

## Air Quality Management: Protecting Health and Addressing Climate Change SPD:

### Schedule of Representations Received and Recommended Responses - Appendix A to Executive Report

Please note: The comments received and the recommended responses do not take account of the proposed changes set out in the government's consultation document 'Changes to the Current Planning System' or the White Paper Planning for the Future - August 2020'

Comment Ref.	Consultee	SPD Ref.	Comments/Key Issues raised	Recommended Response
1	Highways England	General	<p>Thank you for consulting Highways England on Burnley Council's draft Air Quality Management: Protecting Health and Addressing Climate Change Supplementary Planning Document (SPD).</p> <p>There are no specific comments we feel we need to make on this document.</p> <p>Please contact me if you would like to discuss anything about this email.</p>	Noted
2	Graham Howarth	General	<p>I am writing to give my thoughts on your request for feedback on the local plan re air quality.</p> <p>My initial response would be that as the roads around where I live are already operating above their designed capacity and at peak times the junction at Manchester rd Rossendale road is gridlocked with traffic for a good 5 hours per day how can this be good for air quality in the area where I live, even though we as a residents group pointed this out to the council by doing our own traffic survey when the original plan was open for debate, the council still chose to totally ignore this and went ahead using Lancashire county councils 2013 traffic survey which at the time of the local plan was already 5 years out of date.</p> <p>So yes my concern going forward is how can you improve the air quality where I live, when you are proposing to increase traffic and building more houses?</p>	<p>There would appear to be some misunderstanding on the purpose of the document. The purpose of the SPD is not to reconsider the Local Plan Housing allocations or the evidence used in the Plan's preparation.</p> <p>The Council considers that the policy framework set out by Burnley's Local Plan and the SPD will assist in assessing the impacts of proposed developments and providing mitigation where appropriate.</p>

3a	Canal & River Trust	Mitigation	<p>We welcome the general proposals to require developers to undertake initiatives to mitigate against the impact of their development on local air quality.</p> <p>Although we note that improvements to off-site green infrastructure is referred to in part (iv) of the large sites mitigation requirements, we do believe that the incorporation of on-site planting should also be considered. This could be included within the hierarchy for both small site and large site mitigation.</p> <p>The planting of trees on sites, for example, can be a relatively low cost intervention that can have significant impacts on local air quality. This can also have a positive impact upon the biodiversity of neighbouring green infrastructure routes and corridors, which can include our network in certain areas.</p>	Reference to the incorporation of on-site planting within the proposed mitigation requirements has been included.
3b	Canal & River Trust	Appendix B4 – Contributions	<p>The canal corridor can provide a range of habitats and is an excellent existing connecting corridor for wildlife to link up other areas of green space. Developments near the canal should connect their green corridors to the waterway.</p> <p>We welcome the reference in part B4.4 of the role of contributions towards the enhancement of the borough's green infrastructure network, which could help enhance the role of our network in the borough.</p> <p>The canal network also provides access to existing walking and cycling routes, which link many suburban areas of Burnley to the town centre. Improvements to the footpaths and walking infrastructure could help to reduce the demand (and need) for vehicular transport in Burnley, and we advise that the example of possible uses in paragraph B4.4 should include improvements to existing walking routes. This would encompass a wide range of existing paths in Burnley, or which our towpath network is an important part.</p>	<p>Noted.</p> <p>Support noted.</p> <p>Cycling infrastructure is already in the list. Footpaths in this context would come under the wider GI infrastructure network which is already included in the list.</p>

4	Burnley Civic Trust		Burnley Civic Trust is very pleased with the steps taken by the Council and fully supports it with its proposals.	Support welcomed and noted.
5	Natural England		<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	<p>Comment noted.</p> <p>The SPD has already been 'screened' for the need for Strategic Environmental Assessment (SEA) and Natural England concurred with the Council's view that this was not necessary. Formal Habitats Regulations Assessment is not considered necessary either as there are no likely significant effects of the SPD itself. SEA and HRA have already been undertaken for the Local Plan and its policies and the development it supports.</p>
6	Homes England		<p>I would firstly like to thank you for the opportunity to comment on Burnley Air Quality Management (SPD).</p> <p>Homes England is the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market</p>	Comments noted.

