issued in July 2016 to the Burnley Express, Lancashire Telegraph, Radio Lancashire, 2BR, BBC NW TV and Granada TV. Front page articles appeared in the Burnley Express (01/07/16) and the Lancashire Telegraph (27/07/16), listing all the preferred housing sites and consultation events. There were subsequent newspaper articles on the sites included in the Preferred Options. Although it is recognised that not all people have access to the internet, the Council notified the public of the consultation through a variety of media.</p> <p>Additionally, copies of the preferred options we made available to parish council's and libraries, who were also given leaflets to display which contained consultation information. Comments forms were also made available to parish councils to be distributed as seen fit (resources permitting). The Council does also rely on 'word of mouth' to spread news of the consultation.</p> <p>For those who do have access to the internet, information was also put on the Council's website and social media accounts.</p> <p>The consultation generated a good level of response overall from residents through a variety of mediums, which indicates some level of success in reaching out to people; although it is always possible that we may not have been able to reach everyone who may have been interested in the plan.</p> <p>It is important to remember that there is no requirement to prepare or consult on a preferred options draft of the local plan.</p>
	<p>Consultation</p>	<p>Consultation</p>	<p>Consultation meetings held in holiday period</p>	<p>Given the tight deadlines that the Council has to meet in preparing the plan, there was little option but for the consultation period to take place when it did, which largely coincided with the school holiday period. However, the public had six weeks to comment on the plan, and were able to do so via a number of means.</p> <p>The Council held seven 'drop-in' consultation events spread throughout the consultation period where the public could meet Council staff to discuss the plan, including one at the town hall to allow those who could not attend more localised</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				meetings another chance to meet staff. Additionally, there were two public meetings held in the evening at Cog Lane Burnley and at Worsthorne. Considering the reasonable levels of attendance at these meetings, and the volume of responses the Council has received, it is not felt that the timing of the consultation period has been detrimental to people's ability to comment on the plan.
	Consultation	Consultation	The information posted through my letter box as two sheets of paper, one of which can hardly be read as it is a very poor quality Photocopy showing what I assume is proposed areas which the BBC are considering allowing building of houses to take place in Worsthorne. There is no adequate information in the letter stating what is being proposed and is virtually a complete waste of time.	Burnley Borough Council did not send out the information described and it is likely that this was posted by a local resident or resident's group.  The full Preferred Options document and associated Plans were available online, at the libraries or in hard copy on request. Copies were sent to the Parish Councils and were taken to the drop-ins.
	Consultation	Consultation	As so far every Public consultation I know about has resulted in the Public's views being ignored.	The Council does the views of residents seriously, and consultation is an important part of the plan making process. However, it is important to note that whilst the Council (or the Inspector in due course) will always consider any relevant comments, it will not always be possible or appropriate to decide the matter in accordance with the comments received. There may be other material considerations, such as requirements of legislation, or national or other local policies to which the Council or Inspector must adhere and there will always be differing views.
	Consultation	Consultation	I visited the consultation at Worsthorne School and met your very helpful planning officers.  My wife and I recently attended your local meeting in Cliviger Village Hall where we met and talked to your representatives who, I must say, were all extremely helpful.	Comments welcomed
	Consultation	Consultation	More information is needed to be provided, instead of the cloak and dagger attitude displayed.	Whilst there has been criticism of particular aspects of the process (responded to separately) It is not accepted that the Council has adopted a 'cloak and dagger' attitude to consultation.  The Council has undertaken consultation in excess of the statutory requirements by undertaking three rounds of consultation with the public prior to the formal Proposed Submission Stage (Issues and Options, Issues and Options Additional Sites and Preferred Options) and has held multiple drop-ins and public meetings at each stage. At Preferred Options, the Council held seven drop-in seasons and two public meetings. These were spread throughout the consultation period so people could attend.  Officers make themselves available at the drop-ins, public meeting and throughout the consultation period to answer questions and help people understand the Plan.
	Consultation	Consultation	Insufficient notice period under Regulation 18	The Council has undertaken consultation in excess of the statutory requirements by undertaking three rounds of consultation with the public prior to the formal Proposed Submission Stage (Issues and Options, Issues and Options Additional Sites and Preferred Options). Each one has been open for 6 Weeks. Many of the sites

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				<p>have been included in the Plan since 2013 and it is not accepted that residents have had insufficient opportunity to comment on these or attend events or talk to officers to understand the Plan or plan-making process.</p> <p>Regulation 18 only require the Council to consult "about what a local plan with that subject ought to contain" It does not require the Council specifically to produce a draft document or site information. The Council committed to a two stage process under Regulation 18 (Issues and Options and Preferred Options). A further Issues and Options Additional Sites was also held before Preferred Options.</p>
	Consultation	Consultation	<p>Smithyfield Ave was not included in Phase 1 or referred to in Preferred options document July 2016. Therefore, I am given to understand it has been added in the last few weeks, therefore has not been included in the preferred options document 2016, other than on an attached map. There is no other mention of it anywhere in any of the whole of the Burnley's Local Plan: Preferred Options July 2016. Thus there is no rationale or explanation of suitability of this land. I believe this gives us a disadvantage in producing an informed response to the proposals. Each other proposed development has clear Policy requirements, design principles and supporting information linked to policy for residents to consider. Not a single mention of Smithyfield, it appears to be confusingly attached to Heckenhurst reservoir (HS1/15). Suitability and rationale not provided for Smithyfield and not included in SHMA as it is not in the Heckenhurst reservoir. We have not been given 6 weeks to make 'representations' on the plan, its sustainability and supporting evidence was not provided this is contrary to regulations 18, 19 and 20 of Burnley LDS 2016, we will be taking this up with the Planning Inspector.</p>	<p>The Preferred Option proposed allocation Heckenhurst Reservoir HS1/15 was a combination of land from two separate SHLAA sites - Land West of Smithyfield Avenue HEL/105 and the Heckenhurst Reservoir land (United Utilities ownership) HEL/33.</p> <p>A large site at Heckenhurst Reservoir was included in the earlier Issues and Options Additional Sites Plan having been put forward by its owner United Utilities. The land West of Smithfield Avenue was put forward by its owner subsequently and both sites were considered for inclusion in the Preferred Options draft. Only parts of both SHLAA sites were considered suitable and being adjacent they were amalgamated for inclusion in the Plan. This did appear inadvertently to have cause some confusion initially for some, but all residents adjacent to the site who were not aware did become specifically aware of the land's inclusion in the Preferred Options draft during the consultation period and many have commented.</p> <p>It is incorrect to say that the site does not appear in the plan, policy HS1/15 is for the whole site, as marked on the map, and named 'Former Heckenhurst Reservoir'. The site did therefore have the Policy requirements, design principles and supporting information as for the other sites for residents to consider.</p> <p>Both sites are included in the Proposed Submission Plan (with revised boundary for Heckenhurst Reservoir) and have been identified separately as Heckenhurst Reservoir HS1/15 and HS 1/36 Land West of Smithfield Avenue.</p> <p>The Council apologises if the naming of the site has caused confusion.</p> <p>The comment on the regulatory requirements is responded to separately.</p>
	Consultation	Consultation	<p>Drop-ins and Public Meetings were arranged or when people at work. A 6 week period is not only insufficient for quantified objections to be raised by people who work full time and have no experience of planning but is actually discriminatory, adding additional stress and workload to residents. We would like this comment bringing to the attention of the Full Council</p>	<p>The Council has undertaken consultation in excess of the statutory requirements by undertaking three rounds of consultation with the public prior to the formal Proposed Submission Stage (Issues and Options, Issues and Options Additional Sites and Preferred Options) and has held multiple drop-ins and public meetings at each stage. At Preferred Options, the Council held seven drop-in sessions and two public meetings. These were spread throughout the consultation period so people could attend.</p>

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				<p>Officers made themselves available at the drop-ins, public meeting and throughout the consultation period to answer questions and help people understand the Plan. These drop ins extended into the early evening, generally 7pm and the two public meetings held in the evening at Cog Lane Burnley and at Worsthorne.</p> <p>Considering the reasonable levels of attendance at these meetings, and the volume of responses the Council has received, it is not felt that the timing of the consultation period has been detrimental to people's ability to comment on the plan.</p>
	Consultation	Consultation	<p>In particular, I challenge BBC's adherence to its Statement of Conformity Involvement 2015 document. Point 1.11 refers to everyone's opportunity to review the Local Plan. Particularly hard to reach groups.</p> <p>At the Drop In session at the Town Hall on Monday 22 August I was told that copies of the Local Plan document need not be made available to residents in the 60,70, 80 age group as they would not be able to understand it. Worsthorne, Brownside, Lindsay Park, Pike Hill and the surround affected areas have a large number of people in this age group.</p> <p>At the Council Offices in Parker lane the previous week I was told that printed copies of the 250 page document would not be available to take away to read due to the costs involved.</p> <p>I was not offered the opportunity to buy a copy. The total volume of documents is in excess of 1000 pages. These two incidents show that BBC has not met its duty set out in its SCI.</p> <p>The BBC SCI section 2.44 states that a planning advise service is available to community groups and individuals at <a href="http://planningaid.custhelp.com">http://planningaid.custhelp.com</a>, or on an Advice Line 0330 123 9244. The web site no longer exists and the phone Advice Live is currently suspended. This leaves local residents without access to the free and independent planning service as is stated in the document. These errors further hamper residents ability to understand and be involved in the process. There has been poor communication with affected Burnley residents. We were not directly informed and only found out about the proposals in the week before the deadline for comments. Given the volume of documents to read the feedback process has been severely hampered.</p>	<p>It is not accepted that the Council has failed to make proper provision for hard to reach groups.</p> <p>The comment referred to if made, was clearly made in jest. Retirees are often those most likely to engage with plan making. Council officers went out of their way to help residents who needed assistance including in one case a home visit.</p> <p>It is unfortunate if the respondent was told that the document would not be available to take away to read due to the costs involved. The Council's policy as set out in the SCI is that for consultation drafts of the a Local Plan itself, copies are given free of charge on request to members of the public or local groups in response to reasonable requests.</p> <p>At the Town Hall drop-in copies of the plan document were available and many were given to residents. At all the drop ins, copies of the most popular chapters e.g. housing and employment were stacked on the tables to take away.</p> <p>The two respondents who made these points did manage to submit comments.</p>
	Consultation	Consultation	Additional time requested	As set out above the Council has undertaken three rounds of consultation under Regulation 18 and allowed 6 weeks at each stage. It is necessary to have set periods to effectively manage the process and would be the case even if the Council did not have limited resources. Any comments received late or in-between

Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
				<p>consultations are always considered by officers but are not responded to formally as duly made comments within the consultation period are. The Proposed Submission Consultation starting on 31 March will allow people another opportunity to comment but they must make comments within the 6 week period for them to be sent to the Inspector.</p>

## Site Allocations - Employment Sites

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Recommended Response
1381	The Eshton Group	Site Allocations	EMP1	<p>Policy EMP 1 (page 106) identifies those sites to be allocated as employment sites and the inclusion of EMP 1/2 EMP 1/5 and EMP 1/12 is supported. However, these three allocations amount to land in excess of 41.73 hectares. On that basis Policy EMP 1 should be amended to allow the inclusion of some supporting A 1 and A3 uses to assist the successful operation of the Business Parks, and to enable occupiers to gain access to necessary day to day amenities without having to leave the sites in question.</p> <p>It is therefore proposed that Policy EMP1 is amended for EMP 1/2, EMP 1/5 and EMP 1/12 to allow for the construction of up to 400m2 of appropriate local centre uses.</p> <p>Furthermore, the allowed uses within these three sites should be amended so as to allow for uses that fall within Class B1 b and c across all three sites so as to allow research and development, and other industrial uses which do not fall within the B2 or BS Use Classes Order.</p> <p>Historically Burnley Bridge was given a wide planning permission that incorporated a number of other uses which would specifically aid the attractiveness of the location from an employment perspective. It is considered that again a wider range of uses should be supported in order to ensure that investors needs and amenities could be supported.</p> <p>In addition, within that permission, access to the site was allowed from the estate roads to the north. It is considered feasible that this point of access could be used at times when the Bridge is out of services due to wider highways works or emergencies on the motorway network.</p> <p>Recommendation: Policy EMP 1 is amended to allow Use Classes A1, A3, B1 b and B1 c of sites EMP 1/2, EMP 1/5 and EMP 1/12.</p>	<p>There is no requirement within the Local Plan to allocate sites for A1 or A3 uses outside of main or district centres, particularly on employment land where Green Belt is required to be released to meet the employment land requirement. With regards to B1 b and c, the site allocation policies have been amended to include these uses. The previous permission mentioned access to the site from Cambridge Drive for residential purposes when part of the site was approved for residential purposes. As the site owner has now relinquished the residential aspect of this original permission (as stated in planning application APP/2016/0401) there is no requirement to allow traffic onto the housing estate roads to the north. Therefore, in order to protect residential roads and amenity from industrial traffic, access by motorised vehicles (except emergency services vehicles) to both EMP1/2 and EMP1/12 will only be permitted via the existing bridge over the Leeds-Liverpool canal.</p>
1272	Cllr Cosima Towneley	Site Allocations	EMP1	<ul style="list-style-type: none"> <li>• Reiteration of former point concerning integrated, cohesive and inclusive non-motorised access to, through or around sites to tie in with the Green Infrastructure Policies.</li> <li>• That access in, through or round these sites be tied into the greater 'green' network and, where possible, the statutory network.</li> <li>• That the creation of such routes represent a formal part of the planning application.</li> </ul>	<p>The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.</p>
2193	Natural England	Site Allocations	EMP1	<p>Natural England welcomes the policy requirements and design principles for the individual site allocations.</p>	<p>Support noted. The site allocation policies continue to contain policy requirements and design principles in the Pre Submission Document.</p>
1256	Mr Philip	Site Allocations	EMP1	<p>This land is in a flood zone and it is my belief that building on this land will</p>	<p>The Shuttleworth Mead South site lies within Flood Zones 1</p>



	Tomlinson		(Para 5.2.17/Flood risk)	contribute to a greater risk of flooding. This will be detrimental to Padiham's businesses and some residential property.	and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.
2139	Graham Howarth	Site Allocations	EMP1/1	<p>I am writing this email to voice my objections to the local plan you presented at the meeting on 20/07/16 Firstly you presented this housing plan, without due consideration to the infrastructure of the local area of rossendale avenue, you have not shown anything in the way of the road infrastructure in that this area is a total traffic black spot already with standing traffic at peak times making it almost impossible to gain access or exit to and from our homes, and now you are proposing extra housing on both sites in the preferred plan in our area.</p> <p>You are also now proposing an industrial site on rossendale road, where previously permission was refused for the school to be built because of access issues.</p> <p>You have now also decided that access will be allowed from the area around the old bull and butcher public house, which had planning for new houses refused not very long ago as was deemed to be outside the urban boundary. So what has changed here seems you are able to make your rules here.</p> <p>There are no doctors surgery in this area, nor school places, as the primary school in the area is overflowing, and children are travelling to the opposite side of town as they have not been allocated places at the nearer senior schools as these are over subscribed.</p> <p>The sites you are proposing are also on land with major mine workings as Halton valley mine was only a few hundred feet away, and when parklands estate was built on the opposite side of rossendale road there was major subsidence evident.</p> <p>Also what impact will this have on the wildlife in our area, we regularly see deer and all sorts of wild life in the fields where this site is proposed.</p>	<p>In relation to the employment site, the planning permission for the school was granted, but not taken up.</p> <p>In relation to the employment comments, the Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junctions of Manchester Road and Rosegrove. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan and a mitigation scheme has been developed and tested and is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p> <p>A mining report has been obtained from the Coal Authority which does not show any major issues with development on the site in relation to mine workings.</p>

				<p>Also at the meeting you talked about the growth in Burnley, but in actual fact the population is in decline, so this looks as though this proposed site will be for commuters from Manchester. How is that the best thing for the residents of Burnley, who are the council tax payers who paid for this plan and your wages.</p> <p>I would also like to express my dissatisfaction at the total lack of communication, we only found out about this through neighbours and our local councillor, it really does seem as though this plan was to be pushed through with as little interference from local residents as possible, the timing being holiday period, the total lack of any notification is bordering on incompetence from the council.</p> <p>I would think the town would be best served in creating new housing on the derelict sites all over the urban area which would really make a difference to how the town looks and is perceived, rather than build on green field virgin land.</p>	
1432	Mrs Anne Green	Site Allocations	EMP1/1	<p>I would like to comment on the Local Plan, especially the proposed employment indicated on the plan as EMP1/1.</p> <p>This proposed development on Rossendale Road would be far too close to existing residential properties and would seriously detract from the open nature of the surroundings. I feel that there are sufficient designated employment sites within the Local Plan without encroaching on a greenfield site. Rossendale Road is already a congested route, and I feel that with the proposed increase in residential properties behind the Bull and Butcher, which will access via Rossendale Road, that this road will be unable to cope if a further employment site is undertaken.</p> <p>I hope that my comments will influence your final decision.</p>	<p>To screen the site from the surrounding residential properties the site allocation policy requires no built form to the north east of the site; this should be landscaped as open space forming part of a network of green infrastructure utilising the stream that runs across the eastern section of the site. In addition, any development will be expected to consist of low rise units with a maximum ridge height of 7 metres which takes into account and integrates with the contours of the natural landscape. The development will be expected to incorporate natural materials such as local stone to ensure a quality design which will lessen the development's impact on the surrounding landscape and streetscape. Appropriate landscaping and boundary treatment should include screening to the western boundary along with roadside trees and shrubs adjacent to Rossendale Road is also required.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junctions on Rossendale Road. The assessment concludes that mitigation measures are required at these junctions to support the proposed development in the Plan. A mitigation scheme has been developed and is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p>
1585	Lancashire	Site Allocations	EMP1/1	The Trust notes the presence of neutral grassland on the site and an ecological	Comment noted. The requirement for an ecological survey

	Wildlife Trust			survey should be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1.	has been included in policy EMP1/1.
2213	Burnley Wildlife Conservation Forum	Site Allocations	EMP1/1	<p>EMP1/1 Rossendale Road north – Reasons for Objection</p> <p>The proposed new development boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside in a very prominent elevated position in the landscape which is in active agricultural production. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Section 41 protection along with Lancashire BAP Long List and key species and Wildlife and Countryside Act 1981 Schedules 1,5 and 8 species have been recorded within 250 metres of the site, the site is in the Historic Woodland Survey and intersects Lancashire Woodland and Grassland Ecological Network stepping stone habitat</p>	<p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites within the existing urban boundary to meet the proposed employment land requirement set out in SP3.</p> <p>Potential ecological impacts will need to be considered on site and an ecological survey will be required to accompany any planning application identifying how the development would manage protected species and ecological networks.</p>
1733	Catherine Moran, Anne Pilling, Dorothy MacDonald & Richard Parker	Site Allocations	EMP1/1	<p>Policy EMP1: Site Reference EMP1/1 - Rossendale Road (North)</p> <ul style="list-style-type: none"> <li>• The land owners fully support the allocation of site EMP1/1 for employment use.</li> <li>• We note that Use Classes B1 (b&amp;c) &amp; B2 are proposed, which we think are acceptable.</li> <li>• We note that Lancashire County Council Highway Engineers have advised that vehicular access onto site EMP1/1 should be at the northern edge of the site.</li> <li>• Whilst we accept that there needs to be an modest area of open space on the Rossendale Road frontage (at the north), to provide a landscaping buffer to the adjacent residential properties, we would want to ensure that this did not conflict with the preferred access arrangements as advised by Lancashire County Council Highway Engineers.</li> <li>• The "stream" referred to is no more than an open drainage ditch, into which land drains discharge. Whilst we accept the benefit of not developing an 8 metre strip along the length of the open drainage ditch, to enhance the green infrastructure and support wildlife, we are not sure that an "easement" is the correct legal mechanism. We would have thought that a landscaping condition on any future planning approval may be more appropriate.</li> </ul>	Support noted. The open space and access road configuration can be designed in further detail at the planning application stage. The 8 metre easement is a requirement from the Environment Agency.
2176	Mr Anthony	Site Allocations	EMP1/1	I write in connection with the draft Local Plan published with regards to the long	In relation to the employment comments, the Council in

Mancini			<p>term objectives of the Borough to strongly object with my concerns.</p> <p>The principal objection is in relation to the proposed release of HS1/4 of allocated land suitable for housing off Rossendale Road, together with the proposals for land off Glenn View road HS1/2, and rear of Bull and Butcher HS1/28.</p> <p>The preferred options proposal for the release of the allocated areas is considered to be directly in conflict and contradiction with NPPF Policy framework and further the Local Planning framework with regards to the general ethos of protecting greenfield, green belt and general open countryside.</p> <p>The draft plan states and places greater emphasis on the importance and role that open spaces and greenfield infrastructure has to play in the Borough, and yet, the preferred options allocation of greenfield land for housing makes up more than 43% of the total.</p> <p>The draft plan is considered to be contradictory and appears to have failed to consider in sufficient detail the potential of re-development of brown field site to satisfy the projected housing demand.</p> <p>Considerable parcels of brownfield land exist by the previous initiative of block clearance in the Burnley Wood and Accrington Road areas, which have still to be re-developed. The draft plan does not seem to refer or include these areas.</p> <p>These areas would be suitable for affordable housing, and in keeping with the recent Keepmoat development. To sacrifice greenfield and open countryside when undeveloped brownfield sites do exist is considered to be in direct conflict with national and local ethos.</p> <p>It is considered that it would be beneficial if it is written into the final plan, that there is an over riding objective and principal, that, the re-development of allocated brown field sites must be exhausted and completed in preference and before any green field areas are developed.</p> <p>The projected allocation of 188 units on the identified Rossendale Road land and over 400 houses in the immediate wider area, would, in conjunction with the additional release of employment land EMP1/1 and the expansion of the Burnley Business Park, introduce an unbearable and unsustainable significant increase in congestion on what is one of the busiest arterial roads in the Borough.</p> <p>2</p>	<p>partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact fo the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junctions of Manchester Road and Rosegrove. The assessment concludes that mitigation measure are required at this junction to support the proposed development in the Plan and a mitigation scheme has been developed and tested and is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p> <p>The site allocation requires a developer to submit an ecological survey which addresses any impacts on Protected Species and/or Priority Habitats in accordance with Policy NE1. Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.</p>
---------	--	--	--	--

				<p>The draft plan would introduce an unbearable demand on the M65 motorway junction leading to considerable congestion, with no allowance or plans to improve the infrastructure to accommodate such increase.</p> <p>The draft plan preferred options for the release of EMP1/1, HS1/4 and HS1/2 and /28, will have a significant and irreversible detrimental impact on the habitat and the loss of diverse ecological presence and importance, which these parcels of land currently offer.</p> <p>The proposed allocation of HS1/4 is, according to the draft plan in itself, conflicting with the Highways Agency's own observations, considerations and concerns that the development of this land would create congestion to an already over populated and trafficked area.</p> <p>It is understood that the Borough has identified housing needs but, perversely, also identifies a very similar number of empty and under used properties, but fails to include any action to address this situation .</p> <p>The predicted housing demands for the Borough are, according to the draft plan, similar to the quantity of empty units identified within the Borough and it is considered that the redevelopment of the empty under used houses would, to a large extent, satisfy the affordable housing needs and the redevelopment of available and existing brown field sites must be encouraged and positively enforced wherever possible The failure to address the vacant and empty properties would, even after the full development of all allocated plots, keep the Borough in the same position it had been with the same number of vacant and empty units.</p> <p>As a resident within the immediate area of prop</p>	
2170	John Lyons	Site Allocations	EMP1/1	<p>Regarding HS1/4 and HS1/28 house building on this area with alter the water table and drainage.</p> <p>I am experiencing severe problems now and these developments will make them worse. My problems have cost me loads of time and money, are a direct result of extensive house building which have gone on in this area. I have mentioned this to LCC and Burnley planning without much success.</p> <p>The increase in traffic will be a big problem which new houses will bring. Because of bad planning in the past. 20mph in a lot of areas, people using main roads more because of this and speed bumps. So Rossendale Road has become very busy now with air and noise pollution a big problem. Have you got any pollution level readings for this area?</p>	<p>In relation to the employment comments, the Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact fo the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junctions of Manchester Road and Rosegrove. The assessment concludes that mitigation measure are required at this junction to support the proposed development in the Plan and a mitigation scheme has been developed and tested and is identified in the Draft</p>

					<p>Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p> <p>In respect of air quality and noise pollution, policy NE5 within the Local Plan requires development proposals as appropriate to their nature and scale, should demonstrate that environmental risks have been evaluated and appropriate measures have been taken to minimise the risks of adverse impacts to air, land and water quality, whilst assessing vibration, heat, energy, light and noise pollution.</p>
1592	Lancashire Wildlife Trust	Site Allocations	EMP1/10	<p>The Trust notes that the site is adjacent to the River Don-Brun Valley Biological Heritage Site and that the site itself is identified as a stepping stone habitat for grassland and woodland in the Lancashire Ecological Network. The Trust is pleased to see, and supports the requirement, that an ecology survey should accompany any planning application which should indicate how the development will maintain habitat connectivity. However, the ecological survey needs to identify and address the issues in accordance with Policy NE1, as is required in the Policy Requirement and Design Principles for Housing Allocations (Policy HS1). Furthermore, if/when the site is developed, a requirement to secure the positive management of the BHS should be investigated in order to contribute to the indicators for NE1 Biodiversity and Ecological Networks in Table 10 on page 207.</p>	<p>Comment noted, the site allocation policy now makes reference to policy NE1. It was felt not appropriate to require the site to contribute to the positive management of the BHS due to differing site ownerships, however, the site allocation states the existing established vegetative screening to the south and east of the site should be incorporated into a new landscaping scheme, reducing the impact of any development on the adjacent River Don-Brun Valley Biological Heritage Site.</p>
1995	Cllr Cosima Towneley	Site Allocations	EMP1/12	<ul style="list-style-type: none"> <li>• These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>• Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>• Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> <li>• Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	<p>The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.</p>
1558	Joan Lakeland	Site Allocations	EMP1/12	<p>I would like to object to the Burnley Bridge extension under the Local Plan. This would take too much green field land from Pollard Moor and the buildings would be very close to Manchester Road.</p> <p>Hapton is already surrounded by industrial unit sites and we would like to know the percentage of occupied buildings.</p> <p>The units occupied at the moment do not necessarily provide local employment, a lot of the firms bring existing employees with them when they move into the area.</p> <p>The green space between Hapton and Padiham and also Hapton and Burnley</p>	<p>The Council commissioned an Employment Land Demand Study (ELDS) in 2016 to inform the Local Plan and this identified the amount of employment land required in the borough over the plan period as being between 68-104Ha. One of the Council's Strategic Priorities is to increase and encourage economic prosperity; therefore 90Ha is considered an appropriate figure. In terms of land/units within the borough itself, there is a very low vacancy rate across the borough's business parks/industrial estates,</p>

				<p>(Network 65 proposed extension) will be eaten away leaving no distinct boundaries for Hapton.</p> <p>What percentage of new industrial land is proposed for the rest of rural Burnley compared to the Hapton area?</p> <p>We objected to this before at the last consultation, have we been listened to or ignored? in other words why has this proposal been retained in the plan.</p>	<p>therefore new sites, including greenfield sites have been identified in the Local Plan.</p> <p>The Council carried out a Strategic Housing and Economic Land Availability Assessment (SHLAA) which assessed sites put forward for potential development. All of the sites put forward were assessed for their availability, suitability and achievability. From the SHLAA it was found that there were not sufficient sites to meet the employment land requirement set out in Policy SP3, therefore, greenbelt sites needed to be identified.</p> <p>The Burnley Bridge extension is classed as being in the settlement of Burnley in policy SP4. In order to reduce its impact on the surrounding area, Policy EMP1/12 sets out a number of policy requirements and design principles to minimise the impact of the development on the landscape and surrounding uses.</p>
2118	Highways England	Site Allocations	EMP1/12	<p>Highways England is satisfied to see detail regarding land allocations for housing and employment growth presented within the report and welcomes the location of new developments in existing urban areas. It is noted that there do not appear to be any significant additions to the proposed land allocations, with the exception of;</p> <ul style="list-style-type: none"> <li>• Extensions to the west of the existing (approved) Burnley Bridge Industrial Park to the north of Junction 9 (EMP1/12)</li> <li>• Extension of employment allocation to the Burnley Bridge South industrial park to the south of Junction 9 (EMP1/5)</li> <li>• New Employment allocations in Padiham on greenbelt sites that could impact upon Junction 8 (EMP 1/13)</li> </ul> <p>It is our understanding that planning applications have not been submitted for these three schemes. It is important to recognise that the borough's employment sites will need to be assessed for future infrastructure needs, so that the aspirational growth will not compromise local and strategic highway performance. In due course, Highways England would expect to see an assessment of the transport implications of each development, so that the impact upon the SRN may be understood.</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction 9. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. A mitigation scheme has been developed and is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p> <p>In addition, the potential requirement for planning contributions for highway improvements where necessary has been identified.</p>
1356	Environment Agency	Site Allocations	EMP1/12	<p>For additional information the site contains ordinary watercourses. Any development within the easement would require consent from Lancashire</p>	<p>Comment noted. The LLFA would be consulted as part of any planning application submitted in accordance with policy</p>

				County Council as the LLFA.	CC4.
1383	The Eshton Group	Site Allocations	EMP1/12	<p>I am writing in connection with the aforementioned Local Plan Consultation. Background.</p> <p>This letter of representation has been prepared on behalf of our clients, The Eshton Group who presently are the owners and developers of Burnley Bridge Business Park. The Eshton Group also have an interest in land to the South of Network 65.</p> <p>This representation is focussed therefore on two specific sites, the proposed expansion of Burnley Bridge Business Park, and also land to the south of Network 65 which is positioned off Accrington Road, to the west of the Town Centre.</p> <p>This Representation offers support to the Consultation on Preferred Options in respect of specific allocations of EMP 1/2 Burnley Bridge, EMP 1/5 Land to the South of Network 65 and EMP 1/12 Burnley Bridge Extension.</p> <p>It is proposed however that changes are made in order to ensure that the development of these sites can be delivered in line with the aspirations of the Local Planning Authority in respect of making Burnley a location of choice in 2032.</p> <p>Proposed Allocation EMP 1/12 Burnley Bridge Extension</p> <p>At page 120, and specifically the proposed allocation of land to extend Burnley Bridge Business Park, this Representation has already noted that the boundary should be amended to allow for a successful integration between the existing allocation and the proposed extension.</p> <p>In the Policy Requirements and Design Principles summary, the following is recommended to be included as part of the allocation;</p> <p>1. No large scale buildings in terms of height or massing should be located at the northern part of the site.</p> <p>A) Clearly the development of this site, for employment related uses, will result in the significant investment of the site by industrial led occupiers.</p> <p>Accordingly the form, type, massing and scale of the buildings proposed would be of such a character and appearance.</p> <p>It is therefore recommended that an agreement is reached in respect of zoning the site for large buildings. Furthermore, on the area to the north, it would be appropriate to have open uses in this location, such as car parking. This would not therefore render a significant portion of the site unusable.</p> <p>2. It is expected that high quality materials such as natural stone be utilised.</p> <p>A) The use of natural stone would have a cost implication on a form of development which typically generates a lower return in respect of investment than say residential or office development. In addition there is no natural stone on the residential properties opposite (these are rendered in the main).</p> <p>It would therefore be more appropriate to recommend that the design of new,</p>	<p>Comments noted, the boundary of the site has been amended slightly to facilitate access onto the site. Vehicular access should be directly from the existing Burnley Bridge Business Park road network. No vehicular access to the west or north of the site will be permitted. The specific policy requirements and design principles in EMP1/12 have been amended. The policy will require a comprehensive masterplanned scheme for the whole site utilising high quality materials will be expected, accompanied by a visual impact assessment to determine the appropriate location and design of units. Due to the topography of the site, it is expected that any larger units will be located at the eastern part of the site and the buildings with a lesser impact in terms of scale, height and massing and/or landscaped car parking will be located to the north and west of the site. The green infill to the north of the extension is identified as openspace, separating the employment allocation from the existing residential properties to the north to reduce the potential for conflict between the two uses. Car parking can still be provided to the north or west of the site, but outside the green buffer. The proposal for a site extension to accommodate housing will not be taken forward into the Pre-Submission Publication as it provides a break between employment development and residential properties to the north. In relation to residential development there is no justification to release green belt land for residential purposes. As stated in the site allocation policy, vehicular access should be directly from the existing Burnley Bridge Business Park road network.</p>



				<p>modern buildings should seek to be of a good quality, with permanent, durable and modern materials to be used.</p> <p>It would be feasible to include some natural materials in boundary walls, and some entrance points to reflect a wider character, however the character of Lancaster Drive is of newer residential properties and there are no or very few natural materials present. The Design Principles should therefore be amended to reflect this.</p> <p>3. Vehicular access should be directly from the existing Burnley Bridge Business Park road network.</p> <p>A) This statement is supported. However in order to ensure access the boundary of the extension should be amended so as to abut the existing Burnley Bridge Business Park.</p> <p>Recommendation: Amend boundary to abut the existing Business Park, amend the design principles to allow for the use of modern materials. The connectivity between the Business Park and the area ear marked for extension must be considered in close detail, and, on that basis it is proposed that the boundary of the allocation is amended so as to tie in with the boundary of the existing business park.</p> <p>It is proposed that the boundary should be amended so as to encourage and facilitate connectivity through the two employment sites.</p> <p>Whilst Burnley Bridge extension does have a direct road frontage, it would result in traffic that is connec</p>	
2198	Jade Bradley	Site Allocations	EMP1/12	<p>I AM STRONGLY AGAINST ANY PLANNING PROPOSED OF OUR GREENBELT LAND IN PADIHAM!</p> <p>Myself and my family regularly use this land to go walking and purchased our property for this reason. Views from our property have already been compromised due to the eyesore already built. I believe you are not only disregarding residents currently living in the area and putting their properties at risk. My property had a near miss on being flooded in December and any loss to flood plains is only going to make the situation worse.</p> <p>The residents of padihams views must be taken into consideration!</p>	<p>Whilst the council sympathises with residents who may lose a view from their property over open space, the right to an open view over someone else's land is not a material planning consideration, and thus cannot be taken into account when assessing the suitability of a site. Even with development, there will be opportunities for walking both on and around the site as the site allocation policy requires new walking and cycling routes to be provided on the site, connecting the new development to the existing route network on Lancaster Drive and the Padiham Greenway via the Burnley Bridge Business Park. There is a public right of way which crosses the east of the site which will need to be retained/re-routed within the site and improved as part of any development.</p> <p>A landscaping scheme should be submitted as part of any development which includes the retention of the established trees on the site and measures for their protection.</p>

					<p>Additional screen planting will be expected to the south, west and north of the site.</p> <p>The Burnley Bridge Extension site is not identified as an area at risk of flooding. However, any development on the site will be required to provide a Flood Risk Assessment in accordance with policy CC4.</p> <p>Policies CC4: Development and Flood Risk, and CC5: Surface Water Management and Sustainable Drainage Systems (SuDS) seeks to minimise surface water run-off from sites and ensure that new development does not result in flood risk from any source or other drainage problems either on the development site or elsewhere.</p>
2216	Burnley Wildlife Conservation Forum	Site Allocations	EMP1/12	<p>EMP1/12 Burnley Bridge Extension – Reasons for objection</p> <p>The proposed new development boundary extends beyond the present urban boundary to incorporate this plot of land whilst at the same time removing its present Green Belt status unreasonably because exceptional circumstances do not apply as there are alternative development sites outside the Green Belt. It would increase urban sprawl in to the rural area with the loss of a greenfield site in attractive open countryside which is in active agricultural production. It is adjacent to the Pollard Moor/Bentley Wood Green Biological Heritage Site and is part of the Lancashire Grassland Ecological Network. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European protection along with Lancashire key species within 250 metres of the site.</p>	<p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Burnley Bridge Extension, should be allocated for employment use.</p> <p>The site policy requires potential ecological impacts to be considered and an ecological survey will be required to accompany any planning application identifying how the development would manage protected species and ecological networks.</p>
1593	Lancashire Wildlife Trust	Site Allocations	EMP1/12	<p>The Trust notes that Shaw Brook flows through the site and that it is adjacent to Pollard/Stone Moor Biological Heritage Site, which is also identifies as a core area for grassland in the Lancashire Ecological Network. The Trust is pleased to see, and supports the requirement, that an ecology survey will be necessary which</p>	<p>Comment noted. The site allocation policy now makes reference to policy NE1. It was felt not appropriate to require the site to contribute to the positive management of the BHS due to differing site ownerships, however, the site allocation</p>

				<p>should show how any development will maintain and enhance habitat connectivity. However, the ecological survey needs to identify and address the issues in accordance with Policy NE1, as is required in the Policy Requirement and Design Principles for Housing Allocations (Policy HS1). Furthermore, if/when the site is developed, a requirement to secure the positive management of the BHS should be investigated in order to contribute to the indicators for NE1 Biodiversity and Ecological Networks in Table 10 on page 207.</p>	<p>states that a landscaping scheme should be submitted which includes the retention of the established trees on the site and measures for their protection. Additional screen planting will be expected to the south, west and north of the site which may reduce the impact of any development on the adjacent Pollard/Stone Moor Biological Heritage Site and enhance habitat connectivity.</p>
1508	Mrs J Hull	Site Allocations	EMP1/13	<p>Very heavy traffic Monday – Friday from Shuttleworth Mead already causing hold ups through Padiham &amp; passing through Padiham’s main street which is not suitable or meant for this large volume &amp; including heavy lorries etc, fumes from traffic affecting pedestrians also difficulty in crossing the road, increased traffic on Padiham – Barrowford bypass which is already very heavy due to Shuttleworth Mead &amp; traffic from the M65 etc.</p> <p>Loss of trade for Padiham shop keepers (traffic just passes through) including noisy &amp; heavy lorries as stated above. Green belt land where the extension is proposed, is precious, brownfield sites should be considered, also available space on Burnley Bridge Business Park.</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Blackburn Road/A6068. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. A mitigation scheme has been developed and tested and Growth Deal funding has been secured from Government to implement the scheme. The scheme is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p> <p>Paragraph 159 of the NPPF requires that councils “prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about availability, suitability and likely economic viability of land to meet the identified housing need over the plan period.” These assessments are known as SHLAAs. Paragraph of the NPPF 161 goes on to say that “Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.”</p> <p>The Government’s National Planning Practice Guidance sets out a methodology for undertaking SHLAAs. The Council has undertaken a combined Strategic Housing and Employment Land Availability Assessment in line with this methodology but has still called this the SHLAA for ease of reference.</p> <p>The SHLAA assessed all sites put forward for potential development or identified from what are known as ‘desk top’ sources. All were assessed for their availability, suitability and</p>

					<p>achievability. Those that pass all three tests are classed as 'developable'. The SHLAA found that there were not sufficient developable employment sites outwith the Green Belt to meet the proposed employment land requirement set out in Policy SP3. In line with the SHLAA methodology therefore, the three Green Belt sites that had been put forward were reassessed. National policy is clear that Green Belt boundaries should only be reviewed in 'exceptional circumstances' and a lack of developable for employment or housing is one such circumstance which needs to be explored. The Council therefore undertook Green Belt Review to assess the importance land to the purposes and fundamental aim of the green belt and on balance the Council considers that two of these sites should be allocated for employment use.</p>
2424	Burnley, Pendle and Rossendale Green Party	Site Allocations	EMP1/13	<p>Green Belt</p> <p>Burnley's Green Belt has remained unchanged since it was created in 1985. The Plan sets out the Council's case for reducing the already inadequate Green Belt designation. Proposals for changing Green Belt boundaries are only allowed in 'exceptional circumstances'. Policy SP3 falls far short of making such case convincingly and the Council is in danger of setting a worrying precedent.</p> <p>The national requirement of 90 hectares must be found on existing brownfield sites or resisted. The Council has also not adequately set out that it has considered brownfield sites and existing commercial property which is derelict and could be redeveloped and brought back into use when deliberating its obligations in respect of the Employment Land Requirement.</p> <p>Burnley should not be allowed to become a graveyard for white elephant warehouses, which at their highest point will contribute by employing only several dozen unskilled young people on minimum wage and zero hour contracts. As set out in paragraph 4.7.1 of the Plan, the NPPF states that "the fundamental aim of Green Belt Policy is to prevent Urban Sprawl" furthermore NPPF paragraph 79</p> <p>states Green Belt Policy is to "assist urban regeneration by encouraging the recycling of derelict and other urban land".</p> <p>Simply stating that large warehouse developments on the outskirts of Burnley may provide impetus for young people to stay in the town is not a convincing or well researched and evidenced argument for building them. There are many</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was</p>

				<p>factors prompting young people to move away, and many factors for why people are drawn to move here; not least the pristine countryside and Green Belt itself.</p> <p>It is simply not desirable to propose the permanent and unsightly destruction of protected and ecologically sensitive land to assuage short term economic arguments presented in Westminster. The Plan fails to make any suggestion for those young people who do not want to work in a warehouse.</p> <p>It is noted that the requirement to satisfy exceptional circumstances for building on Green Belt land is nationally imposed, however the Council has erred in its decision to allocate greater importance to that requirement given that the requirement to demonstrate 'exceptional circumstances' is also a national requirement.</p> <p>Burnley, Pendle and Rossendale Green Party are firmly opposed to the proposal at paragraph 4.7.13 of the Plan to remove EMP1/X Burnley Bridge Extension (Parcel 24) and EMP1/X Shuttleworth Mead South (part of Parcel 3a) from the Green Belt.</p> <p>A vision of 2032 must include a progressive and innovative interpretation of how business will be done. It is a world of superfast broadband, remote working and flexible hi tech industry. The Plan establishes the town in 2032 as the last place in the UK that still welcomes businesses that require sprawling road freight terminals with easy motorway access. Paragraph 4.7.7 appears to suggest Burnley is losing the fight to the bottom with Pendle and Hyndburn when it comes to sacrificing Green Belt to the whims of Westminster and big business.</p>	<p>therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribbles Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site allocation policies EMP1/12 and EMP1/13 allow B1b and c, B2 or B8 uses to be developed. This range will provide a variety of potential employment opportunities on sites. The Local Plan proposes a range of employment land sites to accommodate a range of uses and businesses. B1a (offices) are accommodated in more sustainable locations within and adjacent to Burnley town centre in line with national policies on town centre uses.</p>
1108	William Pilkington	Site Allocations	EMP1/13	<p>I am writing to inform you that I am absolutely opposed to any building on the green fields that surround Padiham. So much so that myself and others are prepared to occupy the fields to protect them.</p> <p>The one real positive thing about Padiham is that it does have nice countryside around its edges. Because lets be honest the town its self sure aint much to look at. Padiham was a run down place when I was a young lad. It sure hasn't improved very much now im nearly 60. But us Padiham folk know every field and woodland that is around our neglected town and I'm sure many of us will fight to protect our fields and woodland. We'll set up camps on our fields.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a</p>

					<p>Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>In relation to pollution, Local Plan policy NE5 requires development proposals as appropriate to their nature and scale, should demonstrate that environmental risks have been evaluated and appropriate measures have been taken to minimise the risks of adverse impacts to air, land and water quality, whilst assessing vibration, heat, energy, light and noise pollution.</p>
--	--	--	--	--	--

1229	Mr Ian Chapman	Site Allocations	<p>EMP1/13</p> <p>I am against proposals for any development in this area or indeed on any green belt land within or crossing the boundaries of the local plan.</p> <p>I regularly walk down Shuttleworth Mead and find that during the 4 seasons of the year I have noted various amounts of differing wildlife visiting and occupying this area.</p> <p>Notably Otter which was reported to the Rivers Agency who were doing a survey on the species.</p> <p>Little Ringed Plover a protected breeding species also reported as possibly family.</p> <p>Jack Snipe Snipe Woodcock.</p> <p>Reed Bunting Twite Linnet Little Owl Oystercatcher Water Vole Roe Deer Broad Bellied Chaser. Various butterflies Grasshoppers Bees Violet ground beetle Sand martins Swallows Various dragonflies Spiders Beetles Flowers / orchids Damselflies Salmon Trout Greyling</p> <p>The list is endless All of which indicates a valued area to passing migrant species and endemic species native to the UK.</p> <p>The whole area and corridor is extensively used by individuals and has become an</p>	<p>Paragraph 159 of the NPPF requires that Council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Mead South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribblesdale Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site policy for Shuttleworth Mead South requires any development proposed to consider potential ecological impacts and an ecological survey will be required to accompany any planning application identifying how the development would address protected species and ecological networks.</p> <p>A landscaping scheme will be required which may also have a positive impact on wildlife.</p> <p>New walking and cycling facilities and routes will need to be provided on site, connecting the new development to the existing route network in particular the public right of way (dashed line on the above site plan) to the north of the site and also to the road network on via Shuttleworth Mead and</p>
------	----------------	------------------	--	--

				<p>intrinsic part of life for people in the local area.</p> <p>This area if removed and utilised for building will inevitably result in the loss of habitat which will never be replaced or reintroduced elsewhere.</p> <p>I am against this development and proposals.</p>	<p>contributions will be sought towards the signposting of the Padiham Greenway from both Shuttleworth Mead South and the existing Shuttleworth Mead Business Park.</p>
1226	Miss Karen Catlow	Site Allocations	EMP1/13	<p>Comments : I'm writing to protest against the proposal to build warehousing on the green belt next to the river Calder on Shuttleworth Mead South (previously called Eaves Barn Farm).</p> <p>I was so upset by these proposals that I moved away from Blackburn Road, a place I'd always wanted to live as it had such lovely views. The Burnley Bridge site has not been at capacity since it was built and the argument that it is now operating at 85% capacity is statistically a sham as now network 65 is at an all time low regarding capacity as They were lured to Burnley Briidge with low introductory coatings. So the argument that Burnley Bridge is now operating successfully meaning a greater need for more warehousing is massively flawed. The traffic is another huge issue as the traffic there is already a major headache and will cause even more disruption and quite possibly deaths. Have you tried to cross the main road at the traffic lights down there? It's scary and I know a lot of people that make that journey twice a day.</p> <p>Stop trying to make people's lives a misery who paid hard earned, good money for their houses with a view just to satisfy some bureaucratic policies when what we need is quality jobs in Padiham AS IT SAYS IN YOUR IN ONE OF YOUR STSTEMENTS to provide high end jobs for Padiham.</p> <p>Are these warehouses going to provide high end jobs!????</p> <p>I think not!!!</p>	<p>Whilst the council sympathises with residents who may lose a view from their property over open space, the right to an open view over someone else's land is not a material planning consideration, and thus cannot be taken into account when assessing the suitability of a site. Even with development, there will be opportunities for walking both on and around the site as the site allocation policy requires new walking and cycling routes to be provided on the site, connecting the new development to the existing route network.</p> <p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith</p>



					<p>the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying.</p>
1519	Huntroyde Estate	Site Allocations	EMP1/13	We concur with Para 5.2.10 of the PI&O:	A green belt review has been undertaken by the Council which assessed how the green belt is performing against the

			<p>'In order to meet the identified requirement however, a further 19 hectares of employment land needed to be identified and the Council undertook a Green Belt Review to inform a decision on the effects of releasing any land within the Green Belt for development.'</p> <p>However, our clients do not agree with inclusion of EMP1/13 as an allocation in Policy EMP1 Employment Allocations.</p> <p>Reviewing the notes in PI&amp;O on page 121 referring to the policy requirements and design principles for EMP1/13 we have serious concerns as to the deliverability of this site and there is no reasoned justification for it to be released from the Green Belt. EMP1/13 will extend the settlement boundary onto the south side of the River Calder and toward the boundary with the 2 adjacent boroughs of Ribble Valley and Hyndburn. It has no connectivity and is divorced from the main settlement of Padiham by the river. It directly conflicts with paras 79 and 80 of NPPF as it will not preserve the openness of Green Belt and it will not assist in safeguarding the countryside from encroachment. The site is liable to flooding and lies within Flood Zone 2 on the Environment Agency Flood Map. Access to the site has not been agreed and our clients understand it would require a bridge link to the existing employment land to the north. It is traversed by a plethora of pylons and powerlines that will limit the height of buildings and reduce the developable area to well below the 9.72ha (gross) indicated and removal or relocation of pylons and powerlines is extremely costly and given the suggested uses of B2 and B8 would be unviable. The PI&amp;O on page 121 referring to the policy requirements and design principles for EMP1/13 notes in order for this site to come forward it will also need to provide a flood alleviation scheme and also improvements to the highway junction and possibly a new bridge for access all these are major costs. The site is a site known to house Protected Species and would need to address the impact on the setting of Workhouse Farm, a Grade II Listed Building. The inclusion of EMP1/13 as one of the 2 major Green Belt release sites for employment use fails on all 4 grounds of 'soundness' It is not effective, not justified, not consistent with national policy and not positively prepared and therefore EMP1/13 should be removed as an allocation.</p> <p>On the issue of development boundaries and the criteria set down in SP4 section 2. Whilst we concur with the principles set down we must question the logic of choosing to allocate EMP1/13 over Land South of Blackburn Rd, Padiham (HEL/160).</p> <p>Aras 4.7.6 and 4.7.7 of the PI&amp;O note the need to release Green Belt land to</p>	<p>5 Green Belt purposes identified in the NPPF. It found that the majority of the green belt was performing well against these purposes. However, due to the need to allocate new sites for employment use and meet the economic needs of the borough, some green belt sites are proposed to be released. The remaining green belt will continue to be protected under Policy SP7.</p> <p>The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs. The Shuttleworth Mead South site lies within Flood Zone 1 and 2. Uses being proposed on this site, are classed as less vulnerable uses in terms of flood risk vulnerability and are seen as appropriate development in Flood Zones 1, 2 and 3a. However, the site allocation policy requires any development to be accompanied by a Site Specific Flood Risk Assessment in accordance with Policy CC4 and seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and through the provision of an appropriate of sustainable drainage scheme. If the submitted Flood Risk Assessment identifies an adverse impact on Padiham or impacts further down-river as a result of the development, contributions may be sought towards a flood alleviation scheme. In terms of infrastructure to and on the site, the land owner has submitted evidence demonstrating how the site could be designed with pylons on site and how access to the site will be obtained and if the required works were deemed unviable by the site owner the site may not have been submitted. The Blackburn Road site has not been taken forward into the Pre Submission Document due to the site being in a prominent position in terms of its proximity to existing residential properties and its topography.</p> <p>Development on the site would have a greater impact on the residential amenity of local residents and landscape than the site at Shuttleworth Mead South. In addition, development at Blackburn Road could have a detrimental impact on the</p>
--	--	--	--	--

				enable the employment land targets to be met. Whilst we agree with this in principle we disagree with the logic and approach taken to the site selection when bearing in mind NPPF and the 5 purposes of Green Belt and the need to ensure the openness of Green Belt is preserved and that the boundary amendment have longevity. Para 4.7.14 then concludes that only 2 sites met these criteria and are suitable for release from the Green Belt. The selection of EMP1/13 as previously noted defines logic especially when tested against the criteria and tests in NPPF for the purpose and release of Green Belt and thus boundary amendments.	Padiham Greenway, as identified by the many opposition comments received during the Issues & Options stage.
1509	Dr BJ Hunter	Site Allocations	EMP1/13	<p>I object to more warehouses and industrial units being built on the Green Belt next to the Calder: I understand that this is still included in the Preferred Options Document. I consider that warehouses at this place would result in a huge disruption to traffic. The A6068 is a relatively small road and the main access from both the M65 and M66. I use this route to commute and find already that I am often stuck in the middle of heavy lorries, both inwards and outwards, sometimes with long delays. I moved to Padiham as I considered it a fairly quiet town nestling in green land. I would not like to see the flow of heavy traffic increased one iota. Large lorries provoke considerable pollutions, not only noise and fumes, but by strong vibrations; these all have a negative effect on the environment. I do not wish my commute to become more difficult and lengthy, and I do not wish the local environment to suffer.</p> <p>I also strongly wish that the Blackburn Road site be kept as Green Belt and that Craggs Farm is not allocated for housing.</p> <p>I should be grateful if you would kindly confirm that you have registered my objection.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a</p>

					<p>distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, includin</p>
--	--	--	--	--	--