			<p>change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p> <p>Homes England does not have any land holdings affected by the consultation and therefore we do not propose to make at representations at this point. We will however continue to engage with you as appropriate.</p>	
7	United Utilities		<p>Many thanks for consulting United Utilities on the Air Quality Management: Protecting Health and Addressing Climate Change SPD.</p> <p>Given that the purpose of the SPD is to set out the requirements for and scope of air quality assessments to support planning applications and appropriate mitigations, to meet the requirements of Local Plan Policies NE5 and IC2 in particular, United Utilities feel that it is important for us to highlight the importance of both noise and odour assessments to accompany proposed developments situated in close proximity to existing wastewater treatment works.</p> <p>There are a number of existing wastewater treatment works within or neighbouring the Burnley local authority boundary which could be a potential source of noise and odour if new sensitive receptors are proposed within close proximity. A risk assessment of the impact of both noise and odour is essential to be completed as early as possible in the planning process to ensure development is planned in the most appropriate way. Given that potential sources of pollution can have a significant impact on development layout, it is critical that a risk assessment is submitted upfront alongside a planning application for development.</p> <p>United Utilities would like to see the above incorporated into the Air Quality Management SPD to ensure that the amenity of sensitive uses in close proximity to our treatment works is adequately protected. Please don't hesitate to contact me if you have any queries.</p>	<p>Whilst the Council acknowledges the importance of odour and noise assessments, where appropriate, in assessing proposed developments it is not considered that reference to them is appropriate within this SPD given its stated scope and purpose.</p>

8a	Burnley Wildlife Conservation Forum	2. Purpose and Scope of Guidance	2.1 In the second “bullet point” add “& where possible enhancing it “between” green infrastructure “&” which”, consistent with “enhancement” included in 4.2	Noted. The suggested changes have been incorporated to ensure consistency with para. 4.2.
8b	Burnley Wildlife Conservation Forum	3. Air Pollution	<p>3.3 In the second sentence I suggest as follows; after “often “delete” are not immediately harmful, but “before continuing” are released....”. &amp; Then after “&amp;farming &amp; leave a” replace “gradual but” with a stronger “cumulative” the between “significant” &amp;” impact” add “adverse” &amp; finally change “on health &amp; the environment” to health, the environment &amp; biodiversity.</p> <p>3.5 I suggest focusing only on the U.K position &amp; therefore removing “in common with many other countries in Europe”, which could be inferred to imply that no reductions are achievable.</p> <p>3.6 &amp; 3.7 I suggest these two paras would be more appropriately &amp; effectively placed after paras 3.8 &amp; 3.9 Which when all four paras are together will produce a stronger impact.</p>	<p>The suggested changes are not considered necessary.</p> <p>It is not agreed that setting the statutory obligation within a European context is inappropriate as it reinforces the importance of working towards this target and consequently the importance of this SPD.</p>
8c	Burnley Wildlife Conservation Forum	4. Policy Context	<p>Regarding the “Local policy” section, whereas para 4.8 summarises policy NE5 in respect of air quality, I suggest it would be helpful to also include a para or paras summarising &amp; where appropriate updating the Local Plans climate change policies CC1 to CC5 &amp; their supporting section 5.6 Climate Change, perhaps including para 5.6.1 final sentence on the 2008 Climate Change Act &amp; in respect of para 5.6.6 an update of “ The Lancs Climate Change strategy” if one exists, especially with regards to its now out of date target of “lowering Low carbon &amp; well adopted by 2020”!</p> <p>4.10 omission: it looks like “a part has been omitted between “ can play” &amp; “in promoting” &amp; in “figure 2” bottom line has “SPD” been omitted from “ Planning for Health”</p>	<p>An SPD cannot introduce new policy or supporting guidance that is not consistent with the Local Plan.</p> <p>Noted. Suggested change made to para. 4.10 . Figure 2 `Burnley planning policy framework diagram` has been deleted as this was to help inform the consultation.</p>
8d	Burnley Wildlife	5. Site Mitigation	5.15 at the end should “in section 5 “be “in section 6”.	Noted. Suggested change has been incorporated to correct error.