1242	Mr Jon Barry Coldwell	Site Allocations	EMP1/13	<p>The proposal to allocate Site EMP1/13 Shuttleworth Mead South for industrial and is flawed it would result in the loss of much needed Green Belt Land. it would also cause very considerable problems with traffic flow on the A6068 which is already heavily congested in the morning and evenings. The construction of the proposed roundabout would not solve the problem which really demands.</p>	<p>Paragraph 159 of the NPPF requires that councils “prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about availability, suitability and likely economic viability of land to meet the identified housing need over the plan period.” These assessments are known as SHLAAs. Paragraph of the NPPF 161 goes on to say that “Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.”</p> <p>The Government’s National Planning Practice Guidance sets out a methodology for undertaking SHLAAs. The Council has undertaken a combined Strategic Housing and Employment Land Availability Assessment in line with this methodology but has still called this the SHLAA for ease of reference. The SHLAA assessed all sites put forward for potential development or identified from what are known as ‘desk top’ sources. All were assessed for their availability, suitability and achievability. Those that pass all three tests are classed as ‘developable’. The SHLAA found that there were not sufficient developable employment sites outwith the Green Belt to meet the proposed employment land requirement set out in Policy SP3. In line with the SHLAA methodology therefore, the three Green Belt sites that had been put forward were reassessed. National policy is clear that Green Belt boundaries should only be reviewed in ‘exceptional circumstances’ and a lack of developable for employment or housing is one such circumstance which needs to be explored. The Council therefore undertook Green Belt Review to assess the importance land to the purposes and fundamental aim of the green belt and on balance the Council considers that two of these sites should be allocated for employment use.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact fo the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Blackburn Road/A6068. The</p>
------	--------------------------	------------------	---------	---	---

					assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. A mitigation scheme has been developed and tested and Growth Deal funding has been secured from Government to implement the scheme. The scheme is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.
1468	Martin Higginson	Site Allocations	EMP1/13	<p>I am emailing to object to the above extension plan. Why does it need extending? There's plenty of empty industrial units in the vicinity, all within easy reach of the roads. It will a) Leave another ugly blight on our once beautiful landscape. b) lead to an increase in traffic and affect all local people, animals etc. We already have the behemoth on the old Blythes site that is a major eyesore. Do we need more? Personally speaking, I love cycling and rambling in that area with my children. I'm concerned that at this rate we will have nowhere to go. Please reconsider this ridiculous expansion. Surely there's room for development on the rest of the Blythes site... How many empty units will be on this site? We have the Network 65 as well. I gather you won't rest until all the residential areas are dwarfed by unused industrial units? I don't wish to pay council tax to live in a nice area that looks like an overgrown industrial estate. Please reconsider this extension, one that is unneeded.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Mead South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough</p>

					<p>boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1441	Anne Hargreaves	Site Allocations	EMP1/13	I object to the local plan re Shuttleworth Mead for the following reasons.	In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the

			<p>The land is Greenbelt.  Increased risk of flooding through building on a floodplain.  Wildlife adversely affected.  Loss of grazing for livestock.  Increased environmental pollution.  Industrial pollution may decimate fish stocks in the River Calder.  Increased noise pollution.  A blot on the landscape  There would be an increase in the volume of traffic on the A6068.  Burnley Council's own report indicates that the local Burnley population will not increase and may even decrease in the future so this extra land for industry should not be needed.  Industrial sites at Simonstone and Altham already exist in close proximity.  The proposal that this site will provide local jobs is false; prospective employers cannot guarantee this.  The greenbelt is a vital community leisure facility.</p>	<p>amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones</p>
--	--	--	--	---



					<p>1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1594	Lancashire Wildlife Trust	Site Allocations	EMP1/13	<p>The Trust objects to the allocation of this site for development. The site supports Protected Species and other Lancashire BAP Species, is identified as part of the Lancashire Ecological Networks for woodland and grassland, and the majority of the site lies within Flood Zone 2. The Trust objects to the removal of Shuttleworth Mead South (part of Parcel 3a, as delineated on the Preferred Options Map) from the Green Belt and its allocation as Site EMP1/13. The Trust may be prepared to withdraw its objection if the boundary change was revised to retain the floodplain of the River Calder within the Green Belt.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected</p>

					<p>in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level fo flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It</p>
--	--	--	--	--	--

					<p>will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1313	Mr and Mrs John Drake	Site Allocations	EMP1/13	<p>Page 121 falls within the Economy and Employment Section of the plan, specifically EMP1/13</p> <p>Shuttleworth Mead South. There are several reasons why industrial development should not take place on this area the first of which is that the area is Greenbelt; Greenbelt should not be considered for development unless specific conditions exist. I have been informed that a specific quantity of land must be earmarked to provide employment for the projected increase in demand in the Burnley area over the next several years and that the 9.27 ha of Shuttleworth Mead South will bring the overall total up to that required. I believe that the demand will not be as high as is estimated so this area should be omitted from the Local Plan. Even if the estimate is correct, this area could then be included in a subsequent Plan; better that than building on it and finding it was not needed because once Greenbelt is gone it is gone forever. Flooding has become a major issue recently. This area is part of a flood plain and assists in reducing flooding, particularly to areas downstream of it. Whalley was devastated last year. Why make things worse? Development of the area will inevitably harm wildlife and fish stocks in the River Calder; the local traffic congestion will worsen possibly causing developers to avoid the area; and, ultimately, if the area is developed, nobody can guarantee that Burnley residents will benefit from it</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment</p>

			<p>(bearing in mind that the Burnley Local Plan is designed to benefit Burnley residents and not those from anywhere else).</p>	<p>(SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with</p>
--	--	--	---	---

					<p>the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, includin</p>
1306	Julie Ward	Site Allocations	EMP1/13	<p>I am writing to oppose the proposal to develop the land south of Shuttleworth Mead for industrial/commercial use. I understand the land is greenbelt and so should not be built on.</p> <p>There is already too much traffic on the A6068 and equally, there are many industrial units standing empty or offered for sale or let in Burnley and surrounding districts. Why do we need more potentially empty units which are an eyesore and erode our countryside which was once stunning and unspoilt? I am also in opposition to the development as it is detrimental to wildlife.</p> <p>Please accept this as formal opposition.</p>	<p>Whilst the council sympathises with residents who may lose a view from their property over open space, the right to an open view over someone else's land is not a material planning consideration, and thus cannot be taken into account when assessing the suitability of a site. Even with development, there will be opportunities for walking both on and around the site as the site allocation policy requires new walking and cycling routes to be provided on the site, connecting the new development to the existing route network.</p> <p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These</p>

					<p>assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p>
--	--	--	--	--	--

					The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying
1185	Deborah Brayshaw	Site Allocations	EMP1/13	I would like to lodge my objection to the plans to extend Shuttleworth Mead industrial estate on to the green belt land across the river from the original site. Not only will this increase traffic on an already busy junction, it will be another blot on the landscape and will have a negative effect on local wildlife. With so many empty industrial premises in the surrounding areas, I am astounded anyone believes there is a need to build any more.	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribblesdale is not proposed for any development within the Local Plan, therefore,</p>

					<p>avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1375	Mr Bill Whittaker	Site Allocations	EMP1/13	<p>I am contacting you to voice several personal objections in regards to the potential loss of greenbelt land at Shuttleworth Mead South, Padiham.</p> <p>1) It goes without saying that the land is greenbelt and that in itself should be</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that</p>



			<p>enough to discourage the planning department from destroying the habitat.</p> <p>2) The said land is ecologically sensitive and acts as both a flood plain for the area (which I trust you are aware DID flood and cause extensive damage to local homes and businesses on Boxing Day 2015) as well as being home to an abundance of sensitive wildlife that are reliant on the relatively unspoilt habitat.</p> <p>3) The area in question, along with the Padiham greenway, forms an enclave that is popular with families, runners, walkers and wildlife enthusiasts alike and has had a positive impact in terms of local outdoor leisure on both the people on Padiham, people throughout the Burnley borough and visitors from further afield.</p> <p>4) Regrettably, as with most industrial ventures in this borough, the economic projections for an expansion to the Shuttleworth Mead site are, at best, overly ambitious and, at worst, grossly inflated and disproportionately optimistic. There is NO guarantee made by the sites employers to the boroughs jobless that any scheme of expansion would provide a meaningful boost to employment for the area. This expansion would be beneficial ONLY to the people that are making the application to expand and serve incredibly little to no economic improvements to the borough.</p> <p>5) Given the abundance of vacant brownbelt land within the borough (not least the former Baxi Potterton site just to name a plot specifically within Padiham itself) it is completely unnecessary and downright illogical to feel a need or an entitlement to damage the greenbelt for such ventures.</p> <p>6) Given too, the recent expansion of the Burnley football clubs training ground in the ecologically sensitive area of Gawthorpe, Padiham, the flood plain and haven for wildlife that is currently there at Shuttleworth Mead South all the more ought to be left to nature. It is absolutely imperative that the potential for increased floods in the future is accounted for and we should all endeavour to facilitate avoiding such incidents wherever possible. Effectively, it just isn't remotely ethical or environmentally sound to build on this kind of land anymore.</p>	<p>between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when</p>
--	--	--	--	---

					<p>climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1357	Environment Agency	Site Allocations	EMP1/13	This site is adjacent to the main river Calder. Any development within our 8m easement (measured from the top of river bank) may require an Environmental Permit for flood risk activities. We would recommend that The Policy Requirements and Design Principles are amended to reflect this. We would recommend that the developer engages with the Environment Agency at the earliest opportunity.	Comment noted. An 8 metre easement has been included within the site allocation policy.
1311	Anne Wells	Site Allocations	EMP1/13	please do not invade any more green spaces particularly round Shuttleworth Mead area as it is highly valued by the local community . There are plenty of unused brown sites.	In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity

					<p>and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p>
1257	Mr Philip Tomlinson	Site Allocations	EMP1/13	<p>I object to plans to adopt Green Belt land of the borough's highest grade 3 at Shuttleworth Mead South.</p> <p>Despite good intentions of building cycleways and pathways, this proposed development is not close to many residential properties and potential employees would probably choose to drive to this location, further exacerbating the significant traffic problems on Blackburn Road and the A6068. Furthermore, building at this site will be detrimental to the wildlife, including</p>	<p>Paragraph 159 of the NPPF requires that councils "prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about availability, suitability and likely economic viability of land to meet the identified housing need over the plan period." These assessments are known as SHLAAs. Paragraph of the NPPF 161 goes on to say that "Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated</p>

				protected species, and fish stocks.	<p>land.”</p> <p>The Government’s National Planning Practice Guidance sets out a methodology for undertaking SHLAAs. The Council has undertaken a combined Strategic Housing and Employment Land Availability Assessment in line with this methodology but has still called this the SHLAA for ease of reference.</p> <p>The SHLAA assessed all sites put forward for potential development or identified from what are known as ‘desk top’ sources. All were assessed for their availability, suitability and achievability. Those that pass all three tests are classed as ‘developable’. The SHLAA found that there were not sufficient developable employment sites outwith the Green Belt to meet the proposed employment land requirement set out in Policy SP3. In line with the SHLAA methodology therefore, the three Green Belt sites that had been put forward were reassessed. National policy is clear that Green Belt boundaries should only be reviewed in ‘exceptional circumstances’ and a lack of developable for employment or housing is one such circumstance which needs to be explored. The Council therefore undertook Green Belt Review to assess the importance land to the purposes and fundamental aim of the green belt and on balance the Council considers that two of these sites should be allocated for employment use.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact fo the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Blackburn Road/A6068. The assessment concludes that mitigation measure are required at this junction to support the proposed development in the Plan. A mitigation scheme has been developed and tested and Growth Deal funding has been secured from Government to implement the scheme. The scheme is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p>
1337	Rosie	Site Allocations	EMP1/13	Burnley council have already used " special circumstances" to remove greenbelt	In preparation of the Local Plan the Council commissioned an

	Edmondson			land for building at Gawthorpe ,and to exchange a parcel of greenbelt land for house building at Hapton.If they are allowed to progress with "special circumstances" for industrial development at Shuttleworth Mead South precedents are being set for future greenbelt erosion . It doesn't take much imagination to forsee a crescent of warehouses blighting our greenbelt landscape from Burnley Bridge to Altham.	<p>Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p>
1336	Ms Eileen Edmondson	Site Allocations	EMP1/13	<p>I have concerns regarding the local-plan proposal to industrialise greenbelt land at Shuttleworth Mead South.</p> <p>The cost of the infrastructure is likely to prove problematic. A new bridge will</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that</p>

			<p>need to be built across the Calder, and a large roundabout at Dean Range .The alternative of a left turn link to the M65 roundabout would prove problematic for employees and goods drivers wishing to go from the site to Padiham,or the Ribble Valley.</p> <p>In addition to this it is unlikely that 9ha of warehousing can fund the infrastructure costs.</p>	<p>between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when</p>
--	--	--	--	---

					<p>climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1335	Mr David Edmondson	Site Allocations	EMP1/13	<p>I am concerned at the retention of the Burnley council planning option to build warehouse units at Shuttleworth Mead South. I feel that the decision to remove over 9 hectares of our greenbelt has only been made because of the council's need to meet an unrealistic employment target, and that if the more feasible medium - range target had been set then our greenbelt could have remained intact. I am also concerned regarding coalescence with neighbouring boroughs. In addition to this there will be serious environmental problems regarding the pollution of fishstocks in the Calder and the area's wildlife habitat.</p> <p>It beggars belief that, in view of the recent flooding, that there are proposals to industrialise the flood plain. This could result in significant downstream problems.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p>

				<p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level fo flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA</p>
--	--	--	--	--



					<p>identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, includin</p>
1399	Gareth Williams	Site Allocations	EMP1/13	<p>I would personally like to object to the proposal of any further building or industrialisation on land on or around Shuttleworth Mead South.</p> <p>There are numerous serious reasons which need to be considered but please let me explain further about some of the most important issues.</p> <p>The land the council wishes to build on is currently greenbelt land, how on earth with all the run down empty buildings and brownfield land in Burnley/Padiham are you even considering building on Greenbelt?</p> <p>Secondly the traffic in the area on a daily basis is already atrocious, how will bringing more traffic to the area possibly be good for Padiham and the surrounding areas? This will simply drive people away from Padiham when you should be concentrating on building new affordable housing on the brownfield land.</p> <p>Thirdly after the boxing day flooding I sincerely hope you have studied the photos and footage of the area which was heavily submerged in water, this will also directly affect the local wildlife and all told simply seems a inexplicable decision to build new industrial units and that area.</p> <p>These are but just a few reasons, I sense there is some very strong opposition</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All</p>

			<p>regarding these new units, remember people of Padiham are proud to live there, we want to build a stronger community not weaken it, we must attract new business to the town centre and new housing to the area as a priority.</p>	<p>of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is</p>
--	--	--	---	---

					<p>lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1175	Mrs Valerie Blackburn	Site Allocations	EMP1/13	I would like to put forward my objection to your proposed plans for the Shuttleworth mead south	Objection Noted.
2410	Lancashire County Council	Site Allocations	EMP1/13	<p>LLFA General comments relating to all 7 sites</p> <ul style="list-style-type: none"> <li>All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>All sites have some susceptibility to surface water and ground water flooding</li> <li>NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> <li>Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are required outside of the planning framework.</li> <li>The district lead officer may wish to add further comments on his return from leave, if time permits.</li> </ul> <p>EMP1/13 Shuttleworth Mead South, Padiham</p> <p>I do not believe we have had any flooding reports for this site or within the vicinity but the district lead officer would be able to confirm this on his return from leave.</p> <p>We support the policy requirement for the site to contribute to any flood alleviation scheme (Policy IC4)</p> <p>See general comments above</p>	<p>Support noted. The site allocation requires any development will need to be accompanied by a Site Specific Flood Risk Assessment in accordance with Policy CC4 and seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and through the provision of an appropriate of sustainable drainage scheme. If the submitted Flood Risk Assessment identifies an adverse impact on Padiham or impacts further down-river as a result of the development, contributions may be sought towards a flood alleviation scheme.</p> <p>Bullet point 1: Noted. This is made clear in Local Plan policy CC4 Development and Flood Risk.</p> <p>Bullet point 2: The site's susceptibility to these sources of flooding has been examined as part of the the Council's Strategic Flood Risk Assessment (SFRA) In the case of this site a more detailed Flood Risk Assessment has been undertaken.</p> <p>Bullet point 3: Noted. Local Plan policy CC5 (Surface Water Management and Sustainable Drainage Systems) sets out this hierarchy and requires it to be followed.</p> <p>Bullet point 4: Noted. Added to policy CC4 para 2: 'Any works affecting ordinary watercourses may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.' A paragraph has been added to the supporting text for this policy outlining the LLFA's Ordinary Watercourse Consenting and Enforcement Policy.</p> <p>Bullet point 5: Noted.</p> <p>Bullet point 6: The LLFA was invited to the SFRA inception</p>

					meeting with consultants and EA.
1131	Mrs Janet Richardson	Site Allocations	EMP1/13	<p>I strongly object to the proposed development on the Shuttleworth Mead South site.</p> <p>This is not only a green belt area, but is also a flood plain, which, is obviously imperative for the town of Padiham.</p> <p>Many of the points promoting this action are based at best on guesses, and at worst, lies.</p> <p>So much would be lost, and nothing gained, except of course, a few people would gain financially.</p> <p>Wildlife would lose out, the environment would lose out, pollution would increase, traffic would increase, and Padiham would be destroyed by constant flooding, as rainfall will increase in the coming years due to the warming of the planet. Fact!</p> <p>If you had a home or business in the surrounding area, and, if the development went ahead, and the consequences were that your home or business was flooded, again, and again, would you feel that your local council had done it's best for you as a tax payer and community tax payer? No! Not to mention the cost to the council for the clean-up.</p> <p>Money would be better spent on increasing flood defences, and in looking after your local community.</p> <p>I have no hesitation in believing that this is just another scheme to make money for developers, I bet I know who would get the contract, no matter how many tenders were put forward.</p> <p>We, the locals aren't stupid, and will be heard.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of</p>

					<p>the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
2367	CPRE	Site Allocations	EMP1/13	<p>Regretfully due to staff holiday absences we lacked capacity to submit a detailed response. However, it would be remiss for me not to highlight that I received a number of emails from local residents who expressed concern over the need to release 9 hectares of land at Shuttleworth Mead South and asked for help to engage with the local plan process. I trust these people did contact you directly to raise their concerns. CPRE shares the opinion that once farmland is developed it is gone for good, with a range of environmental, social and economic adverse consequences, so we hope there can be an alternative option found to releasing</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for</p>

			<p>Green Belt land for warehousing at Shuttleworth Mead South.</p>	<p>the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level fo flood risk in</p>
--	--	--	--	--

					<p>the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, includin</p>
2350	Padiham Town Council	Site Allocations	EMP1/13	<p>Padiham Town Council has asked me to write to you to confirm that it is opposed to the inclusion of the following sites as Preferred Options in the Emerging Local Plan:</p> <p>Eaves Barn Farm Padiham (Offices, Industry, Warehousing).</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing</p>

					<p>and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p>
--	--	--	--	--	--



					<p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
2217	Burnley Wildlife Conservation Forum	Site Allocations	EMP1/13	<p>EMP1/13 Shuttleworth Mead South – Reasons for objection</p> <p>The proposed new development boundary extends beyond the present urban boundary to incorporate this plot of land whilst at the same time removing its present Green Belt status unreasonably because exceptional circumstances do not apply as there are alternative development sites outside the Green Belt. It would increase urban sprawl in to the rural area with the loss of a greenfield site in attractive open countryside which is in active agricultural production.</p> <p>The site is on the River Calder floodplain in flood zone 2 and other alternative development sites are above the flood zone. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Section 41 protection along with Lancashire BAP Long List and key species The site is part of the Lancashire Woodland and Grassland Ecological Network and is within 250 metres of the Shuttleworth Wood Biological Heritage Site which is also an Ancient Woodland Inventory Site.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land</p>

					<p>requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p>
--	--	--	--	--	--

					The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including
1133	Judith Addison	Site Allocations	EMP1/13	<p>I am responding to the Council's Local Plan Consultation in respect of the proposed loss of Green Belt Land at Shuttleworth Mead South to industrialisation.</p> <p>I live in the adjoining Borough of Hyndburn but am a frequent visitor to Padiham as a Volunteer at Gawthorpe Hall. My late father worked in Padiham for a number of years as Company Secretary at Messrs. Raymakers Ltd., velvet manufacturers. He was a keen walker and always took a walk during his lunch-break on the rural fringe of the town.</p> <p>In principle I am opposed to the surrender of Green Belt land to development, whether to industry/employment or housing. As a longstanding member of the Ramblers' Association I have always valued the green spaces on the fringes of our East Lancashire towns which enable people of all ages, including those on low incomes, to enjoy a country walk within easy reach of their homes. Tourists from other parts of the UK are often astounded when they visit Pennine Lancashire and see how much countryside we have right on our doorsteps.</p> <p>As a volunteer Room Guide at Gawthorpe Hall for over seven years I am well aware of the history of the Padiham area, including its industrial past. Open cast coal mining and effluents from the many factories and mills caused the River Calder to become so heavily polluted that in 1816 Robert Shuttleworth had it diverted away from the Hall. It was only brought back to its original course in 1960 when the National Coal Board was reclaiming the land. Now the countryside is green again and the River Calder is clear, adding to the attractiveness of Padiham as a place to live and bring up a family.</p> <p>Our children and grand-children are fortunate to live in this area where they can benefit from the advantages of living in a small town with a close-knit community and also enjoy the beauty of the local countryside. They can observe wildlife, see the fish in the river and have a healthier lifestyle through fresh air and exercise.</p> <p>It would be a pity if Padiham were to return to the grim days of its industrial past by sacrificing some of its precious Green Belt land to industry and employment. Surely the neighbouring Business Parks at Simonstone, Altham and Hapton are</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Mead South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough</p>

				<p>already sufficient for this purpose, plus the smaller "brown field" sites which must become available as old buildings are demolished?</p> <p>Let's preserve Padiham's rural surroundings for future generations so that local residents can continue to enjoy a good quality of life! I ask you to reconsider your proposals re Shuttleworth Mead South and to prioritise the preservation of our local countryside.</p>	<p>boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1154	Mr Granville Barker	Site Allocations	EMP1/13	<p>WHY?? There are more than enough 'Brownfield' sites in the area without destroying our local outstanding beautiful countryside!! There is more to local life</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the</p>

			<p>than “cow towing” to the industrial profit god!! It may, only may bring some local jobs, but the profits would be channelled well outside this area, &amp; you as a council looking after our local amenities should know this.</p> <p>The idea that you are even contemplating destroying this beauty spot is beyond my comprehension!!</p>	<p>amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones</p>
--	--	--	---	---

					<p>1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1164	Sharon Barnsley	Site Allocations	EMP1/13	<p>I strongly object to the loss of greenbelt land to build more unsightly industrial units that are not needed.</p> <p>We have lost enough wildlife habitat recently, There are empty units on the existing site, there is also the new link bridge site, Altham has empty units, and there have been vacant lots on Widow Hill for years.</p> <p>This expansion will increase traffic, there is already a problem at times with traffic backing up at traffic lights at Shuttleworth Mead, and the M65 Roundabout.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected</p>

			<p>Enough is enough, there will be no more local jobs, companies will just move here with the promise of cheap rates, and bring their staff with them.</p>	<p>in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It</p>
--	--	--	--	--

					<p>will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact fo the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, includin</p>
2119	Highways England	Site Allocations	EMP1/13	<p>Highways England is satisfied to see detail regarding land allocations for housing and employment growth presented within the report and welcomes the location of new developments in existing urban areas. It is noted that there do not appear to be any significant additions to the proposed land allocations, with the exception of;</p> <ul style="list-style-type: none"> <li>• Extensions to the west of the existing (approved) Burnley Bridge Industrial Park to the north of Junction 9 (EMP1/12)</li> <li>• Extension of employment allocation to the Burnley Bridge South industrial park to the south of Junction 9 (EMP1/5)</li> <li>• New Employment allocations in Padiham on greenbelt sites that could impact upon Junction 8 (EMP 1/13)</li> </ul> <p>It is our understanding that planning applications have not been submitted for these three schemes. It is important to recognise that the borough's employment sites will need to be assessed for future infrastructure needs, so that the aspirational growth will not compromise local and strategic highway</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact fo the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Blackburn Road/A6068. The assessment concludes that mitigation measure are required at this junction to support the proposed development in the Plan. A mitigation scheme has been developed and tested and Growth Deal funding has been secured from Government to implement the scheme. The scheme is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p> <p>In addition, the potential requirement for planning contributions for highway improvements are included within the site allocation policy.</p>



				performance. In due course, Highways England would expect to see an assessment of the transport implications of each development, so that the impact upon the SRN may be understood.	
1996	Cllr Cosima Towneley	Site Allocations	EMP1/13	<ul style="list-style-type: none"> <li>• These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>• Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>• Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> <li>• Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.
1171	Mr Craig Simpson	Site Allocations	EMP1/13	<p>I write in respect of Burnley Council's 'Local Plan' to further build on 'Green Spaces' such as Shuttleworth Mead South in Padiham amongst other targeted areas for development. Having lived in Burnley all my life I am saddened at the far reaching changes being thrust upon the general public, with seemingly little or no input into the decision making process that adversely impacts on their lives and environment. Over the past few decades we have seen vast changes brought about, our most affordable terraced housing has been demolished and along with it much of our local historic buildings. We have stretched out our Town Centre to Retail Parks, yet we wonder why the heart of Burnley is dying and businesses are struggling etc. It seems we've knocked lots of houses down in recent times only to be told our population is dwindling and we have no need of them anymore, we've demolished schools only to build new schools (with no pupils).....and suddenly, we wish to build New Houses &amp; New Industrial Buildings all over the place for this vanishing population. Nobody seems to be able to answer where all these folk are coming from for the New Houses or the New Factories. Why are we attempting to expand Burnley, why are we attempting to increase the population when we do not seem able to cherish and nurture what we have already ?</p> <p>In recent years I have looked on in horror as the one decent thing we have diminishes, our enveloping countryside is slowly being devoured by 'Industry' like never before. At the height of the 'Industrial Revolution' they never sought to erode the 'Countryside' like we appear to be doing today. At the top of Manchester Road you used to see nothing but fields as you looked across to the Trough of Bowland.....Now you'd be forgiven for missing any 'Greenbelt' as Rossendale Road, Network 65, the Burnley Bridge Business Park, Shuttleworth Mead &amp; Altham merge into one. More recently we have seen the construction of a large 'Industrial Building' erected on a flood plain directly</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put</p>

			<p>opposite Gawthorpe Hall and plans afoot to expand 'Crow Wood Leisure' .....where do we draw the line ?</p> <p>As a resident of some 55 years in Burnley I resent the whole idea of building on Green Spaces that enhance everyone's quality of life. This 'Local Plan' initiative should not involve building on any 'Green Spaces', the loss of valuable community assets such as the Countryside, once lost will be lost forever. I implore all those involved in 'Local Plan' to re-think what they are doing, we the general public rely on those in positions of responsibility locally to get things right on our behalf. Jobs matter, but the landscape that surrounds us does too. If we concentrate on utilising every derelict piece of land within our Town, make every empty building a precious commodity, then we have no need to plough up our beautiful Countryside. Our landscape is the only thing that we have, please do not tear it up, it's the one single thing that makes living in Burnley worthwhile. For those who's decision it is, do right by the people of Burnley &amp; Padiham and safeguard that which we cherish for the generations to come.</p>	<p>forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribblesdale is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council</p>
--	--	--	---	---

					has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, includin
1184	Jade Bradley	Site Allocations	EMP1/13	<p>I AM STRONGLY AGAINST ANY PLANNING PROPOSED OF OUR GREENBELT LAND IN PADIHAM!</p> <p>Myself and my family regularly use this land to go walking and purchased our property for this reason. Views from our property have already been compromised due to the eyesore already built. I believe you are not only disregarding residents currently living in the area and putting their properties at risk. My property had a near miss on being flooded in December and any loss to flood plains is only going to make the situation worse.</p> <p>The residents of padihams views must be taken into consideration!</p>	<p>Whilst the council sympathises with residents who may lose a view from their property over open space, the right to an open view over someone else's land is not a material planning consideration, and thus cannot be taken into account when assessing the suitability of a site. Even with development, there will be opportunities for walking both on and around the site as the site allocation policy requires new walking and cycling routes to be provided on the site, connecting the new development to the existing route network.</p> <p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land</p>

					<p>requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying</p>
1926	Eric Broadbelt & Carol Broadbelt	Site Allocations	EMP1/13	We wish to register our objection to the proposed industrialisation of green belt land situated at Shuttleworth Mead South.	In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan

			<p>As business owners affected by the Boxing Day flooding in Padiham, we are very much aware of the impact of building on flood plains and we feel it would be extremely dangerous to the community of Padiham to even consider further development in this area. We have spent months and months looking at why Padiham was hit so hard by the flooding and remain convinced one of the key reasons was reduction in the opportunity for the river water to drain away naturally - please, please do not allow this development to proceed.</p> <p>The greenbelt is a vital community leisure facility, wildlife will be adversely affected, there will be a loss of grazing for livestock, and there would be increased environmental pollution - please do not let this happen</p>	<p>period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified</p>
--	--	--	---	---

					<p>potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1872	Mrs Kathleen Askew and Mr Mark Askew	Site Allocations	EMP1/13	<p>The proposal to remove Site EMP1/13 Shuttleworth Mead South from the Green Belt as stated at paragraph 4.7.14.</p> <p>The need for using Green Belt land is not necessary. The council's Green Belt Review said that this part of the Green Belt still performs its original purpose of stopping urban coalescence, so it is still required as Green Belt. The development of Shuttleworth Mead South, together with all the highway improvements, will join Shuttleworth Mead with Simonstone Business Park and Altham so it is bound to take Green Belt land no matter what the council says.</p> <p>[Object to] The proposal to allocate Site EMP1/13 Shuttleworth Mead South for industrial and warehouse/distribution use.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p>

			<p>This land is needed as Green Belt and is not needed for development. There is enough industrial land and warehousing in the area. There is no need for EMP1/13 and Shuttleworth Mead South does not pass the test of being, 'available, accessible and developable' . The works that would be needed to access and leave Shuttleworth Mead South would be enormous, expensive and would require major improvements to the surrounding roads etc. In particular the offsite works, which I understand would involve the construction of a large roundabout, which will involve land purchase. Given the recent floods in Padiham the consequent Flood Risk Assessment studies that would be needed would not be viable in the available time frame.</p>	<p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level fo flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to</p>
--	--	--	---	---

					<p>assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1748	Ribble Property Developments	Site Allocations	EMP1/13	<p>RPD owns the site identified as Shuttleworth Mead South and has previously submitted representations to BBC as part of the Issues and Options stage of the Local Plan. The site is proposed to be allocated (Policy EMP1/13) for industrial and warehousing development in the emerging Burnley Local Plan.</p> <p>The site represents a unique opportunity to attract investment, provide job opportunities and harness the future growth and development of the already successful Shuttleworth Mead Industrial Estate. Shuttleworth Mead South forms a logical extension to the existing industrial estate, would capitalise on existing infrastructure and can form a sustainable employment site which can be developed without significant impacts given its location and nature.</p> <p>RPD wholly supports BBC's decision to identify the site as a new employment allocation for B2 and B8 uses, but suggest that the allocation also includes ancillary B1 and employment uses which fall within this Use Class.</p> <p>This representation provides further, more detailed comments on Policy EMP1/13 which proposed to allocate the site and comments on the key employment and growth strategy policies.</p>	<p>Support noted.</p> <p>Mitigation measures in relation to development on this site can be accommodated within the site boundary proposed within the site allocation or just outside it as proposed in the map submitted by the land owners. The mitigation measures do not require the release of additional Green Belt land.</p> <p>The Policy Requirements and Design Principles in the site allocation policy have been amended to include some of the suggested alterations.</p>



			<p>The site extends to 12.7Ha and could potentially accommodate around 33,000sqm (355,000sqft) of industrial and / or warehousing development. This could generate between 347 - 471 new jobs, which are in addition to job opportunities associated with the construction of the new units (Source: HCA November 2015).</p> <p>We note that the area proposed for mitigation on site (as shown on the masterplan enclosed) has been excluded from the red line shown by BBC for the allocation. This area should be retained within the extent of the allocation to ensure that mitigation can be met on site when a planning application is submitted. The measures set out in the draft policy will ensure that BBC retains ultimate control over how the site is brought forward to ensure suitable landscaping mitigation is delivered.</p> <p>RPD acknowledges the Policy Requirements set out for Policy EMP1/13. However, the following amendments should be made to the proposed policy in order to ensure that policy is positively prepared, justified, effective and consistent with national policy as set out within paragraph 182 of the NPPF.</p> <p>This site is located to the south of the existing Shuttleworth Mead Business Park and would be suitable for B2 and B8 uses [add: as well as ancillary B1 and employment related uses]</p> <p>Policy Requirements and Design Principles</p> <ol style="list-style-type: none"> <li>1. A high quality scheme will be expected with attention paid to the design and massing of buildings, [remove: particularly adjacent to the public vantage points along the A6068 and River Calder. Buildings fronting the River Calder and A6068 are expected to incorporate natural materials such as local stone ] [add: taking into consideration the setting of the site within the local area]. The majority of the site is identified within Flood Zone 2. Any development will need to be accompanied by a Flood Risk Assessment in accordance with Policy CC4 and seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and through the provision of an appropriate of sustainable drainage scheme.</li> <li>2. [Add: If the submitted Flood Risk Assessment identifies an adverse impact on Padiham as a result of the proposal], [Remove: Any development will need to provide] contributions [add: may be sought] towards a flood alleviation scheme in Padiham, [add: subject to viability].</li> </ol>	
--	--	--	---	--

				<p>3. [Add: Following the agreement of an appropriate vehicular access to the site, a Transport Assessment will be required for any proposed development.] Contributions for off-site highway and junction improvements in accordance with policy IC54 [replace IC5 with IC4] will be [remove: expected] [add: sought if the submitted Transport Assessment demonstrates there will be a significant adverse impact on traffic flows] to ensure the existing road network ca</p>	
1813	Joanne Vickers	Site Allocations	EMP1/13	<p>I am appalled to hear today from one of my neighbours of the plans that Burnley BC have regarding more development to extend Shuttleworth mead into the greenbelt area. Surely this is why there is a distinction between, greenbelt, brownbelt land ?? Why is this even being considered on Greenbelt land? Apart from the fact of the increased level of traffic, this area is already extremely overburdened. There are already proposals for another 100 more units near Time industrial estate.</p> <p>I bought this property in 1997 and at no point have I been told, in writing, about these proposals. I bought this property for its view. I also rent a piece of land from LCC (also since 1997) to which I am being told that this may be taken off me to produce a roundabout. This means that I can no longer use my property to the extent that I currently use it for, which is to run my dogs on this land. The property prices will plummet, who will compensate us for this ? These proposals will affect me the most.</p>	<p>Whilst the council sympathises with residents who may lose a view from their property over open space, the right to an open view over someone else's land is not a material planning consideration, and thus cannot be taken into account when assessing the suitability of a site. Even with development, there will be opportunities for walking both on and around the site as the site allocation policy requires new walking and cycling routes to be provided on the site, connecting the new development to the existing route network.</p> <p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith</p>

					<p>the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying</p>
1198	Barbara Smith	Site Allocations	EMP1/13	I want you to note my objections to the above development.	In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the

			<p>I feel that a full traffic impact study should have been undertaken to ascertain the full impact on local traffic especially at rush hour periods when local traffic is heavy enough at the moment. Without this people are being asked to comment on a proposal without having knowing the full impact of the development. Also I believe that a Flood Risk Assessment is required as is a full Ecology Study of the area. Because of the complexity of issues these should be undertaken prior to allocating the site in the Plan. I feel that these plans are being rushed through with complete disregard to the above and the concerns of local residents.</p> <p>I understand that there are numerous issues and problems in developing the site that have been previously stated over the last two years but these seem to be being ignored and disregarded by the council.</p>	<p>amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>All sites included in the Plan have been subject to a Desk Top Ecology Assessment and a Protected Species Survey. Development proposals will need to consider the potential</p>
--	--	--	---	--

					<p>ecological impacts. An ecological survey will be required to accompany any planning application identifying how the development would manage the Protected Species and Ecological Networks would be addressed in accordance with Policy NE1. In addition, landscaping scheme will be required which should include provision for new tree planting, adjacent to the River Calder along with the retention of the established trees adjacent to the River Calder and A6068. Additional screen planting will be expected to the south and east of the site.</p>
1805	Mr Maurice Duckworth	Site Allocations	EMP1/13	<p>Acceptance of the plan would not only remove significant green belt land but would also increase traffic congestion at the junction of the A6068 and Blackburn road at a junction that already sees traffic backed up to the M65 on numerous occasions and traffic backed up on all roads that feed into the same junction.</p>	<p>Paragraph 159 of the NPPF requires that councils “prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about availability, suitability and likely economic viability of land to meet the identified housing need over the plan period.” These assessments are known as SHLAAs. Paragraph of the NPPF 161 goes on to say that “Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.”</p> <p>The Government’s National Planning Practice Guidance sets out a methodology for undertaking SHLAAs. The Council has undertaken a combined Strategic Housing and Employment Land Availability Assessment in line with this methodology but has still called this the SHLAA for ease of reference. The SHLAA assessed all sites put forward for potential development or identified from what are known as ‘desk top’ sources. All were assessed for their availability, suitability and achievability. Those that pass all three tests are classed as ‘developable’. The SHLAA found that there were not sufficient developable employment sites outwith the Green Belt to meet the proposed employment land requirement set out in Policy SP3. In line with the SHLAA methodology therefore, the three Green Belt sites that had been put forward were reassessed. National policy is clear that Green Belt boundaries should only be reviewed in ‘exceptional circumstances’ and a lack of developable for employment or housing is one such circumstance which needs to be explored. The Council therefore undertook Green Belt Review to assess the importance land to the purposes and fundamental aim of the green belt and on balance the</p>

					<p>Council considers that two of these sites should be allocated for employment use.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Blackburn Road/A6068. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. A mitigation scheme has been developed and tested and Growth Deal funding has been secured from Government to implement the scheme. The scheme is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan.</p>
1619	Nesta Lynskey	Site Allocations	EMP1/13	<p>1 Problematic flooding further down the valley</p> <p>2 Expensive bridging work over the River Calder and changes to the road layout to alleviate added vehicular congestion</p> <p>3 Additional warehouse type buildings offering very few blue collar jobs, not the vision of white collar prestigious employment</p> <p>4 The loss of Padiham and Altham as separate entities which loss of greenbelt would allow</p> <p>5 Greenbelt land should only be released under exceptional circumstances</p> <p>6 Ecology, changing of the wetland characteristics</p> <p>7 Currently all the industrial/business parks in this corridor have available empty units</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith</p>

					<p>the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for</p>
--	--	--	--	--	--

					<p>the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1787	Whalley Parish Council	Site Allocations	EMP1/13	<p>Whalley Parish Council expresses concern to build warehouse units at Shuttleworth Mead South.</p> <p>This proposal is to build over 9 hectares of the River Calder flood plain. As a neighbouring authority this plan will have a negative impact on Whalley. The December 2015 floods which caused unparalleled chaos to the village was a result of the Calder breaking its banks.</p> <p>During the last few years the village has experienced two "once in a hundred year" flooding disasters. A decision to build on the flood plain which is a natural water containment area will only make the reoccurrence of the floods more likely.</p> <p>The Parish Council are of the firm opinion that these proposals outlined in your plan, which directly impacts on residents downstream, are scrutinized by the Lancashire Flood Authority and their recommendations followed.</p>	<p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p>
1653	Craig Mortimer	Site Allocations	EMP1/13	<p>This proposal is ridiculous and will be another major eyesore in Burnley and Padiham</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the</p>



					<p>realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level fo flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought</p>
--	--	--	--	--	---

					<p>towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1169	Simonstone Parish Council	Site Allocations	EMP1/13	<p>The Parish Council is opposed to the development of land at Shuttleworth Mead South site(9.27 hectares) EMP1/13. This site has been put forward as a preferred option for B2 and B8 use (industrial/warehousing development) in the Burnley Local Plan - Preferred Option.</p> <p>The Development of this site would cause the loss of important green belt. The A6068 is heavily congested on most days and to allow this development would have a serious impact on the flow of traffic both through Simonstone and Clayton le moors as transport heading south from Ribble Valley heads for the motorways. Should access be allowed from the A6068 to the site this would cause major disruptions to the flow of traffic on the M65. Even now there are often queues of traffic on the M65 in both directions waiting the use the junction either heading north or south.</p> <p>The A6068 is also on the main tourist routes to north east Lancashire and north western Yorkshire from both the Greater Manchester area and central west Yorkshire if the site was to be developed it would cause the industrial area into Calder Valley to extend from Blackburn to Colne and would be one elongated industrial belt without break. This would have a detrimental effect on tourism which plays an increasingly important role in employment for the northern central areas of the country. For over forty years this gap has been an important role in being a conduit both for Flora and Fauna as well as Human economic traffic. It has been suggested that there could be an alternative to allowing access to and</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA</p>

			<p>from the site constructed on the A6068 but with a no right turn allowed leaving or accessing the site. This suggestion would require traffic wishing to enter the site when coming off the motorway to have to travel down to Shuttleworth Meade before it could find a turning place. Possibly a large roundabout would have to be created to allow the HGVs to turn round. Another suggestion which has been made is that traffic would have to turn in within the Shuttleworth Meade Business Park. To do this there would be a loss of industrial land which would reduce the amount of industrial land available in the District.</p> <p>Due to the proximity of the Ribble Calder and the fact that the lower part of the proposed area contributes to the flood alleviation both above and below the site to add an industrial site would have a serious impact of increased speed run water off into the drainage system and ultimately the Calder. There would be little chance of the polluted water going through the filter systems that would, one would assume, be installed as part of any Planning requirement should the site be developed. At times of heavy downpours we are now regularly hearing of rainfalls in excess to 50mm a day and the filter system being overwhelmed causing the downstream to be polluted. You will be aware that this was a major issue for Padiham, Simonstone/Altham and Whalley during the recent floods.</p> <p>Government planning guidance states that development on green belt land should only be considered if it can be categorically proved that there is no alternative. The Burnley Local Plan clearly shows that there are other options. Over provision of green field sites encourages more warehouse and similar uses that only provide a few jobs at the expense of the loss of East Lancashire's landscape and green belt.</p> <p>It is indeed sad that the low aspirations shown in the employment proposals appear to perpetuate a low wage, low value economy. This is clearly contrary to the Plans stated vision and aims.</p> <p>The award winning Padiham Greenway and its extension through Simonstone will also be threatened as the completion of this section of the Greenway will form an important link in the National Tourist Route for Walkers and Cyclist once completed and will complete the a missing link in the National Cycle way in this area. The above are the primary strategic reasons of the objection, therefore, Simonstone Parish Council reserve the ri</p>	<p>found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation,</p>
--	--	--	---	--

					<p>which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact for the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including</p>
1822	Padiham Community Action	Site Allocations	EMP1/13	<p><b>#1</b>  We strongly object to proposals to industrialise greenbelt land at Shuttleworth Mead South..The following list has been indicated by our members:  The greenbelt land is Padiham’s heritage. This is currently in use farming land that will be lost forever. In addition to this the designated area is a flood plain and unsuitable for industrial development.</p> <p>The greenbelt is a public amenity, with rural views ,and open countryside. Children and adults have a stake in this environment.Our members are also concerned for the environment and wildlife habitat. In addition to this there is concern that industrialisation will produce an urban corridor, with units that are a blot on our landscape. The urban sprawl will also lead to coalescence with Hyndburn and the Ribble Valley just yards away.  All of the above points indicate that Padiham will become unattractive to visitors, and also not attract people to live here.  Our members have also questioned if this greenbelt land is needed for industrialisation .There is concern that the jobs created will be low skilled and low waged and not lift Padiham from deprivation.  We consider that the draft local plan and the council’s Greenbelt survey do not make a compelling reason for the inclusion of Shuttleworth South in the local plan.Key issues fail to be addressed: how the site will attract higher-paid employment,how the borough’s landscape will be protected,any of the environment key issues,and how the larger B8 units can be assimilated into the landscape.</p> <p><b>#2</b>  PCA objects to the proposal to remove Site EMP1/13 (Shuttleworth Mead South) from the Green Belt as stated at paragraph 4.7.14 of the Priority Options Document.</p> <p>The need for Green Belt land has not been sufficiently proven and the 'exceptional circumstances' argument is not justified. The councils Green Belt Review concluded that this part of the Green Belt still performs its original</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employment needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct</p>

			<p>purpose of stopping urban coalescence. Therefore, it is still required as Green Belt.</p> <p>Development of Shuttleworth Mead South, together with the required substantial highway improvements, will join Shuttleworth Mead with Simonstone Business Park and Altham. Urban coalescence will be achieved by default. We do not accept that the remaining Green Belt in this area will not be compromised as claimed.</p> <p>As stated above we are of the opinion that the land is not needed for employment but the Green Belt Review makes it clear that it is needed to fulfil the function and aims of the Green Belt.</p> <p>We have already shown that this land is needed as Green Belt and is not needed for development. We have demonstrated that there is significant variation, and therefore flexibility, in the employment projections to justify removing EMP1/13 from the Plan. We have demonstrated that 'exceptional circumstances' cannot be justified as a reason to circumvent the rules preventing development of the Green Belt.</p> <p>There is no need for EMP1/13 and Shuttleworth Mead South does not pass the test of being, 'available, accessible and developable'. In particular the works required to access and leave Shuttleworth Mead South are substantial, expensive and require major improvements to the surrounding road network. In particular the off-site works, which we understand will involve construction of a large roundabout will require land purchase that may not be achievable within the time frame of the Plan.</p> <p>The developer will be required to provide financial contributions to the cost of the highway improvements and as stated at page 121 to the costs of 'a flood alleviation scheme in Padiham', off-site cycling route, etc. There is too much uncertainty about the viability of and timescale of the development for this site to be included in the Plan.</p> <p>A full traffic impact study should have been undertaken. Without this people are being asked to comment on a proposal without knowing the full impact of the development. In addition a Flood Risk Assessment is required as is</p>	<p>boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribbles Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b (functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, includin</p>
--	--	--	---	--

1262	Graham Cottam	Site Allocations	EMP1/13 (& any other loss of greenbelt)	<p>#1 Dear sir, i am writing to object to the proposed industrialisation of our much loved greenbelt, on shuttleworth mead south. This like all other areas of greenbelt is a place of beauty that should be left alone for future generations to also enjoy.</p> <p>#2 I have already sent a email in with my objection to proposals for industrialisation of our much loved greenbelt, on Shuttleworth Mead South and any greenbelt land that is under threat.</p> <p>I did not provide my address (supplied).</p> <p>My objection and reason for why I am against any industrialisation of our much loved greenbelt within the borough of Padiham and Burnley and the surrounding area is, its beauty for my generation and future generations. So they are able to walk in and admire the beautiful area that is a haven for wildlife.</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites, including Shuttleworth Meade South, should be allocated for employment use. The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs.</p> <p>The site lies within Flood Zones 1 and 2 with a small area of the site in Zone 3a. No part of the site is within Zone 3b</p>
------	---------------	------------------	---	--	--

					<p>(functional floodplain). Uses being considered for the site are classed as "less vulnerable" and appropriate on Flood Zones 1, 2 and 3a. The Council's Level 2 SFRA has identified potential depths of flooding across the site, particularly when climate change is taken into account. Any development proposals for the site will need to be accompanied by a site specific Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5. The FRA will need to include breach and overtopping assessments in relation to the EA embankment to demonstrate safe development. It will also need to include a detailed drainage assessment to assess and manage surface water flood risk. If the FRA identifies potential impacts for any development on flood risk either on site or elsewhere, contributions may be sought towards flood alleviation measures in accordance with Policy IC4.</p> <p>The site is located to the South of the existing Shuttleworth Meade Business Park. The existing business park, along with the lower lying topography of the proposed site, screens the site from view from Blackburn Road. In addition, the site is lower lying when compared with the A6068 and M65, with the site screened by existing earth mounds and vegetation, which must be retained on site. Any planning application for the site must include a landscaping scheme.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment development identified in the Local Plan Preferred Option on both the Strategic and Local Road Net</p>
1358	Environment Agency	Site Allocations	EMP1/14	Due to past uses we would recommend that a "Land contamination investigation and the relevant remediation will be required in accordance with Policy NE5".	Comment noted, this point will be added to policy EMP1/14
1595	Lancashire Wildlife Trust	Site Allocations	EMP1/14	The Trust notes the proximity of the site to the Oswald Street Biological Heritage Site (BHS) and that it may support Protected Species and is identified within the Lancashire Ecological Networks for woodland and grassland. The Trust is pleased to see, and supports, the requirement that ecological survey will be required to accompany any planning application identifying how the development would manage any protected species present. However, the ecological survey needs to identify and address the issues in accordance with Policy NE1, as is required in	Comment noted. Reference to Policy NE1 has been included within the site allocation policy. The site is not directly adjacent or related to the BHS and is also not in the same ownership, therefore, the site allocation cannot require/contribute towards the positive management of the BHS.

				the Policy Requirement and Design Principles for Housing Allocations (Policy HS1). Furthermore, if/when the site was developed, a requirement to secure the positive management of the BHS should be investigated in order to contribute to the indicators for NE1 Biodiversity and Ecological Networks in Table 10 on page 207.	
1265	Cllr Cosima Towneley	Site Allocations	EMP1/14	<ul style="list-style-type: none"> <li>• These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>• Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>• Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> <li>• Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.
1704	Pennine Lancashire Community Farm	Site Allocations	EMP1/14	<p>Re EMP1/14 Stoneyholme Gas Works we welcome this overall development but would suggest the following actions:</p> <ul style="list-style-type: none"> <li>• More specific and diverse consultation is required with the local community prior to any development of traveller's site.</li> <li>• Re-investigate the possibility of development of community orchard / forestry area in respect to the interconnected associated land.</li> </ul>	Support for Employment site noted. Comments on Traveller site responded to separately
1586	Lancashire Wildlife Trust	Site Allocations	EMP1/2	The Trust notes the presence of neutral grassland and trees/shrubs on the site. The Trust is pleased to see, and supports, the principle that an ecological survey should be submitted to accompany any planning application which details how any impacts on Protected Species or other Lancashire Biodiversity Action Plan species would be managed. However, the ecological survey needs to identify and address the issues in accordance with Policy NE1, as is required in the Policy Requirement and Design Principles for Housing Allocations (Policy HS1).	Comment noted. The site allocation makes reference to policy NE1.
1372	The Eshton Group	Site Allocations	EMP1/2	<p>I am writing in connection with the aforementioned Local Plan Consultation. Background.</p> <p>This letter of representation has been prepared on behalf of our clients, The Eshton Group who presently are the owners and developers of Burnley Bridge Business Park. The Eshton Group also have an interest in land to the South of Network 65.</p> <p>This representation is focussed therefore on two specific sites, the proposed expansion of Burnley Bridge Business Park, and also land to the south of Network 65 which is positioned off Accrington Road, to the west of the Town Centre.</p> <p>This Representation offers support to the Consultation on Preferred Options in</p>	In relation to EMP1/2, the site owners relenquished the residential aspect of the original permission (as stated in planning application APP/2016/0401), therefore, there is no reason to include reference to this in the site allocation. The ridge height in question is only applicable on the northern site of Burnley Bridge in order to protect the residential amenity of the properties to the north of the site. No ridge height has been included on the remainder of the site. The site allocation identifies the site as an area of potential and opportunity for green infrastructure on site and could be accommodated in the site landscaping that will be required.



			<p>respect of specific allocations of EMP 1/2 Burnley Bridge, EMP 1/5 Land to the South of Network 65 and EMP 1/12 Burnley Bridge Extension.</p> <p>It is proposed however that changes are made in order to ensure that the development of these sites can be delivered in line with the aspirations of the Local Planning Authority in respect of making Burnley a location of choice in 2032.</p> <p>Burnley Bridge Business Park is positioned at Junction 9 of the M65, and has provided a significant opportunity for the delivery of high quality, much needed employment floor space within the heart of the Burnley District.</p> <p>Burnley Bridge Business Park is an extant allocation and the Adopted Burnley Local Plan referenced the site as follows;</p> <p>This site, suitable for business (B1), general industrial (B2) and warehousing (BB) uses, is a major brownfield redevelopment opportunity which would bring currently contaminated land back into use. There is potential to improve access from the site to the M65 making this a highly accessible location. The Council will work in partnership with the North West Development Agency (NWDA), the private sector and other partners to bring this site forward. An ecological survey of the site will be required to accompany any planning application. Should any mitigation measures be identified in such a report they will be a condition of any planning approval. A development brief will be prepared for this site.</p> <p>The Eshton Group have been successful in delivering a bridged connection to Junction 9 of the M65 which has resulted in the development of the Burnley Bridge site being brought forward. The development of this site is widely seen as being a major success story in attracting major occupiers, investors and employers to Burnley.</p> <p>The site has been exceptionally well received, and has resulted in the delivery of a significant level of inward investment into the District.</p> <p>The bridge link connection to the motorway, over the Leeds to Liverpool Canal and delivered by The Eshton Group has been held to be a fundamental aim of the Local Authority. The connectivity of the site to the motorway now means that the site is unrivalled in its accessibility to Burnley, Blackburn, Manchester and West and North Yorkshire.</p> <p>Given the location of the site, its connectivity to the wider area and the amount of development that is to be delivered in the short term it is considered wholly appropriate to support the need for additional land adjacent to the extant allocation.</p> <p>As a result of the high demand for space on the Burnley Bridge Business Park, The Eshton Group have sought to promote the future expansion of the space available to potential investors and occupiers. On that basis representations have been submitted to the Local Planning Authority throughout the Local Plan process.</p>	
--	--	--	--	--

				<p>Accordingly, following consideration, the Local Planning Authority has sought to identify the proposed expansion of Burnley Bridge as a Preferred Option. The map above is taken from the Local Plan Preferred Sites Consultation which notes the area to which the Council is proposing to allocate.</p> <p>The Burnley Bridge Extension site is located within the Green Belt, and therefore for the land to be allocated the Local Planning Authority are proposing to remove the allocation from the Green Belt.</p> <p>It is accepted that the</p>	
1352	Environment Agency	Site Allocations	EMP1/2	<p>We would recommend that, as with other potentially contaminated sites, the following is included in Supporting Information, "Land contamination investigation and the relevant remediation will be required in accordance with Policy NE5".</p>	Comment noted. Reference has been made to land contamination investigations within the policy.
1608	Lancashire Wildlife Trust	Site Allocations	EMP1/2	<p>The Trust notes the presence of neutral grassland and trees/shrubs on the site. The Trust is pleased to see, and supports, the principle that an ecological survey should be submitted to accompany any planning application which details how any impacts on Protected Species or other Lancashire Biodiversity Action Plan species would be managed. However, the ecological survey needs to identify and address the issues in accordance with Policy NE1, as is required in the Policy Requirement and Design Principles for Housing Allocations (Policy HS1).</p>	Comment noted. The site allocation makes reference to policy NE1.
1964	Canal & River Trust	Site Allocations	EMP1/2	<p>EMP1/2</p> <p>The Trust have commented on several applications for this site, part of which is now being developed. We welcome that the policy requirements and design principles for the site incorporate our comments, especially in relation to maintaining a strong landscaped buffer strip between the site and the canal.</p>	Comment noted.
1778	University of Central Lancashire	Site Allocations	EMP1/3	<p>UCLan generally support the proposed Vision Park allocation for employment uses on land close to the UCLan Burnley Campus. However, it is considered that this allocation should make the most of its location adjacent to the UCLan and Burnley College Campus. As such, UCLan recommend that the allocation specifically supports and promotes employment uses that are complementary to the educational uses at UCLan's Burnley Campus. This could include the promotion and delivery of small scale business starter units on the site that are aimed at providing facilities for existing students and graduates to start their own business.</p> <p>As it is understood that 'Site A' already benefits from planning permission, this reference to small scale start up employment facilities could focus upon Sites B and/or C.</p> <p>UCLan consider this to be a suitable option for the site as it will help to build upon the success of UCLan's Northern Lights – Burnley business incubation unit, located within the Burnley Campus, by providing new businesses based at the incubation unit space to expand within Burnley. This will help to retain graduates within the borough and also help to achieve Local Plan objective 10, which seeks</p>	Comments noted.

				to establish Burnley as a centre for educational excellence.	
1353	Environment Agency	Site Allocations	EMP1/3	The site is bisected by the River Calder, a main river. Any development within our 8m easement (measured from the top of each river bank) may require an Environmental Permit for flood risk activities. We would recommend that The Policy Requirements and Design Principles are amended to reflect this. We would recommend that the developer engages with the Environment Agency at the earliest opportunity.	Comment noted. The requirement for an 8 metre easement around the River Calder has been included within the site policy.
1703	Pennine Lancashire Community Farm	Site Allocations	EMP1/3	Re EMP1/3 Vision Park we would suggest this was more feasible development in respect to the development of the redundant playing field which is less connected to the local community.	Support noted.
2408	Lancashire County Council	Site Allocations	EMP1/3	<p>LLFA General comments relating to all 7 sites</p> <ul style="list-style-type: none"> <li>All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>All sites have some susceptibility to surface water and ground water flooding</li> <li>NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> <li>Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are required outside of the planning framework.</li> <li>The district lead officer may wish to add further comments on his return from leave, if time permits.</li> </ul> <p>EMP1/3 Vison Park Stoneyholme Burnley I do not believe we have had any flooding reports for this site or within the vicinity but the district lead officer would be able to confirm this on his return from leave. There are culverts relating to the road crossings in the vicinity. See general comments above</p>	<p>Support for EA comments in relation to this site is noted. Part of the site is identified within Flood Zone 2. Any development will need to be accompanied by a Flood Risk Assessment in accordance with Policy CC4 and seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and through the provision of an appropriate sustainable drainage scheme.</p> <p>Bullet point 1: Noted. This is made clear in Local Plan policy CC4 Development and Flood Risk.</p> <p>Bullet point 2: The site's susceptibility to these sources of flooding has been examined as part of the the Council's Strategic Flood Risk Assessment (SFRA) In the case of this site a more detailed Flood Risk Assessment has been undertaken.</p> <p>Bullet point 3: Noted. Local Plan policy CC5 (Surface Water Management and Sustainable Drainage Systems) sets out this hierarchy and requires it to be followed.</p> <p>Bullet point 4: Noted. Added to policy CC4 para 2: 'Any works affecting ordinary watercourses may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.' A paragraph has been added to the supporting text for this policy outlining the LLFA's Ordinary Watercourse Consenting and Enforcement Policy.</p> <p>Bullet point 5: Noted.</p> <p>Bullet point 6: The LLFA was invited to the SFRA inception meeting with consultants and EA.</p> <p>Site specific comments: Noted.</p>
1587	Lancashire Wildlife Trust	Site Allocations	EMP1/3	The Trust notes the presence of broadleaved woodland and trees/shrubs on the site. The Trust is pleased to see that potential ecological impacts will need to be	Comments noted. Reference to policy NE1 has been included within the site allocation policy. An ecological survey will be

				considered as the site is known to house protected species. The Trust is pleased to see, and supports, the principle that an ecological survey will be submitted as part of any planning application which identifies how any development would manage the protected species. However, the ecological survey needs to identify and address the issues in accordance with Policy NE1, as is required in the Policy Requirement and Design Principles for Housing Allocations (Policy HS1). The issues at Vision Park include the broadleaved woodland and trees/shrubs on the site.	required to accompany any planning application which identifies how any development would address Protected Species and Priority Habitats in accordance with Policy NE1.
1273	Clr Cosima Towneley	Site Allocations	EMP1/3	<ul style="list-style-type: none"> <li>• These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>• Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>• Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> <li>• Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.
1991	Clr Cosima Towneley	Site Allocations	EMP1/4	<ul style="list-style-type: none"> <li>• These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>• Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>• Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> <li>• Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.
1588	Lancashire Wildlife Trust	Site Allocations	EMP1/4	The Trust objects to the allocation of this site for development. The site is known to house Protected Species and other Lancashire BAP Species. The Trust cannot see how mitigation measures can be delivered on site and additional off-site compensation would be required. However, the development of other plots of land on the larger Heasandford Industrial Estate have failed consistently to deliver compensation for net losses in biodiversity in terms of the area of semi-natural habitat and species composition.	Objection noted. Policy NE1 states where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences. For protected and priority species, the first preference is to avoid disturbance, the second to provide suitable inter-connecting new habitats for these species within the development site. If this is not feasible, suitable alternative habitats should be provided such that there is no net loss of biodiversity. For priority

					habitats, where practicable, areas of suitable habitats should be retained, enhanced or created within the development site or, suitable alternative habitats provided elsewhere. If this is not feasible, contributions towards or the provision habitat creation or improvement elsewhere may be required. Where for reasons of viability this is not possible, the benefits of the development should clearly outweigh the loss of the habitat concerned.
2409	Lancashire County Council	Site Allocations	EMP1/5	<p>LLFA General comments relating to all 7 sites</p> <ul style="list-style-type: none"> <li>All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>All sites have some susceptibility to surface water and ground water flooding</li> <li>NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> <li>Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are required outside of the planning framework.</li> <li>The district lead officer may wish to add further comments on his return from leave, if time permits.</li> </ul> <p>EMP1/5 Land South of Network 65</p> <p>I do not believe we have had any flooding reports for this site or within the vicinity but the district lead officer would be able to confirm this on his return from leave.</p> <p>The surface water susceptibility is in the area of Old Barn Cottage and Old Barn and also from the ordinary watercourse named as Hapton Clough.</p> <p>See general comments above</p>	<p>Bullet point 1: Noted. This is made clear in Local Plan policy CC4 Development and Flood Risk.</p> <p>Bullet point 2: The site's susceptibility to these sources of flooding has been examined as part of the the Council's Strategic Flood Risk Assessment (SFRA) In the case of this site a more detailed Flood Risk Assessment has been undertaken.</p> <p>Bullet point 3: Noted. Local Plan policy CC5 (Surface Water Management and Sustainable Drainage Systems) sets out this hierarchy and requires it to be followed.</p> <p>Bullet point 4: Noted. Added to policy CC4 para 2: 'Any works affecting ordinary watercourses may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.' A paragraph has been added to the supporting text for this policy outlining the LLFA's Ordinary Watercourse Consenting and Enforcement Policy.</p> <p>Bullet point 5: Noted.</p> <p>Bullet point 6: The LLFA was invited to the SFRA inception meeting with consultants and EA.</p> <p>Site specific comments: Reference to the culvert and a recommendation that its removal be explored are included in Policy HS1/23.</p> <p>Less than 5% of the site is at high or medium risk of surface water flooding which has been considered as part of a detailed Flood Risk Assessment which also takes account of recent and historical flood incidents. Added to this policy 'Any works affecting Hapton Clough (ordinary watercourse) may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.'</p>
2214	Burnley Wildlife Conservation Forum	Site Allocations	EMP1/5	<p>EMP1/5 Land south of Network 65 – Reasons for objection</p> <p>The proposed new development boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a greenfield site in</p>	<p>In preparation of the Local Plan the Council commissioned an Employment Land Demand Study (ELDS) in 2016 to assess the amount of Employment Land required over the local plan period, as required by the NPPF. The study concluded that</p>

				<p>attractive open countryside in a very prominent elevated position in the landscape which is in active agricultural production. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European protection along with Lancashire BAP Long List and key species with NERC Act Section 41 and Wildlife and Countryside Act 1981 Schedules 1,5 and 8 species have been recorded within 250 metres of the site. The site is part of the Lancashire Grassland Ecological Network and is within 1km of the Pollard Moor/Bentley Wood Green, Thorneybank Clough and Houghton Hey Biological Heritage Sites.</p>	<p>between 68 and 104 hectares of employment land would be required over the plan period. A Strategic Objective of the Local Plan is to increase and encourage economic prosperity and a figure of 90 ha is considered an appropriate figure for the Objectively Assessed Need (OAN) for employment land. Empty units already form part of the employment land supply and were taken into account in the ELDS and reflected in the OAN.</p> <p>Paragraph 159 of the NPPF requires that council's "prepare a Strategic Land Availability Assessment to establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet identified housing and employments needs over the plan period. These assessments are known as SHLAA's. The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all the sites put forward for development or identified from what are known as "desk top" sources. All of these sites were assessed for their availability, suitability and achievability to see if they are "developable". The SHLAA found that there were insufficient development sites outwith the Green Belt to meet the proposed employment land requirement set out in SP3. A Green Belt Review was therefore undertaken and the three Green Belt sites put forward for consideration were reassessed as to their suitability and on balance the Council considers that two of the three sites should be allocated for employment use.</p> <p>Development proposals will need to consider the potential ecological impacts and an ecological survey will be required to accompany any planning application identifying how the development managed protected species and ecological networks.</p>
2120	Highways England	Site Allocations	EMP1/5	<p>Highways England is satisfied to see detail regarding land allocations for housing and employment growth presented within the report and welcomes the location of new developments in existing urban areas. It is noted that there do not appear to be any significant additions to the proposed land allocations, with the exception of;</p> <ul style="list-style-type: none"> <li>• Extensions to the west of the existing (approved) Burnley Bridge Industrial Park to the north of Junction 9 (EMP1/12)</li> <li>• Extension of employment allocation to the Burnley Bridge South industrial park</li> </ul>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan.</p>

				<p>to the south of Junction 9 (EMP1/5)</p> <ul style="list-style-type: none"> <li>• New Employment allocations in Padiham on greenbelt sites that could impact upon Junction 8 (EMP 1/13)</li> </ul> <p>It is our understanding that planning applications have not been submitted for these three schemes. It is important to recognise that the borough's employment sites will need to be assessed for future infrastructure needs, so that the aspirational growth will not compromise local and strategic highway performance. In due course, Highways England would expect to see an assessment of the transport implications of each development, so that the impact upon the SRN may be understood.</p>	<p>Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.</p>
1589	Lancashire Wildlife Trust	Site Allocations	EMP1/5	<p>The Trust notes the presence of Spa Wood/Hapton Clough, which supports semi-natural habitats (acidic grassland with flushes and broadleaved trees/shrubs) to the southeast of the development site boundary. The Trust is pleased to see, and supports the principle that an ecological survey will required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1. If/when the site is developed, a requirement to secure the positive management of Spa Wood/Hapton Clough should be investigated.</p>	<p>Comments noted. The site is not directly adjacent or related to Spa Wood/Hapton Clough and is also not in the same ownership, therefore, the site allocation cannot require/contribute towards the positive management of the site.</p>
1607	Lancashire Wildlife Trust	Site Allocations	EMP1/5	<p>The Trust notes the presence of Spa Wood/Hapton Clough, which supports semi-natural habitats (acidic grassland with flushes and broadleaved trees/shrubs) to the southeast of the development site boundary. The Trust is pleased to see, and supports the principle that an ecological survey will required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1. If/when the site is developed, a requirement to secure the positive management of Spa Wood/Hapton Clough should be investigated.</p>	<p>Comments noted. The site is not directly adjacent or related to Spa Wood/Hapton Clough and is also not in the same ownership, therefore, the site allocation cannot require/contribute towards the positive management of the site.</p>
1374	The Eshton Group	Site Allocations	EMP1/5	<p>I am writing in connection with the aforementioned Local Plan Consultation. Background. This letter of representation has been prepared on behalf of our clients, The Eshton Group who presently are the owners and developers of Burnley Bridge Business Park. The Eshton Group also have an interest in land to the South of Network 65. This representation is focussed therefore on two specific sites, the proposed expansion of Burnley Bridge Business Park, and also land to the south of Network 65 which is positioned off Accrington Road, to the west of the Town Centre.</p> <p>This Representation offers support to the Consultation on Preferred Options in respect of specific allocations of EMP 1/2 Burnley Bridge, EMP 1/5 Land to the South of Network 65 and EMP 1/12 Burnley Bridge Extension. It is proposed however that changes are made in order to ensure that the development of these sites can be delivered in line with the aspirations of the Local Planning Authority in respect of making Burnley a location of choice in</p>	<p>With regard to the cycle way, it is important to provide links between the business park and the existing walking and cycling network. As a result the site allocation policy requires a cycle way however it is not stipulated where the link should be as this will be determined at application stage. In terms of materials, as the site is quite visible in the landscape and the topography rises from Accrington Road to the south, it was deemed appropriate to include a requirement for natural materials along the site boundary and on the units developed adjacent to Accrington Road.</p>

				<p>2032.</p> <p>Burnley Bridge Business Park South, or land to the south of Network 65, forms a natural expansion of this existing allocated business park. The Eshton Group have secured an agreement to bring this parcel of land forward for new, employment led development.</p> <p>The land subject to this representation accounts to around 13.4 hectares, and can be independently accessed from Accrington Road.</p> <p>Proposed Allocation EMP 1/5 - Land South of Network 65</p> <p>Turning to proposed allocation EMP 1/5 (page 113), there is a requirement within the Design Principles that the development of the site should include; "...a new appropriately lit walking and cycling route connecting the site to the existing Network 65 business park should be provided."</p> <p>It is important to note that the existing Network 65 Business Park and the proposed site for allocation are in two different ownerships. Therefore it is not considered appropriate that this route should be a requirement. Accordingly the supporting text should be amended so as to state that this is an aspiration and not a requirement.</p> <p>Discussions are ongoing with the appropriate highway bodies so as to ensure that the site can be adequately and appropriately accessed. The work undertaken to date has demonstrated that the site can be safely accessed.</p> <p>Furthermore, the location of the site is one which is seen in the context of wider, employment buildings, and, on that basis the materials are generally of modern appearance.</p> <p>Whilst some natural materials could be incorporated into the boundary features, and possible some entrance locations, the buildings will themselves be of a modern architectural form and, on that basis, the materials used will no doubt reflect this.</p> <p>Recommendations : Amend Design Principle 2 to incorporate the ability to use modern materials, and Amend Design Principle 6 to acknowledge that the proposed allocation and the existing Business Park are within separate ownerships, and therefore any pedestrian and cycling links would only be an aspiration, nor a policy requirement.</p>	
1992	Cllr Cosima Towneley	Site Allocations	EMP1/5	<ul style="list-style-type: none"> <li>• These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>• Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>• Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> </ul>	The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.



				<ul style="list-style-type: none"> <li>Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	
1354	Environment Agency	Site Allocations	EMP1/6	For additional information the site contains ordinary watercourses. Any development within the easement would require consent from Lancashire County Council as the LLFA and we would require consultation on the site investigation for contamination to assess the risk to controlled waters.	Comment noted. An 8 metre easement requirement has been included within the site allocation.
1606	Lancashire Wildlife Trust	Site Allocations	EMP1/6	The Trust objects to the allocation of this site for development. The site may support Protected Species and is identified within the Lancashire Ecological Networks for woodland and grassland. The Trust cannot see how mitigation measures can be delivered on site and additional off-site compensation would be required. However, the development of other plots of land on the larger Heasandford Industrial Estate have failed consistently to deliver compensation for net losses in biodiversity in terms of the area of semi-natural habitat and species composition.	Objection noted. Policy NE1 states where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences. For protected and priority species, the first preference is to avoid disturbance, the second to provide suitable inter-connecting new habitats for these species within the development site. If this is not feasible, suitable alternative habitats should be provided such that there is no net loss of biodiversity. For priority habitats, where practicable, areas of suitable habitats should be retained, enhanced or created within the development site or, suitable alternative habitats provided elsewhere. If this is not feasible, contributions towards or the provision habitat creation or improvement elsewhere may be required. Where for reasons of viability this is not possible, the benefits of the development should clearly outweigh the loss of the habitat concerned.
1993	CLr Cosima Towneley	Site Allocations	EMP1/6	<ul style="list-style-type: none"> <li>These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> <li>Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.
1590	Lancashire Wildlife Trust	Site Allocations	EMP1/6	The Trust objects to the allocation of this site for development. The site may support Protected Species and is identified within the Lancashire Ecological Networks for woodland and grassland. The Trust cannot see how mitigation measures can be delivered on site and additional off-site compensation would be	Objection noted. Policy NE1 states where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and

				required. However, the development of other plots of land on the larger Heasandford Industrial Estate have failed consistently to deliver compensation for net losses in biodiversity in terms of the area of semi-natural habitat and species composition.	density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences. For protected and priority species, the first preference is to avoid disturbance, the second to provide suitable inter-connecting new habitats for these species within the development site. If this is not feasible, suitable alternative habitats should be provided such that there is no net loss of biodiversity. For priority habitats, where practicable, areas of suitable habitats should be retained, enhanced or created within the development site or, suitable alternative habitats provided elsewhere. If this is not feasible, contributions towards or the provision habitat creation or improvement elsewhere may be required. Where for reasons of viability this is not possible, the benefits of the development should clearly outweigh the loss of the habitat concerned.
1355	Environment Agency	Site Allocations	EMP1/8	The map shows the approximate location of the location of the culverted River Calder. We would ask that this is included in the Supporting Information as it is likely that an Environmental Permit for flood risk activities would be required. Due to past uses we would recommend that a "Land contamination investigation and the relevant remediation will be required in accordance with Policy NE5" as there may be a risk to controlled waters.	Comment noted. Information relating to the culvert and contaminated land has been included in the site allocation policy.
1591	Lancashire Wildlife Trust	Site Allocations	EMP1/9	The red line boundary around the area on the right hand side of the site extends into the Biological Heritage Site (BHS) known as Michelin Factory and Smallshaw Estate Grounds BHS (ref: 83SE02) is appears to be a 'Concreted Area'. It appears that this concreted area has been constructed without planning consent hence it should be removed and the ground reinstated as semi-natural vegetation that is capable of supporting Great Crested Newts.	The site allocation policy makes reference to the BHS and condition 11 of the Local Development Order.
1994	CLlr Cosima Towneley	Site Allocations	EMP1/9	<ul style="list-style-type: none"> <li>• These sites are particularly important in the development of a cohesive urban greenway accessible for all non-motorised users.</li> <li>• Present routes associated with these sites need formal recognition and protection during further or future development.</li> <li>• Burnley is unique in its ability to combine its urban landscape with the outer rural areas. This link should not be lost during the development of these sites. It would be helpful for planners and developers alike if such links on these sites were recognised prior to development.</li> <li>• Integration of above employment sites into Green Infrastructure &amp; Tourism/Recreational policies.</li> </ul>	The employment site allocation policies state that, where necessary, walking and cycling routes be required and where appropriate, connected to the existing network.
2215	Burnley Wildlife	Site Allocations	EMP1/9	EMP1/9 Innovation Drive – Reasons for objection A significant part of the easternmost of the 3 plots of land proposed forms part of	Innovation Drive is subject to a Local Development Order (LDO), therefore any development would need to adhere to

	Conservation Forum		<p>the former Michelin/Smallshaw Industrial Estate Biological Heritage Site and is adjacent to the Brun Valley/River Don Biological Heritage Site (this information is not included and needs to be added to EMP1/9's 'Policy Requirements and Design Principles') and is part of the Lancashire Woodland Ecological Network and so the easternmost of the 3 plots should be excluded from this development site. This site was added at the 'Preferred Options' July 2016 document stage, subsequent to the LERN assessment of Local Sites June 2015 report and requires a LERN assessment before its development status can be determined.</p>	<p>the requirements and conditions set out in the LDO, in particular condition 11.</p>
--	--------------------	--	--	--

## Site Allocations - Housing Sites

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	PO Policy Para	Preferred Options Comments	Recommended Response
1674	Natural England	Site Allocations	HS1	Natural England welcomes the policy requirements and design principles for the individual site allocations.	Support noted
1497	Home Builders Federation Ltd	Site Allocations	HS1	The HBF does not wish to comment upon the acceptability or otherwise of the housing allocations at this stage. We do, however, refer the Council to our comments upon the sources of supply, against Policy SP2 above, as well as our issues against Part 3 of Policy SP4 above.	Comment noted
2329	Rossendale Road Urban Plan Residents	Site Allocations	HS1/ 4 and HS1/28 Alternative Sites	<p>Alternative Sites Other suitable building land in Burnley</p> <p>4.1.1 The NPPF Glossary defines windfall sites as sites which "... have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available."</p> <p>Issues to Consider when Choosing Sites for Construction The selection of a site is perhaps the greatest impact that could happen to the landscape. Evaluation of the site should be done with a small team of experts, contributing their individual expertise to the decision taken. If it is a Greenfield site, are there brownfield sites nearby that may be more appropriate? [Picture of Lucas site Villiers Street / Cog Lane; and Lucas Site on Bruce Street/Hargher Street provided] Using the same reference docs as council officials we can obtain our own conclusions:</p> <p>Sustainability is a real issue when you consider the demographics in the SHMA - an ageing population. {Services and availability of the right type of housing} If young families attracted in - even more pressure on the elderly and services such as transport and hospitals. Without local jobs to support the young families the future is NOT sustainable. It is a temporary solution, and one that could irreparably damage Burnley in the longer term.</p> <p>Dwelling Per Annum {dpa} is suggested at 117 to 225, and is skewed a.t the higher end by MIGRATION and massive JOB OPPORTUNITIES These are extremely tentative and should be reviewed following BREXIT Using the lower end as being more realistic and over a 10 year period 1,170 dwellings will be needed BUT there are 2,458 VACANT dwellings already in the borough Therefore, no need to expand urban boundary to take more new housing! Population trends look fairly static but an aging population with more people living</p>	<p>The two alternatives sites proposed are already included within the Local Plan as proposed housing allocations</p> <p>HS1/12 - Former AIT Site HS1/17 - Former Gardner's Site</p>

				<p>alone - so smaller (not larger) houses needed and more suited to elderly EG if new build required it should be bungalows. Basically unless there are new job opportunities in Burnley there will be no growth. The idea therefore of attracting a commuter community is both unrealistic and harmful to the current character of the neighbourhoods affected by the proposed urban boundary change</p> <p>Burnley Statement of Community Involvement 2015: Sustainability Appraisal and Strategic Environmental Assessment</p> <p>2.8 All DPDs (i.e.the Local Plan) must be subject to a Sustainability Appraisal (SA) and most DPDs and some SPDs to a Strategic Environmental Assessment (SEA), the latter normally being incorporated into the former in the form of a combined 'Sustainability Report'.The Scoping Report, which sets out the methodology for the appraisals,will be updated as necessary and be the subject of consultation with relevant stakeholders each time a DPD is prepared to ensure that it provides for an up-to-date and appropriate appraisal of the document in question.The Sustainability Reports will be published alongside the relevant DPD.</p> <p>2.9 The SA seeks to assess the environmental, social and economic effects of the implementation of the policies contained in the documents or the effects of not having these policies.</p> <p>Sustainability Appraisal and Strategic Environmental Assessment 4.4 The 2004 Act requires Development Plan Documents to be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) to ensure that they reflect principles of sustainable development and comply with both UK and European law. The Scoping Report for the Appraisals sets out the process by which the policies and proposals in the Local Plan are to be appraised to ensure that they contribute to the aims of achieving sustainable development. Three statutory bodies - Natural England, Historic England and the Environment Agency (the 'SEA bodies') - must be consulted to ensure consensus on the scope of the SEA.</p> <p>Brownfield Sites 4.1.7 No allowance has been made for future large brownfield windfall sites as these would normally be identified</p>	
2280	Rossendale Road Urban Plan Residents	Site Allocations	HS1/ 4 and HS1/28 Housing Need	<p>Housing Needs Assessment [Taken from the SHLAA] 5.1.4 As the local Plan is still In development, no new targets have yet been adopted and this SHIAA therefore uses the targets set out in the Preferred Options draft of the Local Plan i.e.</p> <ul style="list-style-type: none"> <li>• Housing: 4,180 net additional dwellings 2012-2032.</li> <li>• Employment land: 90 Hectares 2012-2032.</li> </ul>	<p>2012 is the base date for the the the employment and housing requirements as this was the most up to date statistical release available for household and population projections</p> <p>- Under the Duty to Cooperate, if a Council cannot meet their housing needs in full they should work</p>

		<p>5.1.6 Where the initial assessment (stages 1-3) did not identify sufficient deliverable site to meet the identified need (plus any buffer) for the next five years, or identify sufficient developable sites to meet the needs over the plan period, the following steps were taken:</p> <p>Firstly, local existing and emerging policy constraints, identified physical constraints and impediments to delivery were reassessed, including density assumptions, infrastructure requirements etc and if this still led to a shortfall:-</p> <p>A further 'call for sites' was considered. This was not pursued as two recent invitations to submit sites have been made through the Local Plan Issues and Options consultations.</p> <p>Consideration was given to: whether unmet needs could be met in adjoining local planning authorities' areas; whether the exceptional circumstances to warrant a review of the green belt had been demonstrated; and whether major urban extensions into the open countryside or free standing new settlements were appropriate. These decisions are for the Local Plan and consultation thereon, rather than for the SHLAA. As the preliminary SHLAA work indicated a likely shortfall in deliverable and/developable employment land, a Green Belt Review was undertaken to inform the Preferred Options Local Plan.</p> <p>5.1.7 Three employment sites within the green belt were re-included in the SHLAA assessment and assessed as to their availability, suitability and achievability (Stage 2).</p> <p>"It is clear from the above insertions that</p> <ul style="list-style-type: none"> <li>• the housing target is based on pre-2012 information, and although being re-assessed there is no clear basis for this re-assessment or date.</li> <li>• Unmet need decisions are for the Local Plan, and this includes whether this could be in conjunction with adjoining local planning authority's areas.</li> </ul> <p>The statement of '4,180 net additional dwellings 2012-2032' does not narrow down the current need."</p> <p>Density</p> <p>A sustainable development requires around 40 houses per hectare to support public transportation and facilities like shops and schools. However, the average density on brownfield sites is currently 28 houses per hectare (it's 22 on greenfield sites). That means the real need is for greater-density, mixed use sites, where houses, shops and business can co-exist, and there remains room for urban greenspace, in order for a community to be properly sustainable. Burnley has a policy of 25 dpa for Rural areas and 30 dpa for Urban areas.</p> <p>In the Gorbals area of Glasgow, a 1990 development with 64 houses per hectare used mainly three storey terrace houses and four storey flats, some with shops on the ground floor and offices above. The streets were well-defined, and park space, and roads separated from pavements by a barrier of trees. The development had buses connecting with underground and suburban rail services. It's proved so successful that</p>	<p>with neighbouring authorities to meet this unmet need.</p> <ul style="list-style-type: none"> <li>- The statement refers to the housing need across the Plan Period - 2012-2032</li> <li>- Comment re: Density is covered by Comment Respose Number 2330</li> <li>- Comment re: population growth noted</li> <li>- The Council is committed to reducing the number of vacant homes and an allowance is included within the table in Policy SP2 towards meeting the Plan's housing requirement. However, it is unrealistic to assume that during the Plan Period that all vacant houses will be re-occupied.</li> <li>- The Council do not consider the Objectively Assessed Need to be an 'over assessment' of housing need.</li> <li>- Household projections are the starting point for the calculation of the Borough's Objectively Assessed Need (OAN). A number of demographic and economic projections based scenarios are then produced to calculate the OAN range. The Local Plan housing requirement selects from within the range at a level that best reflects the vision, objectives and strategy of the Local Plan.</li> <li>- Standards densities are not used for all the Local Plan proposed housing allocations where has been possible to look more closely at site characteristics and constraints to determine a more appropriate site capacity.</li> <li>- The Council has not approached neighbouring authorities to assist in meeting the Borough's housing needs as the Strategic Housing (and Employment) Land Availability Assessment shows that there is sufficient land within the Borough to meet the</li> </ul>
--	--	---	---

				<p>there have been attempts to reproduce it in Manchester, Leeds and London.</p> <p>If Burnley made their urban sites sustainable, and met the criteria for Rural sites, then there would be a reduction in land need of 33 hectares [Preferred Options Local Plan Trajectory Table included] The housing allocations for the above sites are NOT all within the 25-30 dpa. If the minimum is 25 dpa then there would be a saving of 14 hectares of land needed If the Urban areas dpa were 40 then there would be a further saving of 19 hectares. A total saving of 33 hectares could be achieved by re-assessing the density in line with the 'sustainable development' strategy. We therefore conclude that 103 hectares of land is excessive and this should be reduced to 70 hectares. This would have a mas</p>	<p>Objectively Assessed Need/</p> <p>- It is not possible at this time for the Local Plan the fully consider the impact of BREXIT</p>
2327	Rossendale Road Urban Plan Residents	Site Allocations	HS1/ 4 and HS1/28 Site Suitability Ecology	<p>Suitability - Ecology Effects of Development upon Greenfield Sites Greenfield sites are areas of land, usually agricultural or amenity land, which are being considered for urban development. This is a highly contentious issue, particularly in the UK, where the development of land is split between Greenfield and brownfield sites. It becomes contentious, and political, due to a limited amount of physical space available, competing with an expanding population that needs housing. All sides of the debate acknowledge that there is a housing crisis within the UK, but politicians, academics and campaigners disagree as to how it could be resolved. The Government has identified a need to find land for 4.4 million new housing units in England and Wales (figures for Scotland have not yet been identified) by 2016. Once land has been converted to development, it is unlikely to ever be converted back to Greenfield use. The results are clear:</p> <ul style="list-style-type: none"> <li>• Destruction of the natural habitat of some animal and plant species</li> <li>• Loss of agricultural land results in loss of production and loss of employment</li> <li>• Reduction of or complete loss of amenity or recreation value</li> <li>• Negative effect upon transport and energy use</li> <li>• Loss of the green belt of agricultural or designated wildlife land, that clearly defines and separates areas of difference, be they cities, towns, suburbs, villages or hamlets of housing</li> </ul> <p>This is a package of negative effects that impact upon the Borough of Burnley, the greenfield site itself and potentially the surrounding areas, if the site is used for building development.</p> <p>Mining Survey Burnley is extensively undermined with many areas suffering from subsidence risk from Deep and Shallow mining and anecdotally there are many privately owned mine workings that are undocumented.</p>	<p>- In selecting the proposed allocations it has been necessary to allocate Greenfield sites to assist in delivering an appropriate mix of housing types in attractive locations. However Greenfield developemnt will only account for just over 24% of the new housing provided during the Plan Period 2012 - 2032.</p> <p>- The Council has viewed the online Coal Authority information referred to in the response and requested and obtained a mining report for the site from the Coal Authority.</p> <p>- A portion of land to the north of the site allocation is recorded by the Coal Authority as being in a 'development high risk area', with the same portion also having 'probable shallow coal mine workings' recorded.</p> <p>- Any site which is in a 'development high risk area' will require a coal mining risk assessment to accompany any planning application. If a developer decides to build on the site, then this report must also be submitted to accompany their planning application and permission would only be granted if any matters raised could be satisfactory addressed. The Council has no information to suggest this issue could not be resolved.</p> <p>- The Council has not conducted its own mining or</p>

		<p>The Coal Authority map below Ref Mine Map 1 taken from the URL below the map shows the extent of the known mine workings. [Coal Authority map of site provided] Ref Mine Map 1 <a href="http://lmapapps2.bgs.ac.uk/coalauthority/home.html">http://lmapapps2.bgs.ac.uk/coalauthority/home.html</a></p> <p>The proposed site for housing on the designated Green Fields behind Helm Close and around to the fire damaged Bull and Butcher Public House known as HS1/4 and HS1/28 are no less affected than any other area in and around Burnley. The Burnley District Development Risk Map below Ref Mine Map 2 taken from the URL below the map shows that Burnley Council is aware of the extent of the problem of mines in and around Burnley and the risks associated with them. The Pink outline shows that all of Burnley is a low risk with the darker shaded areas being high risk.</p> <p>[Map of Burnley District Development Risk provided] Ref Mine Map 2 <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531109/2016BurnleyDistrictBDevelopmentRiskMap.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531109/2016BurnleyDistrictBDevelopmentRiskMap.pdf</a> A close up view of Ref Mine Map 2 as shown in Ref Mine Map 3 shows the high risk areas in more detail. As can be seen the area highlighted in the red outline is a high risk area and lies under the proposed entrance to the site should the Urban Boundary be moved out from its current position as it is designated as: A HIGH RISK AREA AND IS DESIGNATED AS NOT FOR DEVELOPMENT</p> <p>Furthermore a MINE ENTRY POINT (see ref mine map 1) can also be seen, and as there are no others it is safe to assume that there will be unmarked workings underground to access the coal seams and/or to release gases when it was a working mine.</p> <p>[Map showing site mine entry point provided] Ref Mine Map 3 <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531109/2016BurnleyDistrictBDevelopmentRiskMap.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531109/2016BurnleyDistrictBDevelopmentRiskMap.pdf</a> The Burnley District Specific Risk Map also shows probable shallow mine workings and outcrops. The map below Ref Mine Map 4 and 5 further confirms the existence of mine workings under the proposed site for dwellings off Rossendale Road side of the development (HS1/4) [Map of Burnley District Specific Risk provided]</p> <p>Ref Mine Map 4 <a href="https://www.gov.uk/government/uploads/syst">https://www.gov.uk/government/uploads/syst</a></p>	<p>investigatory survey other than the species surveys previously mentioned not is this considered necessary. It has not undertaken a drone or geophysical survey.</p> <ul style="list-style-type: none"> <li>- An ecological survey has been undertaken</li> <li>- An archaeological assessment has been undertaken</li> <li>- As a site of over 1 hectare within Flood Zone 1 development proposals should be supported by a site specific Flood Risk Assessment (or the most up to date flood risk information available) along with evidence from the Lead Local Flood Authority (Lancashire County Council) and the Environment Agency, to establish whether the proposed development: <ul style="list-style-type: none"> <li>i) is likely to be affected by current or future flooding from any source, taking into account the increased risk associated with climate change</li> <li>ii) will increase flood risk elsewhere or interfere with flood flows</li> <li>iii) can provide appropriate mitigation measures to deal with the potential risks and effects</li> <li>iv) would be likely to preclude the future implementation of necessary flood risk measures, including the improvement of flood defences;</li> <li>v) can reasonably maintain access and egress at times of flood</li> <li>vi) can be accommodated within the capacity of the water supply, drainage and sewerage networks</li> </ul> </li> <li>- Proposed policy CC5 requires that as a major development SUDs will be required and surface water discharges should be restricted to Qbar rates (mean annual greenfield peak flow).</li> <li>- The Council has undertaken a desk top survey of all known constraints including its of the contaminated land register</li> </ul>
--	--	--	---



2328	Rossendale Road Urban Plan Residents	Site Allocations	HS1/ 4 and HS1/28 Site Suitability Protecting Character	<p>Suitability - Protecting the Character of the Neighbourhood  [Picture of Habergham Eaves road sign provided]  As well as the environmental impact of any potential construction, both now and in the future, it is also important to consider the human impact.  It is important to recognise that cohesive human communities are valuable and necessary.  The current neighbourhood is a quiet residential area with a significantly high proportion of over SO's.  [Picture of local housing estate provided]  Commuting to work could also be reduced by enhancing communications networks within the potential build to allow tele-commuting.  By extending the Urban Boundary and making way for new housing developments, the social mix must be considered. If the social mix will be significantly different consideration must be given to how will this affect the quality of life for existing residents and the character of the neighbourhood.  A Sustainable Future  There are many examples of small-scale development use of Greenfield sites. These might for instance take part of a piece of agricultural land for construction, but on the other piece, enhance its agricultural status, by converting it for organic agriculture, or small-scale farming, or for the production of plants to convert to bio-fuel, or for the creation of a wildlife habitat, that did not already exist.  There are Greenfield sites that are not being used for any purpose, for whatever reason. Potential development must consider all human and environmental factors, not just consume land and space for short-term solutions.  A sustainable vision would look at all the options for land use, human population expansion, urban sprawl, economic considerations as well as environmental needs.</p> <p>Where to Site a Sustainable Development  Several considerations must be made.  Firstly, it is crucial to take a long-term view of constructing a building on greenfield land. The nature of developing sustainably means that due consideration must be given to the future conditions (environmental, geographical, urban or rural, etc.) of the landscape and the area.  For instance, how does building one structure here affect the surroundings immediately?  And how could these buildings, with for instance, its issues of access, water use, drainage, potential pollution, affect the surrounding area in the future?  The Council need to be clear on the long term impact of moving the Urban Boundary and consuming more Greenfield sites. This in itself should be a study, not just part of a preferred local plan as the impact is enormous - far more than a single development</p>	<ul style="list-style-type: none"> <li>- the Council has consulted with and had discussions with the local health authority</li> <li>- the Council has consulted with and had discussions with Lancashire County Council regarding school places</li> <li>- There is no evidence to show that new housing development will detrimentally impact on the existing residential area or the human ecology of the site. New development and new people can contribute towards establishing a strong community and neighbourhood.</li> <li>- The site is accessible by a number of modes of transport, including the private car.</li> <li>- The character of the area is residential. New housing development would therefore not have a detrimental impact on the character of the area.</li> <li>- development of the site will impact on views from public viewpoints, however the site boundary has been chosen to minimise the visual impact of the site in long distance views. Any visual impacts are considered to be outweighed by the delivery of new housing which contributes towards the borough's housing needs.</li> <li>- development of the site would not involve the loss of the best and most versatile agricultural land</li> <li>- Proposed Local Plan policies covering development quality including SP5: Development Quality and Sustainability will ensure the resulting development does not lead to an over development of the site.</li> </ul>
------	--------------------------------------	------------------	---	--	--

				<p>site on brownfield land.</p> <p>Streets The street is the main thoroughfare in a community. At present it's used mainly by cars, but in a sustainable development you want to encourage much more movement by public transportation, foot and bicycle. That means much wider pavements, a separate marked cycle path and traffic restrictions. Ideas along these lines were part of the proposals for the community of Clyst Hayes near Exeter, as a "walkable neighbourhood principle" with ready access to the existing railway station. By making an area more friendly to pedestrians, you actively encourage walking. This access impacts on density - meaning you can't have one without the other - to make the streets wider and any development sustainable then the properties will be much taller (3 storey) this has an impact on the character of the neighbourhood, overlooking and loss of privacy – especially in relation to the bungalows on Micklehurst Crescent. [Picture of housing in area provided]</p> <p>Overlooking and loss of privacy One point which is controversial is the relevance in planning terms of the loss of a view. It is often said that "there is no right to a view". [Picture of site provided] Whilst that is correct in strictly legal terms, it does not mean that the loss of a view is necessarily irrelevant to planning. Many of the homes in the area enjoy extensive views of the</p>	
2331	Rossendale Road Urban Plan Residents	Site Allocations	HS1/ 4 and HS1/28 Site Suitability Transport	<p>Suitability - Transport Links to New Build Developments One of the primary considerations with any potential site is access and transportation. They are key factors in the success of any development; communities that aren't readily accessible both inside and outside their boundaries simply aren't sustainable. Access means safe, secure and healthy movement for all, whether old and young, rich or poor, and the viability of services, such as public transportation. [Traffic census data map provided] Traffic census data (above) shows that there are no traffic census points on Rossendale Rd, at the junction of Rossendale Rd and Manchester Rd, or at the Rosegrove junction <a href="http://www.uktrafficdata.info/grid/50835308">http://www.uktrafficdata.info/grid/50835308</a></p> <p>Negative effect upon Transport and Energy use There are many concerns regarding the increase of traffic, as a result of any proposed housing development in the area of objection. If houses are built at HS1/4 HS1/28 total houses 212, this would depending on the type of houses built, generate an extra 350-424 cars wishing to leave via the Rossendale Road exit to Manchester Road, on top of the 70+ cars that already struggle to get out at</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.</p> <p>The plan is accompanied by an Infrastructure Delivery</p>

				<p>peak times.  Also if houses are built on HS1/2 Hollins Cross Farm (216), then maybe an extra 400+ cars will be travelling to the lights (Glen View Road) at Manchester Road. The majority of which would probably be travelling straight across to Rossendale Road to get to the M65.  The total of additional vehicles from all nearby proposed sites is close to 1,000 vehicles. An increase of several hundred additional vehicles would be a major cause of concern both in terms of congestion and pollution. Congestion leads to negative energy use and increased levels of harmful gases being released into the environment locally.  The Council should undertake a full traffic survey, incorporating potential access points and safety issues PRIOR to moving the Urban Boundary. If the addition of such numbers of vehicles is identified as being unsustainable to the road network then it will have been a pointless exercise and waste of public money moving the Urban Boundary. Congestion caused by 1,000 additional vehicles will also have a negative effect on public transport.  At present it is difficult to leave Rossendale Avenue entrance onto Rossendale Road in any direction because traffic is backed up. This continues for the peak period 7.30am - 9.00am and the same in the evening. Most of the traffic either turns left onto Rossendale Road or goes straight down Manchester Road.  Traffic also queues on Crown Point Road, hoping to get down Manchester Road. Rossendale Rd is already subject to speeding traffic breaking the statutory limit as it ascends from Coal Clough Lane and other vehicles accelerating towards the 40mph zone in the opposite direction.  The vehicle congestion at the Manchester Road / Rossendale Road traffic lights is already a major problem at peak periods and an increase of traffic volume attempting to turn either way from Rossendale Avenue or attempt to cross to Cog Lane, will only add more danger, frustration and congestion.  [Picture of Rossendale Road provided]  Rossendale Road  <a href="http://ced.s.org/pdfdocs/TrafficAll.PDF">http://ced.s.org/pdfdocs/TrafficAll.PDF</a>  It is expected that an increase of approximately 1,000 additional vehicles would be congesting the proximity, taking into account the increased volume from the proposed development at Hollins Cross Farm site. The majority of these vehicles would be heading towards the Glen View Rd/ Manchester Rd junction then onto Rossendale Road increasing the volume already attempting the Rossendale Avenue exit.  Severe congestion on Manchester Road towards the town centre will only be compounded with the additional volume of vehicles attempting to travel to railstation,supermarkets and town centre shopping.  [Picture of cars provided]  The situation on Premier League match days as visiting football supporters' buses, coaches and cars are routinely directed through the intersection o</p>	<p>Plan which assesses the quality and capacity of infrastructure provision and its ability to meet forecast needs.</p>
2279	Rossendale	Site Allocations	HS1/ 4 and	Summary of Objection Findings	The summary comments are noted.