	Conservation Forum			
8e	Burnley Wildlife Conservation Forum	6. Assessment & Mitigation	<p>6.5 towards the end has “by” been omitted between “caused” &amp; “emissions”.</p> <p>6.15 (iv) I suggest improving the final part of this as follows: Green infrastructure is increasingly promoted as a method for air pollution mitigation, opportunities should be sought when appropriate to plant up areas with native trees &amp; shrubs but always avoiding areas of habitat already available for biodiversity such as natural grasslands &amp;scrubs. Street &amp; park trees, green walls, green roofs &amp; other means of introducing vegetation into the urban landscape also provide a basis for pollutants to be deposited more effectively onto vegetation than onto imperious, artificial surfaces”.</p>	<p>Noted. Suggested change has been incorporated into para. 6.5.</p> <p>Para 6.15 has been reworded taking into account this comment and the comment from the Canal and River Trust.</p>
8f	Burnley Wildlife Conservation Forum	7. Developer Submissions	7.5 in the second sentence “the “has been omitted between “perhaps due to” & “quality”.	Noted. Suggested change has been incorporated into para. 7.5.
8g	Burnley Wildlife Conservation Forum	Appendix A1	A1.5 Towards the end of the first sentence an omission between “used” & “discounted”, perhaps it should be “for” or “as”.	Noted. Suggested change has been incorporated into para. A1.5.
8h	Burnley Wildlife Conservation Forum	Appendix B1	B.1.1 in the first sentence “the” omitted between “due to” &” nature”.	Noted. Suggested change has been incorporated into para. B1.1.
8i	Burnley Wildlife Conservation Forum	Appendix B4	B.4.4 Consistent with suggestions for 6.15 (iv) add the following “bullet point”. “Additional suitable areas planted up with native trees &shrubs”	Noted. Para B4.4 has been reworded taking into account this comment .
9a	Stuart Hoyle	Purpose of the	The main purpose of this document is to focus on the impacts of new developments in relation to air quality; and in particular, transport	The SPD cannot re-examine the appropriateness of allocations included within the adopted Local Plan.