Road Urban Plan Residents	HS1/28 Summary	<p>The argument to move the urban boundary has to be supported by robust evidence and research.</p> <p>The Objectors wish to point out that although the consultation period is set by statute, Rossendale Road Urban Plan Residents Group believe that a 6 week period is not only insufficient for quantified objections to be raised by people who work full time and have no experience of planning but is actually discriminatory, adding additional stress and workload to residents. We would like this comment bringing to the attention of the Full Council.</p> <p>The residents consider the proposals for HS1/4 and HS1/28 to be</p> <ul style="list-style-type: none"> <li>• Unnecessary</li> <li>• 'Inappropriate' development as this is open Countryside adjoining a named settlement - Greenfield and,</li> <li>• That the sites are not developable housing sites for reasons given in this objection report.</li> </ul> <p>Unnecessary</p> <p>If Burnley made their urban sites sustainable in terms of dwellings per hectare, and met their own criteria of 25 dwellings per hectare for Rural sites, then there would be a reduction in land need of 33 hectares, thus reducing the need to move the Urban Boundary.</p> <p>An ageing population requires good access to facilities. It is therefore logical that better access is in Urban rather than Rural areas. Development should therefore concentrate in Urban areas where the needs of existing residents can be catered for properly.</p> <p>Based on Vacant dwelling already in the Borough the need for new housing is reduced from 4,180 to 1,722. Thereby effectively reducing the number of hectares needed even further and adding to the argument that there is no need to move the Urban Boundary. 'The market signals point towards a housing market which is largely matching demand with supply. This is despite the under delivery of dwelling over the past 12 years'</p> <p>This is evidence that there has been previous over assessments of housing need. A principle that seems to continue.</p> <p>There is much evidence that there is limited growth in the housing market within Burnley Borough. Indeed 50 dwellings per annum have been identified in this study, and across the period 2012-2033 the latest projections indicate household growth of 54 dwellings per annum.</p> <p>The above inserts shows that the dpa between 2012 and 2032 is between 117 and 215. This contradicts other reports in relation to Projected Household Growth.</p> <p>Taking the middle figure of 117 (54, 117, 215) as a base, over a 10 year period there would be a maximum of 1,170 new homes needed. If these are built as sustainable properties in Urban areas at a dpa of 40 then just under 30 hectares of development land is required for new housing in the Local Plan. If we use Burnley Council recommended rate of 30 dpa then just under 40 hectares is required.</p>	<p>The themes identified by the the Rossendale Road Urban Plan Residents are covered by the following Comment Record numbers and responses:</p> <p>Consultation - Comment Record 2326  Housing Need - Comment Record 2280  Alternatives Sites - Comment Record 2329  Site Suitability Ecology - Comment Record 2327  Site Suitability Transport - Comment Record 2331  Site Suitability Protecting Character - Comment Record 2328</p>
---------------------------	----------------	--	--

				<p>It is therefore quite clear that the need to move the Urban Boundary is not based on robust evidence and research and these development sites are therefore unnecessary.</p> <p>Inappropriate The areas HS1/4 and HS1/28 are inappropriate to be allocated as potential development areas for several reasons. There are plenty of brownfield sites available Evidence shows the Urban Plan is grossly overestimating Greenfield need The areas contain wildlife on the protected lists who live on the grassland or use it as a source of food supply. (There are BATS and LAPWINGS living on the sites) and only desk research done by the Council on Environmental Matters There is a grade II listed monument on one of the sites There are insufficient facilities locally with no plan to improve these that we can find Transport studies are insufficient and there is no apparent strategy in place for sustainable improvements to transport infrastructure There is a stream that may have riparian rights on one of the sites The loss of amenities to the borough as a whole (as well as local residents) far outweighs any potential short term cash benefit to the Council Not developable housing sites There are many old mine workings (many of them</p>	
1574	Lancashire Wildlife Trust	Site Allocations	HS1/1	<p>The Trust notes the presence of trees on the site and that it is located adjacent to Sweet Clough. The Trust is pleased to see, and supports the principle that an ecological survey will required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1 and retain a substantial area of multi-functional green infrastructure through the central area of the southern half of the site.</p>	Support welcome
1115	Sport England	Site Allocations	HS1/1	<p>Sport England welcomes and supports the inclusion of a requirement in point 4 to either retain the playing field or replace with equivalent provision elsewhere.</p> <p>The only amendment I would wish to see to bring this element in line with Sport England's Playing Field Policy is the inclusion of the words "equivalent or better quantity and quality replacement within the locality." This is to ensure a poor quality playing field is not replaced with a similarly poor quality playing field to meet the equivalent requirement. The inclusion of better ensures a poor quality playing field is reprovided to the current sports standards. The inclusion of within the locality is to ensure the playing field is replaced within the same catchment area as the loss occurs to meet local community demand.</p> <p>Sport England will be a statutory consultee on any subsequent planning application and will assess that application against its own policy and paragraph 74 of NPPF. In addition Sport England will refer to the Council's current Playing Pitch Strategy to ensure any replacement is line with the recommendations of that Strategy.</p>	<p>Support is noted.</p> <p>Changes made to the site's Additional and Site Specific Policy Requirements and Design Principles as suggested.</p>

				<p>Sport England also welcomes the inclusion of the potential for contributions in accordance with policy IC4. Housing growth results in an increase in population with a corresponding increase in demand for sport from certain sections of that population. It is important existing sites are enhanced to create the capacity required to take that additional demand or provide new pitches where necessary. Sport England has developed a new strategic planning tool to estimate the demand for pitch sports arising from housing growth to be used alongside the Playing Pitch Strategy. Please contact the Regional Sport England Planning Manager for information on its use and application.</p>	
1092	Margaret Palmer	Site Allocations	HS1/1	<p>I wish to voice my concerns as a resident of Kiddrow Lane. Yet again we are building on our green areas when previously stated it was only going to be the foot print. I agree we need to build houses but why not concentrate on the areas where the buildings have been knocked down because of poor housing and use the previous land. The council should be ashamed of how the schools were left for vandals to enter and strip the buildings. It was only when they were in a state of dis repair they were boarded up. This makes me feel like this was the plan from the beginning! The council should support the original plan to only build on the current footprint and ensure a future for green space for the environment and our future generations of families. That green area is in constant use by families, children and walkers! The extra strain on traffic schools, drs needs to be a huge consideration. I have lived on Kiddrow lane for over 12 years and can not be a patient of Kiddrow lane health centre because its full! Please listen to the residents. Respect our green areas for the well being of local families</p>	<p>The school and its buildings are the responsibility of Lancashire County Council. Although the policy does not restrict built development to to the existing building footprint, Part 7) does require that a substantial amount of multi functional green infrastructure is retained through the central and Southern part of the site. Part 5) also requires that a new equipped play area should be provided on the site. These measures will ensure that, whilst the site faces some development, it will retain ample green space too. Needs more</p>
1568	Lancashire County Council Property Services	Site Allocations	HS1/1	<p>Lancashire County Council support the allocation of the former Hameldon Schools Site for the development of around 300 dwellings. The site is surplus to educational requirements and is located at the heart of the built up area in a very sustainable location. Its development for residential purposes is entirely appropriate.</p> <p>Notwithstanding this, the policy is too prescriptive at this stage and should be amended as follows:</p> <p>HS1/1 – Former Hameldon Schools Site Housing Delivery The site is acceptable for around 300 dwellings. Policy Requirements and Design Principles 1) A mix of dwelling types, SHOULD BE CONSIDERED including POTENTIALLY 60% 3+ bedroomed detached and semidetached houses , of which at least 50% should be detached; 2) A scheme of the highest quality THAT CAN REASONABLY BE ACHIEVED, which clearly and demonstrably contributes to increasing housing quality and choice across the borough will be expected, including to satisfy the test set out in Policy SP4, as this site is in part a greenfield site; 3) Vehicular access should be provided from both Scott Street and Kiddrow Lane,</p>	<p>Support noted. The Council do not consider the proposed Additional and Site Specific Policy Requirements and Design Principles are too prescriptive, rather they are necessary to ensure the site is brought forward to make a meaningful contribution to the Borough's housing supply in the most appropriate manner.</p>

				<p>subject to APPROPRIATE TRANSPORT ASSESSMENT;</p> <p>4) The existing playing pitches should be retained and/or replaced by equivalent provision elsewhere, IF A SHORTFALL IS IDENTIFIED AND SUBJECT TO VIABILITY, detailed proposals for which should be submitted with any planning application. Planning contributions may be required in accordance with Policy IC4;</p> <p>5) A new equipped play area must be provided on site (see Policy HS4), IF A SHORTFALL IS IDENTIFIED AND SUBJECT TO VIABILITY;</p> <p>6) A footpath link should be maintained to the Sweet Clough Greenway; and</p> <p>7) The site forms part of the Lancashire Ecological Network for woodland. An ecological survey will be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1 and retain a substantial area of multi-functional green infrastructure through the central area of the southern half of the site.</p>	
1189	Councillor Charles Briggs	Site Allocations	HS1/1	<p>I just want to put on record my resistance to building on the green belt between the old Girls High School on Kiddrow lane and Ivy Bank School, I have no objections to you developing both sites but to take up the green belt is a little too much, also the proposed 300 houses between them is in my opinion a little reckless seeing that it is stated that every house may have two cars, where are the roads and infrastructure for these vehicles going to be ? as both Scott Street and Kiddrow could not put up with this type of traffic. Please reconsider the plans for this area with the best interests of the residents who live there now are taken into consideration.</p>	<p>The land on site HS1/1 is not green belt land, but is a mix of green field and brownfield. Policy HS1/1 stipulates that a substantial amount of multi functional green infrastructure should be maintained on the site. A development of 300 houses would not necessarily equate to 2 cars per household, although there will be an inevitable increase in car use in the area. Lancashire County Council have been consulted and have advised that access on to Kiddrow Lane would be preferred due to its signalised access on to Padiham Road.</p>
1655	Councillor Neil Mottershead	Site Allocations	HS1/1	<p>There Is No Room for 300 HOUSES That means the loss of a large amount of green space that our residents use eg playing rounders, people walking their dogs, adults football training and residents use. Councillor Neil Mottershead said "this plan has been sent from County Council to the Borough Council and proposes building on lots of green space we thought would be protected" Councillors Neil Mottershead, I have worked on the problems of building on these school sites since 2011, I am totally against the green areas being built on. Now, they are going back on their word, we were promised by Burnley Council and Lancashire County Council that they could only build on the existing footprints of the school. they are wanting to build houses across the green areas which I am TOTALLY AGAINST.</p>	<p>Whilst the site allocation will mean some development on the site, part 7) of policy HS1/1 does require that a substantial amount of multi functional green infrastructure is retained through the central and Southern part of the site. Point 5) also requires that a new equipped play area should be provided on the site. Point 4) stipulates that the existing play pitches should be retained and / or replaced by equivalent provision elsewhere.</p>
1578	Lancashire Wildlife Trust	Site Allocations	HS1/10	<p>The Trust objects to the allocation of this site for housing, its removal from the Green Belt and inclusion within the Development Boundary. The Trust notes the presence of neutral grassland and trees/shrubs on the site. However, if the site was to be retained,</p>	<p>The site is not located within the Green Belt. In the proposed submission Local Plan the Additional and Site Specific Policy Requirements and Design</p>

				an ecological survey should be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1.	Principles states that "Protected Species have been recorded on the site which also includes Priority Habitat (neutral grassland). An ecological survey will be required to accompany any planning application which identifies and addresses these issues in accordance with Policy NE1"
2184	Metacre Ltd.	Site Allocations	HS1/10	29 A separate representation has been submitted by Avalon which identifies land at Nelson Road, Saxifield, Burnley as a suitable housing allocation (see plan at Appendix 1). Without wishing to reiterate the content of this separate representation, this site is considered a suitable and sustainable location for housing and it is requested that the site be included in policy HS1 as a housing allocation.	
1616	Councillor M. A Lishman	Site Allocations	HS1/10	Any additional housing development in Briercliffe would put an unacceptable strain on local facilities and on the local road network which is already under considerable strain. Previous recent developments, some on land in Pendle have caused problems and an increase in local flooding.	<p>The Local Plan is accompanied by an Infrastructure Delivery Plan (IDP) which is being produced alongside the Local Plan. This reviews and evaluates the social, environmental and economic infrastructure that will be required to support the development and growth set out in the Plan. It identifies the infrastructure required to support the proposals and development sites in the plan, the likely delivery partners e.g. developers, the borough and county councils, government agencies and the likely funding sources. It is a living document in the sense that infrastructure requirements will change over time as new or improved infrastructure is provided or facilities are lost and technological advances or social and national policy changes require new forms of infrastructure or alternative methods of provision.</p> <p>The infrastructure requirements to support the specific allocations in the Plan are identified within the individual site allocation policies. Where there are current known requirements for off-site infrastructure these are identified in the IDP. Further infrastructure may be required over time or as the detail of schemes is developed, and for windfall development proposals, the infrastructure requirements and any contributions required will need to be assessed as schemes are drawn up. Infrastructure can be provided directly by infrastructure providers or developers; or planning contributions can be used to deliver or contribute to on or off-site new or improved infrastructure through</p>



					Section 106 contributions and/or the Community Infrastructure Levy (CIL) should the Council introduce it.
1696	Burnley Civic Trust	Site Allocations	HS1/10	The remarks made in respect of development at the Hollins apply equally to this site. This site is on a hillside and will be unsightly and a blot on the landscape. Further there has been past flooding from this area and development will aggravate future flooding].	<p>The site is locally prominent but it is not considered that a carefully designed scheme of the highest quality would be a blot on the landscape. Policy HS1/2 requires "a scheme of the highest quality which clearly and demonstrably contributes to increasing housing quality and choice across the borough will be expected, including to satisfy the requirements of Policy SP4 2) c) i and iii and SP5, as this site is a greenfield site in the open countryside"</p> <p>This requirement will need to be met in addition to all other relevant requirements of the Plan including Policies SP5.</p> <p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.</p> <p>Preferred Option Local Plan Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.</p>
1691	Briercliffe Parish Council	Site Allocations	HS1/10	Next to the proposed site is an old stream draining water all the way up from and off the golf course and through the two children's play areas. On a rainy day this fills up quickly with the culverts under Standenhall Drive and Wroxham Close barely taking the	Proposed Submission Local Plan Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood

				<p>flow. Any heavier and the channel is in flood due to relatively recent diversions of surface water that have no doubt been constructed along the lines of natural drainage swales. There have recently been severe flooding problems on nearby Rockwood Close. Building on this land would obviously take away much of the capacity as a natural soak. How could this channel take any more water?</p>	<p>risk from any source or other drainage problems, either on the development site or elsewhere.</p> <p>Proposed Submission Local Plan Policy CC% states in relation to Surface Water that surface water discharges from developed sites should be restricted to QBar rates (mean annual greenfield peak flow)</p>
1544	Junction Property Ltd.	Site Allocations	HS1/10	<p>In support of this allocation our Client wishes to make the following comments. We reserve the right to revise and update these comments as and when necessary in the future.</p> <p>Policy HS1/10 relates to our Client's land at Higher Saxfield. It seeks to introduce requirements to assist in the delivery of the site. These are as follows:</p> <ol style="list-style-type: none"> <li>1) A mix of dwelling types including a minimum of 55% 3+ bedroom detached and semi-detached houses will be expected;</li> <li>2) A scheme of the highest quality which clearly and demonstrably contributes to increasing housing quality and choices across the borough will be expected, including to satisfy test set out in Policy SP4 c) I and II as this site is a greenfield site in the open countryside;</li> <li>3) The existing access from Standen Hall Drive is not considered suitable to serve the development and a new vehicular access will be required;</li> <li>4) Contributions may be sought towards highway improvements in the locality in accordance with Policy IC4; and</li> <li>5) Appropriate landscaping and boundary treatment should include screening to the southern boundary to reduce the impact on the wider landscape. New planting on the site will need to accord with Policy NE3."</li> </ol> <p>Part's 1 and 3 of the Policy seek to control the mix and access on the site. Our Client considers that these requirements create an unnecessary policy burden that has the potential to restrict the sites delivery. The requirements are unjustified and do not allow for changes in market signals, such as land prices and housing affordability over the plan period which may affect the deliverability of the site, suitability of access and potential render development on the site unviable.</p> <p>Furthermore, Part's 2, 4 and 5 are a repetition of policies found elsewhere within the Preferred Options document. In order to create a more legible policy and to reduce the policy burden of excessive policy making, our Client considers Policy H1/10 should be</p>	<p>Support for allocation noted.</p> <p>With reference to comments on the policy clauses of HS1/10 the requirement are considered to be fully justified on this greenfield site.</p> <p>Indeed the respondent points out in their objection to HS1 that "A high proportion of the brownfield allocations within Burnley are clearance sites within the urban area, characterised by dense terraced development. These types of sites may be unsuitable to deliver larger properties."</p> <p>Clause 2 of Policy HS1/10 should say Policy SP4 c) I and iii (not I and ii) and is not a repetition of policies elsewhere and Policy SP4 for other greenfield sites says 'or' not 'and'</p> <p>Clause 4) is considered to aid clarity</p> <p>Clause 5) is site specific and so is not a repetition.</p> <p>[See also response to this respondent's comments on SP4]</p>

				<p>removed from the Local Plan and it is unjustified and inconsistent with paragraphs 17 and 173 of the NPPF.</p> <p>Our Client owns a parcel of greenfield land at Higher Saxifield. The site is located to the north east of Burnley on the edge of an existing residential area to the north of Standen Hall Drive. Its northern limit forms the administrative boundary between Burnley and Pendle Councils.</p> <p>The Site extends to 5.1ha and consists mostly of former agricultural land. It is considered the Site has capacity for approximately 120 dwellings. The Site is referenced as HS1/10 within the Local Plan and HEL/074 within the SHLAA. The extent of the site is denoted within Appendix 2 of this report.</p> <p>We set out below our comments in support of the proposed allocation:</p> <p>Availability</p> <p>The site consists mostly of former agricultural land, rising gently in a southern to northerly direction. The site is immediately available for development and there is no land in other ownerships which must be acquired to develop the site.</p> <p>Suitability</p> <p>The site is located adjacent to the existing urban area of Burnley in the suburb of Briercliffe. Burnley is identified as the most sustainable settlement for growth within the Local Plan. The principle of locating new growth in the town is consistent with the emerging development plan. Burnley is a sustainable settlement, and is a town which should grow over the coming plan period.</p> <p>One of the Council's key objectives is to rebalance the housing market encouraging more aspirational market housing including detached and semi-detached properties. Our site is suitable to deliver this type of housing.</p> <p>The site is in an accessible location close to local shops and facilities within Harle Syke Village Centre, including convenience stores and a pharmacy. The site is also within walking and cycling distance of schools and other community facilities and is located within close proximity to local bus services on Standen Hall Drive and Briercliffe Road. This includes regular ser</p>	
2208	Burnley Wildlife Conservation Forum	Site Allocations	HS1/10	<p>HS1/10 Higher Saxifield – Reasons for Objection</p> <p>The proposed new Development Boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a prominent green field site in</p>	The Council believes that this urban extension to the urban boundary is justified in order to fulfill the Objectively Assessed qualitative and quantitative requirements for housing. The site specific policy

				attractive open countryside comprising natural and semi natural grassland habitat. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Sect 41 protection along with Lancs BAP Long List and key species, Wildlife and Countryside Act Schedules 1, 5 and 8 species have been recorded within 250 metres of the site and a bat roost has been recorded within 400 metres of the site.	requirements and design principles seek to minimise the landscape impact of development on this site.  Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.
1341	Environment Agency	Site Allocations	HS1/12	For additional information the culvert contains an ordinary watercourse. Any development within the easement would require consent from Lancashire County Council as the LLFA and we would require consultation on the site investigation for contamination to assess the risk to controlled waters.	Information on culvert updated within the site's Supporting information. The supporting information states that updated contamination reports, ground gas assessments and remediation strategies are required.
2121	Highways England	Site Allocations	HS1/12	There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.	The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.
2122	Highways England	Site Allocations	HS1/13	There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.	The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the

					capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.
1961	Canal & River Trust	Site Allocations	HS1/13	HS1/13 The Trust has previously commented on an approved scheme for this site which is currently being implemented.	Comment noted
1962	Canal & River Trust	Site Allocations	HS1/14	HS1/14 The Trust have recently commented on a planning application (APP/2016/0049) to develop this site and raised matters to ensure that the impacts on the canal and towpath arising from the future development of the site are mitigated. We note that the issues we raised are referenced in the policy requirements and design principles for the site.	Comment noted.
2123	Highways England	Site Allocations	HS1/14	There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.	The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.
2406	Lancashire County Council	Site Allocations	HS1/14	LLFA General comments relating to all 7 sites <ul style="list-style-type: none"> <li>All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>All sites have some susceptibility to surface water and ground water flooding</li> <li>NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> </ul>	Bullet point 1: Noted. This is made clear in Local Plan policy CC4 Development and Flood Risk. Bullet point 2: The site's susceptibility to these sources of flooding has been examined as part of the the Council's Strategic Flood Risk Assessment (SFRA). Bullet point 3: Noted. Local Plan policy CC5 (Surface Water Management and Sustainable Drainage

				<ul style="list-style-type: none"> <li>Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are required outside of the planning framework.</li> <li>The district lead officer may wish to add further comments on his return from leave, if time permits.</li> <li>We would like to be invited to future meetings with your appointed consultants</li> </ul> <p>HS1/14 – Waterside Mill, Langham There is a culvert within the site. I do not believe we have had any flooding reports for this site or within the vicinity but the district lead officer would be able to confirm this on his return from leave. See general comments above</p>	<p>Systems) sets out this hierarchy and requires it to be followed. Bullet point 4: Noted. Add to policy CC4 para 2: 'Any works affecting ordinary watercourses may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.' A paragraph has been added to the supporting text for policy CC4 outlining the LLFA's Ordinary Watercourse Consenting and Enforcement Policy. Bullet point 5: Noted. Bullet point 6: The LLFA was invited to the SFRA inception meeting with consultants and EA. Site specific comments: Reference to the culvert and requirement for no development within 8m of this is included in Policy HS1/14.</p>
1739	Worsthorne-with-Hurstwood Parish Council	Site Allocations	HS1/15	<p>The infrastructure in Worsthorne will not easily support this development. The road is incapable of widening, the drain and water supply are at capacity. The village would require more places in the school, facilities such as a medical centre and the public transport provision is likely to be removed, putting more pressure on the roads. It is disputed that there is a need for the sort of houses it is proposed would be built on this site. Burnley's new industry is to the west of the town adjacent to the M65, a better location also therefore for residential development. Worsthorne's attraction is that it is a village with good natural tourist and leisure facilities. These will be compromised. The land is very wet in places, there is abundant wildlife (lapwings, bats (protected species), osprey. We question the need for developing this site and query if the local demographic will buy there (starter homes needed). High achievers will not want to send their children to Burnley schools as they are performing at present.</p>	<p>Discussions with Lancashire County Council have concluded that this site can be safely accessed and that development of this site will not compromise the capacity of the road network.</p> <p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>The SHMA identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>Infrastructure Capacity and future requirements has been considered by the Infrastructure Delivery Plan which is published alongside the Proposed Submission Local Plan.</p> <p>Policy SP4: Development Strategy sets out a</p>

					<p>settlement hierarchy for the towns and villages identifying their respective role and function, and the scale of development for housing, employment and retail. Development will be focussed on Burnley and Padiham with development of an appropriate scale supported in the main and small villages. To accommodate the level of development identified in policies SP2: Housing Land Requirement 2012-2032 and SP3: Employment Land Requirement 2012-2032 the Strategic Housing and Employment Land Availability Assessment provides evidence that these requirements cannot be met in full on previously developed sites, or on sites within the Urban Boundary as set out in the 2006 Burnley Local Plan. With this in mind, the Proposed Submission Local Plan includes a mix of brownfield and greenfield sites and the new development boundaries for Burnley, Padiham, Worsthorne and Hapton include sites outside of the 2006 Burnley Local Plan urban boundary. The focus of the Plan however remains on brownfield land and on land within the urban areas.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for proposed housing allocation HS1/15 requires potential ecological impacts to be considered and an ecological survey will be required to accompany any planning application in accordance with proposed Policy NE1 identifying how the development would manage protected species and ecological networks.</p>
2209	Burnley Wildlife Conservation Forum	Site Allocations	HS1/15	<p>HS1/15 Former Heckenhurst Reservoir – Reasons for Objection</p> <p>The proposed new Development Boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a prominent green field site in attractive open countryside which is in active agricultural production. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Sect 41 protection along with Lancs BAP Long List and key species within 250 metres of the site. The Houghton Hag Biological Heritage site, also an Ancient Woodland Inventory site, is within 250 metres of the site and the Michelin Factory/Smallshaw Industrial Estate, Swinden Bridge Valley and Hurstwell Biological Heritage Sites are within 1km of the site. Also, the Lancashire Woodland and Grassland Ecological Network and the River Brun/River Don including Brun Valley Forest Park LNR</p>	<p>The Council believes that this urban extension to the urban boundary is justified in order to fullfill the Objectively Assessed qualitative and quantative requirements for housing. The site specific policy requirements and design principles seek to minimise the landscape impact of development on this site.</p> <p>Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced</p>

				search area are in close proximity to the site which forms part of the wildlife links network for these areas.	persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.
1782	United Utilities Property Services	Site Allocations	HS1/15	<p>Section 5: Policies</p> <p>As required by the NPPF, the Council have identified sites in Policy HS1 which will provide sufficient sites to meet the identified residual requirement. Whilst we support the inclusion of the brownfield former Heckenhurst Reservoir site for housing we believe there is a strong case for the inclusion of a greater area of the site to be allocated for residential development, and for the whole of the site to be included within the settlement boundary of Brownside, Burnley as previously set out in our representation to the 'Burnley Local Plan Issues and Options - Additional Sites' consultation (appended to this representation for convenience).</p> <p>The Heckenhurst site is available, suitable and viable for residential development now such that the development of the site for residential use will support the Council's required housing land supply in the short and medium term where there is an acknowledged economic pressure impacting on the delivery of such sites.</p> <p>Furthermore, there are genuine concerns over the Council's delivery of the identified capacity of housing land on identified sites, particularly where there are sensitivities in regards to: flood risk (sites within flood zone 3); contamination that cannot be easily, and viably, remediated (including landfill and former industrial sites); existing employment uses (employment sites are likely to be lost for residential uses where there are residential land pressures and where insufficient residential sites are identified); and existing sites of important community function and benefit.</p> <p>Overall, we have concerns over the delivery of over 100 dwellings from a number of such sites that we question would come forward as part of the deliverable housing supply for Burnley. This represents a key issue for the authority in achieving their growth aspirations and vision to 2032.</p> <p>It is therefore wholly appropriate for a larger area of the Former Heckenhurst Reservoir site to be allocated for residential development in order to achieve the Council's objectives for providing a range of housing sites for both affordable and aspirational new homes for residents of Burnley. This enlarged allocation, extending north towards Heckenhurst Farm would support the objectives and vision of the Local Plan to create sustainable communities, not harm the landscape character or appearance of the wider area but deliver a meaningful contribution to the housing challenges of Burnley.</p> <p>We would therefore support the extension of the existing Former Heckenhurst Reservoir site, north to Heckenhurst Farm, to help provide the identified potential shortfall in dwellings of the previously considered sites.</p>	The Council disagrees that the level of provision included in the Proposed Submission Local Plan is not deliverable. The sources of supply identified in Policy SP2, including the proposed allocation of sites is robust and will meet in full the Boroughs Objectively Assessed Need for housing
1342	Environment Agency	Site Allocations	HS1/15	Our previous response indicated that this site was partly located on a historic landfill site. As such we would recommend that, as with other potentially contaminated sites, the following is included in Supporting Information, "Land contamination investigation	Additional information added to site's Additional and Site Specific Policy Requirements and Design Principles



				and the relevant remediation will be required in accordance with Policy NE5”.	
2297	United Utilities Property Services	Site Allocations	HS1/15 (Proposed extension to allocation)	<p>Section 5: Policies</p> <p>As required by the NPPF, the Council have identified sites in Policy HS1 which will provide sufficient sites to meet the identified residual requirement. Whilst we support the inclusion of the brownfield former Heckenhurst Reservoir site for housing we believe there is a strong case for the inclusion of a greater area of the site to be allocated for residential development, and for the whole of the site to be included within the settlement boundary of Brownside, Burnley as previously set out in our representation to the ‘Burnley Local Plan Issues and Options - Additional Sites’ consultation (appended to this representation for convenience).</p> <p>The Heckenhurst site is available, suitable and viable for residential development now such that the development of the site for residential use will support the Council’s required housing land supply in the short and medium term where there is an acknowledged economic pressure impacting on the delivery of such sites.</p> <p>Furthermore, there are genuine concerns over the Council’s delivery of the identified capacity of housing land on identified sites, particularly where there are sensitivities in regards to: flood risk (sites within flood zone 3); contamination that cannot be easily, and viably, remediated (including landfill and former industrial sites); existing employment uses (employment sites are likely to be lost for residential uses where there are residential land pressures and where insufficient residential sites are identified); and existing sites of important community function and benefit.</p> <p>Overall, we have concerns over the delivery of over 100 dwellings from a number of such sites that we question would come forward as part of the deliverable housing supply for Burnley. This represents a key issue for the authority in achieving their growth aspirations and vision to 2032.</p> <p>It is therefore wholly appropriate for a larger area of the Former Heckenhurst Reservoir site to be allocated for residential development in order to achieve the Council’s objectives for providing a range of housing sites for both affordable and aspirational new homes for residents of Burnley. This enlarged allocation, extending north towards Heckenhurst Farm would support the objectives and vision of the Local Plan to create sustainable communities, not harm the landscape character or appearance of the wider area but deliver a meaningful contribution to the housing challenges of Burnley.</p> <p>We would therefore support the extension of the existing Former Heckenhurst Reservoir site, north to Heckenhurst Farm, to help provide the identified potential shortfall in dwellings of the previously considered sites.</p>	In Policy SP2, HS1 and the housing trajectory in Appendix 5 the Council set out how they will meet the Borough's objectively assessed need for housing. The Council do not consider that there is need to identify additional housing sites beyond those proposed. The larger site boundary was considered during the production of the Strategic Housing (and Employment) Land Availability Assessment. The Council consider that the boundary proposed in the Proposed Submission Local Plan is the most appropriate extension to Brownside at this location.
2124	Highways England	Site Allocations	HS1/16	There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.	The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the

					capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.
2125	Highways England	Site Allocations	HS1/17	There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.	The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.
1343	Environment Agency	Site Allocations	HS1/17	For additional information the culvert contains an ordinary watercourse. Any development within the easement would require consent from Lancashire County Council as the LLFA and we would require consultation on the site investigation for contamination to assess the risk to controlled waters.	Additional information added to the site's supporting information.
1572	Lancashire Wildlife Trust	Site Allocations	HS1/18	The Trust objects to the removal of the Former Ridgewood School at Stoneyholme (Parcel 30, as delineated on the Preferred Options Map) from the Green Belt. The Trust may be prepared to withdraw its objection if the boundary change was revised.	<p>The Green Belt Review prepared by LUC on behalf of the Council concludes that this site no longer fulfils its Green Belt purposes due to its particular circumstances on Oswald Street over time which has altered its role in Green Belt terms.</p> <p>This site already has planning permission for housing development restricted to the footprint of the former school, recognising n its current location within the Green Belt.</p> <p>The Council accepts the case for removal and</p>

					considers the released site is suitable for housing development.
1116	Sport England	Site Allocations	HS1/18	<p>Sport England welcomes and supports the inclusion of a requirement in point 4 to either retain the playing field or replace with equivalent provision elsewhere.</p> <p>The only amendment I would wish to see to bring this element in line with Sport England's Playing Field Policy is the inclusion of the words "equivalent or better quantity and quality replacement within the locality." This is to ensure a poor quality playing field is not replaced with a similarly poor quality playing field to meet the equivalent requirement. The inclusion of better ensures a poor quality playing field is reprovided to the current sports standards. The inclusion of within the locality is to ensure the playing field is replaced within the same catchment area as the loss occurs to meet local community demand.</p> <p>Sport England will be a statutory consultee on any subsequent planning application and will assess that application against its own policy and paragraph 74 of NPPF. In addition Sport England will refer to the Council's current Playing Pitch Strategy to ensure any replacement is line with the recommendations of that Strategy.</p> <p>Sport England also welcomes the inclusion of the potential for contributions in accordance with policy IC4. Housing growth results in an increase in population with a corresponding increase in demand for sport from certain sections of that population. It is important existing sites are enhanced to create the capacity required to take that additional demand or provide new pitches where necessary. Sport England has developed a new strategic planning tool to estimate the demand for pitch sports arising from housing growth to be used alongside the Playing Pitch Strategy. Please contact the Regional Sport England Planning Manager for information on its use and application.</p>	<p>Support is noted.</p> <p>Changes made to the site's Additional and Site Specific Policy Requirements and Design Principles as suggested.</p>
1579	Lancashire Wildlife Trust	Site Allocations	HS1/18	<p>The Trust objects to the allocation of this site for housing, its removal from the Green Belt and inclusion within the Development Boundary. The Trust notes the presence of neutral grassland on the site. However, if the site was to be retained, an ecological survey should be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1. The Trust may be prepared to withdraw its objection if the boundary change was revised.</p>	<p>The Green Belt Review identifies the Green Belt Parcel which includes this site as a potential site for release from the Green Belt. The Council agrees with this recommendation.</p>
1567	Lancashire County Council Property Services	Site Allocations	HS1/18	<p>Lancashire County Council support the allocation of the former Ridgewood High School for the development of around 42 dwellings, although subject to site constraints this should not be a limit to the amount of development that can be accommodated on the site. The site is surplus to educational requirements and is located at the heart of the built up area in a very sustainable location. Its development for residential purposes is entirely appropriate as is evidenced by the extant outline planning permission on the site.</p> <p>Notwithstanding this, the policy is too prescriptive at this stage and should be amended</p>	<p>Support noted. The Council do not consider the proposed Additional and Site Specific Policy Requirements and Design Principles are too prescriptive, rather they are necessary to ensure the site is brought forward to make a meaningful contribution to the Borough's housing supply in the most appropriate manner.</p>

				<p>as follows:  HS1/18 – Former Ridgewood High School  Housing Delivery The site is acceptable for around 42 dwellings.  Policy Requirements and Design Principles  1) A mix of dwelling types WILL BE ENCOURAGED SUBJECT TO VIABILITY;  2) Access should be taken from Folds Street UNLESS A SAFE AND SUITABLE ACCESS CAN BE ACHIEVED ELSEWHERE;  3) Screening and noise mitigation measures should be considered IF REQUIRED, as the site lies adjacent to the M65 to the west, Stoneyholme Community Primary School to the north-east, and a nursery school to the south; and  4) The existing playing pitches should be retained and/or replaced by equivalent provision elsewhere IF THE DEVELOPMENT WOULD RESULT IN A LOSS OF PITCHES AND THERE IS A SHORTFALL OF PROVISION, details of which should be submitted with any planning application. Planning contributions may be required in accordance with Policy IC4 AND SUBJECT TO VIABILITY;</p>	
1702	Pennine Lancashire Community Farm	Site Allocations	HS1/18	<p>Re the proposed development of the Ridgewood School Site H51/18, which I now understand includes the currently designated playing field areas / green belt land. We would object to any further development of this site beyond the outline planning permission of 24 houses on the following grounds:</p> <ul style="list-style-type: none"> <li>• The additional access required along Burleigh Street would potential put it beyond its natural capacity given existing usage.</li> <li>• We would object to the removal of the important part of Green Belt land.</li> </ul>	<p>Discussions with Lancashire County Council have raised no concerns over the capacity of Burleigh Street.</p> <p>The Green Belt Review prepared by LUC on behalf of the Council concludes that this site no longer fulfils its Green Belt purposes due to its particular circumstances on Oswald Street over time which has altered its role in Green Belt terms.</p> <p>This site already has planning permission for housing development restricted to the footprint of the former school, recognising n its current location within the Green Belt.</p> <p>The Council accepts the case for removal and considers the released site is suitable for housing development.</p>
1344	Environment Agency	Site Allocations	HS1/19	<p>For the purposes of strategic flood risk management we would request that the surface water is discharged below greenfield QBar rates (where applicable) and attenuated onsite. This is because there was significant flooding along the River Calder in December 2015 and increased retention of surface water, if possible, would help to reduce flood risk overall (NPPF, para 102).</p>	<p>Policy CC5: Surface Water Management and Sustainable Drainage Systems requires major developments to restrict surface water discharges from developed sites to QBar rates (mean annual greenfield peak flow).</p>
2448	Residents Against Hollins Cross	Site Allocations	HS1/2	<p>19.0 – School Places, Doctors, Dentists, Hospital Facilities</p> <p>19.1 - Has the Council made provision for new schools to be built to take the 2 children</p>	<p>As part of the plan-making process the Council assesses the likely requirement for infrastructure for the plan as whole and for individual sites, consulting</p>

	Farm Development			<p>per house in this new estate, these will all have to be in the Rose Hill Area - let's say 210+ primary school places and 210+ secondary school places over a 12 year period not to mention the natural expansion of families already resident in the area?</p> <p>19.2 - Has the Council made provision for Nursery Places to be made available in the Rose Hill area?</p> <p>19.3 - At present all doctors surgeries have full patient lists has the Council made ( provision for new Doctors and Dentists to be available to the area?</p> <p>19.4 - The Overstretched A&amp;E at Blackburn cannot cope with the influx of Burnley people. Will the Council now champion a new A&amp;E at the Burnley General Hospital?</p> <p>19.5 - Should building commence then the New Road   Glen View Road site junction will create more traffic bottlenecks with Temporary Traffic Lights - Lorries   Vehicles, Mud   Debris on the road - will the Council pay for Cleaning of Roads and the cleaning of resident's vehicles and resident's property on Glen View Road until all work is completed in 2032?</p> <p>19.6 - A 12 year projected building plan at the Hollins Cross Farm site would severely impact on the A646 road surface which has just recently been resurfaced, the council would be liable for the damage to the surface and also the damage to cars from the deterioration of the road surface? Has the Council costed the continual road surface repairs?</p>	<p>and liaising (including in line with the duty to cooperate) with a number of service providers including health service providers.</p> <p>The Local Plan is accompanied by an Infrastructure Delivery Plan (IDP) which is being produced alongside the Local Plan. This reviews and evaluates the social, environmental and economic infrastructure that will be required to support the development and growth set out in the Plan. It identifies the infrastructure required to support the proposals and development sites in the plan, the likely delivery partners e.g. developers, the borough and county councils, government agencies and the likely funding sources. It is a living document in the sense that infrastructure requirements will change over time as new or improved infrastructure is provided or facilities are lost and technological advances or social and national policy changes require new forms of infrastructure or alternative methods of provision.</p>
2444	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>8.0 – Problems Associated with Properties Build Over Abandoned Coal Mines</p> <p>8.1 - Has the Council done a survey to ascertain the impact on the local house prices and the cost to local residents of building houses over Abandoned Coal Mines?</p> <p>8.2 - Has the Council done a survey to check how Insurance costs will rise to local residents as they will be in the same post code area as New Houses built over the Hollins Cross Farm site mine workings, this is more of a problems as the new development of the Hollins Cross Farm site then the mine working are to be disturbed?</p> <p>8.3 - Has the Council done a survey to check with insurance companies as they may not insure present homes nearby - <a href="http://www.policyexpert.co.uk/home-insurance-guides/specialist-insurance/subsidence-and-home-insurance/">http://www.policyexpert.co.uk/home-insurance-guides/specialist-insurance/subsidence-and-home-insurance/</a> - and more so they may ( not insure the "New Build Houses" - this makes them worthless - even to the Manchester Yuppies that the council wish to attract</p> <p>.</p> <p>8.4 - Has the Council set aside funds for Legal Action from local residents and the "New Manchester Money" should this insurance issue become a reality?</p>	<p>Residents concerns about the impact of major housing development close to their homes on their own properties are entirely understandable.</p> <p>The Council has not undertaken a survey to ascertain the impact on the local house prices or insurance costs due to building on the site. This is not necessary. House prices are affected by a variety of macro and micro economic factors and any effects, be they positive or negative, are not a material consideration for the Local Plan.</p> <p>It is not clear why the group fear local residents will have to meet any of the costs of building on the site. This will be met by the developer.</p> <p>House purchasers in the area and their insurers will already no doubt require a coal authority mining</p>

				<p>8.5 - Has the Council done a survey and set aside funds to compensate residents who border the Hollins Cross Farm site for any increase in subsidence and land settlement due to the disturbance in the abandoned mine workings, this also includes depreciation in the value of present properties as they could be reclassified as built on subsiding old mine working?</p>	<p>report and this will or won't be factored into the premium as determined by the insurer.</p> <p>There is no evidence to suggest that the new houses once approved if built in accordance with the appropriate permissions and consents will not be insurable. Nor is there evidence or reason to suggest that the development would endanger exiting properties.</p> <p>Of course it does sometimes happen that developers build otherwise than in accordance with the required consents and damage nearby properties, but there is nothing to suggest that would be that case here. The Council cannot assume this as a reason not to allocate a site. If any damage did occur residents could seek damages from the developer.</p>
2441	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>5.1 - The Hollins Cross Farm site where the proposed housing estate is to be built is Green Field and of significant natural beauty. Development on this site will have a detrimental impact upon residential amenities and the visual impact of a development of this magnitude that of carving out the hillside will spoil the natural beauty of the Lancashire countryside and will have an irreparable impact on the character of the area. The creation of Urban Sprawl such as is planned by Burnley Borough Council will have a catastrophic effect on local amenities, overrunning the present availability of local infrastructures .</p> <p>The planned property density, over-development and modern day housing estate layout and designs coupled with the use of modern materials in a mature countryside environment will create a visually unaesthetic external appearance to the existing listed buildings and mature properties that already exist in the surrounding Hollins Cross Farm site.</p> <p>5.2 - Has the Council walked and examined the full terrain of the Hollins Cross Site?</p> <p>5.3 - Has the Council done a study and employed people from the JNCC or DEFRA to ensure that there are NO flora, fauna, insects, moths, butterflies, bees, ladybirds, voles, newts or more importantly bats or any such animals that are on the UK protected/endangered lists inhabiting the fields and surrounding areas that could be compromised by building on this land in accordance with -</p> <p>The legislative provisions in Great Britain for the protection of wild plants are contained primarily in the Wildlife and Countryside Act, 1981, Section 13, with protected wild</p>	<p>It is accepted that development of this greenfield site which currently lies within the countryside adjacent to the urban boundary will have a considerable impact on the landscape and will fundamentally change its character. This is not reason to prevent it being allocated per se.</p> <p>The need to look to release sites outwith the current urban boundary is set out in Policy SP2 and SP4.</p> <p>The approach to site selection is summarised in para 4.2.21 of the Plan and a ' background paper' targeted at the general public to explain the site selection process in more detail is being produced for the 6 weeks Proposed Submission Consultation starting on 31 March 2017.</p> <p>Each site needs to be assessed individually on its social, environmental and economic impacts and benefits, including both its site specific and cumulative impacts and importantly its contributions to meeting the housing need identified.</p> <p>Site Specific Policies and Design Details seek to address the visual impact and design of any proposals</p>

		<p>plants listed on Schedule 8, and the licensing and enforcement provisions in Sections 16-27. In England and Wales, enforcement provisions ( were extended by the Countryside Rights of Access Act, 2000, Section 81 and Schedule 12. In Scotland, the provisions were amended by Section 50 and Schedule 6 of the Nature Conservation (Scotland) Act 2004. In Northern Ireland, the legal provisions are similar to those in Great Britain and are covered by the Wildlife (Northern Ireland) Order, 1985 (Amended 1995), Articles 14 and 18, and the protected wild plants are listed on Schedule 8. The protection of European plant species in Great Britain is covered by the Conservation (Natural Habitats, &amp; c.) Regulations, 1994, Part II, Regulations 42-46, with the wild plant species listed on Schedule 4 and, in Northern Ireland, the provisions for European species are laid down in the Conservation (Natural Habitats, etc.) Regulations (NI) 1995, Part II, Regulations 37-41, and the wild plant species are listed on Schedule 4. The Wildlife and Countryside Act (as amended) 1981 is still the major legal instrument for wildlife protection in Britain. This legislation covers the protection of a wide range of protected species and habitats and provides the legislative framework for the designation of Sites of Special Scientific Interest (SSSIs). The Conservation (Natural Habitats, &amp;c.) Regulations 1994 implement two pieces of European law and provide for the designation and protection of 'Special Protection Areas' (SPAs) and 'Special Areas of Conservation ' (SACs), together with the designation of 'European Protected Species', which include bats and great crested newts. The Countryside and Rights of Way (CRoW) Act 2000 compels all government departments to have regard for biodiversity when carrying out their functions. In addition, the powers of the statutory nature conservation organisation (Natural England for England) to intervene in the management of SSSIs were strengthened and steps taken to assist in prosecuting individuals breaching wildlife legislation . The Protection of Badgers Act 1992 consolidated existing legislation on the protection of badgers. This legislation is intended to prevent the persecution of badgers. The act protects both individual badgers and their setts."</p> <p>More information at this URL - Please Confirm the Council has studied</p>	<p>coming forward.</p> <p>Surveys:</p> <p>Planning Policy Officers have not walked the full terrain of the Hollins Cross Farm Site. This is not necessary.</p> <p>The Council has undertaken or employed others on its behalf to undertake a desk top ecological survey and protected species walk over survey. The details of the surveys undertaken and where these can be found on the Council's website have been supplied to a representative of the opposition group. Those employed to do this work do not work for DEFRA or the JNCC.</p> <p>The Council is aware of the requirements of the legislation referred to, where relevant; and the Council's professional planning officers are familiar with relevant national policy, guidance, appeal decisions and case law necessary for preparing the Local Plan. Specials consultants are employed where necessary to support the work of the Planning Policy Team.</p> <p>The Council has employed specialist consultants to carry out a Habitats Regulations Assessment of the Likely Significant Affects of the Plan proposals on the South Pennines SPA and SAC which has included an Appropriate Assessment of the effects on Integrity of these European Sites. (LUC March 2017)</p> <p>Policy NE1 of the Plan: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any</p>
--	--	---	---

					development commences. The specific requirement for a survey and the addressing of these issues has been added to HS1/2 (Clause 5) as the desk top survey has confirmed the presence of Protected Species at this site and Priority Habitat (the Pond).
2449	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>17.0 – Previous abandoned building – Hollins Cross Farm site at Wilkie Avenue</p> <p>17.1 - A number of houses were built on a small area of the Hollins Cross Farm estate 40+ years ago by William Leech Ltd (Newcastle), this was Wilkie Avenue - but building work was abandoned due to the ground conditions, the properties were sinking. The contractors at the time found foundations and drains were being washed away overnight and plant machinery was having to be recovered from the Wetland area as it became bogged down or sank at night.</p> <p>17.2 - Has the council consulted the original developers William Leech and has the council looked at the original development documentation to understand why the original development was stopped.</p> <p>17.3 The white circle on the image shows the end of Wilkie Avenue – building work was halted as new properties were sinking and it was decided not to continue further into the field. The red outline is the extent of the wetland area where ground conditions worsen with water saturation. The blue lines show streams in the field. The yellow circle is the naturally formed pond at the back of 85/87 Glen View Road.</p> <p>17.4 - It can be seen from this aerial photograph the darkening area at the bottom of field close to pond and houses this is the water saturation from the hillside that has not made it to the streams draining downwards .</p> <p>17.5 - A number of residents of Wilkie Avenue have documented solicitors search information prior their house purchases confirming that the council's plans to build a large number of houses on the proposed Hollins Cross Farm land were abandoned due to adverse ground conditions. These ground conditions have only worsened over the years.</p>	We have checked the Council's historic planning records and there is no evidence to support the claim of previously abandoned buildings at this site.
2442	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>6.0 – Ecology Overview of Hollins Cross Farm Site</p> <p>6.1 - The Area designated by Burnley Borough Council as a Prime Greenfield site suitable for development has a varied topography being a combination of rich arable and grazing land adjoining a lush naturally formed wetland with various Water Courses, Streams, Rising underground springs and an idyllic naturally formed Pond.</p> <p>6.2 - The designated area contains many trees, bushes and hedgerows, that are home to many indigenous and area specific species of plants and insects. It is bordered by</p>	<p>The description of the site is noted.</p> <p>The Council is aware of the information on its own website.</p> <p>Officers have read the relevant national policy, guidance, appeal decisions and case law necessary for preparing the Local Plan.</p>



				<p>dense areas of forest and pocketed with areas of natural man made copse plantations instigated by the Forest of Burnley Project - Please Confirm the Council has studied this. <a href="http://www.burnley.gov.uk/residents/parks-open-spaces/forest-burnley">Http://www.burnley.gov.uk/residents/parks-open-spaces/forest-burnley</a>.</p> <p>6.3 - The designated area of Hollins Cross Farm is home to Bats, Badgers, Foxes, Rabbits, Deer, various species of Owl, Kestrels, Sparrow Hawk, Merlin and other protected Birds of Prey are all regularly seen in the field, by residents of Glen View Road, Woodplumpton Farm, Wilkie Avenue, Fairways Drive and Hollins Cross Farm. More so recently there are nesting pairs of curlews adjacent to the site, these being classed as a protected species - Please Confirm the Council has studied this. <a href="http://www.rspb.org.uk/whatwedo/projects/details.aspx?id=198450">Http://www.rspb.org.uk/whatwedo/projects/details.aspx?id=198450</a></p> <p>6.4 - The upper part of the field has been for the past 20 years been rich grazing land for cattle with large areas of the upper part of the field that are harvested every year for silage. It has a steep incline, it contains natural waterways, streams, gullies and underground springs that rise in a number of areas to aid the natural water drainage of the surrounding hills.</p> <p>6.5 - The center part of the field is meadow land intersected with streams I watercourses I containing many species of flora and fauna and is again rich pasture land and used for grazing. This area also terrain wise is of a steep incline.</p> <p>6.6 - The lower part of the field is a wetland of lush marsh grasses, reeds, plants and rushes with intersecting streams and water courses. The lower half also contains a naturally formed pond that is home to breeding water fowl and birds. The wetland and pond can be seen from aerial photography and has been there for over 50+ years.</p> <p>6.7 The surrounding hills including the Hollins Cross Farm Site originally drained into a very large reservoir known locally as "Rock Lane / Bottom / Woodplumpton" reservoir.</p> <p>6.8 The reservoir was drained just after the A646 (New Road) was built and so the bottom half of the fields now bordering the A646 have had to have a number of Concrete Culverts built under the A646 to allow the streams, watercourses in the fields to drain into the original reservoir in-flow rivers.</p> <p>6.9 The Hollins Cross Farm site borders a protected conservation area on Woodplumpton Rd. to the East which has recorded protected bat roosts that use the Hollins Cross Farm site for hunting and feeding, predominantly over the insect laden wetland area and pond.</p> <p>[Map provided</p>	<p>The Council is aware of the presence of Protected Species on the site and the Pond (Priority Habitat) See comments response Ref 2441.</p> <p>There isn't a 'conservation area' as such bordering the site. The opposition group are assumed to be referring to .....???</p> <p>See comment response Ref 2446 on watercourses and flooding issues.</p>
1211	Burnley Golf Club	Site Allocations	HS1/2	<p>Burnley Golf Club are the owners of the freehold land shown for the purpose of this letter edged red on the plan annexed hereto and we have also shown coloured yellow on this plan details of the Hollins Cross Farm development proposal referred to above.</p>	<p>The council can confirm that the yellow area on the map accompanying this representation is the allocation for HS1/2 Hollins Cross Farm.</p>

				<p>Please advise us if the yellow area is incorrect. We make the following comments:-</p> <ol style="list-style-type: none"> <li>1. When the scheme is designed or proposed, this should not have any detrimental effect on adjoining properties, in particular Burnley Golf Club who have been at the property for over 100 years.</li> <li>2. The southern boundary of the development as it borders with the Golf Club land may be affected by errant golf balls. To avoid danger of this the development should proceed with a buffer zone and/or. Standoff zone with no public access.</li> <li>3. Any development should take place with a view to minimising any noise from that part of the development as it borders the Golf Course.</li> </ol>	<p>Policy HS1/2 specifies that there should be appropriate landscaping and boundary treatment should be included to the southern boundary, which may help create a buffer for any errant golf balls, as well as helping create a natural noise buffer. This issue can properly be assessed at the design stage. The schme is proposed to be low density which will allow for appropriate buffering.</p>
1437	Habergham Eaves Parish Council	Site Allocations	HS1/2	<p>This proposal for houses is to the right of Woodplumpton Road. The Parish Council was involved in problems with flooding caused by water cascading from the fields on to the land of houses on the cul de sac of Wilkie Avenue, Habergham Eaves.</p> <p>The history of the involvement of the Parish Council, with this ongoing situation, can be traced back to 2013 with Mr Nigel Hopwood of Burnley Borough Council and later with Mr Ian Welsby, Head of Flood Risk Management, Lancashire County Council and ultimately Mr Charles Lang of Smiths Gore the Land Agent's for Lord Shuttleworth, - Lord Shuttleworth being the owner of the land. It was 2015 when a ditch was finally dug out to help lessen the problem.</p> <p>Residents and the Parish Council have growing concerns with regard to the above development and the Parish Council in particular as excavating etc. could again lead to flooding and exacerbate a problem that at the moment is minimal. There are also concerns regarding old mine workings.</p> <p>Access is another potential problem – the New Road is extremely busy. The impact on the Summit junction could be horrendous as at the moment traffic, travelling towards this junction on Glen View Road can be hazardous when said flow of vehicles wishing to turn right down Manchester Road towards Burnley. Vehicles turning right are often left in 'no man's land' as the 'green signal' is 'ON' for turning right but also for vehicles travelling up from Rossendale road wishing to turn right and travel straight on.</p> <p>Habergham Eaves Parish Council would question whether checks have been carried out on all 'Preferred Options' with regard to possible underground streams.</p> <p>Finally all sites in Habergham Eaves in the 'Preferred Options Document' are the habitat to a variety of wild birds and species of flora and fauna.</p>	<p>Policy NE1 of the Plan: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences. The specific requirement for a survey and the addressing of these issues has been added to HS1/2 (Clause 5) as the desk top survey has confirmed the presence of Protected Species at this site and Priority Habitat (the Pond).</p> <p>The Summit junction has been assessed and suitable mitigations have been included in the Draft Infrastructure Delivery Plan</p> <p>The site is situated in Flood Zone 1 and is therefore compatible with the proposed housing use. The Council's Strategic Flood Risk Level 1 SFRA found that there are no significant surface water flood risk at the site. The Council is aware of the issues of flooding on the road.</p>
2443	Residents	Site Allocations	HS1/2	7.0 – Mining	The Council has consulted the Coal Authority on the

<p>Against Hollins Cross Farm Development</p>	<p>7.1 - The town of Burnley over the years had one of highest concentration of mine workings in Lancashire and as such has vast mine workings that are documented and also many mine workings that are not documented .</p> <p>7.2 - The proposed area of Hollins Cross Farm is designated by the Coal Authority as a HIGH RISK AREA and as such is recommended it should not have houses built on it. This designation by the "The Coal Authority" is shown on their maps and is shown highlighted in RED in figure MW1.0</p> <p>[Coal authority map provided]</p> <p>7.3 There are a number of small private mineshafts dug into the Hollins Cross Farm site.</p> <p>7.3.1 - The present owner of Hollins Cross Farm has confirmed that Hollins Cross Farm used to have its own private coal mine and that as a boy he worked it with his father and grandfather, the entrance to this abandoned shallow mine being near to Wilkie Avenue and stretches under the field into the Coal Seam that is highlighted by the above Red circle in figure. MW1.0.</p> <p>-The owner of the smallholding on the corner of Woodplumpton Road and New Road Mr. D. Bradbury and his Son have on their property the entrance to a Private Mine leading into the Hollins Cross Farm site that was mined for Anthracite many years ago - again this is another example of "Undocumented Mining" above and beyond what the Coal Authority have documented</p> <p>7.3.3- Local Retired Miner Mr. Brian Taylor of Glen View Road some 20+ years ago made an application with colleagues to extract coal from the Hollins Cross Farm site and has extensive knowledge of the area being a miner all his life. He knows the Hollins Cross Farm site to be riddled with shallow mine workings.</p> <p>7.4 - There is more detailed information with regard to Coal Mine workings in the Hollins Cross Farm site at the following URL - Please Confirm the Council has studied this.  <a href="https://www.gov.uk/government/publications/coalfield-plans-burnley-area">https://www.gov.uk/government/publications/coalfield-plans-burnley-area</a></p> <p>7.5 - Figure MW1.1 shows a map of the Mine Workings that cut into the base of the hillside at the Hollins Cross Farm Site it can be seen that it covers 2/3 of the field from New Road I Glen View Road and so the land is designated as High Risk and not for development - Please Confirm the Council has studied this.  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/429984/2015_Burnley_District_B_Development_Risk_Map.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/429984/2015_Burnley_District_B_Development_Risk_Map.pdf</a></p>	<p>Plan at all stages of its development. The Coal Authority responded to the Preferred Options consultation and did not raise any objection in principle to the development of the site.</p> <p>A portion of land to the north of the site allocation is recorded by the Coal Authority as being in a 'development high risk area', with the same portion also having 'probable shallow coal mine workings' recorded. The Council has also received anecdotal evidence from the public about past informal mining activity on the site and erring on the side of caution it is assumed to be correct.</p> <p>The Council has viewed the online Coal Authority information referred to in the Options document and requested and obtained a mining report for the site from the Coal Authority.</p> <p>The Council has undertaken a desk top survey of all known constraints including the contaminated land register</p> <p>The Council has not conducted its own mining or investigatory survey other than the species surveys previously mentioned and is not considered necessary. It has not undertaken a drone or geophysical survey.</p> <p>Officers are familiar with the relevant national policy, guidance, appeal decisions and case law necessary for preparing the Local Plan.</p> <p>Any site which is in a 'development high risk area' will require a coal mining risk assessment to accompany any planning application. If a developer decides to build on the site, then this report must also be submitted to accompany their planning application and permission would only be granted if any matters raised could be satisfactorily addressed. The Council has no information to suggest this issue could not be resolved.</p>
---	---	---

				<p>[Figure MW1.1 mining map provided]</p> <p>7.6 - The Specific Risk category of The Hollins Cross Farm site is designated as Probable Shallow Coal Mine Workings and is such not suitable for ( development. Pink means very shallow.</p> <p>7.7 The Coal Authority also groups Coal Mine workings into categories dependent on how close to the surface they are, below in figure MW1.2 highlighted in red - this URL shows a detailed map of the Mine Workings that are under the Hollins Cross Farm site . <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431758/2015_Burnley_District_B_Specific_Risk_Map.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431758/2015_Burnley_District_B_Specific_Risk_Map.pdf</a> - Please Confirm the Council has studied this.</p> <p>7.8 As the Hollins Cross Farm site is predominantly wetland I marsh I bog on top of shallow mine workings then in order to try and build house foundations there would have to be extensive Piling. At present gas bubbles can be seen escaping to the surface in the marshy land, has the Council done any survey and risk assessment work to understand how Piling with Continuous Flight Auger CFA or Driven Piles or any type of foundation work could disturb any more Gas Pockets or break into shallow coal mine workings. The ramifications of this would present the problem of poisonous mine gasses being released and continual seepage into any new dwellings, this is outlined in the -  "Guidance on Evaluation of Development Proposals on sites where Methane and Carbon Dioxide are Present" - Please Confirm the Council has read this paper. <a href="http://www.nhbc.co.uk/NHBCpublications/Lite">http://www.nhbc.co.uk/NHBCpublications/Lite</a></p>	<p>The Council does not need to obtain a permit form DEFRA for the matters listed in 7.13 as it is not intending to develop the site. The site is in private ownership and any developer would need to ensure these matters are addressed through the planning permission, building regulations approval and any related discharge consents.</p>
1693	Burnley Civic Trust	Site Allocations	HS1/2	<p>This site is on a hillside and will be unsightly and a blot on the landscape. Further there has been past flooding from this area and development will aggravate future flooding. The access to and from this site leads to the traffic lights at the summit where there is already congestion especially for traffic turning right into Manchester Road.</p>	<p>The site is locally prominent but it is not considered that a carefully designed scheme of the highest quality would be a blot on the landscape. Policy HS1/2 requires "a scheme of the highest quality which clearly and demonstrably contributes to increasing housing quality and choice across the borough will be expected, including to satisfy the requirements of Policy SP4 2) c) i and iii and SP5, as this site is a greenfield site in the open countryside"</p> <p>This requirement will need to be met in addition to all other relevant requirements of the Plan including Policies SP5.</p> <p>The potential traffic issues at Manchester Road have been assessed and suitable mitigation measures have been included in the Draft Infrastructure Delivery</p>

					Plan
1095	Winston Parkinson	Site Allocations	HS1/2	<p>We have lived here since 2010. Myself and wife are both retired. We moved here to have a nice quiet and peaceful retirement . We have been trying to get permission to have parking spaces for our car but no luck. We have to leave our car across the road. We have noticed the amount of traffic on this road has increased considerably this last 6 years. If there are more houses = more cars etc. we will never be able to get across the road! This road is a death trap now! I can still run a little if I have to do otherwise it can take 10-15 mins at certain times to get to the car. My wife suffers from asthma and finds it very difficult to walk across, she can't run! We know it would be a detrimental step to build houses directly behind our properties so we will definitely object to these proposals.</p>	<p>The Council has, and will continue to liaise with Lancashire County Council (the local highway authority) over highways impacts of sited both individually and cummulatively. Policy IC3 requires sufficient parking provision to be made for new housing developments through specific standards and in applying these standards the Council will look to ensure that any existing highways safety or on street parking issues should not be exacerbated,</p>
2445	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>20 – Localised Property Caveats</p> <p>20.1 - Woodplumpton Farm - The owner informs us that there is a Natural Spring that rises in the field and supplies the farm with water for irrigation and baths, this water supply is covered by Riparian Rights to use. It is still in use to this today and is documented in the Deeds to Woodplumpton Farm - disturbance of this natural water source cannot be interfered with or is natural downstream water course in the field. Note - "The environment agency lists the riparian rights and duties in England and Wales: The rights include ownership of the land up to the center of the watercourse unless it is known to be owned by someone else, the right for water to flow onto land in its natural quantity and quality, the right to protect property from flooding and land from erosion but subject to approval by the agency), the right to fish in the watercourse unless the right is sold or leased if an angler has a valid Environment Agency rod licence. They also include the right to acquire accretion and the right to boomage (a fee charge for securing a boom, generally ( for the retention of logs).</p> <p>Duties arising from the model include these:</p> <ul style="list-style-type: none"> <li>• Pass on the flow of water without obstruction, pollution or diversion affecting the rights of others.</li> <li>• Maintain the bed and banks of the watercourse and to clear any debris, whether natural or artificial, to keep any culverts, rubbish screens, weirs and mill gates clear of debris.</li> <li>• Be responsible for protection of land from flooding and cause no obstructions, temporary or permanent , preventing the free passage of fish.</li> <li>• Accept flood flows even if caused by inadequate capacity downstream, but there is no duty to improve the drainage capacity of a watercourse."</li> </ul> <p>Has the Council done a survey, investigated or done any land registry searches on ALL local properties that had dependency on the natural springs in the surrounding hill side I fields that are interlinked with Hollins Cross Farm site . These Riparian rights are still binding and interruption to these water supplies, or disruption to downstream access</p>	<p>Allocations in a Local Plan or planning permission do not sever any legal right enjoyed by adjoining properties over land.</p> <p>See separate comments</p>

				<p>of the water rights associated with the Hollins Farm Site is illegal.</p> <p>20.2 - The Owner of Glen View House also has Riparian rights to a cistern in Hollins Cross Farm this is documented in the deeds to Hollins Cross Farm any interruption in this flow by development will cause a flood to residents of Wilkie Avenue and Fairways Drive. The diversions of springs in the Hollins Cross Farm site again is both ecologically an environmentally damaging and illegal. Is the Council aware of this?</p> <p>20.3 - A number of gardens on Glen View Road I Wilkie Avenue I Fairways Drive become water logged when the rainfall is heavy and natural water seepage drains from the hillside. Proposed building on the slope of the field will mean many new properties being dug into the hillside, with concrete and tarmac driveways and access roads, this in turn will make new properties very prone to underground water seepage and gardens full of water at the base of the proposed development. The development will divert the natural drainage that has formed over hundreds of years, has the Council done a survey to determine the disruption to the natural water courses both above and below the surface in the area above Wilkie Avenue and Fairways Drive?</p> <p>20.4 - Due to the slope of the hill if special work such as "Piling" is needed to provide the foundation of new properties or other specialist foundation work such as shuttering needs to be performed to build on the waterlogged land this will mean that the large vehicles needed to drill the piles and concrete in reinforced piles will cause further traffic jams on the adjoin roads, 216 houses * 10 piles per house as just a guess a lot of disruption over many years - has the Council done a Study or factored in the costs of providing extra Double Glazing and Sound deadening insulation to all the present residents of Glen View Road, Wilkie Av</p>	
1765	Lord Shuttleworth	Site Allocations	HS1/2	<p>2.30 Policy HS1 'Housing Allocations' Site H1/2 - Land at Hollins Cross Farm (South Burnley)</p> <p>2.31 We fully support the future allocation of Site H1/2 - Land at Hollins Cross Farm (South Burnley) –which is identified to accommodate circa 216 dwellings on a site size of 8.65 hectares from 2020/21 to 2028/29.</p> <p>2.32 Our clients are the sole landowners of this allocation and are fully supportive of bringing the site forward for residential development. We also support the assertion that the site is identified as being suitable of accommodating circa 216 dwellings but that this is not identified as a maximum yield for the site. This provides flexibility with regard to the final scheme and associated layout, density etc.</p> <p>2.33 We also support the assertion that the site would help deliver high quality development which will contribute to increasing housing quality and choice across the borough.</p>	Support for site HS1/2 noted. The indicative capacity of the site has been reduced in the Proposed Submission Document to 184 allowing a slight lower density scheme with greater GI including to accommodate SUDs, further buffering to adjacent properties and help minimize landscape impact.

				<p>2.34 The proximity of this residential site to sustainable transport links could affect levels of car use for accessing work and services. The accessibility assessment which Burnley Borough Council carried out as part of the SHLAA identifies that the site is within 400m of a bus stop. As such, the Sustainability Assessment identifies the site as being sustainable in respect of reducing the need to travel and increase the use of sustainable transport modes. The site is also within 400m of a defined on or off road cycle route and within 1,200m of a GP. This is likely to promote healthy lifestyles and a significant positive effect is identified.</p> <p>2.35 Additionally, the site is within 1,200m of a primary school, a shop and a community facility as well as being within 30 minutes public transport travel time of key Borough services.</p> <p>2.36 We therefore support the assertion that the development of site HS1/2 will help towards meeting the full, objectively assessed needs (OAN) for market and affordable housing and that there are no likely significant negative effects to delivering the site in respect of the Sustainability Appraisal which was undertaken as part of the Preferred Options consultation.</p>	
2446	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>11.0 – Disruption to Water Courses</p> <p>11.1 - The Land Water Drainage or Seepage down the Hollins Cross Farm Site in the fields below Crown Point where the proposed development is planned will be interrupted by foundations of any new properties built.</p> <p>11.2 - Has the Council done a land drainage survey, this is to study the Natural Water Drainage of the hillside, under the "The Land Drainage Act 1991" (this underpins the ordinary watercourse regulations that should be undertaken by Local Authorities).</p> <p>11.3 - Has the council done a survey to decide the necessary type of foundation that the buildings will need and the impact of pollution into streams underground and over ground - Please Confirm the Council has read this paper.  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/485199/pmho1107bnkg-e-e.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/485199/pmho1107bnkg-e-e.pdf</a></p> <p>11.4 - There are water courses I streams running down and across the hill from Crown Point show in Blue in the figure DWC1.0 below, these water courses are also augmented with water flowing from natural springs that are present in the hillside, 'after all' Farms were always built in the "old days" where there was a source of fresh drinking water - a spring - this was to supply the farmer's families and their cattle.</p>	<p>The Council has not undertaken a land drainage or foundation survey. This is not required for the purpose of the Local Plan.</p> <p>The site is situated in Flood Zone 1 and is therefore compatible with the proposed housing use. The Council's Strategic Flood Risk Level 1 SFRA found that there are no significant surface water flood risk at the site. The Council is aware of the issues of flooding on the road.</p> <p>Proposed Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.</p> <p>As a site of over 1 hectare within Flood Zone 1, development proposals should be supported by a site specific Flood Risk Assessment (or the most up to date flood risk information available) along with</p>

				<p>11.5 - No building work should be carried out on the Hollins Cross Farm site as this will Damage the ecology of the field - and any re-routing of this natural drainage will result in existing properties on the periphery of the site being impacted.</p> <p>Nature will always a find a way to reassert its watercourse routes.</p> <p>This URL documents the importance of small water bodies - Please Confirm the Council has studied this.  <a href="http://freshwaterhabitat.org.uk/research/small-water-bodies/">http://freshwaterhabitat.org.uk/research/small-water-bodies/</a></p> <p>A report on the Management and importance of preserving Small Water Bodies can found at this URL - Please Confirm the Council has read this paper.  <a href="http://freshwaterhabitat.org.uk/wp-content/uploads/2014/11/SWB-workshop-report-final.pdf">http://freshwaterhabitat.org.uk/wp-content/uploads/2014/11/SWB-workshop-report-final.pdf</a></p> <p>11.6 - The Water Courses I Streams provide an important drainage mechanism for the field and surrounding hillsides. Building houses on the hillside will disrupt the natural flows of the streams on the hillside, these streams feed the river that then flows through the culvert below Woodplumpton Farm and under New Road (A646) and down into what used to be the Rock Lane reservoir.</p> <p>This Culvert which is a fixed diameter at present is on the Flood Risk Asset Register - Please Confirm the Council has read this paper.  <a href="http://www.lancashire.gov.uk/media/321179/Flood-Risk-Asset-Register.pdf">http://www.lancashire.gov.uk/media/321179/Flood-Risk-Asset-Register.pdf</a></p> <p>11.7 - Installing "Sustainable drainage systems" would also not benefit the Hollins Cross Farm Site as this would create a larger than acceptable volume of water at the base of the site, this larger volume would then be trying to flow into the concrete pipe culvert under the A646 - Please Confirm the Council has studied this.</p> <p>11.8 - The result of draining the water off the field faster than allowing the natural seepage into the hillside and forcing it into the culvert would cause what is known as "choked flow", basically the venturi effect. For the layman's view of fluid dynamics this means too much water in one end causes the flow rate to slow down and reduces the efficiency of the culvert. It will backup, overflow and discharge onto the A646.</p> <p>The only alternative would be a larger diameter culvert, has the council done surveys ( or employed professional bodies to project increased flow rates and costing for the installation of a larger culvert system across a main arterial route such as the A646 into Burnley. The alternative is going to be the flooding of the A646 , and as such the incline of the A646 will mean all this excessive water will go downhill to Burnley Center. This could prove to be another "Padiham Flood" as Global Warming is set to produce more flash flooding in this area - Please Confirm the Council has studied this.  <a href="http://www.burnleyexpress.neU">http://www.burnleyexpress.neU</a></p>	<p>evidence from the Lead Local Flood Authority (Lancashire County Council) and the Environment Agency, to establish whether the proposed development:</p> <ul style="list-style-type: none"> <li>i) is likely to be affected by current or future flooding from any source, taking into account the increased risk associated with climate change</li> <li>ii) will increase flood risk elsewhere or interfere with flood flows</li> <li>iii) can provide appropriate mitigation measures to deal with the potential risks and effects</li> <li>iv) would be likely to preclude the future implementation of necessary flood risk measures, including the improvement of flood defences;</li> <li>v) can reasonably maintain access and egress at times of flood</li> <li>vi) can be accommodated within the capacity of the water supply, drainage and sewerage networks</li> </ul> <p>Proposed policy CC5 requires that as a major development SUDs will be required and surface water discharges should be restricted to Qbar rates (mean annual greenfield peak flow).</p>
2447	Residents	Site Allocations	HS1/2	18.0 – Traffic Management in the Local Areas	The Council in partnership with Lancashire County



<p>Against Hollins Cross Farm Development</p>	<p>18.1 - We are informed by Burnley Borough Council that £10,000,000 has been set aside to help with Lancashire's roads for issues they call "Pinch Points" the real terminology is Traffic Chaos. Burnley's share of this money will not even cover the repairs to the roads that are needed at present.</p> <p>18.2 - In the Rossendale Road/Glen View Road /New Road and all surrounding housing estates has the Council done a traffic count survey? <a href="http://ceds.org/pdfdocs/TrafficAll.PDF">http://ceds.org/pdfdocs/TrafficAll.PDF</a> - Please Confirm the Council has read the paper.</p> <p>18.3 - The building plan is to build 20+ houses 1 year from 2020-2032 on the Hollins Cross Farm site to attract "Young Money" to come to Burnley from Manchester for cheaper High Quality homes. Young high earners will generally be two car families, that is 40-50 new vehicles 1 year at peak times exiting onto New Road + all the Works Vehicles that will be using the Hollins Cross Farm site over the 12 year period as the Urban Sprawl takes hold.</p> <p>18.4 - Traffic Congestion on all roads in the area of the Hollins Cross Farm site are at present gridlocked during peak travel times from 07:30 - 09:30, 16:30-18:30. Below are two recent photographs at differing times showing the congestion on Glen View Road.</p> <p>18.5 - The above images are in mid-summer July in good weather and good road surface conditions. In winter this is a different matter, has the council done a traffic management survey in winter on the present traffic levels when the snow falls. The entrance to the proposed Hollins Cross Farm site will break the flow of traffic.</p> <p>18.6 - The two images below again highlight that this a daily traffic jam - not isolated - and it is definitely more than a "Pinch Point" as the planning people like to spin it. [Images of traffic on Glen View Road provided]</p> <p>18.7 - Travelling up from the traffic lights at Bacup Road 1 New Road is a steady incline, in fact all roads to and from Glen View Road 1 New Road are inclines and are around 700-900 feet above sea level this is a very distinct altitude as there are two distinct snow lines here in this area - one manifesting itself at the Rose and Crown on Manchester Rd and the 2nd snow line across the middle of the Hollins Cross Farm site field. Has the council checked past traffic survey records if they exist to show the congestion in bad weather on New Road/Glen View Road?</p> <p>18.8 - There is also a new development planned for Rossendale Road which will mean 50 more vehicles per annum heading towards Manchester Road 1 Rossendale Road traffic lights then on towards the M65 and Manchester Road Station. This is a total of up to 1000 new vehicles by 2032 on the Glen View Road, Rossendale Road, Manchester Road Junction. Has the Council done a traffic count survey on Rossendale Road?</p>	<p>Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Rossendale Road/Accrington Road and Manchester Road/Glen View Road. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period and these are included in the Draft Infrastructure Delivery Plan (IDP) developed alongside this Plan.</p> <p>Local traffic management and highway safety issues will be assessed at the time of the application and matters such as extending speed limits imporing pedestrian crossing and no parking restrictions will be examined by LCC Highways engineers who are always conscios of the need where possible and safe to retain on street parking for those who rely on it.</p> <p>Policy IC1 encourgas the use of sustainable modes of transport and development proposals would need to satisfy the requirements for either a Transport Assessment or a Transport Statement as set out in Policy IC2</p> <p>The Council has secured funding and land to extend the car park at Manchester Road Station. This is identified in the Draft IDP.</p>
---	--	---

				<p>18.9 - On Match days at Turf Moor Glen View Road   Rosendale Road is a main arterial route to and from the ground for football traffic, now Burnley FC is a Premiership club this will mean larger crowds and more traffic, more cutting through the local housing estates, more danger to pedestrians.</p> <p>Has the Council done a traffic count survey on match days and in various weather conditions throughout the year and then has the Council factored in through mathematical modelling the extra traffic trying to negotiate filtering in and out of the Hollins Cross Farm Site and also the Proposed site on Rossendale Road?</p> <p>18.10 Has the council done any surveys or Traffic modelling through mathematical calculations to project the impact of all the new cars adding to the roads of Burnley's already crumbling network</p> <p>A very good paper from Warwick University section 1.1 covers the aspects such as the impact on pedestrians, buses and cyclists as well as the congestion aspect - <a href="https://www2.warwick.ac.uk/fac/cross-fac/complExity/study/emmcS/outcomes/student%20projects/tadeusiak.pdf">https://www2.warwick.ac.uk/fac/cross-fac/complExity/study/emmcS/outcomes/student projects/tadeusiak .pdf</a> - Please Confirm the Council has studied this.</p> <p>18.11 - As a sideline note by 2032 - if</p>	
2203	Burnley Wildlife Conservation Forum	Site Allocations	HS1/2	<p>HS1/2 Hollins Cross Farm – Reasons for Objection</p> <p>The proposed new Development Boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a green field site in attractive open countryside which is in active agricultural production and is an upland pasture habitat where the LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Sect 41 protection along with Lancs BAP Long List and key species and that the site is within 50m of Lancashire Woodland and Grassland Ecological Network stepping stone habitat. The site is also next to the Green Infrastructure Strategy's Towneley Park and Timber Hill LNR search area.</p>	<p>The presence of Protected Species on the Site does not preclude its development. Policy NE1 of the Plan: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences. The specific requirement for a survey and the addressing of these issues has been added to HS1/2 (Clause 5) as the desk top survey has confirmed the presence of Protected Species at this site and Priority Habitat (the Pond).</p> <p>It is accepted that development of this greenfield sites which currently lies within the countryside adjacent to the urban boundary will have a considerable impact on the landscape and will fundamentally change its character. This is not reason to prevent it being allocated per se.</p>

					<p>The need to look to release site outwith the current urban boundary is set out in Policy SP2 and SP4.</p> <p>The site is locally prominent but it is not considered that a carefully designed scheme of the highest quality would be a blot on the landscape. Policy HS1/2 requires "a scheme of the highest quality which clearly and demonstrably contributes to increasing housing quality and choice across the borough will be expected, including to satisfy the requirements of Policy SP4 2) c) i and iii and SP5, as this site is a greenfield site in the open countryside"</p> <p>This requirement will need to be met in addition to all other relevant requirements of the Plan including Policies SP5.</p>
1794	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>4.0 – Statement of Opposition to the Development of Hollins Cross Farm Site</p> <p>4.1 - We the Residents of the surrounding areas of Deer Play and Coal Clough are opposing the development of the Hollins Cross Farm site HS1/2.</p> <p>4.2 - As part of the council's due diligence process in establishing whether Hollins Cross Farm is considered by the council to be viable for construction, it would be expected that the various reports referred to in our document will have been already obtained and thoroughly reviewed before coming to such a conclusion. Therefore please confirm the council's findings from these reports to substantiate the decision that has led to considering the land as a suitable construction location.</p> <p>4.3 - Outlined in this document are the reasons why "We the Residents" know this site to be wholly unsuitable for development and require it to be declassified now as a suitable site and removed from Burnley Borough Councils list of urban Green Field sites that are seen as possible areas for development.</p> <p>4.7 - "We the Residents" insist to see all financial projections of the plans that Burnley Borough Council involved with the development of the Hollins Cross Farm Site, including all documentation and agreements made with the current land owner Tom Shuttleworth.</p> <p>4.9 - "We the Residents" need evidence based documentation and it be made public all the financial gains that the Council intend to make:-</p>	<p>Objection noted.</p> <p>The Council has made no agreement with the landowner with respect of this site.</p> <p>The Council does not intend to purchase the land from the owner.</p> <p>The owner may decide to develop the land himself or sell to another developer. The allocation and any planning permission granted runs with the land.</p> <p>To project future New Homes Bonus payments (assumed to be the incentive referred to in 4.9.4) would be misleading. There is no certainty that this grant scheme will exist at the time the homes are completed. The mechanism for calculating new homes bonus has already been changed by the government since the Preferred Options Plan was published.</p> <p>Council Tax receipts similarly could be subject to change and whether occupants were liable to pay Council Tax or part thereof would depend on their personal circumstances.</p>

			<p>4.9.1 - From the purchase of the land from Shuttleworth Estates.</p> <p>4.9.2 - The projected profit from resale of the land to appointed developers.</p> <p>4.9.3 - The projected profit made from incentive grants on new homes that the Council intend to receive from the Government.</p> <p>4.9.4 - The projected Counciltax revenue that the Council intend to receive per annum, year on from 2020-32 as the development grows.</p> <p>4.10 - "We the Residents" want written guarantees that before developers put a spade in the ground anywhere in Burnley that all our requests for infrastructure enhancements are past all stages of planning and are in development.</p> <p>4.10.1 - Primary schools are being built to service the areas where properties are developed in Burnley.</p> <p>4.10.2 - Secondary Schools are being built to service the areas where properties are developed in Burnley.</p> <p>4.10.3 - Doctors Surgeries are being built to service the areas where properties are developed in Burnley.</p> <p>4.10.4 Dentist Surgeries are being built to service the areas where properties are developed in Burnley.</p> <p>4.10.5 - Burnley General Hospital has an A&amp; E to service all the areas where properties are developed in Burnley.</p> <p>4.10.6 - Burnley Ambulance Service is not relocated but staying here to service all the areas where properties are developed in Burnley.</p> <p>4.10.7 - Manchester Road Railway Station has a fully developed larger Car Park to service all the areas where properties are developed in Burnley.</p> <p>4.10.8 - All Roads adjoining any development sites are improved to take developer traffic and new resident's traffic.</p>	<p>Future Council Tax revenues and New Homes Bonus are not therefore material consideration for the Local Plan.</p> <p>As part of the plan-making process the Council assesses the likely requirement for infrastructure for the plan as whole and for individual sites, consulting and liaising (including in line with the duty to cooperate) with a number of service providers.</p> <p>The Local Plan is accompanied by an Infrastructure Delivery Plan (IDP) which is being produced alongside the Local Plan. This reviews and evaluates the social, environmental and economic infrastructure that will be required to support the development and growth set out in the Plan. It identifies the infrastructure required to support the proposals and development sites in the plan, the likely delivery partners e.g. developers, the borough and county councils, government agencies and the likely funding sources. It is a living document in the sense that infrastructure requirements will change over time as new or improved infrastructure is provided or facilities are lost and technological advances or social and national policy changes require new forms of infrastructure or alternative methods of provision.</p> <p>The infrastructure requirements to support the specific allocations in the Plan are identified within the individual site allocation policies. Where there are current known requirements for off-site infrastructure these are identified in the IDP. Further infrastructure may be required over time or as the detail of schemes is developed, and for windfall development proposals, the infrastructure requirements and any contributions required will need to be assessed as schemes are drawn up. Infrastructure can be provided directly by infrastructure providers or developers; or planning contributions can be used to deliver or contribute to on or off-site new or improved infrastructure through</p>
--	--	--	---	--

					<p>Section 106 contributions and/or the Community Infrastructure Levy (CIL) should the Council introduce it.</p> <p>See separate responses on specific infrastructure queries.</p>
2325	Residents Against Hollins Cross Farm Development	Site Allocations	HS1/2	<p>4.8 - "We the Residents" need evidence based documentation that The Government Guidelines against Corruption in Public Procurement are being adhered to - <a href="http://www.transparency.org/topic/detail/public%20procurement">http://www.transparency.org/topic/detail/public procurement</a> - Please Confirm the Council has studied this.</p> <p>4.11 - "We the Residents" require to see all recorded transcripts of verbal conversations, phone conversations and communicates between the Council and Shuttleworth Estates or any interested parties who own the said Hollins Cross Farm site lands as all these conversations and communicates are shared public information under the freedom of information act</p>	<p>The relevance of this comment to the Hollins Cross Farm allocation HS1/2 is not understood and the comment implies that the Council has acted corruptly, a suggestion which is strongly refuted. If the authors of the opposition document have evidence of corruption this should be presented through the proper channels.</p> <p>The FOI request was responded to following receipt of the objection report.</p>
1740	Worsthorne-with-Hurstwood Parish Council	Site Allocations	HS1/20	<p>Worsthorne would struggle to support more properties without significant infrastructure investment.</p> <p>The means of access to Gordon Street is poor, not suitable for the traffic generated during and after the development. The character of the immediate area will be compromised, the Mill being an integral part of the character of the village.</p> <p>Burnley's population is declining, new houses if needed have to be affordable (not for Worsthorne). Senior Managers etc to be attracted to the area will first of all need to see that Burnley has schools that deliver good results on par with Clitheroe Grammar School and Bacup and Rawtenstall Grammar School.</p> <p>Brownside Road at all times is busy, it is narrow and incapable of widening. Traffic by the school at 9am and 3.30pm is horrendous now.</p>	<p>Discussions with Lancashire County Council have concluded that this site can be safely accessed and that development of this site will not compromise the capacity of the road network.</p> <p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>The SHMA identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth.</p> <p>Proposed policies in the Local Plan will ensure that development respects the local character.</p>
1697	Burnley Civic Trust	Site Allocations	HS1/20	<p>The trust believes that further development in this part of the village will destroy the characteristics of the village and turn it into an urban sprawl.</p>	<p>Policy SP4 seeks to maintain Worsthorne's village status, by allocating it as a main village, and thus defining the area as having a different role, function</p>

					and development scale to other parts of the borough. This policy states that medium and small scale housing sites that deliver quality and choice are appropriate in the village, as well as small scale employment schemes. The council has not allocated some sites in the village that we put forward previously, due to potential coalescence, and has also dedrawn the boundaries of other allocations to make them a more appropriate size for village development. HS1/20 is one such site.
1345	Environment Agency	Site Allocations	HS1/20	We would recommend that, as with other potentially contaminated sites, the following is included in Supporting Information, "Land contamination investigation and the relevant remediation will be required in accordance with Policy NE5". The site is also in Source Protection Zone 2, which is designated to protect groundwater supplies. As such any foul drainage will require connection to the main sewer.	Additional text added to the site's Additional and Site Specific Policy Requirements and Design Principles
1089	United Utilities	Site Allocations	HS1/20	Groundwater Source Protection Zones (SPZs)  Land adjacent 250 Brownside Road (HS1/31) and Gordon Street Mill (HS1/20)  These sites are situated within Groundwater Source Protection Zone (SPZ) 2. United Utilities has a water abstraction borehole situated within close proximity to these sites. The Environment Agency have defined Source Protection Zones (SPZs) for these groundwater sources, which are used for public drinking water supply purposes.  The aim should be to avoid siting potentially damaging activities in the most sensitive locations from a groundwater protection viewpoint. Groundwater SPZ's show where there may be a particular risk from polluting activities on or below the land surface to the water abstraction.  When assessing each of these allocations, I would urge you to refer to the Environment Agency's Groundwater Source Protection Zones Map (available online at <a href="http://apps.environment-agency.gov.uk/wiyby/default.aspx">http://apps.environment-agency.gov.uk/wiyby/default.aspx</a> ) together with the document 'Environment Agency Groundwater protection: Principles and practice (GP3)' to ensure any impact of the proposed allocation on groundwater quality in the area is best managed. The document encourages planners, developers and operators to consider the groundwater protection hierarchy in their strategic plans and when proposing new development.	The location of the site within Groundwater Source Protection Zone (SPZ) 2 does not preclude the site from development. The Environment agency advise that to safeguard the groundwater resources any foul drainage will require connection to the main sewer
1346	Environment Agency	Site Allocations	HS1/21	We would recommend that, as with other potentially contaminated sites, the following is included in Supporting Information, "Land contamination investigation and the relevant remediation will be required in accordance with Policy NE5".	Additional text added to the site's Additional and Site Specific Policy Requirements and Design Principles
1963	Canal & River	Site Allocations	HS1/21	HS1/21	Site specific comment noted. Comments in relation

	Trust			<p>The Trust have previously commented on several applications for this site and raised matters to ensure that any impacts arising from the development on the canal are mitigated. We note that the policy requirements and design principles for the site recommends that proposals for the site should address its waterfront setting in accordance with proposed draft Policy SP5.</p> <p>In our comments relating to Policy SP5 we highlighted the need for a more robust policy that specifically referred to design requirements for waterfront development. As such, we recommend that should our request for a specific waterfront development policy be adopted by the Council, such a policy is referenced for site HS1/21.</p>	to SP5 covered separately
2126	Highways England	Site Allocations	HS1/22	<p>There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.</p>
1347	Environment Agency	Site Allocations	HS1/22	<p>For additional information the culvert contains an ordinary watercourse. Any development within the easement would require consent from Lancashire County Council as the LLFA and we would require consultation on the site investigation for contamination to assess the risk to controlled waters.</p>	<p>This site has been removed from the Proposed Submission Local Plan.</p>
2407	Lancashire County Council	Site Allocations	HS1/23	<p>LLFA General comments relating to all 7 sites</p> <ul style="list-style-type: none"> <li>• All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>• All sites have some susceptibility to surface water and ground water flooding</li> <li>• NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> <li>• Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are</li> </ul>	<p>Support for EA comments in relation to this site is noted. Bullet point 1: Noted. This is made clear in Local Plan policy CC4 Development and Flood Risk. Bullet point 2: The site's susceptibility to these sources of flooding has been examined as part of the the Council's Strategic Flood Risk Assessment (SFRA) In the case of this site a more detailed Flood Risk Assessment has been undertaken. Bullet point 3: Noted. Local Plan policy CC5 (Surface Water Management and Sustainable Drainage Systems) sets out this hierarchy and requires it to be</p>

				<p>required outside of the planning framework.</p> <ul style="list-style-type: none"> <li>The district lead officer may wish to add further comments on his return from leave, if time permits.</li> <li>We would like to be invited to future meetings with your appointed consultants</li> </ul> <p>HS1/23 – Former Perseverance Mills, Padiham  There is a culvert within the site which the EA have recommended removal of. We would generally support that proposal.  The FRA should take account of flooding which occurred during winter 2015 as we have a record of flooding in the vicinity of the site.  Potential for significant surface water flooding at this location and surrounding locations  Also see general comments above</p>	<p>followed.</p> <p>Bullet point 4: Noted. Add to policy CC4 para 2: 'Any works affecting ordinary watercourses may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.' A paragraph has been added to the supporting text for this policy outlining the LLFA's Ordinary Watercourse Consenting and Enforcement Policy.</p> <p>Bullet point 5: Noted.</p> <p>Bullet point 6: The LLFA was invited to the SFRA inception meeting with consultants and EA.  Site specific comments: Reference to the culvert and a recommendation that its removal be explored are included in Policy HS1/23.  Over 30% of the site is at high or medium risk of surface water flooding which has been considered as part of a detailed Flood Risk Assessment which also takes account of recent and historical flood incidents.</p>
1348	Environment Agency	Site Allocations	HS1/23	<p>Green Brook runs in culvert across this site. We would recommend that the following is included in Supporting Information: "Culvert removal at Perseverance Mill would remove a long-term maintenance burden and result in significant environmental improvements in accordance with Policy CC4. Removal of the culvert could reduce the need for the full 8m easement usually required either side of a culvert, leaving more land for development."</p> <p>For the purposes of strategic flood risk management we would request that the surface water is attenuated onsite if the proposal is to discharge to Green Brook. This is because there was significant flooding along the River Calder in December 2015 and increased retention of surface water, if possible, would help to reduce flood risk overall (NPPF, para 102). Although we have not received reports of the site flooding in December 2015 the FRA should investigate this event.</p>	<p>Comments noted. These issues are currently being addressed in conjunction with the Environment Agency as part of a planning application at the site for 56 dwellings. Any future application would need to meet requirements of Policy CC4 (which states that culverts should be opened up where possible) and CC5 in relation to surface water management/SUDS.</p>
2127	Highways England	Site Allocations	HS1/24	<p>There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed</p>



					development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.
1770	Spacious Places Ltd.	Site Allocations	HS1/24	<p>We write on behalf of Spacious Place Ltd in response to the Preferred Options document of the Burnley Local Plan. The comments form provided by Burnley Borough Council (BBC) is enclosed with this letter.</p> <p>Burnley is in need of additional deliverable housing sites that can assist in meeting the housing shortfall and ‘kick start’ the growth strategy for the Borough in the short term. We support the promotion of site HS1/24 through to allocation, as it represents a deliverable site able to accommodate future residential development. The site represents a logical and suitable site to deliver housing within the area and should therefore come forward as a housing allocation as proposed.</p> <p>Availability, suitability and achievability</p> <p>Footnote 11 of the National Planning Policy Framework alongside paragraph 47 sets out that for sites to be considered deliverable, they should be available now, offer a suitable location for development, be achievable with the prospect of delivering housing on the site within five years and be a viable development.</p> <p>The site is available for development. Although the previous planning permission (ref: 2011/0176) for 34 dwellings on site has lapsed, Spacious Place are in the process of preparing a planning application for 34 affordable houses. Subject to planning permission, the site will come forward within less than five years.</p> <p>Given the planning history on site, the principle of residential development has already been established. The site is situated within a sustainable location within the settlement boundary, bound predominantly by residential properties. Bus links are located along Sycamore Avenue and Gannow Lane whilst the M65 motorway is easily accessible via the Gannow Lane roundabout. The site is considered suitable for development.</p> <p>26 August 2016 let.002.DJ.KI.25070002</p> <p>The Officer’s Report for the lapsed planning permission stated that:  “there are no other material considerations to indicate that planning permission should not be granted.”</p> <p>There have been no material changes to the site since this permission was granted and as such, there are no technical constraints to hinder the site coming forward.</p> <p>Summary</p> <p>Spacious Place wholly supports the proposed allocation of Land NE of Sycamore Avenue (HS1/24) for residential development in the Burnley Local Plan.</p> <p>The site is situated in a sustainable location, is unconstrained and has no known land contamination, access or instability issues. The site adjoins the built up area, is</p>	Comments and support for site HS1/24 noted.

				<p>compatible with the surrounding residential area and comprises a sustainable, suitable location for housing.</p> <p>The site is not a valued landscape and is not of special ecological value nor is it allocated or protected for any specific use.</p> <p>The site is in a suitable location for housing, is available now and can be developed for housing in the short term (0-5 years). It follows that the site should be allocated for residential development.</p> <p>It is requested that this representation is taken into account as the Local Plan progresses and that we are placed on the mailing list to receive updates on the various consultation stages of the Plan.</p>	
1698	Burnley Civic Trust	Site Allocations	HS1/25	<p>This is a lovely small woodland which has been nurtured and under no circumstances should this be developed.</p>	<p>The Additional and Site Specific Policy Requirements and Design Principles which accompany this proposed allocation make specific reference to the retention of woodland - "An area of the existing tree planting on the northwest edge of the site should be retained as a buffer possibly within the gardens of the new dwellings; and a larger area at the south eastern edge of around 50 metres should be retained as woodland with public access to allow a future link to Brun Valley Park"</p>
2210	Burnley Wildlife Conservation Forum	Site Allocations	HS1/25	<p>HS1/25 Ridge Avenue - Reasons for Objection</p> <p>This site was planted with trees as part of the Millennium 'Forest of Burnley' project and it forms part of the Lancashire Woodland Ecological Network and is adjacent to its Grassland Network on the Rowley tip reclamation site part of the Brun Valley Forest Park (BVFP), which is in turn part of the Green Infrastructure Strategy's River Brun/River Don including BVFP LNR search area. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Sect 41 protection along with Lancashire BAP Long List and key species within 250 metres of the site and a bat roost has been recorded within 400 metres of the site.</p>	<p>The additional Site Specific Policy Requirements and Design Principles for this site state that an area of the existing tree planting on the northwest edge of the site should be retained as a buffer possibly within the gardens of the new dwellings; and a larger area at the south eastern edge of around 50 metres should be retained as woodland with public access to allow a future link to the Brun Valley. In addition, the trees along Ridge Avenue should be retained and protected.</p> <p>Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.</p>

1580	Lancashire Wildlife Trust	Site Allocations	HS1/25	<p>The Trust objects to the allocation of this site for housing. The Trust notes the presence of trees on the site and that it is part of the 'Forest of Burnley'. However, if the site was to be retained, it supports the principle that an ecological survey will be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1. Whilst the principle that contributions will be sought to provide compensatory enhanced publically accessible open space on the land to the northeast of the site, this must not be on land that is already subject to planning conditions, e.g. Rowley landfill site, or management arrangements through the Forest of Burnley Millennium Project.</p>	Support for the requirement for an ecological survey noted.
1775	Trees for Burnley	Site Allocations	HS1/25	<p>Up until the Millennium Burnley had very little wooded areas and those woodlands that did exist were in very poor condition, due to having been grazed by animals. Burnley Council successfully obtained a grant from the Millennium Commission to plant 1 million broadleaf native trees and an urban arboretum. Volunteers were involved in planting the trees, including Trees for Burnley. The above proposed site for 24 houses owned by Burnley Borough Council was rented out by the Council on a 'summer grazing licence' and was over grazed and eaten down to the soil. There was no good husbandry whatsoever. Burnley Council was approached to see if the Council would include the site in the Forest of Burnley and be planted up with trees. The Council agreed with this proposal and volunteers, together with students from Myerscough College, as part of their work experience, planted the trees and some post and rail fencing. The trees have done well and Trees for Burnley still carry out woodland management with bulb planting and wildflower planting. People use the woodland for dog walking, others to enjoy the trees, flowers and wildlife. In the autumn to help themselves to apples and hazel nuts. The woodland gives a countryside feel for the many walkers alongside a busy main road.</p> <p>We feel that having given agreement for tree planting the woodland should not be sacrificed for 24 houses when Burnley has many brownfield sites for housing and with a declining population does Burnley really need these 24 houses. The woodland is called Bell Pit Wood.</p>	<p>With regard to the presence of trees on site the Additional and Site Specific Policy Requirements and Design Principles for this site states that:</p> <ul style="list-style-type: none"> <li>- The site forms part of the Lancashire Ecological Network for Woodland and forms part of a stepping stone habitat within the Woodland Network. It is also adjacent to a Stepping Stone habitat within the Grassland Network An ecological survey will be required to accompany any planning application which addresses this issue in accordance with Policy NE1;</li> <li>- Off-site replacement tree planting together with compensatory open space improvement will be required for which contributions may be sought under Policy IC4 and 5;</li> <li>- An area of the existing tree planting on the northwest edge of the site should be retained as a buffer possibly within the gardens of the new dwellings; and a larger area at the south eastern edge of around 50 metres should be retained as woodland with public access to allow a future link to Brun Valley Park; and</li> <li>- The trees along Ridge Avenue should be retained and protected during the development's construction.</li> </ul>
1790	S Williams	Site Allocations	HS1/25	<p>PETITION - 21 SIGNATORIES</p> <p>We object to the above proposals to build 24 houses on the above woodland site, Bell Pit Wood, due to the following:</p> <p>Inadequacy of Ridge Avenue to cope with the extra traffic generated from 24 houses (especially as there is a short distance from Bell Pit)</p>	<p>The Council has liaised with Lancashire County Council the Local Highway Authority in developing the Local Plan to ensure that road capacity and highway safety is not compromised. The County Council have not raised any concerns about local traffic impacts.</p> <p>The Additional and Site Specific Policy Requirements</p>

				<p>Ridge Avenue is very narrow and not suited for an increase in traffic.</p> <p>The site is already a maturing woodland with a wide variety of flora and fauna and is well used by many people for recreational purposes.</p> <p>In the past the site had shallow mining, the bell pits are still there, the site is also very wet and floods during heavy rainfall. It would be a shame to fell the trees and then find the site is not suitable for housing.</p> <p>The site is immediately adjacent to Rowley landfill site, although now not in use, still produces methane gas.</p> <p>People are being encouraged to get out and about to exercise for health and yet you are intending to build houses on a superb site for peoples' wellbeing and also good for wildlife.</p> <p>Bell Pit Wood, Ridge Avenue is part of the Forest of Burnley and Brun Valley Forest Park, with a waymarked walk through the woodland.</p>	<p>and Design Principles for this site states that:</p> <ul style="list-style-type: none"> <li>- The site forms part of the Lancashire Ecological Network for Woodland and forms part of a stepping stone habitat within the Woodland Network. It is also adjacent to a Stepping Stone habitat within the Grassland Network An ecological survey will required to accompany any planning application which addresses this issue in accordance with Policy NE1;</li> <li>- Off-site replacement tree planting together with compensatory open space improvement will be required for which contributions may be sought under Policy IC4 and 5;</li> <li>- An area of the existing tree planting on the northwest edge of the site should be retained as a buffer possibly within the gardens of the new dwellings; and a larger area at the south eastern edge of around 50 metres should be retained as woodland with public access to allow a future link to Brun Valley Park; and</li> <li>- The trees along Ridge Avenue should be retained and protected during the development's construction.</li> </ul>
1349	Environment Agency	Site Allocations	HS1/26	The site is adjacent to a former landfill site. As such we would recommend that, as with other potentially contaminated sites, the following is included in Supporting Information, "Land contamination investigation and the relevant remediation will be required in accordance with Policy NE5".	Additional text added to the site's Additional and Site Specific Policy Requirements and Design Principles
1699	Burnley Civic Trust	Site Allocations	HS1/26	Whilst the Trust is unhappy with this proposal it believes that the objection could be sacrificed for no development on HS1/25	Comment noted.
1174	Miss Margaret Black	Site Allocations	HS1/26	<p>As the owner of 0.95Ha of land off Ridge Avenue between the end of the houses on Queens Park Road and High Barn, I feel that I have an ideal residential development site. The size of the plot is ideally suited to approximately 30 houses of high executive quality.</p> <p>There are a wide range of services and facilities in the area. The site is near to good transport links. The relevant infrastructure (water, electric, gas, foul drainage, telecoms. etc.) is already in place; all services to the above named site are readily available in the near vicinity. Schools, the hospital, doctors, police, sporting facilities, shops, and transport routes are all available to the area.</p> <p>A good vehicular access from Ridge Avenue into the site is already in existence and as</p>	Support for the allocation is noted. The site is included in the Proposed Submission Plan as HS1/26 - 'Land Adjacent 2 Queens Park Road'.

				<p>such provides the necessary visibility splays to satisfy highways requirements.</p> <p>The development will not impact upon the surrounding setting and is within a secluded and idyllic area, surrounded by mature trees that would help to create a minimal visual impact.</p> <p>The site can be described as that which has been identified in the SHLAA: Suitable, Available, Achievable and within the Urban Boundary</p>	
2211	Burnley Wildlife Conservation Forum	Site Allocations	HS1/26	<p>HS1/26 Land adjacent to 2 Queens Park Road – Reasons for Objection</p> <p>This is a greenfield site close to Queens Park and it is also adjacent to the Brun Valley Forest Park (BVFP) which in turn is both part of the Green Infrastructure Strategy's River Brun and River Don including BVFP LNR search area and the Lancashire Woodland and Grassland Ecological Network. This site was added at the 'Preferred Options' July 2016 document stage, subsequent to the LERN assessment of Local Sites 2015 report and requires a LERN assessment before its development status can be determined.</p>	Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.
2128	Highways England	Site Allocations	HS1/27	<p>There is also a concentration of smaller housing allocation sites which are located either side of the M65 Junction 10; HS1/12, HS1/13, HS1/14, HS1/16, HS1/17, HS1/22, HS1/24 and HS1/27. Whilst each site is relatively small, collectively they could provide an indicative 465 dwellings which may result in increased traffic demand at Junction 10, which has been identified above as a constrained junction.</p>	The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.
2212	Burnley Wildlife Conservation Forum	Site Allocations	HS1/28	<p>HS1/28 Land to Rear of Bull and Butcher – Reasons for Objection</p> <p>The proposed new Development Boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a green field site in attractive open countryside comprising natural and semi-natural grassland. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Sect 41 protection along with Lancashire BAP Long List and key species,</p>	The Council believes that this urban extension to the urban boundary is justified in order to fulfill the Objectively Assessed qualitative and quantitative requirements for housing. The site relates well to the existing urban area and is significantly smaller than the site proposed at Issues and Options stage.

				and Wildlife and Countryside Schedules 1, 5 and 8 species.	Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.
2111	Habergham Eaves Parish Council	Site Allocations	HS1/28	<p>Re: Supporting Information for HS1/4  “2) .....has identified fully funded improvements to the Rosegrove junction to be undertaken by Lancashire County Council and Burnley Borough Council  ”4) There is potential to explore a combined access strategy in conjunction with site HS1/28 – Land to rear of the Bull ‘n’ Butcher’  The Parish Council refer to point ‘2’ above. Access to Rossendale Road would not only impact on the Rosegrove junction but would in turn exacerbate the existing problems at The Summit junction. (As already pointed out in the Parish Council’s comments with regard to HS1/2 – Hollins Cross Farm.)  The Parish Council refer to point ‘4’ above which is linked to HS1/28. This is dealt with under the following:-  Re: - ‘Supporting Information for HS1/28’  “1) There is potential to explore a combined access strategy in conjunction with Site HS1/4 – Land at Rossendale Road.”  “2) The site is close to a Key Gateway and development with need to address this in accordance with Policy SP5”  The Parish Council refer to ‘Point 1’. If the combined access strategy was to be put in place together with HS1/4 and vehicles were to exit on to Manchester Road this would put extra pressure, again, on The Summit junction.  Manchester Road is a fast flowing road (despite traffic speed and ‘slow down’ signs being in place) as vehicles travel down towards The Summit. It is also a danger for traffic exiting Crown Point Road, opposite the Bull ‘n’ Butcher, attempting to travel downwards towards The Summit. Sight lines are extremely dangerous here. In fact vehicles tend to ‘nudge out’ into the road to see whether it is safe to exit.  With reference to ‘Point 2’. The site is indeed a ‘Key Gateway’ which the Parish Council have attempted to enhance by the addition of planters (regularly re-planted by Burnley Borough Council), a bench and two plaques commemorating the Queens’ Diamond Jubilee and WW1. A tree was planted some time ago by the late Enid Tate who was a Burnley Borough Councillor and past Chairman of Habergham Eaves Parish Council. This tree is well established now.  The Parish Council would also like to draw attention to the base of the ancient ‘Butter Cross’ (Grade 2) situated in the field (known as Cross Field) behind the Bull ‘n’ Butcher.</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.</p> <p>Preferred Option Local Plan Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for this site states "Protected Species have been recorded on the site. An ecological survey will be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1"</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for this site states that "The</p>

				<p>Mr K. G. Spencer makes reference to this in his book 'An outline History of Habergham Eaves' (1989). A blue plaque was fixed to the side of the Bull 'n' Butcher (facilitated by the Burnley Historical Society) in relation to this site but has had to be removed due to the condition of the said building due to the recent fire.</p> <p>Habergham Eaves Parish Council would question whether checks have been carried out on all 'Preferred Options' with regard to possible underground streams.</p> <p>Also, with particular reference to HS1/28, there has been subsidence in the past particularly around the Bull 'n' Butcher/Manchester Road area due to old mine workings at Hapton Valley.</p> <p>Finally all sites in Habergham Eaves in the 'Preferred Options Document' are the habitat to a variety of wild birds and species of flora and fauna.</p>	<p>presence of known heritage assets (Medieval and earlier) within close proximity of the site would suggest some limited potential for unknown archaeology of local-regional significance and suitable provision will need to be made for archaeological desk based assessment and field evaluation consistent with Policy HE4 ; and any further investigation or recording works that may be necessary as a consequence of development."</p>
1700	Burnley Civic Trust	Site Allocations	HS1/28	<p>This small piece of land should not be spoilt by development as it forms an attractive gateway to the town and existing housing. It is also very close to the site of historic interest – the ancient Butter Cross – Grade 2.</p>	<p>The Additional and Site Specific Policy Requirements and Design Principles for this site states that "The presence of known heritage assets (Medieval and earlier) within close proximity of the site would suggest some limited potential for unknown archaeology of local-regional significance and suitable provision will need to be made for archaeological desk based assessment and field evaluation consistent with Policy HE4 ; and any further investigation or recording works that may be necessary as a consequence of development."</p>
1581	Lancashire Wildlife Trust	Site Allocations	HS1/29	<p>The Trust notes the proximity of the site to the Oswald Street Biological Heritage Site (BHS) and is pleased to see, and supports, the principle that an ecological survey will be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1. However, if/when the site was developed, a requirement to secure the positive management of the BHS should be investigated in order to contribute to the indicators for NE1 Biodiversity and Ecological Networks in Table 10 on page 207.</p>	<p>Support for the requirement for an ecological survey noted.</p>
1959	Canal & River Trust	Site Allocations	HS1/3	<p>HS1/3</p> <p>The Trust have recently commented on a planning application (APP/20160021) to develop this site and raised matters to ensure that the impacts on the canal and towpath arising from the future development of the site are mitigated. We note that the issues we raised are referenced in the policy requirements and design principles for the site.</p>	<p>Comments noted.</p>
1575	Lancashire Wildlife Trust	Site Allocations	HS1/3	<p>The Trust has objected in the recent past to details of a planning application for this site</p>	<p>Objection noted</p>
1741	Worsthorne-with-Hurstwood	Site Allocations	HS1/31	<p>Access to this site is poor, not good sightlines and adjacent to the School, so real safety issue. Brownside Road is at capacity, narrow and unable to be widened.</p> <p>We question the need for more housing in Burnley and if any is needed it can be met by</p>	<p>Discussions with Lancashire County Council have concluded that this site can be safely accessed and that development of this site will not compromise the</p>

	Parish Council			<p>reusing existing brownfield sites. We question if there is a market for houses of this calibre.</p> <p>The village infrastructure will not support substantial development (school, roads, utilities)</p>	<p>capacity of the road network.</p> <p>In calculating the level of housing development identified in Policy SP2 the Council have drawn on up to date evidence of need and demand from an updated Strategic Housing Market Assessment undertaken in line with national planning practice guidance.</p> <p>The SHMA identifies the Objectively Assessed Need for housing up to 2032 as a range equivalent to 117 to 215 dwelling per annum. The level of development proposed in the Plan sits towards the top of this range and aligns with the Plan's Vision and Objectives to provide housing at a level to meet need and demand and support economic growth and as such it is not considered necessary to exceed this requirement; this is not a requirement of national policy.</p> <p>Infrastructure capacity and requirements have been considered in the Infrastructure Delivery Plan which is published alongside Proposed Submission Local Plan.</p>
1701	Burnley Civic Trust	Site Allocations	HS1/31	<p>The same remarks as HS1/20 apply equally [The trust believes that further development in this part of the village will destroy the characteristics of the village and turn it into an urban sprawl].</p>	<p>Policy SP4 seeks to maintain Worsthorne's village status, by allocating it as a main village, and thus defining the area as having a different role, function and development scale to other parts of the borough. This policy states that medium and small scale housing sites that deliver quality and choice are appropriate in the village, as well as small scale employment schemes. The council has not allocated some sites in the village that we put forward previously, due to potential coalescence, and has also redrawn the boundaries of other allocations to make them a more appropriate size for village development.</p>
1350	Environment Agency	Site Allocations	HS1/31	<p>Our previous comments were unclear. We would suggest the following to replace points 2 and 3 under Supporting Information: "The site is partly within Source Protection Zone 2, which is designated to protect groundwater supplies. As such any foul drainage will require connection to the main sewer."</p>	<p>Supporting information amended in accordance with the comments received.</p>