		<p>Document</p> <p>emissions and exposure. These impacts can be through an increase in harmful emissions arising from traffic generated by new development, or by new development being exposed to existing harmful emissions.</p> <p>This it can do by: Limiting emissions and controlling the location and design of emissions sources, such as transport, industry and households; and also receptors such as schools, nurseries, hospitals, and nursing homes - where new development requires planning permission</p> <p>By protecting existing green infrastructure which helps mitigate against impacts.</p> <p>Poor air quality has an significant impact on public health, the report states that each year 44 deaths in the Burnley District are attributable air pollution.</p> <p>Local Authorities have a statutory duty to work towards compliance with health based Air Quality Objectives.</p> <p>All the above does not really sit with the Local Plan when it is looked at in detail. Every site that the Local Plan has earmarked for potential Residential or Industrial new development will have an adverse impact on the quality of the air in Burnley.</p> <p>To illustrate this point I would like to take as an example of how this could affect in just one of the Thatched category areas already identified as being “ an area for concern as regards Air Quality.”</p> <p>This being the Junction of Accrington Rd/Rossendale Rd.</p> <p>Work has started on improving this already overcrowded junction. This work was planned before the Local Plan was agreed because the junction</p>	<p>The appropriateness of the Plan’s allocations and their likely impacts were considered by the Council during the Plan’s preparation and then during the Local Plan Examination by the Planning Inspector.</p> <p>Now the Local Plan has been adopted, the policies included in the Local Plan and the supporting SPDs adopted and under preparation will ensure that the impacts of development proposals can be properly assessed and any necessary mitigation included in subsequent planning permissions.</p>
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			<p>was already over capacity.</p> <p>All well and good as the traffic flows will be quicker so less queues. However before this junction has been improved there will be an extra 250 dwellings built on the Former Hameldon School site ( HS1/1 in Local Plan), this being a double blow as part of the site was playing fields up more damaging will be the extra vehicles ( between 500/600 extra cars plus delivery vans etc)that will now need to travel in that area either to the junction to get to the M65 or along Accrington Rd or even along Burnley Rd Padiham ( which is another Thatched area identified by the Council as an area for concern for air quality).</p> <p>Add to this the proposed HS1/14 Land at Rossendale Road where on a prominent greenfield site in Open Countryside there is potential for 188 new dwellings, which could mean an extra 400 cars using Rossendale Rd to go the junction at Rosegrove, going past a school en route. This is not “ protecting existing green infra structure to help mitigate against the impacts of air pollution.</p> <p>Development HS1/28 Land rear of Bull and Butcher 20 houses equates to perhaps 40 plus cars plus delivery vehicles. These will mainly either go down Manchester Rd or Rossendale Rd to get to the M65.</p> <p>EMP1/1 Rossendale Rd (North) again a Greenfield site; 20 units. How much traffic will this generate which will probably use the junction to get onto the M65.</p> <p>This is not an exhaustive list of new builds already up in the area but give some idea of how one development taken in isolation does not mean a lot unless the whole picture is looked at, 10 houses on their own may not have an enormous impact on the air quality of an area but if that development is on a greenfield site next to another large development that has 200 houses near to an industrial site that has extra units by the side of an established Industrial complex like the two on Rossendale Rd</p>	
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			then the air quality in that area is not going to be to the benefit of residents already living opposite the sites as well as the new residents of the new builds.	
9b	Stuart Hoyle	Site Classifications	<p>I believe that the Council need to be more specific by what they mean by Smaller Sites. Leaving it to the Developer to decide what they think is a smaller site would leave a grey area. Where the site is should also be part of the classification process. If it is near to other sites etc.</p> <p>The number of homes and the size of the house ( 2/3/4/5 ) bedrooms should give a clear potential estimate of number of cars that might be owned by residents ( 2 beds = 1.5 spaces, 3 beds =2 spaces, 4 beds =3 spaces). There are average journeys that these cars could potentially do plus the amount of extra traffic generated by parcel deliveries from Amazon, EBay , etc.</p> <p>As it stands a potential development could come up with a number of car movements whilst residents who live near by who object to the development could engage a traffic consultant to argue the numbers.</p>	<p>It is considered that the categorisation of the site size is clear. It is also necessary for the developers site categorisation to be confirmed by the Council.</p> <p>Site location and the amount of traffic generated, where appropriate, also forms part of the Site classification process.</p> <p>Residents are able to comment on information submitted with planning applications. These comments will be considered as part of the determination of the application.</p>
9c	Stuart Hoyle	Travel Plans	<p>The above needs to have a Template that details what/who it covers, for example:</p> <p>Numbers of expected vehicles per household  Distance to bus stops  Distance to Rail station cycle ways (that are safe)  Open spaces  Other developments nearby  List of anyone that has been consulted (Parish Council, Local Residents associations)</p> <p>This should not just be as a tick list. The designated Travel Co-ordination should have realistic plans for sustainable travel.</p> <p>If the plan for cycling is not realistic, for example there area in roads nearby but the development is up a steep hill then surely people will</p>	<p>The requirements with regard to Travel Plans is included within Local Plan Policy IC2: Managing Transport and Travel Impacts and Appendix 8: Transport Assessments and Travel Plans, both of which are included in Appendix C1 of the SPD.</p>