1088	United Utilities	Site Allocations	HS1/31	<p>Groundwater Source Protection Zones (SPZs)</p> <p>Land adjacent 250 Brownside Road (HS1/31) and Gordon Street Mill (HS1/20)</p> <p>These sites are situated within Groundwater Source Protection Zone (SPZ) 2. United Utilities has a water abstraction borehole situated within close proximity to these sites. The Environment Agency have defined Source Protection Zones (SPZs) for these groundwater sources, which are used for public drinking water supply purposes.</p> <p>The aim should be to avoid siting potentially damaging activities in the most sensitive locations from a groundwater protection viewpoint. Groundwater SPZ's show where there may be a particular risk from polluting activities on or below the land surface to the water abstraction.</p> <p>When assessing each of these allocations, I would urge you to refer to the Environment Agency's Groundwater Source Protection Zones Map (available online at <a href="http://apps.environment-agency.gov.uk/wiyby/default.aspx">http://apps.environment-agency.gov.uk/wiyby/default.aspx</a>) together with the document 'Environment Agency Groundwater protection: Principles and practice (GP3)' to ensure any impact of the proposed allocation on groundwater quality in the area is best managed. The document encourages planners, developers and operators to consider the groundwater protection hierarchy in their strategic plans and when proposing new development.</p>	The location of the site within Groundwater Source Protection Zone (SPZ) 2 does not preclude the site from development. The Environment agencu advise that to safeguard the groundwater resources any foul drainage will require connection to the main sewer
1734	Cllr Tony Martin	Site Allocations	HS1/32	<p>We the undersigned call on Burnley Borough Council to remove from the Local Plan the proposal (HS1/32) to build houses on green land at Cleveland Road, Burnley.</p> <p>87 signatories, 1 late, 17 anonymous = 67 authorised signatories</p>	Petition noted.
1351	Environment Agency	Site Allocations	HS1/32	<p>There is an historic landfill site to the east of the site. We would recommend that, as with other potentially contaminated sites, the following is included in Supporting Information, "Land contamination investigation and the relevant remediation will be required in accordance with Policy NE5".</p>	Additional text added to the site's Additional and Site Specific Policy Requirements and Design Principles
1626	Cllr Tony Martin	Site Allocations	HS1/32	<p>I am asking that this site be removed from the plan as an area designated for housing/building purposes. It is green land and, having looked at the Ordnance Survey maps of 1860, 1910 and 1930, I can see no evidence of any building on this land before. There is plenty of brownfield land and enough empty, low cost affordable family housing (both for sale and rent) in the area to serve demand for the lifetime of this plan.</p> <p>Trinity ward, as a whole, has many brownfield sites currently in need of development that would be better used to regenerate and improve the area and the local plan should be concentrating on these sites.</p> <p>Any development on this site would put pressure on local schools and roads and even a</p>	<p>Approximately 75% of the Plan's overall housing requirement will be met on Brownfield sites. A range of sites have been chosen to address both the quantitative and qualitative housing needs identified in the Strategic Housing Market Assessment.</p> <p>Lancashire County Council has not raised any specific issues with regard to the junction of Springhill Road and Manchester Road. The issue will be mitigated to an extent by the planned expansion of the car park at Manchester Road Station for which funding has been</p>

				<p>small increase in traffic would have an impact. The access to the site is from two local residential roads, Springhill Road (to the north) and Clevelands Road (to the south). Any development would add significant pressure to the dangerous junction of Clevelands Road and Manchester Road, or an even more dangerous junction of Springhill Road and Manchester Road, the latter already suffering from excessive overspill double-sided parking from the recently refurbished and expanded Manchester Road Railway Station which is likely to get worse rather than better. The local primary schools are full and building additional homes in this area means families would have difficulties getting children placed and if placed further away would add yet more strain to traffic congestion at peak times.</p> <p>Turning to the ecology of the area, there are many mature trees on site which would need to be removed if this development were allowed. These provide a valuable habitat to insects, birds and bats, there is a known mature population of Pipistrelle bats on Healey Heights and I am sure building on this site would disturb their nocturnal feeding activities. I believe they are a protected species and should this development be allowed would need specific remediation measures to ensure their ecology is not degraded.</p> <p>In short, local residents don't want development on green land that has never been built on before. It would mean the loss of a much valued local amenity that has been enjoyed by local residents for recreation and dog walking for generations. There are many elderly dog owners in the area for whom the adjacent Healey Heights Recreation Ground is more difficult terrain and unsuitable.</p> <p>I am not a "NIMBY", I have a proven track record of support for proposals I believe enhance the area I represent and the town as a whole, but I am very strongly opposed to any development on this site. To build here would, in my view, amount to an unforgivable act of municipal vandalism. I will vigorously oppose any future plans to build on this site. I am asking once again for the proposed designation of this as land for housing to be lifted and removed from the local plan.</p>	<p>secured and is a committed scheme.</p> <p>Following consultation on the Local Plan Preferred Options, the Local Education Authority (LEA) determined that the potential housing sites identified, (based on a worst case scenario) could bring forward the need for 3½ additional primary forms of entry and approximately 376 secondary school places over the plan period (up to 2032). Where and when the places will be required will depend on where and when sites come forward for development. The LEA are consulted on all housing applications. Developer contributions may be sought in accordance with Policy IC4.</p> <p>All sites have been subject to a Desk Top Ecology survey and a more detailed Protected Species Survey where identified. Policy NE1 states: where sites are known or likely to house protected species, priority species or priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.</p>
1582	Lancashire Wildlife Trust	Site Allocations	HS1/32	<p>The Trust notes the presence of trees on the site. The Trust is pleased to see, and supports the principle that an arboricultural survey will be required and a detailed landscaping scheme prepared showing a majority of the trees on and adjoining the site including to the road frontage retained and protected during the site's construction and any trees accepted to be lost will need to be compensated for by new planting within or adjoining the site.</p>	<p>Support is noted.</p>
1823	Padiham Community Action	Site Allocations	HS1/33	<p>The housing site HS1/33 the Old Vicarage, for 6 dwellings should be removed from the Plan and the site left in its current use as a family home. The site is not available and is too small to be considered a matter for the Plan to deal with.</p>	<p>The site is in a highly sustainable location. This site which was included in the preferred options plan has been removed from Proposed Submission Plan. Uncertainty about the likelihood of the site coming forward which if it did could be for a very small</p>

					number of dwellings would be better considered against policy as a windfall site. Further information about the Council's process for selecting sites is set out in the Site Allocations background paper.
1438	Habergham Eaves Parish Council	Site Allocations	HS1/4	<p>Re: Supporting Information for HS1/4</p> <p>"2) .....has identified fully funded improvements to the Rosegrove junction to be undertaken by Lancashire County Council and Burnley Borough Council</p> <p>"4) There is potential to explore a combined access strategy in conjunction with site HS1/28 – Land to rear of the Bull 'n' Butcher'</p> <p>The Parish Council refer to point '2' above. Access to Rossendale Road would not only impact on the Rosegrove junction but would in turn exacerbate the existing problems at The Summit junction. (As already pointed out in the Parish Council's comments with regard to HS1/2 – Hollins Cross Farm.)</p> <p>The Parish Council refer to point '4' above which is linked to HS1/28. This is dealt with under the following:-</p> <p>Re: - 'Supporting Information for HS1/28'</p> <p>"1) There is potential to explore a combined access strategy in conjunction with Site HS1/4 – Land at Rossendale Road."</p> <p>"2) The site is close to a Key Gateway and development with need to address this in accordance with Policy SP5"</p> <p>The Parish Council refer to 'Point 1'. If the combined access strategy was to be put in place together with HS1/4 and vehicles were to exit on to Manchester Road this would put extra pressure, again, on The Summit junction.</p> <p>Manchester Road is a fast flowing road (despite traffic speed and 'slow down' signs being in place) as vehicles travel down towards The Summit. It is also a danger for traffic exiting Crown Point Road, opposite the Bull 'n' Butcher, attempting to travel downwards towards The Summit. Sight lines are extremely dangerous here. In fact vehicles tend to 'nudge out' into the road to see whether it is safe to exit.</p> <p>With reference to 'Point 2'. The site is indeed a 'Key Gateway' which the Parish Council have attempted to enhance by the addition of planters (regularly re-planted by Burnley Borough Council), a bench and two plaques commemorating the Queens' Diamond Jubilee and WW1. A tree was planted some time ago by the late Enid Tate who was a Burnley Borough Councillor and past Chairman of Habergham Eaves Parish Council. This tree is well established now.</p> <p>The Parish Council would also like to draw attention to the base of the ancient 'Butter Cross' (Grade 2) situated in the field (known as Cross Field) behind the Bull 'n' Butcher. Mr K. G. Spencer makes reference to this in his book 'An outline History of Habergham Eaves' (1989). A blue plaque was fixed to the side of the Bull 'n' Butcher (facilitated by the Burnley Historical Society) in relation to this site but has had to be removed due to the condition of the said building due to the recent fire.</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Junction 10. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period. These proposals are included in the Draft Infrastructure Delivery Plan on which HE have been consulted and provided comments.</p> <p>Preferred Option Local Plan Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for this site states "Protected Species have been recorded on the site. An ecological survey will be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1"</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for this site states that "The presence of known heritage assets (Medieval and earlier) within close proximity of the site would suggest some limited potential for unknown archaeology of local-regional significance and suitable provision will need to be made for archaeological desk based assessment and field</p>

				<p>Habergham Eaves Parish Council would question whether checks have been carried out on all 'Preferred Options' with regard to possible underground streams.</p> <p>Finally all sites in Habergham Eaves in the 'Preferred Options Document' are the habitat to a variety of wild birds and species of flora and fauna.</p>	<p>evaluation consistent with Policy HE4 ; and any further investigation or recording works that may be necessary as a consequence of development."</p>
2204	Burnley Wildlife Conservation Forum	Site Allocations	HS1/4	<p>HS1/4 Land at Rossendale Road – Reasons for Objection</p> <p>The proposed new Development Boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a green field site in attractive open countryside in a very prominent elevated position in the landscape which is in active agricultural production. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Sect 41 protection along with Lancs BAP Long List and key species, Wildlife and Countryside Schedules 1, 5 and 8 species have been recorded within 250 metres of the site, the site is in the Historic Woodland Survey and intersects Lancashire Woodland and Grassland Ecological Network Stepping Stone Habitat.</p>	<p>The Council believes that this urban extension to the urban boundary is justified in order to fullfill the Objectively Assessed qualitative and quantative requirements for housing. The site relates well to the existing urban area and is significantly smaller than the site proposed at Issues and Options stage.</p> <p>Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.</p>
1191	Mr David Brindle	Site Allocations	HS1/4	<p>As joint landowner of HS1/4 (part) I welcome and support the inclusion of this parcel of land as one of the Preferred Options.</p> <p>Site Allocation section, page 72, HS1/4 Policy requirements 2) refers to Policy SP4 2)c)i and ii.</p> <p>Can you confirm this wording is correct and if so what ii (provision of an important community facility) would mean ?</p> <p>The Issues and Options LP included a larger area HEL/094 which the Preferred Plan is now classing as Not Suitable apart from the smaller area HEL/094d (HS1/4). This leaves an area of low quality grazing land to the west, part of which would be available to be included or linked to any development to provide more open space or landscaping (tree planting ) providing a 'countryside corridor' and access to the existing public footpaths in that area.</p> <p>Can this be noted and would it be of benefit to agree and identify such an area of land at this stage ?</p>	<p>Support for the allocation of HS1/4 noted, as well as the potential to improve amenity on the land to the west of the site.</p> <p>The reference to SP4 2) c) I &amp; ii is a stipulation that sites should (i) contribute to increasing choice and be of the highest quality, OR (ii) be for the provision of an important community facility (such as a school or other facilities needed in the area)</p> <p>The land not included could be enhanced for it visual and biodiversity value but the Council would not support this for development or any proposals which would undermine it fundamental character.</p>
1339	Environment	Site Allocations	HS1/5	<p>We support the policy requirements for contributions towards flood alleviation scheme</p>	<p>Support welcomed.</p>

	Agency			for Padiham.	
2405	Lancashire County Council	Site Allocations	HS1/5	<p>LLFA General comments relating to all 7 sites</p> <ul style="list-style-type: none"> <li>All sites are &gt;1ha and therefore require a site specific flood risk assessment in line with NPPF paragraph 103 footnote 20.</li> <li>All sites have some susceptibility to surface water and ground water flooding</li> <li>NPPG paragraph 80 outlines the discharge hierarchy for surface water for new developments and this should be followed and robust evidence provided if the preferred options cannot be utilised.</li> <li>Any works affecting ordinary watercourses may be subject to Land Drainage Consent. Consideration of impact on Ecology would be required. Planning approval does not automatically give consent to alter or work within an ordinary watercourse. Neither does it give consent to connect to highway drainage. Separate approvals are required outside of the planning framework.</li> <li>The district lead officer may wish to add further comments on his return from leave, if time permits.</li> <li>We would like to be invited to future meetings with your appointed consultants</li> </ul> <p>HS1/5 – Former Baxi Site Padiham.</p> <p>I understand there is planning application currently being considered and the LLFA have yet to provide formal comments. There is concern that this site and the access to it was subjected to flooding during December 2015 and any site specific flood risk assessment should take account of the recent events and provide appropriate mitigation. Residential is classed as more vulnerable and therefore this needs to be considered, appropriately, within the FRA as per NPPF paragraph 103 footnote 20.</p> <p>There is a culvert within the site. The site is located within the functional floodplain Padiham as a wider location is susceptible to flooding and Risk Management Authorities are currently working together to manage flood risk. We support the policy requirement for the site to contribute to any flood alleviation scheme (Policy IC4). Also see general comments above</p>	<p>Support for EA comments in relation to this site is noted. Bullet point 1: Noted. This is made clear in Local Plan policy CC4 Development and Flood Risk. Bullet point 2: The site's susceptibility to these sources of flooding has been examined as part of the the Council's Strategic Flood Risk Assessment (SFRA). In the case of this site a more detailed (Level 2) assessment has been undertaken. Bullet point 3: Noted. Local Plan policy CC5 (Surface Water Management and Sustainable Drainage Systems) sets out this hierarchy and requires it to be followed. Bullet point 4: Noted. Add to policy CC4 para 2: 'Any works affecting ordinary watercourses may be subject to Land Drainage Consent and early engagement with the Lead Local Flood Authority (LLFA) is recommended.' A paragraph has been added to the supporting text for this policy outlining the LLFA's Ordinary Watercourse Consenting and Enforcement Policy. Bullet point 5: Noted. Bullet point 6: The LLFA was invited to the SFRA inception meeting with consultants and EA. Site specific comments: Reference to the culvert and requirement for no development within 8m of this is included in Policy HS1/5. Only 1% of the site is located within Flood Zone 3b Functional Floodplain as defined by the Council's SFRA January 2017. 60% of the site is within Flood Zone 3a, and proposed residential development here is subject to the Exception Test. The Council believes that the SFRA Level 2 which has been undertaken for the site and the Sustainability Appraisal highlighting the benefits of development, together demonstrate that the Test has been passed.</p>
1662	National Trust	Site Allocations	HS1/5	<p>At the issues and options stage the Trust submitted the following comments:</p> <p>"There are concerns relating to the development of this site unless it is able to adequately address flood risk issues and to secure the appropriate improvement of the nature conservation site to the east as part of the development. This wet marshland area provides important wintering grounds for Snipe and its nature conservation</p>	<p>Preferred Option Local Plan Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.</p>

				<p>attributes need to be safeguarded and enhanced – this raises particular issues in respect of any physical works to deal with flood risk concerns and the potential conflicts with increased pressure for enhanced public access."</p> <p>It is unclear that these issues have been adequately addressed by the work undertaken in the meantime and in particular the practical measures that will be needed, and their consequent impacts, to address the known flood concerns are remain unknown. It is considered essential to ensure that development is possible that is not only reasonably resilient in terms of flood risk and that also does not compromise nature conservation and green infrastructure interests but rather secures enhancements to those resources.</p> <p>At present the Policy requirements do not adequately reflect these concerns and where they are referred to it is on the basis of "retention" rather than "enhancement".</p>	
1576	Lancashire Wildlife Trust	Site Allocations	HS1/5	<p>The Trust is pleased to see, and supports the principle that an ecological survey will be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1, and that the southern part of the site adjoining the River Calder should be retained/developed as multi-functional green infrastructure to part of the Ecological Network with public access retained.</p>	Support welcome
2205	Burnley Wildlife Conservation Forum	Site Allocations	HS1/5	<p>HS1/5 Former Baxi Site  This site is on the river Calder floodplain and because of this it is unsuitable for housing. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European protection along with Lancs BAP Long List and key species, Wildlife and Countryside Schedules 1, 5 and 8 species have been recorded within 250 metres of the site, and a bat roost has been recorded within 400 metres of the site. The site is part of the Lancashire Grassland Ecological Network and is next to the Green Infrastructure Strategy's River Calder wetlands LNR search area, also proposed as a Burnley Wildlife site.</p>	<p>The Council acknowledges that the Baxi Site is on the River Calder Floodplain. The Environment Agency has developed a mitigation scheme to enable housing development to go ahead on the site. The EA has considered a number of mitigation options. The preferred option is for Raised Defences including raising existing floodwalls and an embankment on land to the East of the former Baxi site. The scheme is identified in the Draft Infrastructure Delivery Plan that has been developed alongside the Plan and Growth Deal funding has been secured.</p> <p>Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.</p>
1960	Canal & River	Site Allocations	HS1/6	HS1/6	Comments noted

	Trust			The Trust have commented on several applications for this site. We note that planning permission has been approved and works are underway to implement the approved schemes.	
1577	Lancashire Wildlife Trust	Site Allocations	HS1/7	The Trust objects to the allocation of the woodland element of the site for housing. However, if the site was to be retained, it supports the principle that an ecological survey will be required to accompany any planning application which identifies and addresses this issue in accordance with Policy NE1. Whilst the principle that contributions will be sought to provide compensatory enhanced publically accessible open space on the land to the northeast of the site, this must not be on land that is already subject to planning conditions, e.g. Rowley landfill site, or management arrangements through the Forest of Burnley Millennium Project.	The site area in the Proposed Submission Plan is much reduced. Significant areas of tree planting have been excluded. Site capacity reduced to 18 dwellings from 120.
1694	Burnley Civic Trust	Site Allocations	HS1/7	This site is still too unstable to permit development and access will be difficult.	Site area significantly reduced in Proposed Submission Local Plan. Safe access can be taken from the existing road access from Queens Park Road
2206	Burnley Wildlife Conservation Forum	Site Allocations	HS1/7	HS1/7 Ridge Wood – Reasons for Objection This Burnley Borough Council owned land is a Millennium ‘Forest of Burnley’ tree planted site managed similarly to the adjacent Rowley tip reclamation site, part of the Brun Valley Forest Park (BVFP) which is also part of the Green Infrastructure Strategy’s River Brun and River Don including BVFP’s LNR search area and the site forms part of the Lancashire Woodland and Grassland Ecological Network. This site was added at the ‘Preferred Options’ July 2016 document stage, subsequent to the LERN assessment of Local Sites June 2015 report and requires a LERN assessment before its development status can be determined.	The additional Site Specific Policy Requirements and Design Principles for this site state that an area of the existing tree planting on the northwest edge of the site should be retained as a buffer possibly within the gardens of the new dwellings; and a larger area at the south eastern edge of around 50 metres should be retained as woodland with public access to allow a future link to the Brun Valley. In addition, the trees along Ridge Avenue should be retained and protected.  Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.
1583	Lancashire Wildlife Trust	Site Allocations	HS1/7	The Trust notes that the site forms part of the Lancashire Ecological Network for Woodland and Grassland and lies to the west of a Biological Heritage Site. The Trust is pleased to see, and supports, the principle that an ecological survey will be required to accompany any planning application which identifies and addresses these issues in accordance with Policy NE1.	Support noted.
1340	Environment	Site Allocations	HS1/9	For the purposes of strategic flood risk management we would request that the surface	Policy CC5: Surface Water Management and

	Agency			water is attenuated onsite and discharged to watercourse below greenfield QBar rates (please see comments on CC5 below). LCC will be able to provide advice on this at planning application stage. This is because there was significant flooding along the River Calder in December 2015 and increased retention of surface water, if possible, would help to reduce flood risk overall (NPPF, para 102).	Sustainable Drainage Systems requires major developments to restrict surface water discharges from developed sites to Qbar rates (mean annual greenfield peak flow).
2207	Burnley Wildlife Conservation Forum	Site Allocations	HS1/9	<p>HS1/9 Red Lees Road, Cliviger – Reasons for Objection</p> <p>The proposed new Development Boundary extends beyond the present urban boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a prominent green field site in attractive open countryside which is in active agricultural production. The LERN assessment of Local Plan sites June 2015 report states that species have been recorded with European and NERC Act Sect 41 protection along with Lancs BAP Long List and key species. The site is within 250 metres of the Ormerod and Gin Woods Biological Heritage site and is close to the Green Infrastructure Strategy's Towneley Park/Timber Hill LNR search area and is within 50m of the Lancashire Woodland Ecological Network and forms part of the wildlife links network for these areas.</p>	Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences.
1695	Burnley Civic Trust	Site Allocations	HS1/9	The traffic on Red Lees Road is already unacceptable and as it is likely that most houses on this development will have one two or three cars the site is unsustainable from this aspect alone. The infrastructure to support this development is not there – no main sewers, schools, surgeries etc.	The need for improved or new infrastructure to support the developments proposed in the Proposed Submission Local Plan is considered in the Infrastructure Delivery Plan which accompanies the Local Plan.
1237	Cliviger Parish Council	Site Allocations	HS1/9	<p>The parish council has the following comments to make:</p> <p>HS1/9 Red Lees Road</p> <p>As with the first consultation, the parish council has not changed its views on this proposal and is disappointed to see this proposal and indeed any urban infringement on the countryside.</p> <p>We repeat our objections in that this site will lead to Cliviger being gradually swallowed up into Burnley and we feel this site is not sustainable. Traffic is already heavy and fast on this road and the potential further 250 vehicles would add to this and cause big problems in the area. The local school which serves this area is already full, there is no main sewer to the site and there are no local facilities such as doctors and dentists in the area.</p>	<p>Development of the site proposed whilst extending the current development Boundary will be within a new development boundary for Burnley. Development outside of this boundary will be strictly controlled.</p> <p>Discussions with Lancashire County Council have concluded that there are no concerns with regard to the capacity of Red Lees Road and safe access can be achieved.</p> <p>Infrastructure capacity and future requirements have been considered in the Infrastructure Delivery Plan which is published alongside the Proposed Submission Local Plan.</p>



## Site Allocations - Housing – Responses from Individuals

Comment Ref	Site Policy Para	Suumarised or Example Comment	Recommended Response
<b>Number of Individual who commented (not including pertitions)</b>			
HS1/1 = 7 HS1/2 = 33 HS1/3 = 1 HS1 4 = 9 HS1/7&8 = 9 HS1/9 = 16 HS1/10 = 24	HS1/11 = 2 HS1/15 = 184 HS1/20 = 145 HS1/25 = 30 HS1/27 = 8 HS1/31 = 144 HS1/32 = 4		
4	General	"Worsthorne" definition	<p>The Council is aware that there has been some confusion about how Worsthorne is defined in the local plan, and why.</p> <p>Policy SP4 seeks to define a settlement hierarchy for the borough. The purpose of this is not to indicate the existence or extent of villages as local people may perceive them, but rather, is a planning tool to indicate where infill development of a particular type or scale may be acceptable.</p> <p>In the case of Brownside and Worsthorne, the boundary which defines Worsthorne as a 'main village' has been drawn around the older traditional village, with Brownside being defined as part of the 'principal town' of Burnley. This acknowledges that, whilst residents may consider Brownside to be part of Worsthorne for non-planning purposes, they have intrinsic differences for planning purposes – Worsthorne is a historic village with the form and facilities typical of a village, whereas Brownside in the vicinity of Heckenhurst is a C20 housing development which directly adjoins Burnley along Brownside Road, and as such, different types and scales of development may be acceptable in each area. The Plan's approach recognises the character of and seeks to protect the identity of the historic village of Worsthorne.</p>
1	General - Raised in respect of a number of sites	Development of the site will result in loss of view	Whilst the council sympathises with residents who may lose a view from their property over open space, the right to an open view over someone else's land is not a material planning consideration, and thus cannot be taken into account when assessing the suitability of a site.
2	General - Raised in respect of a number of sites	Development of the site will result in reduction in house value	The Council sympathises with residents who fear that nearby development may negatively affect the value of their homes, however, the impact of development, be it positive, negative or neutral on other property values, is not a material planning consideration, and therefore cannot be taken into account when assessing the suitability of the site. The Plan as a whole is likely to have a positive impact on property prices but these are of course also heavily influenced by non-local factors.
144	HS/15 HS/21 HS/31	This is a greenfield area and is connected to the Rowley Lake in terms of the wildlife habitat. Owls, bats, birds, toads and frogs and many other protected species use this area. Development would result in a loss of biodiversity due to habitat loss,	It is not national policy that each and every development must achieve no net loss of, or indeed gains in, biodiversity. This is a requirement of the Plan as a whole and individual developments and actions will contribute to achieving this as appropriate to their nature and scale.

		pollution and disturbance contrary to NPPF which states there should be a net gain in biodiversity.	
9	HS1/1	Objections to building on green areas and not keeping to school footprint	<p>The number of dwellings proposed at this site has been reduced from the Preferred Option figure of 300 to 250 dwellings dwelling in the Proposed Submission Plan giving gross density of just under 25 dwellings per hectare (the site being 10.10ha in total). The precise number and site layout would be confirmed at the planning application stage but would be expected not to exceed 250.</p> <p>The site is in a highly sustainable location within the current urban boundary and whilst it is acknowledged that development would result in the loss of some green space on the site, Policy HS1/1 requires that development should retain the existing playing pitches, or provide replacement provision elsewhere in the locality. HS1/1 also requires a new equipped play area to be provided on site, and stipulates that a substantial amount of multi-functional green infrastructure through the central and southern half of the site should be retained. In the surrounding area, there are a number of Protected Open Spaces proposed under Policy NE2.</p>
10	HS1/1	I just want to put on record my resistance to building on the green belt between the old Girls High School on Kiddrow lane and Ivy Bank School, I have no objections to you developing both sites but to take up the green belt is a little to much, also the proposed 300 houses between them is in my opinion a little reckless	<p>The number of dwellings proposed at this site has been reduced from the Preferred Option figure of 300 to 250 dwellings giving gross density of just under 25 dwellings per hectare (the site being 10.10ha in total). The precise number and site layout would be confirmed at the planning application stage but would be expected not to exceed 250.</p> <p>The site is in a highly sustainable location within the current urban boundary and whilst it is acknowledged that development would result in the loss of some green space on the site, Policy HS1/1 requires that development should retain the existing playing pitches, or provide replacement provision elsewhere in the locality. HS1/1 also requires a new equipped play area to be provided on site, and stipulates that a substantial amount of multi-functional green infrastructure through the central and southern half of the site should be retained. In the surrounding area, there are a number of Protected Open Spaces proposed under Policy NE2.</p> <p>The site is part brownfield and part greenfield but is not in the Green Belt.</p>
11	HS1/1	Too many houses proposed will lead to significant traffic impacts	<p>The number of dwellings proposed at this site has been reduced from the Preferred Option figure of 300 to 250 dwellings. The precise number and site layout would be confirmed at the planning application stage but would be expected not to exceed 250.</p> <p>Lancashire County Council, the Local Highway Authority has identified the need for improvements to the junction at Kiddrow Land and developer contributions will be sought in accordance with Policy IC4.</p> <p>Lancashire County Council has been involved in discussions regarding the redevelopment of this site and have raised no objections. Its comments have been reflected in the Additional and Site Specific Policy Requirements and Design Principles for this site which state "Vehicular access should be provided from Kiddrow Lane with only an emergency (and cycle and pedestrian) access onto Scott Street". In addition, any necessary off-site highway improvement works agreed to be necessary must be carried out in accordance with a phasing plan to be agreed.</p>

33	HS1/10	Congestion on Standen Hall Drive	<p>The Council has liaised with Lancashire County Council the Local Highway Authority in developing the Plan to ensure that road capacity and highway safety is not compromised.</p> <p>The site specific policy requirements for this site at HS1/10 state that contributions may be sought towards highways improvements in the locality accordance with Policy IC4: Infrastructure and Planning Contributions.</p>
34	HS1/10	Ability of schools and doctors to cope with additional numbers	<p>The council invited the NHS to comment on the Preferred Options document, and no specific concerns about the ability of doctor's surgeries to cope in the area have been raised. The NHS has provided more detailed information and proposed mitigations that are included in the Draft Infrastructure Delivery Plan (IDP) that has been developed alongside the Local Plan.</p> <p>With regards to schools, the council has liaised with Lancashire County Council about school capacity and future needs. LCC's response and proposed mitigation measures are included in the Draft IDP.</p>
35	HS1/10	Poor drainage and subsequent flood risk on the site	<p>Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.</p>
36	HS1/10	How will the issue of access to the site itself be resolved?	<p>The existing access to the site is not considered suitable to serve the development. It is understood however that a property on Standen Hall Drive is within the control of the landowner and could be demolished to accommodate satisfactory new access to the site.</p>
37	HS1/11	Parking is already problematic in the area and will be made worse	<p>Parking provisions are covered by Policy IC3, and Appendix 9. Policy IC1 also specifies how schemes should encourage sustainability, including promoting a user hierarchy which prioritises pedestrians, cyclists and public transport over private vehicles, the implementation of which will, in turn, encourage and enable people to consider and using sustainable transport methods.</p>
128	HS1/11	Parking is a big issue around the hospital area for local residents. Already there are not enough parking places for out patients and visitors. What about the problems it will cause for local residents, where will all the workers and back up people going to park. Also there is not enough parking for hospital staff. Why is the NHS selling off good buildings that could be used for out-patients and clinics?	<p>The council will liaise with Lancashire County Council about the concerns raised, and how any potential development on the site might mitigate this. The local plan includes a policy on car parking - IC3, with standards required for new developments found in Appendix 9.</p>
127	HS1/15	HS1/15 Change of use from Greenfield to Brownfield HS1/15. There are many locations available in Burnley to accommodate housing needs without encroaching on rural Greenfield areas. I oppose the council building in this area and believe they should concentrate on building more affordable housing in areas West of the borough, or which are already classified as Brownfield land, closer to motorway links and focussing on areas of the town in need of development before encroaching on an area that does not require modernisation or improvement. This development is not in line with NPPF (Para 55) as 'to promote sustainable development in rural areas, housing should be	<p>In selecting the proposed allocations it has been necessary to allocate Greenfield sites to assist in delivering an appropriate mix of housing types in attractive locations. However Greenfield development will only account for just over 24% of the new housing provided during the Plan Period 2012 - 2032.</p>

		located where it will enhance or maintain the vitality of rural communities'. The proposed development will not 'enhance or maintain the vitality' but do exactly the opposite.	
129	HS1/15	<p>As Worsthorne-with-Hurstwood is designated as a conservation area, it is responsibility of the villagers and Burnley Council to preserve its character.</p> <p>It is well documented that the architecture and history are important to so it is essential that the ambience is maintained and its assets preserved. Our countryside around Burnley is outstandingly beautiful and should remain intact for future generations to enjoy.</p> <p>Apart from the ethical point of view, the council's option to build housing estates on green land simply doesn't seem necessary. There are already large swathes of land around the Burnley area which have been cleared and are available for re-building.</p> <p>Also there are unsightly spaces which would benefit from their attention With imagination and landscape gardening these projects could make attractive places in which to live.</p> <p>Nationwide there is concern for the English meadow which is disappearing at an alarming rate. There is now a society for the Preservation of the English Meadow – so this is something to emulate.</p>	<p>HS1/15 lies outside of the Worthorne Conservation Area. Conservation Areas are not designated to stop future development. Instead, designation seeks to manage change in order to enhance Conservation Areas and ensure that new development preserves and enhances their character. Whilst new development in the Conservation Area will have an impact, the impact will not always be harmful. New development will provide opportunities to enhance the character and appearance of the Conservation Area and its setting and will be subject to Policy HE2: Designated Heritage Assets and SP5: Design Quality. A standard house type is likely to have a harmful impact on the Conservation Area and is not a suitable design solution for historically sensitive locations and as such there will be a need for careful consideration of layout, height, design, scale and materials to ensure development contributes positively to character and appearance as required by HE2.</p>
130	HS1/15	<p>I support the proposed development of HS1/15 i.e. the end of Heckenhurst Avenue &amp; the rear of Smithyfield Avenue but only on the condition that no development is allowed at any time on any land between Lindsay Park and Worsthorne School. It is paramount that the approach to Worsthorne reflects the rural nature of the village and any development in the Brownside Road area will have a seriously negative impact on the characteristics, environment and sustainability of what is Burnley's only remaining district village centre.</p> <p>Furthermore any houses built on HS1/15 will only have my support on condition that they are aspirational houses that will address the local issues relating to the declining socio-economic profile of Burnley Borough.</p>	<p>Conditional support noted.</p>

5	HS1/15 HS1/20 HS1/31	Worsthorne village status / village feel and potential coalescence with Burnley / loss of village status	<p>Policy SP4 seeks to prevent coalescence between the village of Worsthorne and the principal town of Burnley, by drawing and defining a development boundary around Worsthorne. Although proposing three housing allocations in Worsthorne (HS1/20, HS1/31 and HS1/38), it is considered the the individual and cummlative scale of development proposed and the sites chosen is acceptable. Policies HS1/20,HS1/31 and HS1/38 all state that schemes of the highest quality will be expected, in line with and in excess of the requirements of Policy SP4.</p> <p>By managing development in Worsthorne in this way, its status and character as a village can be preserved whilst maintaining and enhancing the vitality of this rural community.</p> <p>Whilst in some cases, the sites considered at Issues and Options stage have been reduced in size, other sites considered were have not been taken forward e.g. due to concerns that they may lead to the coalescence of the two settlements or be out of scale with the village's size.</p>
38	HS1/15 HS1/20 HS1/31	<p>Not compatible with Policy NE3 Landscape character.</p> <p>The proposed development is contrary to stated aims of Policy NE3 as this environment will not be improved or enhanced by development, it will have a detrimental effect on the current landscape by loss of habitat, features and by planting planned to screen the proposed development will entail loss of light to current residents.</p>	<p>It is not disputed that housing development on a greenfield site will fundamentally alter its landscape character. This is not at odds with Policy NE3. Policy NE3 is not intend to protect sites or land as open space. Policies such as SP4 perform this role for the wider countryside.</p> <p>Policy NE3 requires development proposals to respect and where possible, enhance and restore landscape character as appropriate to their nature and scale. The policy sets out criteria for how schemes should be designed to achieve this.</p>
39	HS1/15 HS1/20 HS1/31	<p>Loss of Privacy and increased overlooking</p> <p>Protecting the residents' wellbeing and mental health state -</p> <p>Without a doubt the proposals are already causing a large amount of stress and concern.</p> <p>If sanctioned, people on HS1/15 area are likely to experience a huge amount of disruption, change to their current peaceful environment, property on Smithyfield will suffer a direct loss of privacy, as currently we are not overlooked and new build will replace the natural views we now have. This would undoubtedly effect a detrimental change in mental wellbeing in many residents, extra homes and the construction thereof will affect sleep patterns and daily life activities, including risk to children from extra traffic and construction site, as they currently play in the fields, thus having an adverse effect both at work and of residents' family home life.</p> <p>This proposal would clearly be an infringement on ones right to</p>	<p>It is not clear from the comment which properties would be at risk from a loss of light, however given that any development on this site is likely to be of a similar layout or style to the existing development, the risk to residents light is no different to the impact existing properties may have on each other</p> <p>The Plan required adequate privacy distances between new and existing development. Policy HS4 is designed to manage the impact of developments on the amenity of existing and future residents, including, as per paragraph 5.1.32, "to allow the admission of daylight and sunlight..." Any issues of overlooking would be addressed during the assessment of any planning applications submitted for development on this site.</p> <p>The Council is mindful that development proposals can generate fear and distress but the allocation of a site through a local plan does not infringe the Human Rights Act.</p> <p>National policy supports housing development in and around villages in principle.</p>

		private and family life (Human Rights Act 1998) in his/her home and his/her correspondence and our rights to live in a rural area as stated in the local and national plan (National Planning Policy Framework).	
41	HS1/15 HS1/20 HS1/31	<p>Detrimental impact upon the infrastructure of the community and village and ecology.</p> <p>This whole area will be seriously compromised by expansion and development and will affect all residents, services and traffic.</p> <p>Transport links are poor, bus service finishes at 6.30 pm, remote from employment opportunities, increase in pollution, light and noise, no policing in this area only PCO so crime and antisocial behaviour will increase.</p> <p>The school would have to be rebuilt as it is at capacity/oversubscribed. <a href="http://www.genuki.org.uk/big/eng/LAN/Worsthorne/ParishMap">Http://www.genuki.org.uk/big/eng/LAN/Worsthorne/ParishMap</a></p> <p>his is a greenfield area and is connected to the Rowley Lake in terms of the wildlife habitat. Owls, bats, birds, toads and frogs and many other protected species use this area. Development would result in a loss of biodiversity due to habitat loss, pollution and disturbance contrary to NPPF which states there should be a net gain in biodiversity.</p> <p>The school would have to be rebuilt as it is at capacity/oversubscribed. <a href="http://www.genuki.org.uk/big/eng/LAN/Worsthorne/ParishMap">Http://www.genuki.org.uk/big/eng/LAN/Worsthorne/ParishMap</a></p>	<p>As part of the plan-making process the Council assesses the likely impact on infrastructure of the plan as a whole and individual sites, consulting and liaising (including in line with the duty to cooperate) with a number of service providers. The plan is accompanied by an IDP which sets out where there are known deficiencies in infrastructure and how these may be addressed so as to ensure the Plan can be delivered. It is important to note that the IDP is a live document as infrastructure needs and deficits will change over time to 2032 and any requirements or contributions to address relevant deficiencies would be assessed at the time of granting planning permission. Where an issue is known at this stage a specific requirement for delivery or a contribution to delivery of infrastructure improvement would be set out in the policy.</p> <p>The issue with buses stopping at 18:30 has been flagged up by a number of residents. However it is still considered that Worsthorne and Brown side are sustainable locations. Additional housing in villages can make additional bus services more profitable for operators</p> <p>Following the Preferred Option consultation, further discussion took place with the Local Education Authority regarding Worsthorne Primary School. This is a popular village school with children attending from outside the village. The current LEA school place forecast displays that there is capacity over the next 5 years that may accommodate children from developments allocated in the Plan, in particular those from the developments close to the school. However, in Worsthorne, the physical expansion of the school within the existing site would be restricted and there may be a need to look towards the use of additional land to replace any outside areas used to expand the school building. If a school expansion is required contributions may be sought from developers in accordance with IC4</p>
42	HS1/15 HS1/20 HS1/31	<p>Brownside Road is the main route in and out of the village. This road is already at capacity and difficult due to chicane effect of traffic. Many accidents have happened within the area, because of the narrow road; these figures are likely to rise if the plans are sanctioned. Hurstwood and the Mary Towneley loop is accessed by many equestrians via Brownside road and this increase in traffic on an already dangerous road would present even more risk to horses and riders of which there are many in this rural district.</p>	<p>The County Council is aware that two sections of Brownside Road are throttled to single working by parked vehicles. The unofficial give and take is created by residential parking adjacent to the two terraced blocks immediately east of the river Brun Bridge. No alternative parking facility is available for some residents who consequently park vehicles on Brownside Road. The County Council has been unable to identify any additional traffic management measures, beyond those already instigated, which would be of sufficient benefit to merit introduction at this location at the present time. However it should be noted that vehicles speeds into the area are controlled and low. From the east speeds are restrained by the junction table located at the Brownside Road / Lindsey Park road junction. Vehicle speeds from the west are regulated by the parking itself which takes place within the eastbound carriageway.</p> <p>Although not ideal the two informal give way systems created by roadside parking do operate safely. An investigation of the 5 year casualty rate has confirmed that no collisions resulting in personal injury have been recorded in the area. A 5 year review of the County Councils Public Enquiry Message (PEM) system,</p>

			the database of all public contact, has also confirmed that no contact has been received or complaints made regarding the operation of Brownside Road, or occurrence of on street parking in the vicinity of the discussed throttle.
43	HS1/15 HS1/20 HS1/31	Pike Hill mini-roundabout is already difficult for cars to negotiate due to cars coming in and out of the shops and the fact that there are various entrances to the Spar shop. It is extremely hazardous to pedestrians due to the volume of traffic already without further increase. There is no pedestrian crossing.	During the lifetime of the emerging Local Plan, development levels proposed are likely to see the Brunshaw Road / Brownside Road junction reach capacity. Developments proposed will be expected to contribute towards junction improvements, such as the installation of traffic lights, which will mitigate the effects of increased traffic levels. The need for junction improvements is included in the Draft Infrastructure Delivery Plan that has been developed alongside the Local Plan and contributions may be sought in accordance with Policy IC4.
44	HS1/15 HS1/20 HS1/31	<p>Brownside Bridge is often bottlenecked, although some work was undertaken recently, it is still prone to flooding and is still considerably narrow, meaning that one driver must give way if there is anything larger than an ordinary car width e.g. buses, lorries. With neither way having priority it is a formidable part of road to negotiate. Immediately after the bridge there is a bus stop at the hairdressers with no designated parking stop, this means cars park at the bus stop so the bus either double parks to stop, or stops almost on the bridge causing traffic problems and dangers from motorists trying to quickly pass to beat oncoming traffic.</p> <p>This road would certainly not take the strain of constant pounding of heavy goods vehicles delivering unprecedented loads from building materials and heavy plant machinery. They are likely to face serious problems in negotiating the hill directly after the bridge, especially with the cottage residents' parked vehicles on the left hand side. Unnecessary dangers and hazards are being ignored here. The disruption would be for an extended period of time, causing traffic chaos on the one small main road into the village, Brownside Road, along with the noise levels and vibrations from the daily movement of plant machinery and vehicles.</p>	LCC highways have stated that as a classified highway (C661) the road has been constructed to cater for all classes of vehicular traffic. In addition the bridge is not restricted to an operational weight limit. Consequently the County Council would have no concern regarding access to the site by normal construction traffic.
45	HS1/15 HS1/20 HS1/31	Townfield Ave\Brownside Road. Townfield is the main access route to the proposed development (HS1\15) directly opposite facing this avenue are parked cars outside 139 - 141 Brownside Road, this means that as you turn right out of Townfield Ave onto Brownside Road you are often forced out into the opposite lane going down the hill, to be met by cars coming up the hill almost colliding on frequent occasions. This is very dangerous and difficult to avoid as the hill makes it a blind manoeuvre.	The Highways Authority have stated that they have no specific concerns in relation to the existing road network at the locations referred to.

		<p>From the Thornton Arms there are cars parked at the bottom of houses on the right hand side due to their steep access. This means oncoming traffic overtaking parked cars on a bend, many taking up most of the road, nearly forcing traffic coming down from the Thornton onto the footpath.</p> <p>102 -104 Brownside Road to Lyndsey Park entrance. This is a narrow uphill stretch with many parked cars on the left and some on the right, therefore creating an extended chicane effect to add to the danger of the road and enhancing the backlog of traffic both ways with no clear right of way in either direction. Opposite, on the right, before the first Lindsay Park turning, are several homes set back from the road with driveways.</p> <p>These residents already find difficulty turning in and out of their driveways with the abundance of traffic, on a road that clearly will not accommodate an influx of extra traffic.</p> <p>Further up Brownside, is the second turning to Lindsay Park on the right. This turning is just before the right hand, almost blind bend, on Brownside Road. Turning into this junction is already hampered by oncoming traffic, and turning out of the junction requires extra vigilance. Further up Brownside Road on the sharp right bend is the left turning to Heckenhurst Ave, which is where children cross from the school to these avenues and an increase in traffic will make this already dangerous crossing more hazardous to residents. There is no crossing patrol due to cutbacks.</p> <p>Lennox Street\Brownside Road. At the junction of Lennox Street is the blind, sharp right bend. This part of the road narrows even further and is a prominent danger hot-spot. The remainder of the road to the crossroads at the heart of the village is much the same, with parked vehicles on either side and dangerous narrow footpaths, which require crossing twice to keep on a footpath or risking life and limb by walking on the road. The village itself is already stretched over capacity with regards to parking.</p>	
46	HS1/15 HS1/20 HS1/31	<p>Worsthorne School. The road is very narrow with cottages on the left with many parked vehicles just beyond the school entrance, making this another one way passing place which is on a sharp right bend making it difficult for traffic flow, coupled with parked cars all the way from the school bus stop on the</p>	<p>Schools create traffic at drop off and pick up times as a consequence of their operation rather than as a result of development. Dangerous road conditions at this location are considered most likely to be due to inconsiderate and un-safe parking. New development within and close to the village may over time be reflected in changes to traffic patterns of parents which see reductions in the need to drive to the village as new residents live within walking distance.</p>



		<p>right all the way down Brownside to opposite North West water.</p> <p>Brownside Road traffic is already at capacity as it is the main route out of the village. At school times the problem is exacerbated with increased school run traffic, which profoundly compromises safety for children and other pedestrians and other road users and again there is no crossing patrol due to cutbacks. Just after the school, on the right is a children's playground, with the entrance on the roadside. Extra traffic would unacceptably compromise child safety and that of road users.</p>	
47	HS1/15 HS1/20 HS1/31	<p>Unsuitable access routes.</p> <p>The road out towards Briercliffe is a single track road in most parts and used for access to outlying farms and private homes. This road leads through to Cockden and Haggate where access is single track in many places for extended lengths, particularly at the dangerously hump backed blind hill in the road at Cockden, making this unsuitable for an increase in traffic to Worsthorne.</p> <p>The narrow road out towards Red Lees Road via Ormerod Street, is a very winding road between houses, hampered with residents' parked vehicles on both sides which have to be negotiated with extra care. This leads to Salterford Lane, with farm accesses and the turning to Hurstwood. Further on, there are a series of blind and dangerous bends and single track sections of road. These roads cannot possibly be deemed as main routes into the village as due to their many areas of impassability for more than one vehicle on large sections are unsuitable access roads.</p>	<p>The Highways Authority do not consider the number of cars using these alternative access routes are to be significant and as such there are no concerns with regard to capacity or safety.</p>
48	HS1/15 HS1/20 HS1/31	<p>Increased flood risk. The currently inadequate drainage system means that water drains can only cope with the village as it is; further erection of the amount of proposed homes would not only weaken the system, it would have adverse effects on existing areas and homes.</p> <p>During times of inclement weather, the flow of water runs from numerous drains and one of the adjacent proposed fields including the Lindsay Park area, over the road between houses, creating a torrent, which thereby creates an overflow of the drainage. Flooding frequently occurs with roads surfaces and</p>	<p>Proposed Submission Local Plan Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.</p> <p>Any development proposals for the site will need to be accompanied by a site specific Flood Risk Assessment (FRA) in accordance with Policy CC4 and also seek opportunities to reduce the overall level of flood risk in the area in accordance with Policy CC5.</p>

		<p>drains lifting and this was particularly evident in the winter of 2015/16 where many homes in the village flooded as did Brownside Road.</p> <p>One also has to consider that the village drainage system, including sewerage in most parts, will be of Victorian origin. The implementation of a new drainage system would result in the village itself being dramatically disrupted, thus causing further chaos for months, perhaps running into a year or two. The drains would have to be dramatically improved on Brownside Road, making it near impossible for village access on an already difficult road to negotiate.</p> <p>Access to Lindsay Park, Townfield, Smithyfield, Copperfield and Heckenhurst, including surrounding residential avenues and perhaps the areas in and around the Thornton Arms, would be unacceptably restricted for months on end causing severe disruption and difficulty to residents.</p> <p>The proposed field for development behind Smithyfield Ave has serious drainage issues during periods of wet weather and flooding regularly results. An area behind my house (10 Smithyfield Ave.) becomes a temporary duck pond several times every year.</p>	
50	HS1/15 HS1/20 HS1/31	<p>Impact on ecological features The natural wildlife habitat and ecology which borders our immediate environment will be adversely affected as will the existing conservation areas that provide safety and a future for all wildlife. Some examples of the wildlife we currently have are bats, lapwings, badgers, toads, frogs, wild deer and migrating Canada geese to name a few.</p> <p>Lapwings in particular are protected species as recorded by the RSPB red list.</p> <p>The old mill buildings at the bottom of Copperfield, Smithyfield and Riddings are inhabited by bats whose breeding and habitats must not be disturbed. Bat Conservation Trust must be informed in the event of any building disturbance in the area.</p> <p>Therefore, we consider the proposed development to adversely affect our green infrastructure and quality of life which currently</p>	<p>Local Plan Policy NE1: Biodiversity and Ecological Networks states that where are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles note for all these sites HS1/15 HS1/31 and HS1/36 that Protected Species have been recorded on the site and ofr HS1/20 bats may be present. All require an ecological survey in line with Poicy NE1 (including a breeding bird survey and survey of any South Pennines SPA qualifying species present) to accompany any planning application to identifies and addresses these issues.</p> <p>Further explanation of this is set out at paragraph 5.5.5 and 5.5.13 of the Proposed Submission Local Plan.</p>

		affords benefits to residents of Smithyfield Ave and consider this to be a direct contravention of The protection of wildlife habitats. Regulation 8, Conservation of Habitats and Species Regulations 2010	
51	HS1/15 HS1/20 HS1/31	Local tourism may be affected. We may suffer a reduction in the numbers of walkers, cyclists, ramblers, runners, holiday makers and visitors to the village whom could be put off from visiting the area, because of its change from a quaint country village in beautiful countryside into a sprawling annexed building estate. The visual impact of this historic village would be severely impaired, as would the surrounding areas. Natural landscapes would disappear, affecting all residents of Worsthorne and Hurstwood.	The Council is not aware of any evidence that housing development will adversely affect tourism.
52	HS1/15 HS1/20 HS1/31	Loss of community and recreation space for safe play. The proposed field for development in HS1/15, though privately owned, is currently and has for many years been used for recreational purposes by children and local residents with acceptance from the farmer and landowner. This is a great social and community aspect of the residences on Smithyfield and reduces the risk of children playing near traffic.	The landowner has put forward the site for development.  Policy HS4 sets out the requirements for open space provision within new housing developments.
53	HS1/15 HS1/20 HS1/31	Geological considerations.  There are old mine shafts in some of the areas proposed for development including under some of the nearby and current properties where residents already live. The extreme digging for depth for foundations and sound ground for new properties may cause subsidence to existing ones. This has happened in other areas of the town and resulted in compensation claims by its residents after negligent construction.  Appropriate protection needs to be assured to our current property that we could not be subject to a similar scenario. Mineral Safeguarding Policy M2 requires mineral stabilisation which is applicable to HS1/15.	The Council, as part of the consultation process, have liaised with the Coal Authority, as a statutory consultee, about mine workings across the borough. A portion of the site HS1/15 is recorded by the Coal Authority as being in a 'development high risk area', with the tame portion also having 'probable shallow coal mine workings'. However, the Coal Authority has not raised any objection in principle to the development of the site.  Any site which is in a 'development high risk area' will require a coal mining risk assessment to accompany any planning application. If a developer decides they would like to build on the site, then this report must also be submitted as part of the planning application and permission would only be granted if any matter raised could be satisfactory addressed. The Council has no information to suggest that any issue could not be resolved.  A new clause has been added to Policy NE3 - clause 8) which sets out the requirements for sites that are know or suspected to be unstable to ensure the safety of new and existing residents.
65	HS1/15 HS1/20 HS1/31	Highway safety - Inadequate parking and access, the increased housing will considerably increase traffic in the area, which is not sustainable where access is already limited given there is only one main road in and out of the village. This in turn will seriously compromise highway safety. The generation of more traffic will affect visibility and car parking which will increase the risk and safety of pedestrians, cyclists, horse riders and other	The Council has liaised with Lancashire County Council the Local Highway Authority in developing the Plan to ensure that road capacity and highway safety is not compromised.  Parking provisions are covered by Policy IC3, and Appendix 9. Policy IC1 specifies how schemes should encourage sustainability, including promoting a user hierarchy which prioritises pedestrians, cyclists and public transport over private vehicles, the implementation of which will, in turn, encourage and enable people to consider using sustainable transport methods.

		road users, and potentially cause serious road traffic incidents.	
143	HS1/15 HS1/20 HS1/31	The school would have to be rebuilt as it is at capacity/oversubscribed. <a href="http://www.genuki.org.uk/big/eng/LAN/Worsthorne/ParishMap">Http://www.genuki.org.uk/big/eng/LAN/Worsthorne/ParishMap</a>	Following the Preferred Option consultation, further discussion took place with the Local Education Authority regarding Worsthorne Primary School. This is a popular village school with children attending from outside the village. The current LEA school place forecast displays that there is capacity over the next 5 years that may accommodate children from developments allocated in the Plan, in particular those from the developments close to the school. However, in Worsthorne, the physical expansion of the school within the existing site would be restricted and there may be a need to look towards the use of additional land to replace any outside areas used to expand the school building. If a school expansion is required contributions may be sought from developers in accordance with IC4
54	HS1/18	Objection to the removal of site from Green belt.	The Green Belt Review prepared by LUC on behalf of the Council concludes that this site no longer fulfils its Green Belt purposes due to its particular circumstances on Oswald Street over time which has altered its role in Green Belt terms.  This site already has planning permission for housing development restricted to the footprint of the former school, recognising n its current location within the Green Belt.  The Council accepts the case for removal and considers the released site is suitable for housing development.
12	HS1/2	Development will increase flood risk to adjacent properties and wide area	The site is situated in Flood Zone 1 and is therefore compatible with the proposed housing use. The Council's Strategic Flood Risk Level 1 SFRA found that there are no significant surface water flood risk at the site. The Council is however aware of the current issues of flooding on the road.  Proposed Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.  As a site of over 1 hectare within Flood Zone 1, development proposals should be supported by a site specific Flood Risk Assessment (or the most up to date flood risk information available) along with evidence from the Lead Local Flood Authority (Lancashire County Council) and the Environment Agency, to establish whether the proposed development: i) is likely to be affected by current or future flooding from any source, taking into account the increased risk associated with climate change ii) will increase flood risk elsewhere or interfere with flood flows iii) can provide appropriate mitigation measures to deal with the potential risks and effects iv) would be likely to preclude the future implementation of necessary flood risk measures, including the improvement of flood defences; v) can reasonably maintain access and egress at times of flood vi) can be accommodated within the capacity of the water supply, drainage and sewerage networks  Proposed policy CC5 requires that as a major development SUDs will be required and surface water discharges should be restricted to Qbar rates (mean annual greenfield peak flow).

13	HS1/2	Wildlife and Protected Species on the site will be affected	<p>Policy NE1 of the Plan: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.</p> <p>The specific requirement for a survey and addressing these issues has been added to HS1/2 (Clause 5) as the Council's Ecological Asset desk top survey has confirmed the presence of Protected Species at this site and Priority Habitat (the Pond).</p>
14	HS1/2	Mine workings on the site / development could lead to subsidence etc.	<p>The Council, as part of the consultation process, have liaised with the Coal Authority, as a statutory consultee, about mine workings across the borough. A portion of land to the north of the site allocation is recorded by the Coal Authority as being in a 'development high risk area', with the same portion also having 'probable shallow coal mine workings' recorded. However, the Coal Authority has not raised any objection in principle to the development of the site. The Council has also received anecdotal evidence from the public about past informal mining activity on the site.</p> <p>Any site which is in a 'development high risk area' will require a coal mining risk assessment to accompany any planning application. If a developer decides they would like to build on the site, then this report must also be submitted as part of the planning application and permission would only be granted if any matter raised could be satisfactorily addressed. The Council has no information to suggest this issue could not be resolved.</p>
15	HS1/2	Congestion on surrounding roads – including rush hour congestion at present – cannot cope with additional cars	<p>The impact that the development may have on nearby roads has been highlighted as part of policy HS1/2. This policy states that contributions may be sought for off-site highway improvement work in the vicinity of the site, particularly as there could be cumulative impacts on Manchester Road and Rosegrove junctions. Since Preferred Options the Council has commissioned, through Lancashire County Council further traffic modelling work and mitigation proposals have been agreed for these junctions. The Rosegrove improvements are a fully funded and committed scheme to be delivered by LCC. Developer contributions will be sought for improvements to the Manchester Road Junction.</p> <p>There has been no site specific objection from Lancashire County Council the Local Highway Authority.</p>
16	HS1/2	Infrastructure (schools, doctors etc.) stretched already / insufficient / cannot cope with additional numbers / what plans or provisions have been put in place?	<p>As part of the plan-making process the Council assesses the likely impact on infrastructure of the plan as a whole and individual sites, consulting and liaising (including in line with the duty to cooperate) with a number of service providers. The plan is accompanied by an IDP which sets out where there are known deficiencies in infrastructure and how these may be addressed so as to ensure the Plan can be delivered. It is important to note that the IDP is a live document as infrastructure needs and deficits will change over time to 2032 and any requirements or contributions to address relevant deficiencies would be assessed at the time of granting planning permission. Where an issue is known at this stage a specific requirement for delivery or a contribution to delivery of infrastructure improvement would be set out in the policy.</p> <p>The Council invited the NHS to comment on the Preferred Options document and no specific concerns</p>

			<p>about the ability of doctor's surgeries to cope in the area have been raised. The NHS has provided more detailed information and proposed mitigations that are included in the Draft Infrastructure Delivery Plan (IDP) that has been developed alongside the Local Plan. The Sustainability Appraisal notes that the site more than 1200m from a doctors surgery.</p> <p>With regards to schools, the council has liaised with Lancashire County Council about school capacity and future needs. LCC's response and proposed mitigation measures are included in the Draft IDP.</p>
19	HS1/2	Mine workings on the site / development could lead to subsidence etc.	<p>The Council has consulted the Coal Authority on the Plan at all stages of its development. The Coal Authority responded to the Preferred Options consultation and did not raised any objection in principle to the development of the site.</p> <p>A portion of land to the north of the site allocation is recorded by the Coal Authority as being in a 'development high risk area', with the same portion also having 'probable shallow coal mine workings' recorded. The Council has also received anecdotal evidence from the public about past informal mining activity on the site and erring on the side of caution this is assumed to be correct.</p> <p>The Council has viewed the online Coal Authority information referred to in the Options document and requested and obtained a mining report for the site from the Coal Authority. Any site which is in a 'development high risk area' will require a coal mining risk assessment to accompany any planning application. If a developer decides to build on the site, then this report must also be submitted to accompany their planning application and permission would only be granted if any matters raised could be satisfactory addressed. The Council has no information to suggest this issue could not be resolved.</p>
131	HS1/2	<p>#1 As a resident who will be effected by the development of the Hollins Cross Farm site HS1 / 2, can you please tell me why when the council started planning to expand Burnley by building 3000 houses in 2014, they did not factor in the need for any more new schools to be built (Please do not start quoting about the replacements for all our older schools such as Habergham, Gawthorpe and Burnley Grammar school that we now have with these PFI over price fund stripping leviathans that the council sanctioned)</p> <p>We have a number of friends and relatives in this area with young children ready to start school, also primary school children who are ready to move up to High School who cannot get their first choice school places in schools that are near to their homes.</p> <p>What plans has the council put in place to build new primary schools and create more nursery places to accommodate upwards of 6000 children?</p>	<p>The Council in partnership with Lancashire County Council has commissioned a Highways Impact Assessment, in consultation with Highways England to assess the impact of the proposed new housing and employment developments identified in the Local Plan Preferred Option on both the Strategic and Local Road Network, including an assessment of the capacity of the junction at Rosendale Road/Accrington Road and Manchester Road/Glenn View Road. The assessment concludes that mitigation measures are required at this junction to support the proposed development in the Plan. Mitigation proposals have been developed and tested to support growth in the first five years of the plan (up to 2021) and to the end of the plan period and these are included in the Draft Infrastructure Delivery Plan (IDP) developed alongside this Plan.</p> <p>Local traffic management and highway safety issues will be assessed at the time of the application and matters such as extending speed limits imporing pedestrian crossing and no parking restrictions will be examined by LCC Highways engineers who are always conscious of the need where possible and safe to retain on street parking for those who rely on it.</p> <p>Policy IC1 encourgas the use of sustainable modes of transport and development proposals would need to satisfy the requirements for either a Transport Assessment or a Transport Statement as set out in Policy IC2</p>

	<p>#2</p> <p>As a resident who will be effected by the development of the Hollins Cross Farm site HS1 / 2, can you please tell me why when the council started planning to expand Burnley by building 3000 houses in 2014, can you tell me what traffic surveys have been done on the roads to ensure that the towns infrastructure can cope with the traffic?</p> <p>As a modern family now has 2-3 cars that are regularly used on a daily basis. Let me help you with some simple maths, 3000 houses equals 6000 – 9000 cars. How are these cars going to do the following:-</p> <p>3000 cars going for the M65 and Burnley Manchester Road railways station – they won't be going to any new businesses in Burnley as there are none that will fund £150,000 - £350,000 mortgage on these new houses. I am not sure where these 100's of cars are going to park at the railway station.</p> <p>3000 cars with 6000 children in, on the school run to schools that do not exist in the Burnley area, Any other cars in the households that young adults may drive – after all 4 &amp; 5 bedroom houses are not bought by families with 2 or Less than 2 children.</p> <p>Can you explain how all this traffic is going to be absorbed by the already gridlocked Burnley road network?</p> <p>#3</p> <p>Please can you provide us with straight Yes and No answers – we do not want the political Clap Trap / Policy, Procedural, legislation log winded Mumbo Jumbo that you are all full of and continue to hide behind.</p> <p>As a resident who will be effected by the development of the Hollins Cross Farm site HS1 /2 can you please tell me why what if any traffic surveys the council started planning to expand Burnley by building 3000 houses in 2014, can you tell me what extra parking the council has planned in Burnley. As the modern family now has 2 – 3 cars that are regularly used on a daily basis, 3000 homes = 6000 – 9000 cars.</p>	<p>The Council has secured funding and land to extend the car park at Manchester Road Station. This is identified in the Draft IDP.</p>
--	--	---

		<p>Can you tell me how we are going to accommodate all these new vehicles wanting to park:- Manchester Road railway station is now full every day at 8:00 in the morning, all the roads locally have cars parked all over both sides, which is a major inconvenience for the residents who live there.</p> <p>The town centre has no envisaged extra parking planned, and car parks are always full. Will the council be opening up Manchester Road back into a “dual carriageway” By double yellow lining down both sides of the Road? I will be emailing yourselves again regularly as I feel you need to communicate more in your roles as public servants who are paid for by tax contributions.</p> <p>#4 Please can you provide us with straight Yea and No answers – we do not want the political clap trap / procedural, legislation log winded mumbo jumbo that you are all full of and continue to hide behind.</p> <p>As a resident who will be effected by the development of the Hollins Cross farm site HS1 / 2, it is now over 2 weeks since Gordon Birtwistle submitted our opposition document, can you please tell me who will be tasked with answering all our questions, in the said document.</p> <p>I assume you will be calling in experts to investigate all the</p>	
132	HS1/2	<p>I welcome the new development on Woodplumpton Road for the following reasons:</p> <p>Hopefully will stop the never ending fly tipping on Woodplumpton Road which is a blight on the area Hopefully will stop cars being dumped on there and set on fire.</p> <p>Hopefully will stop the speeding and racing of cars on Woodplumpton Road and make safer for walkers.</p> <p>Hopefully bring some more high quality houses to the area</p> <p>Will open up the countryside to others</p>	Comments and support noted.



		<p>Will not be overly close to other houses; still have green fields surrounding the development</p> <p>Hopefully will increase the membership of the golf club, generating more income for the club.</p>	
133	HS1/2	<p>I am writing to strongly object to the proposal for houses on Hollins Cross Farm (behind Glen View Rd) Burnley. Please take into account the following objectives.</p> <p>1) Human Rights Act We have the right to peaceful enjoyment of all our possessions which includes home and land and the right to respect for private and family life. This proposal will ruin this</p> <p>2) Loss of privacy and increased overlooking We purchased the house so we would have privacy. Our quality of life will be affected by the overlooking of our garden and the right to privacy.</p> <p>3) Highway Safety Issues The increase in local traffic will be badly affected. The road (Glenview) is very busy at spells during the day and any extra traffic will be a hazard. The bus service on Glenview Rd has been cut and is very limited so residents will use their cars.</p> <p>4) Impact on ecological features. The beautiful greenfield site will be gone forever destroying all the natural beauty and abundance of wildlife.</p> <p>5) Increased flood risk My garden floods during heavy rain causing damage to the land.</p> <p>6) Increase noise and disturbance We have a lovely pleasant and safe environment. This is going to cause extra noise and disturbance across the neighbourhood.</p> <p>7) Access and Parking Any overspill of cars is going to cause access and parking for residents on Glenview Rd problems. Please can you take my comments on board.</p>	<p>With regard to privacy Policy HS4 is designed to manage the impact of developments on the amenity of existing and future residents, including, as per paragraph 5.1.32 "to allow the admission of daylight and sunlight..." Any issues of overlooking would be addressed during the assessment of any planning applications submitted for development on this site.</p> <p>There has been no objection from Lancashire County Council, the local highways authority to this proposed site. Bus services are privately funded businesses and respond to demand and as such new development can increase demand for bus services, but this is beyond the remit of this plan.</p> <p>Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where sites are known or likely to house protected species, priority species and priority habitats surveys should be carried out by suitably qualified and experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats before any development commences</p> <p>The site is situated in Flood Zone 1 and is therefore compatible with the proposed housing use. The Council's Strategic Flood Risk Level 1 SFRA found that there are no significant surface water flood risk at the site. The Council is aware of the issues of flooding on the road.</p> <p>Parking provision is covered by Policy IC3, and Appendix 9.</p> <p>In respect of noise disturbance, Policy NE5 requires development proposals as appropriate to their nature and scale, to demonstrate that environmental risks have been evaluated and appropriate measures have been taken to minimise the risks of adverse impacts to air, land and water quality, whilst assessing vibration, heat, energy, light and noise pollution.</p>

		<p>Please can you take into consideration my sons HUMAN RIGHTS He has the right to peaceful enjoyment of all our possessions which include home and land and the right to respect for private and family life. We love our life but this is going to turn it upside down. The panel we met at yesterdays meeting are these the people who will make the decision.Please can you let me know. Thank you for time</p> <p>11/08/16:</p> <p>Please can you let me know how all the extra hundreds of cars are going to affect our gridlocked roads. Please can you tell me if any traffic surveys have been done. PS.PLEASE PROTECT ARE GREENFIELD SITES ONCE THEY HAVE GONE THERE IS NO GOING BACK</p> <p>13/08/16:</p> <p>Please say no to Hollins cross farm development Please be remembered for saving greenfield sites Not destroying them. HOUSES OR GREENFIELDS.? Visitors would like to see the green of Burnley Not concrete jungles</p>	
134	HS1/2	<p>We have been trying to get permission to have parking spaces for our car but no luck. We have to leave our car across the road.</p>	<p>Policy IC3 requires sufficient parking provision to be made for new housing developments through specific standards, and in applying these standards the Council will look to ensure that any existing highways safety or on street parking issues should not be exacerbated.</p>
62	HS1/20	<p>Wildlife near to the proposal / bats in the mill building</p>	<p>Local Plan Policy NE1: Biodiversity and Ecological Networks states that where are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for this site under Policy HS1/20 confirms the potential of the site to house bats and that an ecological survey (including a breeding bird survey and survey of any South Pennines SPA qualifying species present) will be required to accompany any planning application which identifies and addresses these issues in accordance with the recommendation of the Council's Protected Species Survey and Policy NE1.</p> <p>Further explanation of this is set out at paragraph 5.5.5 and 5.5.13 of the Proposed Submission Local Plan.</p>

66	HS1/25	Problems with traffic, especially on match days	<p>The Council has liaised with Lancashire County Council the Local Highway Authority in developing the Plan to ensure that road capacity and highway safety is not compromised.</p> <p>Parking provisions are covered by Policy IC3, and Appendix 9. Policy IC1 specifies how schemes should encourage sustainability, including promoting a user hierarchy which prioritises pedestrians, cyclists and public transport over private vehicles, the implementation of which will, in turn, encourage and enable people to consider using sustainable transport methods.</p>
67	HS1/25	Concerns about loss of wildlife on the site	<p>Local Plan Policy NE1: Biodiversity and Ecological Networks states that where are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for this site under Policy HS1/25 confirm that an ecological survey will be required to accompany any planning application in accordance with Policy NE1 as the sites are within the identified Ecological Networks for Woodland and Grassland.</p>
68	HS1/25	Previous shallow mining on the site	<p>The Council, as part of the consultation process, have liaised with the Coal Authority, as a statutory consultee, about mine workings across the borough. A portion of land to the north of the site allocation is recorded by the Coal Authority as being in a 'development high risk area', with the site also having 'probable shallow coal mine workings'. However, the Coal Authority has not raised any objection in principle to the development of the site.</p> <p>Any site which is in a 'development high risk area' will require a coal mining risk assessment to accompany any planning application. If a developer decides they would like to build on the site, then this report must also be submitted as part of the planning application and permission would only be granted if any matter raised could be satisfactorily addressed. The Council has no information to suggest this issue could not be resolved.</p>
69	HS1/25	Loss of community woodland – planted at cost and by volunteers	<p>The Additional and Site Specific Policy Requirements and Design Principles for this site states that an area of the existing tree planting on the northwest edge of the site should be retained as a buffer possibly within the gardens of the new dwellings; and a larger area at the south eastern edge of around 50 metres should be retained as woodland with public access to allow a future link to Brun Valley Park. In addition, the trees along Ridge Avenue should be retained and protected during the development's construction. It also requires off site replacement tree planting to compensate for the loss of trees on the site.</p>
70	HS1/26	Too many properties proposed for the size of the site	<p>29 houses is an indicative number based on a standard density calculation of 30 dwellings per hectare (the site size measuring 0.95ha). This is not a high density. The precise number and site layout would be confirmed at the planning application stage but would be expected not to exceed this number.</p>
71	HS1/26	Development would lead to parking and traffic problems / traffic especially bad on match days	<p>The Council has liaised with Lancashire County Council the Local Highway Authority in developing the Plan to ensure that road capacity and highway safety is not compromised.</p> <p>Parking provisions are covered by Policy IC3, and Appendix 9. Policy IC1 specifies how schemes should encourage sustainability, including promoting a user hierarchy which prioritises pedestrians, cyclists and</p>

			public transport over private vehicles, the implementation of which will, in turn, encourage and enable people to consider using sustainable transport methods.
72	HS1/26	Potential contamination on the site from adjacent landfill site	Policy NE5: Environmental Protection states that on sites that are known to be or potentially contaminated, applicants will be expected to carry out an appropriate survey by a suitably qualified and experienced specialist. And where necessary a remediation strategy will be required.
73	HS1/26	Increased chance of surface run off and associated issues	Proposed Submission Local Plan Policy CC4: Development and Flood Risk seeks to ensure that new development does not result in increased flood risk from any source or other drainage problems, either on the development site or elsewhere.
74	HS1/26	Not sustainable – no bus stop within 400m & no account of where the bus goes – will result in more not less car journeys	The site is in highly sustainable location within the urban areas. The site is within 400m of a bus stop measured from the centre of the site as the Crow flies (which was the basis for the assessment).
75	HS1/26	Doctor is over 1200m	<p>According to our maps, the site is within 1200m of nine doctors surgeries measured from the centre of the site as the Crow flies:</p> <p>Colne Road Surgery  Daneshouse Medical Centre  Parkside Surgery  Oxford Road Medical Centre  Riverside Family Practice (St Peters Centre)  Rosehill Surgery (St Peters Centre)  St Nicholas Group Practice (St Peters Centre)  Thursby Surgery  Yorkshire Street Medical Centre</p> <p>Therefore, the SA is scored correctly on this matter.</p>
76	HS1/26	Construction will impact on nearby dwellings	The Council accepts that during construction phase there will be impacts but through planning conditions and proper site management these impacts will be minimised.
86	HS1/31	Loss of trees on the site	Proposed Policy NE4: Trees, Hedgerows and Woodland will ensure that proposals that lead to a loss of protected trees important hedgerows, prominent mature or aged or veteran trees or areas of mature or ancient woodland will not normally be permitted. In addition, the Council will consider the making of Tree Preservation Orders where trees of moderate and high quality which have a life expectancy of at least 10 years and are of visual amenity value may be affected by future development or have been recognised as having public value.
136	HS1/31	The said development will be built on the village conservation area, surely the word conservation area says it all.	HS1/31 sits adjacent the Worthorne Conservation Area. Conservation Areas are not designated to prevent future development. Instead, designation seeks to manage change in order to enhance Conservation Areas and ensure that new development preserves and enhances their character. Whilst new development in the Conservation Area and on its boundary will have an impact, the impact will not always be harmful. New development will provide opportunities to enhance the character and appearance of the Conservation Area and its setting and will be subject to Policy HE2: Designated Heritage Assets and SP5: Design Quality. A standard house type is likely to have a harmful impact on the Conservation Area and is not a suitable design solution for historically sensitive locations and as such

			there will be a need for careful consideration of layout, height, design, scale and materials to ensure development contributes positively to character and appearance as required by HE2.
87	HS1/32	Increased traffic and an lack of parking (parking already difficult)	<p>The Council has liaised with Lancashire County Council the Local Highway Authority in developing the Plan to ensure that road capacity and highway safety is not compromised.</p> <p>Parking provisions are covered by Policy IC3, and Appendix 9. Policy IC1 specifies how schemes should encourage sustainability, including promoting a user hierarchy which prioritises pedestrians, cyclists and public transport over private vehicles, the implementation of which will, in turn, encourage and enable people to consider using sustainable transport methods.</p>
88	HS1/32	Trees and wildlife on the site	The Additional and Site Specific Policy Requirements and Design Principles for this site require a majority of the trees on and adjoining the site, including to the road frontage, to be retained and protected and that in accordance with Policy NE1 an ecological survey will be required carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.
89	HS1/32	Loss of valued local amenity / undeveloped green space	There would be a loss of accessible greenspace on the site but a majority of the trees are required to be retained.
90	HS1/32	Lack of archaeological information / investigation on the site	<p>An archaeological assessment has been undertaken using the County Council Historic Environment Record (HER). This notes that:</p> <p>"No heritage assets are recorded within this site. No early buried remains are anticipated here. 29 and 31 Rose Hill Road, Rosehill House Hotel, and Rosedale, Hawthorne Road, are all listed grade II and are located 200m, 280m and 250m west of the site respectively. Lower Howorth Fold Farmhouse and its associated poultry house are also listed grade II and are 495m southeast of the site.</p> <p>This site is considered to be of negligible archaeological significance.</p> <p>No archaeological investigation or recording is recommended."</p>
137	HS1/33	The housing site HS1/33 the Old Vicarage, for 6 dwellings. This should be removed from the Plan so that the site left as a family home. The site is too small to be considered a matter for the Plan to deal with	This site has been removed from Proposed Submission Plan. Uncertainty about the likelihood of the site coming forward which if it did could be for a very small number of dwellings would be better considered against policy as a windfall site.
138	HS1/4	<p>Please look again at these plans as any access to the new development needs to be directly from Rossendale road and not via Rossendale Ave / Mickelhurst Ave as appears to be proposed.</p> <p>These are clearly residential roads and we have a higher than average population of Older People, as well as having young children. I believe that the increased traffic on this type of road will not only reduce the quality of living for the existing</p>	Policy HS1/4 3) states that access should be taken from a single point onto Rossendale Road.

		residents, but will endanger life.	
17	HS1/4 & HS1/28	Traffic issues, especially at peak times	<p>Policy HS1/4 specifies that 'Appropriate traffic management systems will be required both at the site entrance and within the locality, for which contributions may be sought in line with IC4'. Lancashire County Council have previously noted that this site could adversely impact on Rosegrove and Manchester Road signal junctions. Since Preferred Options the Council has commissioned, through Lancashire County Council further traffic modelling work and mitigation proposals have been agreed for these junctions. The Rosegrove improvements are a fully funded and committed scheme to be delivered by LCC. Developer contributions will be sought for improvements to the Manchester Road Junction.</p> <p>There has been no site specific objection from Lancashire County Council, the Local Highways Authority.</p>
21	HS1/5	Flood risk on site and potential to increase flood risk in Padiham	<p>Flood risk is one of the many important considerations in selecting sites for allocating through the SHLAA/SA and wider site selection process. The site is within an area of low, medium and high risk of flooding, the majority of it lying within Flood Zone 3. A Level 2 Strategic Flood Risk Assessment (SFRA) has been undertaken which confirms that appropriate flood mitigation measures must be agreed with appropriate agencies before planning permission could be granted. In view of its proposed use and flood risk a 'Sequential Test' and 'Exception Test' for this site needs to be met. The Council considers that the sequential test is satisfied and that the 'Exception Test' can be subject to detailed design. Flood Risk matters will be necessary on site and contributions may also be required towards the costs of a Flood Alleviation Scheme for Padiham in accordance with Policy IC4.</p> <p>A site Specific Flood Risk assessment will be required to support any planning application in line with Policy CC4 through which the development should be demonstrated to pass the Exception Test as set out in the national policy and satisfy all other requirements of Policies CC4 and CC5.</p>
22	HS1/7	Concerns about previous land use as a tip	The site area of proposed housing allocation HS1/7 has been significantly reduced. Development is not proposed on land which was formerly used as for landfill.
23	HS1/7	Loss of a significant amount of open space	The site area of proposed housing allocation HS1/7 has been significantly reduced. The resultant site is 0.87 hectares and as such will not result in a significant loss of open space.
24	HS1/7	Cumulative impact of HS1/7, HS1/25 & HS1/26	Whilst the Council understands residents concerns over the potential cumulative impact of the three sites, the number of residential units proposed in the Proposed Submission Local Plan is substantially reduced due to the fact that the site area for proposed housing allocation HS1/7 has been reduced. In addition, the housing trajectory included as an appendix to the Local Plan does not envisage that all three sites will be under construction at the same time.
25	HS1/7	Impact on wildlife	<p>The Additional and Site Specific Policy Requirements and Design Principles for proposed housing allocation HS1/7 requires potential ecological impacts to be considered and an ecological survey to accompany any planning application in accordance with proposed Policy NE1 identifying how the development would manage protected species and ecological networks.</p> <p>Policy HS1/7 and Policy NE4 will require the majority of the mature tree on the site to be retained and the number of dwellings proposed (now 18) reflects this requirement.</p>
135	HS1/7 and HS1/26	My email is regarding Burnley's local plan, with particular	The site area of proposed housing allocation HS1/7 has been significantly reduced. The remaining area of

	<p>reference to HS1/7 and HS1/26 as these are the sites I feel I have local knowledge I would like to share with you.</p> <p>Having spent 20 years of my life working in Burnley, then moving to the town 6 years ago, I would like to feel I was able to make a relevant contribution.</p> <p>Part of the appeal of moving to Burnley was the wealth of beautiful well tended parks, green lowland spaces and an expanding cycle network.</p> <p>Whilst residing at Queen's Park road, Burnley, I have been impressed with the recent developments improving access to green spaces, particularly HS1/7 creating links with existing green protected spaces, Queen's Park and Rowley Lake. Not only has access been improved but the whole ecology of the area, with extensive planting and managing of woodland and grassland. The flora and fauna is there for all to see, with specially selected native trees and plants provide the perfect habitat for regular sighting of roe deer, badgers, foxes, rabbits, moles, bats, and several species of birds, insects, butterflies and moths too numerous to mention. More detailed study and recording is required to truly value the wealth of species. In recent times it seemed we were going down an environmentally friendly ecological route all about creating wildlife habitats. Why now the change of plan to destroy these habitats? Thousands of pounds of hard earned money have so recently been spent on HS1/7 and HS1/25, volunteers have given time planting trees, collecting rubbish and attending meeting, does this not matter to you? What has been created is something that enhances Burnley for its residents and wildlife, making it a more attractive place to live for everyone.</p> <p>I am aware that there is a need to create affordable housing, so it is necessary to find a solution to this problem. In my mind Burnley Borough Council needs to very much focus on the brownfield sites, of which there are many. Derelict mills, factories, shops and wasteland where housing would actually enhance an area. Examples where this has been effective are Straight mile court, housing around Colne road/ Barden lane junction and also Accrington road developments. All these once quite depressed areas have now been rejuvenated and</p>	<p>the site is proposed to be Protected as Open Space under Policy NE2.</p>
--	---	---

		<p>enhanced.</p> <p>I would urge Burnley Borough Council not to follow poor planning of other local boroughs, who are now left with towns devoid of green spaces, woodland, grassland and farmland. I moved to Burnley thinking it was different in celebrating its open spaces, developing and linking them together and planning housing thoughtfully for the whole community. Why spoil this successful plan when there are so many alternative options to consider. This is definitely not something to rush into.</p>	
139	HS1/7 HS1/25	<p>HS1/7 land behind Queens Park Road (QPR)...referred to as ecological network and part of Rowley Landfill Site..</p> <p>Why when houses including affordable ones are not selling would Burnley look for potential building plots..What about turning iconic buildings like the old college and the old crown courts into flats... For first time buyers and/ or retired people.</p> <p>1..Area of Outstanding Beauty</p> <p>The area of QPR and the lower Ridge Road has always been known as an are of outstanding beauty...</p> <p>The Council kindly allowed our access gates under that philosophy..also as we could be bothered by football traffic looking for parking.</p> <p>Also planning permission for dwelling to the rear of Nos 7 and 8 QPR was knocked back locally for this reason and again knocked back at The House of Lords for this reason...although this was over 10years ago..I can hardly think the area has become a lesser area of outstanding beauty in the intervening years...I could not find the details of this planning application on your website. Furthermore the council have planted a colossal amount of trees and made a footpath so that the area can be enjoyed by others too...</p> <p>2...Buffer Zone</p> <p>The council have planted many trees on this site..attempting conservation..I had presumed so as to improve the habitat after the many years of untold damage done by the landfill site..the</p>	<p>The site area of proposed housing allocation HS1/7 has been significantly reduced. The remaining area of the site is proposed to be Protected as Open Space under Policy NE2.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for proposed housing allocation HS1/7 requires potential ecological impacts to be considered and an ecological survey to accompany any planning application in accordance with proposed Policy NE1 identifying how the development would manage protected species and ecological networks.</p> <p>Policy HS1/7 and Policy NE4 will require the majority of the mature tree on the site to be retained and the number of dwellings proposed (now 18) reflects this requirement.</p> <p>The allocation of a site through a local plan does not infringe the Human Rights Act.</p> <p>See separete responses to comments on HS1/25</p>



	<p>site is still tested regularly for gas emissions. The trees act as a buffer..counteracting the negatives of the landfill site. Helping to purify the air. Also the area has become a great habitat for wildlife...</p> <p>There is also a cycle track that is used by youngsters..not mainly from QPR but from surrounding areas of Burnley.</p> <p>3... Protection of wildlife</p> <p>The area has become a haven for wildlife..I have seen the following  Bats  Deer with their young  Owls  Hedgehogs  Foxes  Rabbits  Mice and rats  A multitude of wild birds..not my subject as such but I know some have been rare..  Butterflies and moths..some the size of tennis balls attracted by the buddleias  Ducks..the area is somewhat of a flood plain and turns into ponds..  Doesn't need me to go into explanations on this point..</p> <p>4...Drainage</p> <p>Poor natural drainage on the site and the drainage network in this area is not brilliant...a few years ago my cellar flooded and was several feet under..luckily for me the council put me onto United Utilities who were great and over a period of a few months rectified the situation..having traced the problem to some distance away from QPR ..I'm no expert but any drains for this site would run into the existing system..which in turn could be problematic..I know I have intermittent problems with my drains..not least helped by tree roots..</p> <p>5... Trees under Protection Orders</p> <p>There are quite a few trees under orders on this road... The</p>	
--	--	--

		<p>roots may not be on the proposed site but the crowns of these trees are pretty huge and would be vulnerable should a large scale development take place...plaster/ brick dust in the air would be detrimental to these trees ..as it would to gardens in this area...</p> <p>6.....No public transport</p> <p>Resident traffic could be up 75% or more...road safety could definitely be compromised...</p> <p>7... Sustainability , road safety</p> <p>QPR would be the only access to this site...the road just does not have the capacity..this is a road with 15 houses on it ..how will it cope with 100 or more houses extra..Thinking the access road would be near to the Youth Theatre..which in turn attracts vehicles and the road provides parking...visibility may be poor and heavily congested at the start and end of the day...</p> <p>QPR is already a busy road..with non residents exceeding the speed limit regularly..the lovely park attracts many visitors..the school many inconsiderate drivers who already make the road unsafe..plus football traffic..including all the away coaches...</p> <p>8...Detrimental impact on residential amenities..</p> <p>This is a low density area..a road with just 15 houses...m</p>	
26	HS1/9	Traffic issues, including emerging onto fast road	<p>It is noted that on Red Lees Road, which runs to the North of the site, the speed limit changes from 50mph to 30 mph on the approach to the existing dwellings. The council have liaised with Lancashire County Council who have no concerns with an access being created on to Red Lees Road at this location. It is not uncommon for the County Council to extend the lower speed limits beyond the new access.</p>
27	HS1/9	Increase in number of cars	<p>The Council has liaised with Lancashire County Council the Local Highway Authority in developing the Plan to ensure that road capacity and highway safety is not compromised.</p> <p>Parking provisions are covered by Policy IC3, and Appendix 9. Policy IC1 specifies how schemes should encourage sustainability, including promoting a user hierarchy which prioritises pedestrians, cyclists and public transport over private vehicles, the implementation of which will, in turn, encourage and enable people to consider using sustainable transport methods.</p>
28	HS1/9	Sewer at/ over-capacity and will not cope with additional housing	<p>United Utilities have previously notified the council of drainage and sewer capacity issues on this site. They have advised that surface water should be removed to a local watercourse if possible due to a lack</p>

			<p>of surface water sewers to connect the site to.</p> <p>Policy CC5 is related to surface water management and sustainable urban drainage systems, and sets out the council expects surface water discharges from developed sites to be restricted to QBar rates (mean annual greenfield peak flow).</p> <p>United Utilities have also advised that the foul sewer on Dyneley Avenue is already over hydraulic capacity, and so investment will be required to accommodate this development.</p>
29	HS1/9	Threat to wildlife on the site	<p>Preferred Options Local Plan Policy NE1: Biodiversity and Ecological Networks states that where are known or likely to house protected species, priority species and priority habitats, surveys should be carried out by suitably qualified or experienced persons to establish the presence, extent and density of these species and habitats before planning applications are determined and appropriate measures should be taken to safeguard these habitats and species before any development commences.</p> <p>The Additional and Site Specific Policy Requirements and Design Principles for this site states that Protected Species have been recorded on the site. An ecological survey (including a breeding bird survey and survey of any South Pennines SPA qualifying species present) will be required to accompany any planning application which identifies and addresses these issues in accordance with the recommendation of the Council's Protected Species Survey and Policy NE1.</p> <p>Further explanation of this is set out at paragraph 5.5.5 and 5.5.13 of the Proposed Submission Local Plan.</p>
30	HS1/9	Public rights of way on the site	<p>The footpath and public rights of way which exist on the site will be subject to discussions at the planning application stage. Public footpaths need to be retained or appropriately rerouted.</p>
31	HS1/9	Lack of community infrastructure – schools, surgeries etc.	<p>The council invited the NHS to comment on the Preferred Options document, and no specific concerns about the ability of doctor's surgeries to cope in the area have been raised. The NHS has provided more detailed information and proposed mitigations that are included in the Draft Infrastructure Delivery Plan (IDP) that has been developed alongside the Local Plan.</p> <p>With regards to schools, the council has liaised with Lancashire County Council about school capacity and future needs. LCC's response and proposed mitigation measures are included in the Draft IDP.</p> <p>It is acknowledged in the Sustainability Appraisal that the site is over 1200m from both a primary school and a doctors surgery.</p>
32	HS1/9	125 is too many houses	<p>125 houses is an indicative number based on a standard density calculation of 25 dwellings per hectare (the site size measuring 5ha). The precise number and site layout would be confirmed at the planning application stage but would be expected not to exceed 125.</p> <p>To lessen the potential impact of the site, the overall area was been reduced from that put forward for consideration by the landowner, slightly by removing a portion of land to the south.</p>
141	HS1/9	[Objects] If development goes ahead then there should be	<p>Screening to the South was included to lessen the impact on the open countryside and Towneley Park.</p>

		adequate screening using trees to the southern perspective of the site. May I ask why just the south of the site? Surely residents on the western edge of the site, i.e. in Richmond Ave, also deserve the same privilege? Many of these residents have lived here for a long period of time having put a lot of money into their houses to improve their property and, indirectly, have so visually improved this 'gateway' to Burnley which recently seems to have gained importance. Surely a row of trees is the least that can be asked for, as a token of goodwill?	Screening from the existing houses would also be required. Policy SP4 g) and HS4 3) set out policies to protect the privacy of existing residents.
142	HS1/9	Green Belt land	Land around HS1/9 is greenfield, not green belt land, and unfortunately residents views over adjacent fields, and any prospective property value (be that positive, negative, or neutral) cannot be taken into account for planning purposes.

## Site Allocations - Omission Sites (i.e. sites requested to be in the Plan)

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
2290	Lord Shuttleworth	Site Allocations	Omission Sites (Land at Bullions Close and Land at Cornfield Grove)	<p>2.19 Policy SP7 'Protecting the Green Belt'</p> <p>2.20 As set out in the consultation document, on page 61, the NPPF (para 79) states that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence."</p> <p>2.21 The NPPF sets out five purposes of the Green Belt:            1) To check the unrestricted sprawl of large built up areas;            2) To prevent neighbouring towns from merging into one another;            3) To safeguard the countryside from encroachment;            4) To preserve the setting and special character of historic towns; and            5) To assist urban regeneration by encouraging the recycling of derelict and other urban land.</p> <p>2.22 The NPPF states that: 'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'. As such, we fully support the opportunity to review the Green Belt boundaries at this time to help address the development needs of the Borough, particularly as Burnley's Green Belt remains unchanged for over 31 years.</p> <p>2.23 However, it is considered that, in line with our comment to Policy SP2, additional housing sites need allocating (in addition to those already identified as preferred housing sites) and these may be best located within land which is currently identified as Green Belt but no longer fulfils Green Belt purposes.</p> <p>2.24 Our client has land within the Green Belt along the immediate edge of the northern boundary of Burnley which could accommodate new housing development. The sites include:            1) Land at Bullions Close (north Burnley)            2) Land at Cornfield Grove (north Burnley)</p> <p>Please see Appendix A for site location plans and further site details</p>	<p>See also response under Policy SP7 and SP2.</p> <p>The Council's Strategic Housing and Employment Land Availability Assessment (SHLAA) assessed all sites put forward for development or identified from what are known as 'desk top' sources. All of these sites were assessed for their availability, suitability and achievability to see if they are 'developable'. The SHLAA found that there were more than sufficient developable sites outwith the Green Belt to meet the proposed housing land requirement set out in Policy SP2 and the release of Green Belt land for housing is not therefore justified.</p>

				<p>under our comments to Policy HS1, below.</p> <p>2.25 It is considered that the shortfall of sites to meet the requirements for employment land and the additional housing numbers (as set out in our comments to Policy SP2 above) does constitute the exceptional circumstances required to justify an alteration to the existing Green Belt boundaries.</p> <p>2.26 Whilst the Green Belt still fulfils its purpose and its general extent should be maintained we consider that the above two sites should be deleted from the Green Belt to help meet the housing requirements of the Borough during the Plan period.</p> <p>2.27 It is considered these could be released for development without undermining the overall integrity of the Green Belt, and that they could be developed in an acceptable manner addressing other Plan requirements.</p> <p>2.28 The deletion of 1) Land at Bullions Close (north Burnley); and, 2) Land at Cornfield Grove (north Burnley) from the Green Belt and allocated for housing development would not: lead to unrestricted sprawl of large built up areas; would not lead to neighbouring towns from merging into one another; would continue to safeguard necessary countryside from encroachment which addressing the housing requirements; would preserve the setting and special character of historic towns as the sites are not in close proximity to any historic or heritage assets; and would continue to assist urban regeneration by encouraging the recycling of derelict and other urban land as other brownfield land (as part of other allocations allocated through the Plan process).</p> <p>2.29 Upon additional amendments to the Green Belt in respect of the two sites identified above, we would be in a position to support, in principle, Policy SP7 as the text of Policy SP7 is considered to comply with the NPPF.</p>	
1713	H F Eccles & Sons	Site Allocations	Omission Site (Butchers Farm Site HEL/19)	<p>There is strong objection to policy HS1 'Housing Allocations' as it has not carried forward two sustainable and deliverable housing sites in Worsthorne from the Issues and Options Additional Sites consultation. These two sites are HEL/016 - Brownside Road, Worsthorne (Issues and Options Additional Sites ref: Site F) and HEL/019 – Butchers Farm, Worsthorne (Issues and Options Additional Sites ref: Site G).</p>	<p>The site was in the Issues and Options Additional Sites Local Plan of Autumn 2014. The area reduced to 2.36 Ha following clarification of the site boundary by the landowner and this was considered unsuitable in the initial SHLAA June 2016, including due to unacceptable visual impact. Part of site is within the current urban boundary and the Preferred Options Local Plan included a change to the development boundary to include more</p>

			<p>Planning applications for residential development are in the process of being prepared for both sites and there is active housebuilder interest for taking these sites forward. A public exhibition was held in July 2016 where draft proposals were presented to the public. Since that time further technical work and surveys have been undertaken, which further demonstrate the suitability of these sites for housing.</p> <p>Burnley is in need of additional deliverable housing sites that can assist in meeting the housing shortfall and 'kick start' the growth strategy for the Borough in the short term. The Brownside Road and Butchers Farm sites are sustainably located and suitable sites that can assist in the delivery of housing in the short term. It is recommended that both these sites are identified as future housing allocations as the Local Plan progresses for the reasons set out in these representations.</p> <p>There is strong support for including the brownfield element of Butchers Farm within the settlement boundary of Worsthorne. This northern part of the site is occupied by a number of buildings and areas of hardstanding used for by the farm and commercial ground works business that also operates from the site. The remainder is used for agricultural purposes.</p> <p>The site abuts and is well related to residential development in Worsthorne to the north and east, with open fields lying to the south and west.</p> <p>The initial focus is on the redevelopment of the brownfield area of this site which has capacity to deliver circa 25 – 30 dwellings. Other land is available within the same ownership which would be suitable to accommodate a further 30 dwellings approximately.</p> <p>The site is assessed below against the three principles of deliverability.</p> <p>Available There are no site ownership constraints that would prevent the site from coming forward. It is in single ownership, with a willing landowner seeking to promote the site for development.</p> <p>The site is therefore available now and able to contribute to</p>	<p>of the site. Planning permission has now been granted for a smaller site of 1.17 ha for up to 24 dwellings. The site is included with the Proposed Submission Local Plan as proposed allocation HS1/38.</p>
--	--	--	---	--

				<p>addressing the need for high quality family housing in the short term.</p> <p>Although there are existing activities on site, this is not a constraint to the delivery of housing. The existing activities can be relocated and incorporated into other nearby premises operated by the landowner. This would consolidate and improve facilities ensuring no loss to employment.</p> <p>Suitable</p> <p>The NPPF encourages the re-use of brownfield sites, which part of this site is. It is also located partly within the settlement boundary and development of such sustainable sites is an objective of national policy.</p> <p>Although the farm and operations in connection with the ground works business and existing residential development have co-existed next to one another, residential development at the site would cause less harm to the character and amenity of the surrounding area and be betterment to the existing environment.</p> <p>Both the farming and ground work operations at the site means there are a significant number of large vehicles accessing the site on a regular basis, which will result in noise, air pollution and traffic disturbance to local residents nearby.</p> <p>The positives of relocating this use would offer benefits to existing residents in terms of noise and appearance. The presence of well-designed and high quality houses will be an improvement to the entrance to Worsthorne and will better respect the Conservation Area.</p> <p>3.50. It would also remove larger vehicle movements from the road network surrounding the site. Residential devel</p>	
1706	Coates / Mulbury Land	Site Allocations	Omission Site (Land at Crow Wood (Land at Crow Wood) HEL/068	<p>PWA Planning act on behalf of Messers Coates and Mulbury Land, in respect of land at Crow Wood, Burnley ( a site shown approximately by red-edging on the plan attached at Appendix 1).</p> <p>PWA Planning may wish to provide additional evidence and other supporting information to expand upon its objections [Objections to Policies SP1 and SP2 and Green Belt Review], both before and during</p>	The site was 'Excluded' in the Council's Strategic Housing (and Employment) Land Availability Assessment (SHLAA) as it would represent inappropriate development in the Green Belt contrary to national policy. The SHLAA provides evidence that the Borough's Objectively assessed Need for housing can be met on land outwith the Green Belt and as such the exceptional circumstances required to release land from the Green Belt



				<p>the examination. In particular it is likely that further evidence will be provided which will consider the importance of our clients land (Crow Wood, Burnley) in terms of the Green Belt. We will also wish to provide additional evidence related to the extent to which the sites identified in Policy HS1 will deliver the identified housing land requirements, together with any other evidence relevant to these matters</p>	<p>through the Local Plan are not met.</p>
2420	Huntroyde Estate	Site Allocations	<p>Omission Site (Land North of Blackburn Rd, Padiham</p>	<p>Our client also owns land north of Blackburn Rd, Padiham out to the bypass (A6068) and back along Whalley Rd toward the current settlement edge. In considering amendments to Green Belt boundaries that will have long term defensibility then we urge you to seriously consider the area edge red on the attached plan. This would be land that could be brought forward for development in the mid to later stages of the plan process for housing or a mix of uses. It is like our clients' other sites available, achievable, accessible, and sustainable, in a single ownership and has previously been used for mineral extraction in the mid 20th century.</p> <p>Our Client has major concerns over the effectiveness of the Plan and deliverability of the allocated sites identified in Policy HS1. Especially, the reliance placed on the large number of brownfield sites in the urban area and whether these can be delivered. There does not appear to be any contingency or policy mechanism in place to enable the LPA to respond to a shortfall in housing delivery should any of the allocations not come forward, or the allocated sites deliver fewer dwellings than estimated. There would then be a need to look at other sites including Green Belt to meet the shortfall and in so doing ensure the boundaries had longevity and fulfil not impinge on openness of the Green Belt. Our clients site north of Blackburn Road would be such a site for allocation being available, suitable, deliverable, sustainable and meeting the OAN. We would further suggest that the LPA also consider amending the boundary of the Green Belt to also include the aforementioned land north of Blackburn Road, see attached plan.</p>	<p>To help achieve sustainable development within the borough a balance must be sought between the environment and social considerations and economic growth. Over a number of years Burnley has seen its population decline due to a number of reasons, including the employment opportunities on offer to people, which in turn has a negative impact on existing services and businesses. To try and stem this reduction in population, a key objective of the plan is to support economic prosperity and growth.</p> <p>A green belt review has been undertaken by the Council which assessed how the green belt is performing against the 5 Green Belt purposes identified in the NPPF. It found that the majority of the green belt was performing well against these purposes. However, due to the need to allocate new sites for employment use and meet the economic needs of the borough, some green belt sites are proposed to be released. The remaining green belt will continue to be protected under Policy SP7.</p> <p>The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribbles Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs. The Shuttleworth Mead South site lies within Flood Zone 1 and 2. Uses being proposed on this site, are classed as less vulnerable uses in terms of flood risk vulnerability and are seen as appropriate development in Flood Zones 1, 2 and 3a. However, the site allocation policy requires any development to be accompanied by a Site Specific Flood Risk Assessment in accordance with Policy CC4 and seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and through the provision of an appropriate of sustainable drainage scheme. If the submitted Flood Risk Assessment identifies an adverse impact on Padiham or impacts</p>

					<p>further down-river as a result of the development, contributions may be sought towards a flood alleviation scheme. In terms of infrastructure to and on the site, the land owner has submitted evidence demonstrating how the site could be designed with pylons on site and how access to the site will be obtained and if the required works were deemed unviable by the site owner the site may not have been submitted. The Blackburn Road site has not been taken forward into the Pre Submission Document due to the site being in a prominent position in terms of its proximity to existing residential properties and its topography. Development on the site would have a greater impact on the residential amenity of local residents and landscape than the site at Shuttleworth Mead South. In addition, development at Blackburn Road could have a detrimental impact on the Padiham Greenway, as identified by the many opposition comments received during the Issues &amp; Options stage.</p>
1712	H F Eccles & Sons	Site Allocations	<p>Omission Site (Brownside Road HEL/16)</p> <p>There is strong objection to policy HS1 'Housing Allocations' as it has not carried forward two sustainable and deliverable housing sites in Worsthorne from the Issues and Options Additional Sites consultation. These two sites are HEL/016 - Brownside Road, Worsthorne (Issues and Options Additional Sites ref: Site F) and HEL/019 – Butchers Farm, Worsthorne (Issues and Options Additional Sites ref: Site G).</p> <p>3.2. Planning applications for residential development are in the process of being prepared for both sites and there is active housebuilder interest for taking these sites forward. A public exhibition was held in July 2016 where draft proposals were presented to the public. Since that time further technical work and surveys have been undertaken, which further demonstrate the suitability of these sites for housing.</p> <p>Burnley is in need of additional deliverable housing sites that can assist in meeting the housing shortfall and 'kick start' the growth strategy for the Borough in the short term. The Brownside Road and Butchers Farm sites are sustainably located and suitable sites that can assist in the delivery of housing in the short term. It is recommended that both these sites are identified as future housing allocations as the Local Plan progresses for the reasons set out in these representations.</p> <p>The omission of this site from the POD is not supported. The site is in</p>	<p>The site has been considered by the Council through the production of the Strategic Housing (and Employment) Land Availability Assessment. The site was considered to be unsuitable principally due to the fact that it would lead to coalescence of Brownside and Worsthorne.</p>	

			<p>a sustainable location and is deliverable, enabling housing to be brought forward in the short term.</p> <p>This site is capable of delivering circa 60 residential dwellings and is assessed below against the three principles of deliverability.</p> <p>Available</p> <p>3.8. There are no site ownership constraints that would prevent the site from coming forward. It is in single ownership, with a willing landowner seeking to promote the site for development. The site is therefore available now and able to contribute to addressing the need for high quality family housing in the short term.</p> <p>3.9. As indicated above, a planning application for residential development will be submitted shortly at this site, re-enforcing its availability.</p> <p>Suitable</p> <p>3.10. Whilst the site is located outside the settlement boundary, it is immediately adjacent to it along its northern and western boundary. The predominant character of the area is residential with the site having an excellent relationship with the well-established Brownside estate.</p> <p>3.11. Development at this location would represent an appropriate and suitable extension to Lindsay Park Road, a rounding off of the settlement. The proposed frontage along Brownside Road would only extend to the same extent as the existing housing opposite, mirroring the existing pattern of development.</p> <p>3.12. The extent of development proposed, circa 60 dwellings, can be accommodated on the site whilst still maintaining a physical gap between Brownside and Worsthorne when travelling along Brownside Road. Development at this site would not, therefore, lead to a merging of Brownside and Worsthorne.</p> <p>3.13. As per the draft proposals presented at the public exhibition, a parcel of public open space (POS) will be provided to the east of any built development at this site and would be maintained as POS (i.e.</p>	
--	--	--	--	--

				<p>non-developable land) in perpetuity ensuring the physical separation is maintained.</p> <p>3.14. The site is in close proximity to Worsthorne and Burnley, which offer a range of services and facilities for residents. The site is also adjacent to a school.</p> <p>3.15. There are no technical constraints that would preclude residential development from being delivered at this site as set out below.</p> <p>Landscape and Visual Impact</p> <p>3.16. Randall Thorp has prepared a landscape advice note providing a high level overview of any landscape and visual impacts that would result for residential development at this site. The advice note is attached at Appendix 2, but is summarised below:</p> <p>3.17. A detailed assessment of the landscape and visual impa</p>	
1515	Huntroyde Estate	Site Allocations	Omission site (Craggs Farm, Padiham HEL/028)	<p>We strongly object to the exclusion of all our client's sites from the allocations. We have already stated above the inconsistency of approach to the SP2 and thus the need for the number of dpa to be increased in line with meeting the economic led approach selected by the Council. Also the fact that the shortfall on housing delivery needs to be addressed within the first 5 years not spread over the whole plan period.</p> <p>Thus there is justification for reinstating Craggs Farm, Padiham (HEL/028) as an allocation as per the previous consultation version of the I&amp;O plan. The site is an infill site within the settlement boundary, suitable, available (being in single ownership) achievable and given its location close to the current settlement boundary and looking at the Proposals Map West, it has easy accessibility to 2 of the largest areas of identified Protected Open Space in Padiham. We have read the comments made to the previous consultation that included this site as an allocation and consider undue weight has been given to emotive statements which are not justified in any way rather than justified technical support thus we do not accept the reason stated for its exclusion that 'other sites were preferred' to the loss of this open space. It would deliver up to 10 detached and semi-detached family homes and would not impinge on the existing garden extensions.</p>	The site was considered during the preparation of the Strategic Housing (and Employment) Land Availability Assessment and was considered 'developable'. The site is in a highly sustainable location and whilst considered to be developable in the SHLAA for 10 dwellings, other sites were preferred to the loss of this attractive open space in an area of high density housing.