			<p>drive to work and not cycle because they would then have to cycle back up the hill after a full days work plus maybe having to cycle a couple of miles.</p> <p>Showing a bus route is fine but if buses only run hourly will not be enough to get someone to give up their car. if SMART targets are to be set then they need to be realistic and a time set for them to be achieved.</p> <p>Should bigger developments for example offer bus/rail discounts to new residents if they travel by public transport.?</p> <p>Who is going to monitor this and if the targets are not met then what are the consequences because once houses are built then they stay built. If the Developer has to pay a fine then who decides on what that money is spent on and where.</p> <p>The whole process has no involvement/ discussion with local people in the area.</p> <p>Shouldn't residents nearby be consulted? They know traffic issues better than either the Developer or the Council.</p>	
9d	Stuart Hoyle	Conclusion	<p>Now more than ever with new illnesses such as Covid 19 having a devastating effect on local people who have underlying respiratory illnesses, I think that it is a timely reminder of the importance of good clean air quality.</p> <p>Will people want to travel by bus or crowded trains?</p> <p>I understand the need for new builds and am not against this but I do believe that a holistic approach to developments/ potential developments should be taken by looking at the wider impact of the development.</p> <p>Every development will have an affect on the air quality, there are certain areas of town that have been identified and these areas</p>	<p>The importance of air quality and the need to assess the potential impacts of developments is agreed. The policy framework provided by the Local Plan and supporting SPDs will help ensure that this can be properly assessed and appropriately determined when applications for development are submitted.</p> <p>Air quality monitoring is undertaken by the Council's Environmental Health team.</p>

			especially the Rossendale Rd/Rosegrove and Manchester Rd junctions are all going to see big increases of traffic and need to be monitored constantly.	
10	Cliviger Parish Council		Cliviger Parish Council wishes to endorse the attached document prepared by CPRE Lancashire and hopes your team will take the important point made into consideration when preparing the new SPD.	Noted. See response to CPRE comments.
11	Habergham Eaves Parish Council		Habergham Eaves Parish Council wishes to endorse the attached document prepared by CPRE Lancashire and hopes your team will take the important point made into consideration when preparing the new SPD.	Noted. See response to CPRE comments
12	Burnley Civic Society		Burnley Civic Society wishes to endorse the attached document prepared by CPRE Lancashire and hopes your team will take the important point made into consideration when preparing the new SPD.	Noted. See response to CPRE comments
13	Mrs Rebecca Hay		<p>I wish to endorse the attached document prepared by CPRE Lancashire and hope your team will take the important points made into consideration when preparing the new SPD.</p> <p>In my view the council needs to carefully consider allowing roadside developments where there is little real option for transport unless by car.</p> <p>The Red Lees Road development at Cliviger is a classic example of a roadside development, where "independent" reports commissioned by the developer state there will be no real change to air quality management, but as the lockdown has proved, less traffic means cleaner air etc.</p> <p>The council needs to ensure that practical, not pie in the sky travel plans are in place before a site is even put in the Local Plan. You can highlight bus/cycle travel as much as you want, but in real terms and in rural places, this is not feasible unless there is a massive injection of cash or incentive for the traveller, neither is the argument that children can walk three miles to school, without taking into consideration the lack of footpaths, a safe route and the terrain of the area.</p>	<p>Noted. See response to CPRE comments</p> <p>Any proposal for new development will be carefully considered against the planning framework set by Burnley's Local Plan and its supporting SPDs.</p> <p>The Councils requirements with regard to Travel Plans is included within Local Plan Policy IC2: Managing Transport and Travel Impacts and Appendix 8: Transport Assessments and Travel Plans both of which are included in Appendix C1 of the SPD.</p>