				All three of these sites are available and could deliver new homes within the next 5 years.	
2421	Huntroyde Estate	Site Allocations	Omission site (Grove Lane, Padiham HEL/040)	<p>We strongly object to the exclusion of all our client's sites from the allocations. We have already stated above the inconsistency of approach to the SP2 and thus the need for the number of dpa to be increased in line with meeting the economic led approach selected by the Council. Also the fact that the shortfall on housing delivery needs to be addressed within the first 5 years not spread over the whole plan period.</p> <p>We do not accept the reasons for our client's site at Grove Lane, Padiham (HEL/040) also being excluded when it reason given is it is 'considered to be unsuitable and therefore not developable in the SHLAA.' This contradicts the latest version of the SHLAA which in fact notes it is suitable as well as being available, achievable and within the urban boundary and immediately abutting Padiham town centre so highly sustainable in fact one we venture to suggest one of the most sustainable locations available in the plan. The majority of comments on the previous consultation we note supported its allocation for housing. It is 0.46ha so only just within the size category for being considered as a potential allocation site rather than a windfall.</p> <p>All three of these sites are available and could deliver new homes within the next 5 years.</p>	The site is in a highly sustainable location but is a steeply sloping site (southwards), particularly at the western end. Includes former (private) allotments. One of a number of open spaces in this area. When considered along with other sites to the east of Burnley Road development at this location is not preferred and would be challenging. Further information about the Council's process for selecting sites is set out in the Site Allocations background paper.
1814	Phillip Walton	Site Allocations	Omission Site (Hill End House HEL/257)	<p>I understand that the Council is still considering the suitability of sites for housing as part of the production of its new Local Plan. Please find attached a site in Briercliffe which we would be grateful if it might be considered for housing Grid ref: easting 387420; northing 435553</p> <p>Please let me know if there is a standard form to fill in and which I shall be pleased to complete.</p> <p>The applicant lives at Hill End House (ie at the site) Such sites in this part of Burnley will not be very common and there is some relatively recent housing which is visible from this site.</p> <p>In addition the owner has approached the LPA recently with regard to the possible suitability of this site and was advised that it would be worth pursuing via the call for sites</p>	The site was considered in the Council's Strategic Housing (and Employment) Land Availability Assessment as requested but was 'Excluded' due to it being very poorly related to the existing settlement.

				[Site map included]	
1738	Mr D Myers	Site Allocations	Omission Site (Land at Brownside Road HEL/065)	<p>INTRODUCTION</p> <p>This statement is submitted in response to the Burnley local Plan Preferred Options consultation document which has been put out to public consultation in accordance with the Council's Statement of Community Involvement. The consultation period runs from 15 July to 26 August 2016. The Council's proforma comment form has also been completed and is separately attached as part of this submission.</p> <p>The purpose of this submission is to seek the inclusion of the objection site as land allocated for new housing. In the Preferred Options publication, the objection site is not allocated for any development and lies outside, although adjacent to, the designated urban area.</p> <p>THE SITE AND PROPOSAL</p> <p>The site the applicant wishes to promote (the objection site), is shown outlined in red on the attached plan at document 1.</p> <p>The site is situated to the rear of Buttermere Road, which leads directly off Brunswick Road, a main arterial route that leads south east from the Burnley conurbation, and is about 2.5 kilometres to the east of the town centre. It is open grassland with some specimen trees both in a line and individually dotted within the site. Along the north eastern boundary, the site backs onto the River Brun, identified on the LP Proposals Map as 'Ecological Network - Woodland'. The listed Hollins Hall is some 150 metres to the south east separated from this site by a dense woodland area. The site slopes from the back of Buttermere Road down to the river on the northern boundary.</p> <p>The site has no direct road frontage along its boundaries. Access to the site will be from Buttermere Road via a length of new road leading from the termination point of Buttermere Road northwards into the site alongside no.48.</p> <p>The proposed housing will be large executive style houses of low density (approximately 25 per hectare), allowing areas of green space</p>	The site is in a sustainable location and considered along with a number of sites in the Brownside area of Burnley. Development in this location as an extension to Brownside/Burnley was not preferred. Further information about the Council's process for selecting sites is set out in the Site Allocations background paper.

			<p>within the site, retention of trees and enhancement boundary landscape planting. This will include ecological surveys and mitigation with respect to the identified woodland habitat along the river on the north eastern boundary.</p> <p>THE EFFECTIVENESS OF THE SITE FOR A HOUSING ALLOCATION.</p> <p>Ownership</p> <p>The site is in the single ownership of the applicant. Therefore there are no problems to delivery of the land for housing in terms of land acquisition.</p> <p>Physical</p> <p>The site is physically adjoined onto the existing urban area of Burnley on two sides. There is existing urban development to the immediate southern and eastern boundaries. The remaining boundaries follow existing ground features, that is the river to the north and the boundary to Hollins House to the east, which is a continuation of the existing urban boundary on that side. Given that the site sits comfortably within existing features, it becomes a logical extension of the existing built form at this locality.</p> <p>Site Constraints.</p> <p>The site is laid to open grass and therefore there are no physical obstacles on the site that</p> <p>would prevent the site's development. There are no features on the site to be taken into account such as public footpaths, buildings, surface features, waterways ditches or service easements that cross the land. There are mature trees within the site, which can be retained as part of the green space and landscaping of any development. These will aid assimilation of any development into its surroundings. The site is not within a Conservation Area or in a locality that has any other restrictive landscape designation. The ecological designation of the Lancashire Ecological stepping stone habitat for woodland can be effectively managed by ecological</p>	
--	--	--	---	--

				<p>mitigation measures that would result from development, leading to environmental enhancement. Hollins hall is a listed building and adjoins the site to the east. However it has substantial grounds and mature trees around it that would help to prevent development on this site from encroaching onto its setting.</p> <p>Marketability.</p> <p>The si</p>	
2422	Huntroyde Estate	Site Allocations	<p>Omission site (Land at Cemetery Rd, Padiham HEL/082)</p>	<p>We strongly object to the exclusion of all our client's sites from the allocations. We have already stated above the inconsistency of approach to the SP2 and thus the need for the number of dpa to be increased in line with meeting the economic led approach selected by the Council. Also the fact that the shortfall on housing delivery needs to be addressed within the first 5 years not spread over the whole plan period.</p> <p>Our client's site - Land at Cemetery Rd, Padiham (HEL/082) – falls below the 0.4ha so whilst like the 2 aforementioned sites our client owns it 'ticks all the boxes' in the SHLAA it is only 0.18ha so a windfall site.</p> <p>All three of these sites are available and could deliver new homes within the next 5 years.</p>	<p>The site is below the site threshold (0.4 Ha) for being allocated in the emerging Local Plan. The site could come forward as a windfall site.</p>
1785	Mr J Uttley	Site Allocations	<p>Omission Site (Land at Nelson Road, Saxifield HEL/254) (Land at Nelson Road) HEL/254</p>	<p>1. INTRODUCTION</p> <p>This statement is submitted in response to the Burnley Local Plan Preferred Options consultation document which has been put out to public consultation in accordance with the Council's Statement of Community Involvement. The consultation period runs from 15 July to 26 August 2016. The Council's proforma comment form has also been completed and is separately attached as part of this submission.</p> <p>The purpose of this submission is to seek the inclusion of the objection site as land allocated for new housing in the Preferred Options publication, the objection site is not allocated for any development and lies outside, although adjacent to, the designated urban area.</p> <p>2. THE SITE AND PROPOSAL</p>	<p>The site was considered in the Council's Strategic Housing (and Employment) Land Availability Assessment and considered 'developable'</p> <p>However, it is a greenfield site which although in a sustainable location is a prominent site close to the existing built up area but not particularly well related to it - separated by field(s) from an area of very attractive largely stone built development at Haggate 'Village' and was not chosen for allocation with other sites considered more suitable. Further information about the Council's process for selecting sites is set out in the Site Allocations background paper.</p>



			<p>The site the applicant wishes to promote (the objection site), is shown outlined in red on the attached plan at document 1.</p> <p>The site is situated on Nelson Road, about 150 metres north of its junction with Burnley Road on the east side of the Burnley conurbation, about 4 kilometres to the east of the town centre. The site is laid to grass and is roughly rectangular in shape.</p> <p>The site has a frontage onto Nelson Road of about 105 metres. There is no vehicular access available from the other sides of the site although footpath links can be made available. The ground is open and laid to grass with a gradual slope from east to west across the site.</p> <p>The proposed housing will be provided at a density and layout that is compliant with the relevant policies of the Local plan, allowing areas of green space and enhancement planting within the site as part of the proposals. Access is envisaged to be by a new access formed directly from Nelson Road with planting and low stone wall behind adequate visibility splays where required to provide screening and maintain the existing appearance to the road frontage.</p> <p><b>3. THE EFFECTIVENESS OF THE SITE FOR A HOUSING ALLOCATION.</b></p> <p><b>Ownership</b></p> <p>The site is in the single ownership of the applicant. Therefore there are no problems to delivery of the land for housing in terms of land acquisition.</p> <p><b>Physical</b></p> <p>The site is physically adjoined onto the existing urban area of Burnley. To the immediate east is recent housing development together with a new school at Delamere Road, Briercliffe Primary School. To the south is the older developed area around the Nelson Road and Burnley Road junction. The remaining boundaries follow well established physical boundaries on the ground, those being Nelson Road and the field boundary along the northern side. Given that, the site is a logical</p>	
--	--	--	---	--

				<p>extension of the existing built form of this locality.</p> <p>Site Constraints.</p> <p>The site is laid to open grass and therefore there are no physical obstacles on the site that would prevent its development. There are no features on the site to be taken into account such as mature trees, existing buildings, surface features, waterways, ditches or service easements across the land that would prevent development. Neither are there any nearby or adjoining constraints that need to be taken into account such as heritage assets, landscape designation or ecology protection that will hinder development of the site. There is a designated Conservation Area at Harle Syke, which is about 140 metres to the south but is distinct enough in separation terms not to be affected by development at this site. There is a public footpath that crosses the site,, footpath no. 12-3-FP-81, but that can be accommodated within the development as a corridor without the need for diversion. Its retention will aid accessibility.</p> <p>Marketability.</p> <p>The site is located within a high quality housing market area where there is a very high level of home ownership of quality housing and of larger properties. The locality is not a housing renewal area or an area of deprivation. Accordingly, new housing here will attract high levels of home ownership interest with no anticipated levels of market vulnerability that will prevent or obstruct the d</p>	
1525	James Pollard and Sons (Worsthorne) Ltd	Site Allocations	Omission site (Land at Red Lees Road/Richmond Avenue HEL/093) (Red Lees Road)	<p>We write on behalf of our client in response to the Preferred Options Report of the Burnley Local Plan. We made formal comments in October 2014 to the Issues and Options consultation, with specific regard to land at Red Lees Road, Burnley. The comments below follow on and respond directly to the latest consultation publication documents.</p> <p>Details of our client's ownership was provided in the previous response, with arguments as to why part of the site should be considered for new housing development, either independently or alongside the site already considered off Red Lees Road, which lies adjacent and is now a proposed allocation. Despite this request, and specific indication of a willingness to discuss in more detail, no contact has been forthcoming. We note however that the site has been considered in the SHLAA and Sustainability Appraisal. The</p>	<p>The site was considered in the Council's Strategic Housing (and Employment) Land Availability Assessment and considered 'developable'</p> <p>The site is in a sustainable location and was considered along with a number of sites off Red Lees Road. It is a visually prominent site and the significant visual impact of the proposed site meant the site was not preferred. Further information about the Council's process for selecting sites is set out in the Site Allocations background paper.</p>

			<p>Sustainability Appraisal refers to the site not being taken forward as a proposed allocation, but no explanation is given, nor is there any reasoning published at this consultation stage as to the decision making process for sites included or excluded as potential allocations. We understand this detail will be published at Submission stage and will make further representation accordingly, if necessary.</p> <p>Since the start of the Plan Period at 2012 up to 2015, including since the Issues and Options document was produced in 2014, there has only been a net addition of 215 new houses built in the District, including demolitions. It is unclear whether a future demolition programme in the rest of the Plan Period forms part of the Council's strategy. If so, this should be included within the Local Plan as it will clearly have an impact on the net growth of housing and need for site allocations. We seek clarification on this point.</p> <p>The slow delivery of new housing in Burnley is clear from the evidence, with the need to boost supply and improve choice through developing detached, semi-detached and larger terraced housing with off street parking and gardens being identified as key issues and challenges for the Plan. These issues are of paramount importance to the successful delivery of the Council's strategy and we support the need to boost housing delivery and widen choice. To this end, the Plan must provide a range of sites in a range of locations to provide quality and choice to the market. The proposed allocations within Policy HS1: Housing Allocations, includes a number of sites that are described as having extant planning consent. We trust there is no double counting in the housing figures, which includes a figure for extant consents and allocations. Without the publication of an updated Housing Land Availability Report it is impossible to test the evidence in detail.</p> <p>Of the proposed allocations for 2,747 houses, only five are on large greenfield sites of more than 100 dwellings, with a significant number being on brownfield sites in the urban area. The need to encourage housebuilders to build in the Borough, when neighbouring authorities are also proposing to boost the supply of housing, means that sites need to be forthcoming through allocation in high value areas to deliver the larger detached and semi-detached dwellings to widen choice in the Borough, which is identified as a key challenge in the Plan. The proportion of high quality sites being made available for housing needs to be sufficient to encourage delivery, to significantly</p>	
--	--	--	---	--

				<p>boost supply.</p> <p>In this regard, we continue to promote the site at Red Leeds Road, which lies adjacent to proposed allocation HSI/9 . The site promoted here lies closer to the existing dwellings in the settlement than HSI/9 and would not present an extension of the urban area along Red Leeds Road if developed independently. It could also be developed alongside HSI/9, and present a larger development site to boost housing supply to this area and the Borough in general, and meet the demand for detached and semi-detached dwellings . The development</p>	
1725	Mrs Glenys Hill	Site Allocations	<p>Omission Site (Land rear of 158 Talbot Drive HEL/253) (Land to the rear of 158 Talbot Drive) HEL/253)</p>	<p>We would like to propose that the land to the rear of 158 Talbot Drive, Harle Syke, Burnley as shown in the attached drawing LOC_001 is designated for residential development in place of, or in addition to, some of the land that is currently being proposed.</p> <p>We feel that the proposed site is in an area of high housing demand and that its development as residential use will:</p> <ul style="list-style-type: none"> <li>- Provide an opportunity to provide affordable housing.</li> <li>- Provide an opportunity to provide diversity of housing types and sizes in an area where insufficient diversity currently exists.</li> <li>- Provide much needed housing in an area of high demand.</li> <li>- Help to sustain local services in a village that are coming under increasing pressure from services provided elsewhere.</li> <li>- Provide an opportunity to provide more sustainable housing.</li> <li>-Provide an opportunity to stimulate an economic development area.</li> </ul> <p>[Drawings and details attached]</p>	<p>The site was considered in the Council's Strategic Housing (and Employment) Land Availability Assessment where it was considered unsuitable and therefore 'not developable' due to it being poorly related to the existing settlement form with no satisfactory access identified.</p>
2142	Huntroyde Estate	Site Allocations	<p>Omission Site (Land South of Blackburn Rd, Padiham HEL/160)</p>	<p>On the issue of development boundaries and the criteria set down in SP4 section 2. Whilst we concur with the principles set down we must question the logic of choosing to allocate EMP1/13 over Land South of Blackburn Rd, Padiham (HEL/160).</p> <p>In seeking to find a site for additional employment land in Padiham then our clients land south of Blackburn Rd, Padiham (HEL/160) provides a site of 8.8ha(gross). Sitting as it does immediately north of</p>	<p>To help achieve sustainable development within the borough a balance must be sought between the environment and social considerations and economic growth. Over a number of years Burnley has seen its population decline due to a number of reasons, including the employment opportunities on offer to people, which in turn has a negative impact on existing services and businesses. To try and stem this reduction in population, a key objective of the plan is to support economic prosperity and</p>

			<p>Shuttleworth Mead employment site and abutting the existing settlement boundary of Padiham to the East and NE so has existing direct connectivity to the settlement. It is a genuine infill site that would be a rounding off of the settlement and the loss of this site from Green Belt would not impinge on the openness of Green Belt nor the 5 purposes in para 80 of NPPF for including land in Green Belt. It would be a long term defensible boundary in line with NPPF. The site is not fettered by any of the constraints of EMP1/13. This site could be accessed off the existing Shuttleworth Mead access or directly off Blackburn Road which is straight and has good visibility west and east. It is not in an identified Flood Risk area, it does not have overhead powerlines, it does not house Protected Species. Whilst there is a heritage asset (Stirkin Farm) adjacent to the site it is not a Listed Building. It is 8.8ha (gross) but not fettered by the same list of constraints as EMP1/13 so is deliverable. If improvements to the junction of Blackburn Rd with the A6086 were shown to be necessary, then this site has fewer other costs to overcome than EMP1/13 so would not have the viability issues that EMP1/13 will have.</p> <p>Paras 4.7.6 and 4.7.7 of the PI&amp;O note the need to release Green Belt land to enable the employment land targets to be met. Whilst we agree with this in principle we disagree with the logic and approach taken to the site selection when bearing in mind NPPF and the 5 purposes of Green Belt and the need to ensure the openness of Green Belt is preserved and that the boundary amendment have longevity. Para 4.7.14 then concludes that only 2 sites met these criteria and are suitable for release from the Green Belt. The selection of EMP1/13 as previously noted defines logic especially when tested against the criteria and tests in NPPF for the purpose and release of Green Belt and thus boundary amendments.</p>	<p>growth.</p> <p>A green belt review has been undertaken by the Council which assessed how the green belt is performing against the 5 Green Belt purposes identified in the NPPF. It found that the majority of the green belt was performing well against these purposes. However, due to the need to allocate new sites for employment use and meet the economic needs of the borough, some green belt sites are proposed to be released. The remaining green belt will continue to be protected under Policy SP7.</p> <p>The Shuttleworth Mead South site sits adjacent to the A6068, which forms a distinct boundary to the west of the site. The remaining Green Belt within the borough which sits adjacent to the borough boundary with Hyndburn and Ribble Valley is not proposed for any development within the Local Plan, therefore, avoiding the merging of the employment sites across the three boroughs. The Shuttleworth Mead South site lies within Flood Zone 1 and 2. Uses being proposed on this site, are classed as less vulnerable uses in terms of flood risk vulnerability and are seen as appropriate development in Flood Zones 1, 2 and 3a. However, the site allocation policy requires any development to be accompanied by a Site Specific Flood Risk Assessment in accordance with Policy CC4 and seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development and through the provision of an appropriate of sustainable drainage scheme. If the submitted Flood Risk Assessment identifies an adverse impact on Padiham or impacts further down-river as a result of the development, contributions may be sought towards a flood alleviation scheme. In terms of infrastructure to and on the site, the land owner has submitted evidence demonstrating how the site could be designed with pylons on site and how access to the site will be obtained and if the required works were deemed unviable by the site owner the site may not have been submitted. The Blackburn Road site has not been taken forward into the Pre Submission Document due to the site being in a prominent position in terms of its proximity to existing residential properties and its topography. Development on the site would have a greater impact on the residential amenity of local residents and landscape than the site at Shuttleworth Mead South. In addition, development at Blackburn Road could have a detrimental impact on the Padiham</p>
--	--	--	---	---

					Greenway, as identified by the many opposition comments received during the Issues & Options stage.
1731	Lodge Mill Co Ltd.	Site Allocations	Omission Site (Lodge Mill HEL/256) (Lodge Mill)	<p>Following our phone conversation this morning, I have attached a file showing a map of the land which was the site of Lodge Mill. The land is currently vacant brownfield land and I would like you to consider adding it to the local plan as possible future residential development land. I am not aware of any constraints on the land which would prevent this. If you need any further information then please can you let me know.</p> <p>[Map provided]</p>	The site was considered in the Council's Strategic Housing (and Employment) Land Availability Assessment and considered 'developable' The site is now included in the Proposed Submission Local Plan as proposed housing allocation HS1/35.
1724	Mr M Henderson	Site Allocations	Omission site (Red Lees Road HEL/092)	<p>INTRODUCTION</p> <p>This statement is submitted in response to the Burnley Local Plan Preferred Options consultation document which has been put out to public consultation in accordance with the Council's Statement of Community Involvement. The consultation period runs from 15 July to 26 August 2016. The Council's proforma comment form has also been completed and is separately attached as part of this submission.</p> <p>The purpose of this submission is to seek the inclusion of the objection site as land allocated for new housing. In the Preferred Options publication, the objection site is not allocated for any development and lies outside, although adjacent to, the designated urban area.</p> <p>THE SITE AND PROPOSAL</p> <p>The site the applicant wishes to promote (the objection site), is shown outlined in red on the attached plan at document 1.</p> <p>The site is situated on the east side of Red Lees Road, on the east side of the Burnley conurbation, about 2.5 kilometres to the east of the town centre. It is open grassland with a substantial tree frontage alongside Red Lees Road with some individual trees within the centre of the site. There is a private road that crosses the site through the middle that serves Hollins Hall, a group of listed properties situated to the immediate east of the site.</p> <p>The site has a road frontage onto Red Lees Road of some 158 metres. To the immediate east of the site is the main tree lined private access to Hollins Hall.</p>	<p>The site was considered in the Council's Strategic Housing (and Employment) Land Availability Assessment and considered 'developable'</p> <p>The site is in a sustainable location. Site considered along with a number of sites off Red Lees Road. Development not considered to be preferred on the northern side of Red Lees Road. Further information about the Council's process for selecting sites is set out in the Site Allocations background paper.</p>

			<p>The proposed housing will be large executive style houses of low density (approximately 25 per hectare), allowing areas of green space within the site, retention of trees and enhancement boundary landscape planting. Access is envisaged to be by a new access formed directly from Red Lees Road with replanting behind adequate visibility splays where required to maintain screening to the road frontage.</p> <p>THE EFFECTIVENESS OF THE SITE FOR A HOUSING ALLOCATION.</p> <p>Ownership The site is in the single ownership of the applicant. Therefore there are no problems to delivery of the land for housing in terms of land acquisition.</p> <p>Physical The site is physically adjoined onto the existing urban area of Burnley. There is existing development directly opposite the site to the west and to the north. The remaining boundaries follow existing features on the ground, that is the existing treed driveway and curtilage to Hollins House to the south and existing woodland to the north. Given that, the site sits comfortably within existing features, it becomes a logical extension of the existing built form at this locality.</p> <p>Site Constraints. The site is laid to open grass and therefore there are no physical obstacles on the site that would prevent the site's development. There are no features on the site to be taken into account such as public footpaths, buildings, surface features, waterways ditches or service easements that cross the land. There are mature trees within the site, which can be retained as part of the green space and landscaping of any development. These will aid assimilation of any development into its surroundings. The site is not within a Conservation Area or in a locality that has any other restrictive landscape or ecological designation. Hollins Hall is a listed building and adjoins the site to the east. However it has substantial grounds and mature trees around it that would help to prevent development on this site from encroaching onto its setting.</p>	
--	--	--	--	--

				<p>Marketability.</p> <p>The site is located within a high quality housing market area where there is a very high level of home ownership of quality housing and of larger properties. The locality is not a housing renewal area or an area of deprivation. Accordingly, new housing here will attract high levels of home ownership interest with no anticipated levels of market vulnerability that will prevent or obstruct the deliverability of the site. Because of the high degree of marketability of the site, there are no issues of viability to pr</p>	
1771	Spacious Places Ltd.	Site Allocations	<p>Omission Site Land SW of Sycamore Av) HEL/134</p>	<p>We write on behalf of Spacious Place Ltd in response to the Preferred Options document of the Burnley Local Plan.</p> <p>We put forward land at Sycamore Avenue in Burnley, opposite the proposed housing allocation (REF: HS1/24). A site location plan is enclosed with this letter showing the indicative area proposed for housing.</p> <p>Given the site’s sustainable location and the pressing need for housing in Burnley, it is requested that the site is allocated for residential development as part of the Burnley Local Plan.</p> <p>Site Context</p> <p>The site comprises brownfield land within a predominantly residential area. A former swimming pool (Gannow Baths) occupies part of the site with adjacent car parking to the north whilst brownfield derelict land is located to the far northern boundary of the site. This area is often used by the Life Church, situated slightly further north, for car parking.</p> <p>The site is situated within a sustainable location within the settlement boundary. Bus links are located along Sycamore Avenue and Gannow Lane whilst the M65 motorway is easily accessible via the Gannow Lane roundabout.</p> <p>Planning policy</p> <p>Within the Burnley Local Plan Second Review – 2006, part of northern section of the site is designated as an area of ‘protection, enhancement and replacement of playing pitches’ as well as ‘protection of existing public parks, informal recreation areas, play areas and other areas of open space’. The site is also designated as</p>	<p>The site was considered to be 'developable' in the SHLAA but the developable area of the site falls below the site threshold for allocation in the emerging Local Plan (0.4ha). The site could come forward as a windfall site.</p>



			<p>development within the urban boundary.</p> <p>The emerging local plan proposes to amend the boundary of the 'recreational' designations on site. The proposed designation for the area further north is protected open space however the site itself is no longer designated for protection or allocated for development.</p> <p>We support the re-alignment of the 'recreational' designation to no longer include this site. The site does not offer any recreational value and would be better if redeveloped for housing to meet the pressing need for new homes in Burnley, Furthermore, the Burnley Indoor Sports Facilities Review (February 2015) concludes that there is no current need to allocate land for further provision for indoor sports facilities in the new Burnley Local Plan.</p> <p>Availability, suitability and achievability Footnote 11 of the National Planning Policy Framework alongside paragraph 47 sets out that for sites to be considered deliverable, they should be available now, offer a suitable location for development, be achievable with the prospect of delivering housing on the site within five years and be a viable development.</p> <p>Spacious Place seek to promote the site for residential development which is likely to comprise affordable housing, forming part of the social enterprise's promotion of supporting and assisting with long-term unemployment issues.</p> <p>It follows that subject to planning permission; the site would be developed for housing within the short term and as such is considered available and deliverable.</p> <p>The site also offers a suitable location for housing given the surrounding residential nature of the immediate area and the proposed housing allocations to the east and further north offering compatible surrounding uses.</p> <p>The site has been identified as a suitable and achievable development area by Spacious Place. Given that the adjacent site to the east is also being proposed for housing, and is situated within a sustainable location, this site represents a logical area for residential redevelopment.</p>	
--	--	--	--	--

			<p>Furthermore application APP/2007/0701 for up to 40 residential dwellings and new church building was approved 9 November 2007 which establishes the principle of housing on site.</p> <p>The site is brownfield comprising a vacant building with ancillary car parking and scrub land. Development on site will therefore ensure the reuse of brownfield land as encouraged in national planning policy whilst allowing for a more compatible, aesthetic use to be developed on site.</p> <p>Summary The site is situ</p>	
--	--	--	---	--

## Site Allocations - Omitted Sites (i.e. sites not in the Plan that were commented on)

Comment Ref	Organisation or Consultee	Preferred Options Plan Section	Preferred Options Policy Para	Preferred Options Comments	Recommended Response
1840	William Pilkington	Site Allocations	Omitted site	<p>I am writing to inform you that I am absolutely opposed to any building on the green fields that surround Padiham. So much so that myself and others are prepared to occupy the fields to protect them.</p> <p>The one real positive thing about Padiham is that it does have nice countryside around its edges. Because lets be honest the town its self sure aint much to look at. Padiham was a run down place when I was a young lad. It sure hasn't improved very much now im nearly 60. But us Padiham folk know every field and woodland that is around our neglected town and I'm sure many of us will fight to protect our fields and woodland. We'll set up camps on our fields.</p>	This may have been a comment related to Craggs Farm which was in the Issues and Option Plan but was not taken forward to Preferred Options.
1828	Padiham Community Action	Site Allocations	Omitted site (Blackburn Road South Site)	<p>#1 We are pleased that land alongside Blackburn Rd has now been omitted from the local plan.</p> <p>#2 [Support] The deletion of the Blackburn Road Site and retention of this area in the Green Belt.</p>	Support noted.
1816	Padiham Town Council	Site Allocations	Omitted site (Craggs Farm)	<p>Padiham Town Council has asked me to write to you to confirm that it is opposed to the inclusion of the following sites as Preferred Options in the Emerging Local Plan:</p> <p>Craggs Farm, Padiham (Housing);</p>	The Town Council's support is noted.
1300	Mr Paul Dew	Site Allocations	Omitted site (Oswald Street /BHS)	<p>I am not in the UK to view the plan but am interested in the Oswald Street proposed use of the former biological heritage site.</p> <p>Your report called Burnley Wildlife and Habitat Survey attached and point 4.3.1 Biological Heritage Sites says the site has no heritage value. If the square meter examination of the site is undertaken you will find it does not come up to the standards needed for it to be classified as such.</p> <p>Most definitely the local people have no interest at all in the site except for fly tipping or future housing and employment opportunities.</p> <p>The current Gleeson Development is very slow in selling homes mainly because the size and price or the homes are not what is needed in the area.</p>	The site which is the subject of this representation has been considered during preparation of the Strategic Housing (and Employment) Land Availability Assessment. The larger site of 3.51 ha was put forward by the landowner for consideration. A large part of this site is identified as a biological heritage site and is therefore considered to be unsuitable. 0.6 hectares at southern end of site outside the BHS was assessed as suitable but is likely to require remediation. This smaller site was actually included in the Preferred Options Plan and is included in the Proposed Submission Local Plan as housing allocation HS1/29.

			<p>Could you tell me what the future designation is planned? Possible the reasoning would also be good?</p> <p>Comments : Golder Associates undertook a Habitat Survey of the Oswald Street Site in 2007 and the survey was commissioned by Burnley Borough Council. The contents clearly state that the site should be removed from the Heritage List as it does not meet the criteria.</p> <p>December 2007 1 07514520059.501 Burnley Wildlife and Habitat Survey Version A.0 Golder Associates 1.0 INTRODUCTION Under instruction from Burnley Borough Council, Golder Associates (UK) Ltd has undertaken a resurvey of all sites of known or potential nature conservation value within Burnley Borough. This took the form of a Phase 1 Habitat Survey that followed the standard methodology set out by the Joint Nature Conservation Committee (JNCC, 2004). This survey is described as the 'Burnley Wildlife and Habitat Survey'.</p> <p>The most recent studies of the whole Borough were undertaken in the early 1990s and resulted in the production of Burnley's Landscape and Wildlife Strategy in 1992. In order to meet the requirements of the EC Habitats Directive, Section 40 of the Natural Environment and Rural Communities Act 2006, Planning Policy Statement 9, and the Regional Spatial Strategy, Burnley Borough Council required more up to date information to provide a sound evidence base for the production and monitoring of the Local Development Framework.</p> <p>"Oswald Street BHS has suffered from its urban location and does not qualify under the BHS criteria. However it has not lost all its floristic diversity and still qualifies under the LWS guidelines. Oswald Street could be downgraded to BWS status, also this would only refer to areas on the periphery of the site."</p> <p>A new survey will probably find that the 1992 survey, 1996 survey and the above all say that there is no heritage value as defined by "a resurvey of all sites of known or potential nature conservation value within Burnley Borough. This took the form of a Phase 1 Habitat Survey that followed the standard methodology set out by the Joint Nature Conservation Committee (JNCC, 2004)."</p> <p>Over ten past 10 year and including to former 25 years these former railway shunting yards and gas board access coal delivery areas have been fly tipped regularly with an annual machinery clean up of the area removing tipped tyres, stone, household renovation debris and gypsies with the associated problems.</p>	<p>In respect of the Public Open Space planning application, this is not a Local Plan matter and should be discussed with Development Management.</p>
--	--	--	--	---

				<p>Nearly ten years have past and no redesignation of the area has been implemented allowing a planned enhancement of interest of LWS and residential development of the remaining area. This could enhance the housing needs of the residents, improve the area by supplying better quality homes and within the development framework (as this land is within the urban boundary) find an agreement with the developer to obtain access to the parts of LWS interest for the general public.</p> <p>Presently there is no access agreement with the owner, myself, a need for larger low cost homes, for nursing home sites within the borough (as it is in an area where local staff are plentiful and near the hospital) and presently of little benefit to the population of the town. Historical pictures of the site are available but there seems to</p>	
2426	Padiham Town Council	Site Allocations	Omitted site (Blackburn Road, Padiham)	<p>Padiham Town Council has asked me to write to you to confirm that it is opposed to the inclusion of the following sites as Preferred Options in the Emerging Local Plan:</p> <p>Blackburn Road, Padiham - land to north of Shuttleworth Mead (General Industry, Warehousing);</p>	<p>This site was not included for allocation in the Preferred Options not having been assessed as 'developable' in the Strategic Housing (and Employment) Land Availability Assessment. The site is not included in the Proposed Submission Local Plan.</p> <p>The Town Council's support is noted.</p>
1254	Mr Ray Toddington	Site Allocations	Omitted site (Butchers Farm and Land Adj to Lindsay Park)	<p>I commented in detail on your proposals a few years ago and, at first glance, your recent preferred options for Worsthorne appear to be more acceptable although I'll defer my final comments until after the public meeting on 8th August!</p> <p>The reason for my writing at this stage is to ask if you know about Indigo Planning's proposals to apply for construction of 120 "high end" homes at Butcher's Farm and on land adjacent to Lindsay Park. I attended the public meeting with Indigo Planning on 13th July and I can tell you that the villagers were not happy with their proposals.</p> <p>A few days after that meeting, I received an email from you detailing your preferred options which don't of course include the additional 120 houses proposed by Indigo Planning! What's going on???</p> <p>Perhaps you might let us all know what's happening because we're not very happy at present?</p>	<p>The Council was aware of the meeting that Indigo Planning held in Worsthorne, and they have since applied on behalf of their client for planning permission on the two sites in Worsthorne referred to. This was explained to residents at the meeting.</p> <p>Developers and land owners can apply for planning permission at any time on any site and their applications must be determined in accordance with the development plan unless material considerations indicate otherwise.</p> <p>Planning permission has now been granted for a smaller part of the Butcher's Farm site for up to 24 dwellings and this is now included as a proposed allocation HS1/38.</p>
1613	Lesley Leah	Site Allocations	Omitted site (Butchers Farm)	<p>I am putting my comments forward on the local plan which involves the (plan for Butchers farm Worsthorne.)</p> <p>I am currently a resident and have grown up in Worsthorne, having lived in Worsthorne for a number of years many aspects of the village has changed. Living on Ormerod Street, this is the major route through the village. It has already</p>	<p>This site was included in the Issues and Options Additional Sites Plan, but was not taken forward in the Preferred Options document. Planning permission has now been granted for part of this site for up to 24 dwellings and this is now included as a</p>

				<p>got a lot of traffic and this produces and impacts difficulties as the roads are originally built for horse and cart, not for speeding motorists that do not follow the highway code and designated speed limit.</p> <p>This part of the village does not have the means for new dwellings to be built, as the main sewer runs down through the farm area, and is prone to flooding and hasn't the capacity to support new housing.</p> <p>Also this area has been used for coal mining over the years and when we purchased our dwelling it showed that movement may have been present.</p> <p>Also I do feel that there is a lot of free land around the Burnley area that can be built on and not cause a negative impact on areas of beauty, also upsetting residents that look after their houses and thrive on the issue of living in a small beautiful village.</p> <p>In my opinion PLEASE DON'T SPOIL OUR ENVIRONMENT.</p>	proposed allocation HS1/38.
2360	Mr Nigel Wilkinson	Site Allocations	Omitted site (Butchers Farm)	<p>We are pleased to note that BUTCHER'S FARM has not been included in the revised plan and being described as "unsuitable". We are not certain of the reasons for it being excluded, but we would like to re-state our view that of all the potential sites, BUTCHER'S FARM is the least suitable, for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The traffic issues on Brownside Rd - already highlighted above - would extend past the school, round the bend which has no pavement and into the square. On leaving the square, (which is already full of parked cars), traffic then has to pass round a blind corner into Ormerod St before accessing the site somewhere down that narrow road.</li> </ol> <p>There is already limited parking for residents on Ormerod St and nearby.</p> <ol style="list-style-type: none"> <li>2. Due to the difficulty of access via Brownside Rd, many new residents might be tempted to use the single track road to Cliviger (Salterforth Rd.) as access. This would be a very bad consequence of bad planning, and would lead to significant issues and probable accidents as people drove too quickly in using this as a "rat run".</li> </ol> <p>It would also create further danger to the many walkers who frequent this route on a daily basis.</p> <ol style="list-style-type: none"> <li>3. The topography of this land also makes it unsuitable and it is highly likely that there would be an increased FLOOD RISK not only in OLD HALL SQUARE, but also in the MAIN SQUARE. Both of these were badly flooded as recently as December 2015, and leveling the land, building houses with hard-standing drives, patios etc on the BUTCHER'S FARM site is certain to make the situation a lot worse.</li> <li>4. We are led to believe that it is also the case that a major water pipe serving the village runs through this land.</li> <li>5. This part of the village has outstanding views over pleasantly undulating land, with green fields, attractive trees, dry stone walls etc. Building on this land would have a seriously detrimental effect on the visual amenity of the village, not only for</li> </ol>	Whilst the larger site at Butcher's farm was not included at Preferred Options, a smaller site has now been granted planning permission for up to 24 dwellings and this smaller sites is now included in the Proposed Submission Plan as allocation HS1/38.

				<p>locals, but perhaps more importantly for visitors and tourists.</p> <p>6. There are potential significant issues for ecology including the presence of lapwings and bats.</p> <p>I am sure residents will have raised further issues, and for all these reasons we urge you to ensure that Butcher's Farm remains excluded from the plan, and that very serious consideration is given before allowing any significant building on any of the alternative Worsthorne sites.</p>	
2035	Mr Kenneth Duxbury	Site Allocations	Omitted site (Butchers Farm)	<p>I am relieved that two pieces of land have been removed from the options, Butcher's Farm and land on Brownside Road, as inclusion of these would have destroyed the village making it an extension of Burnley. I think it is important that the village is clearly demarked with green fields.</p>	<p>Whilst the larger site at Butcher's farm was not included at Preferred Options a smaller site has now been granted planning permission for up to 24 dwellings and this smaller site is now included as a proposed allocation HS1/38</p>
1609	Mrs Jane Lane	Site Allocations	Omitted site (Craggs Farm)	<p>May I draw your attention to paragraphs 16 and 17 in the report from the Planning Inspectorate, Bristol dated 20 April 2009 regarding the application to build a nursing home on this greenfield site.</p> <p>This proposal was dismissed on appeal.</p> <p>Paragraphs 16 and 17 of the report state the following:</p> <p>Paragraph 16          "Craggs Farmhouse dates from about 1840 and is listed Grade II. An associated barn is dated 1777 and a later conjoined lean-to-stable is also listed Grade II. The Farmhouse and associated barn and stable stand apart from the existing building fronting Whalley Rd and this sense of rural isolation is an integral part of the setting of the listed buildings. The proposal would fill the space between Craggs Farmhouse and its barn and lean-to-stable and the existing housing. This would draw the listed buildings into the settlement and the sense of rural isolation would be lost. The loss of the trees referred to would exacerbate this impact."</p> <p>Paragraph 17          Therefore the proposal would harm the settings of the listed buildings contrary to Policy E10 and advice in Planning Policy Guidance: Planning and the Historic Environment (PG115). The loss of the trees would fail to accord with Policy E6 that seeks to protect important trees."          I trust that this will be taken into account when you make your decision.</p>	<p>The comment although references HS1/33 appears to be made in reference to the site 'Craggs Farm' which was included in the Issues and Options Additional Sites Plan of 2014. This site was not included in the Preferred Options Plan but the comments are noted.</p> <p>Site H1/33 has been however been removed from Proposed Submission Plan. Uncertainty about the likelihood of the site coming forward which if it did could be for a very small number of dwellings would be better considered against policy as a windfall site.</p>
1634	Mr Bill McLellan	Site Allocations	Omitted site (Land between Worsthorne and Lindsay Park)	<p>Firstly residents in the area do not want any more development, they want the rural aspect of the area to stay as this. No urban development. The villagers do not want the land between Worsthorne and Lindsay Park developed so they remain a village.</p>	<p>This site was not included for allocation in the Preferred Options not having been assessed as 'developable' in the SHLAA, primarily because its development would lead to coalescence between Worsthorne, Brownside and consequently Burnley. It is not included in the Proposed Submission Plan</p>

2160	Alister Leaver	Site Allocations	Omitted site (Land between Worsthorne and Lindsay Park)	I understand that there are also plans for a private sale of land for development on the south side of Brownside Road between Lindsay Park and Worsthorne Primary School which would add well over a hundred more houses to the 117 you are proposing. With or without this separate development the addition of 117 new houses will destroy the character and appearance of the village and place a serious burden on an already flimsy infrastructure.	Support noted. The site is not included in the Proposed Submission Plan
2427	Mr Kenneth Duxbury	Site Allocations	Omitted site (Land on Brownside Road)	I am relieved that two pieces of land have been removed from the options, Butcher's Farm and land on Brownside Road, as inclusion of these would have destroyed the village making it an extension of Burnley. I think it is important that the village is clearly demarked with green fields.	Support noted. However, since Preferred Options, an outline planning application for up to 24 dwellings has been granted at Butcher's Farm. This site is included in the Proposed Submission Local Plan as proposed housing allocation HS1/38.
1129	Mr/Mrs Carl Richards	Site Allocations	Omitted site (Butchers Farm)	I recently attended Worsthorne School for the Planning meeting and spoke with several people in relation to the preferred options, and would like to add the following:  I have lived in the Brownside / Worsthorne area for the last 16 years, my wife has lived in the area all her life so we are proud of the area and location.  Although we understand the need for housing in the Burnley area, we believe that if the Butchers Farm was to get into the plan it would have a massive impact on the village, due to the planned size of the development with the volume of traffic and extra persons etc. We would hope the council does everything in its powers to blocking any further applications to be passed. This development would take away the feel of Worsthorne village and have a detrimental effect in years to come.	This site was included in the Issues and Options Additional Sites Plan, but was not taken forward in the Preferred Options document. Planning permission has now been granted for smaller part of this site for up to 24 dwellings and this is now included in the Proposed Submission Plan as site HS1/38.
1429	Marcia Gore	Site Allocations	Omitted site (Butchers Farm)	(Re: Butchers Farm) Although we understand that the indicative proposal of approx. 130 new homes may have been reduced by 50% the site is unsuitable. I have listed the reasons:- <ul style="list-style-type: none"> <li>• Limited road access</li> <li>• Loss of green space</li> <li>• Threat to the areas rural and unspoilt landscape</li> <li>• Unsustainable pressure on rural location – traffic, risk of safety, wildlife, bats, conservation area.</li> <li>• Risk to local community – increase crime, loss of visitors to the village as a 'beauty spot'.</li> <li>• Loss of peace and tranquillity</li> <li>• Commercialism</li> <li>• Loss of village character and threat to the historical hamlet of Hurstwood.</li> <li>• Young people's / children – educational needs and understanding of village life compared to the commercial world we live in.</li> </ul>	This site was included in the Issues and Options Additional Sites Plan, but was not taken forward in the Preferred Options document. The comments may relate to the SHLAA conclusion which stated that the site was 'partly suitable'. Planning permission has now been granted for part of this site for up to 24 dwellings and this is now included as a proposed allocation HS1/38.
1140	Janet Rushton	Site Allocations	Omitted site (Craggs Farm)	I should like to register my objection to this proposal to build yet more on Craggs farm site.	This site was included in the Issues and Options Plan, but was not taken forward in the Preferred Options



				<p>The present building in the area are ugly and the traffic congestion is severe in the morning and evening relating to the use of the present site. It is on the edge of the borough and so the planners think no one cares but we do.</p> <p>Padiham is being surrounded and not in a nice way.</p>	<p>document as other sites were preferred to the loss of this attractive open space in an area of high density housing. It is not included in the Proposed Submission Plan.</p>
1236	Mr P Clegg	Site Allocations	Omitted site (Craggs Farm)	<p>With regard for plans to make land available on the green field in the above area we list below our objections.</p> <ol style="list-style-type: none"> <li>1. The new builds would be totally out of character with the style and materials of the existing properties i.e. Victorian stone build terraces and would create an overbearing presence.</li> <li>2. An increase in pollution levels, due to the increase of cars and traffic flow, would be very detrimental to this small proposed area.</li> <li>3. An Increase in noise levels.</li> <li>4. An increase in light pollution.</li> <li>5. A loss of existing residents' privacy.</li> <li>6. The new houses would have gardens at the expense of the residents on Blackburn Road and Vicarage Avenue losing theirs. We have rented our garden on this land from Huntroyde for the past 21years and it has become an integral part of our lives. We have created a haven for wildlife such as frogs, bats, owls, and numerous birds, some of which have not been seen in this area until we created our gardens i.e. goldfinch, bullfinch, long tailed tits, wrens all of which would be decimated by this proposal.</li> <li>7. To build on this green field would mean the felling of mature sycamore, ash and birch trees.</li> <li>8. The loss of social contact with neighbours if our garden was taken away.</li> <li>9. The traffic access and egress from either Blackburn Road or Whalley Road is impractical and downright dangerous. To attempt to put both access and egress to any proposed site on the short one way street, which is Vicarage Avenue, with a dangerous blind exit onto Whalley Road would be a nightmare and create a dangerous corner.</li> <li>10. Before the Plan would even consider beautiful green field sites, with wonderful residential amenity and active wildlife such as this area, there must first be an identified need and a lack of reasonable brown field sites. This is simply not the case as Padiham has the potential for numerous dwellings on the former Baxi site and the former Perseverance Mill site. No reasonable person could come to the conclusion that with all this brown field building land available there is a need to build on this valuable, small green space</li> <li>11. In 2008 a planning application was proposed for a 60 bedroom nursing home on the above site (ref: CRP/APP/2008/0577) and rejected. I trust that you will re-address this previous application and look closely at the reasons for its refusal, as surely these apply with regard to this current preferred option.</li> </ol>	<p>This site was included in the Issues and Options Plan, but was not taken forward in the Preferred Options document as other sites were preferred to the loss of this attractive open space in an area of high density housing. It is not included in the Proposed Submission Plan.</p>

				<p>To lose this beautiful green space to bricks and tarmac would be vandalism.</p> <p>We trust that you will seriously take into account our previous objections and hope that common sense will yet again prevail and reject this 'preferred option' from the plan and thus destroying our strong community spirit and abundance of wildlife that we enjoy.</p>	
1604	Lancashire Wildlife Trust	Site Allocations	Omitted site	<p>Alternative Options Considered. The Trust welcomes the removal of the following sites from the Preferred Options Policies and Map:</p> <ul style="list-style-type: none"> <li>• Land at Lowerhouse Lane (0.47ha),</li> <li>• Land off Rossendale Road (41.27ha), and</li> <li>• North of Bronte Avenue (1.45ha).</li> </ul>	Support noted. The Land off Rossendale was revised and scaled back considerably for the Preferred Options, but portions of the site were still included for housing and employment development and are included in the Proposed Submission Local Plan.
1334	Mrs Ann Eddleston	Site Allocations	Omitted site	<p>I take it that this relates to the proposal to build new properties in Worsthorne Village and in the area of Lindsay Park in Brownside.</p> <p>I don't know what you mean by 'document' policy/paragraph ref or page number' all I have is this form and a map which is mainly illegible (probably relates to your website).</p> <p>I am very strongly opposed to any new builds in the area.</p> <p>I live on Brownside Road, which at the moment is a very busy road indeed.</p> <p>More houses will create a huge impact on the volume of traffic both during the build and afterwards.</p> <p>Most properties would probably have at least two cars and visitors.</p> <p>More builds will also have a huge impact on the environment and quality of life for current residents.</p>	The Preferred Options contains five sites in Worsthorne and Brownside - HS1/15, HS1/20, HS1/31, HS1/36 and HS1/38. Land near Lindsay Park was not included at Preferred Options stage and is not included in the Proposed Submission Plan.
1201	Mr John Smith	Site Allocations	Omitted site	<p>With reference to the proposed housing development consultations within Brownside &amp; Worsthorne.</p> <p>Whilst I realise that some development is inevitable my objections to the plans are as follows:-</p> <ol style="list-style-type: none"> <li>1. from the cartographical plans seen in the local offices, I am unable to follow the reasoning that Butcher's Farm and land adjacent to 210 Brownside Road is unsuitable for the council whereas 'Indigo Planning of Manchester' have will be applying for planning permission for these two sites.</li> <li>2. Indigo Planning have also drawn plans for a development on Brownside Road adjacent to Lindsay Park. The fields here are constantly waterlogged. Indeed many of the residents whose homes are facing the field have dug ditches to divert rain water runoff onto Lindsay Park itself.</li> </ol>	There is nothing to stop land owners and developers putting forward alternate sites to those allocated in the local plan for planning permission, and these sites would have to be judged either against policies in the current local plan, or the emerging local plan when adopted. The council believe that the sites it has allocated in the Proposed Submission (HS1/15, HS1/20, HS1/31, HS1/36 and HS1/38) are suitable for development in Brownside and Worsthorne, and equally have decided not to allocate the site adjacent 210 Brownside Road on planning merits. If developers decide to apply for permission on any site (allocated or otherwise), they will be subject to the normal planning application process.
1620	Nesta Lynskey	Site Allocations	Omitted site (Blackburn Rd and	I wish to support the vision and objectives to remove the Blackburn Rd and Craggs Farm areas from the plan	Support noted. These sites are not included in the Proposed Submission Local Plan.

			Craggs Farm)		
1827	Padiham Community Action	Site Allocations	Omitted site (Craggs Farm)	<p>#1 We are pleased that .... the proposed housing development at Eaves Barn has now been omitted from the local plan.</p> <p>#2 [Support] The deletion of the Craggs Farm Site and request that the site be included in the adjoining Green Belt.</p>	<p>Support noted. The first response is also presumed to relate to the site at Craggs Farm as there was no housing site at Eaves Barn in the plan at Issues and Options stage.</p> <p>This Craggs Farm site was included in the Issues and Options Plan, but was not taken forward in the Preferred Options document as other sites were preferred to the loss of this attractive open space in an area of high density housing. It is not included in the Proposed Submission Plan.</p> <p>The Green Belt Review undertaken to inform the emerging Local Plan considered land which could be added to the Green Belt. The Review did not recommend that the land at Craggs Farm should be added to the Green Belt.</p>