14a	CPRE Lancashire	<p>We welcome that the Council is progressing this important SPD as there is much fanfare in the media about the Climate Emergency, and the 'urgent need' to adhere to our Carbon Budgets, but not near enough detail in policy about the planning pathway to achieve the necessary greenhouse gas emission reductions in a more timely manner.</p> <p>CPRE Lancashire thinks the scope as set out in the SPD is about right. In addition to the other policy considerations it is worth mentioning the National Planning Policy in Appendix C1 and air quality is mentioned twice.</p> <p>CPRE Lancashire CPRE wants to see a thriving, beautiful countryside rich in nature playing a crucial role in our nation's response to this emergency. Both mitigating the worst impacts of climate change and adapting to the changes already being felt and yet to come are essential. The solutions to tackle the climate emergency, such as planting more trees and hedgerows, making the most out of renewables, making our homes more energy efficient, and new sustainable public transport, will require transformational change across the country, touching every sector and community. It is therefore necessary that the landscapes we know, the biodiversity around us, the ways in which we travel and the type of places that we live, will change.</p> <p>Summary In summary, CPRE Lancashire is pleased to see Burnley Council is progressing an up to date SPD.</p>	Support for preparing the SPD is welcomed.
14b	CPRE	<p>The Climate Change Act 2008</p> <p>It is important to refer to the Climate Change Act 2008, which establishes a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels. To drive progress and set the UK on a pathway towards this target, the Act introduced a system of carbon budgets including a target that the annual equivalent of the carbon</p>	The Climate Change Act 2008 is referenced in the local plan and although the role of the SPD in helping to address climate change is noted, its primary focus is in relation to air quality and as such the long-standing Environment Act 1995 is most relevant.

			<p>budget for the period including 2020 is at least 34% lower than 1990. The Climate Change Act 2008 also requires the government:</p> <ul style="list-style-type: none"> <li>•to assess regularly the risks to the UK of the current and predicted impact of climate change;</li> <li>•to set out its climate change adaptation objectives; and</li> <li>•to set out its proposals and policies for meeting these objectives.</li> </ul> <p>These requirements are fulfilled by the UK climate change risk assessment and the National adaptation programme report respectively, which may provide helpful information for plan-making.</p>	
14c	CPRE	National Policy	<p>National Planning Policy Framework (NPPF)</p> <p>Meeting the challenge of climate change, flooding and coastal change is set out in Section 14 of the National Planning Policy Framework, 2019. Paragraph 148 states, “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”</p> <p>Air quality is mentioned in Paragraph 103. “The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”</p>	<p>The quotes from and comments on national policy are noted.</p> <p>Section 4 of the SPD has been amended to include reference to para 103 of the NPPF. Paragraph 181 was already referred to.</p>

		<p>The second reference to air quality is in Paragraph 181. “Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.” Local Plan Policy NE5: Environmental Protection, refers to AQMAs.</p> <p>In the NPPF Glossary, Air quality management areas is defined as: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines. Planning Practice Guidance</p> <p>There are a dozen sub-headings under the Climate Change banner, setting out the importance of planning policies to consider, the legislation, the challenges, adaptations and mitigations and building standards. For Air Quality there are 8 points covering what air quality considerations does planning need to address, the role of different spatial tiers, development management considerations and others.</p> <p>There is a useful flow chart included in the Planning Practice Guidance under point 5, which could be replicated in the SPD Appendix C1, to aid local decision making. It explains the process stages if an application is received that gives rise to air quality concerns. The correct level of environmental assessment is set out. It includes the potential for an application that would otherwise be refused to be made acceptable for consent with mitigation.</p>	<p>The SPD explains the process that will be used in the borough for assessing air quality concerns at the application level.</p>
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14d	CPRE	Local Policy	<p>Local Plan Policies</p> <p>The following Local Plan Policies relate to climate change and air quality:</p> <ul style="list-style-type: none"> <li>•Policy SP6: Green Infrastructure</li> <li>•Policy NE5: Environmental Protection</li> <li>•Policy IC1: Sustainable Travel</li> <li>•Policy IC2: Managing Transport and Travel Impact</li> <li>•Policy IC3: Car Parking Standards</li> </ul> <p>We call for all development to contribute to efforts to mitigate and adapt to the climate emergency. Sustainable development needs to be redefined to focus on living within environmental limits and the importance of addressing the climate emergency. Building Regulations ought to be radically tightened up to ensure that new and existing buildings meet zero carbon standards.</p> <p>Policy NE5: Environmental Protection has reference to Light Pollution, and Noise Pollution. In the Countryside light pollution and noise can be a real nuisance, spoiling the intrinsic character of our countryside so it is good to have wording in the SPD that can stop light spill through avoidance, and use of cowls for needed external lighting.</p> <p>In terms of transport, we urge for a functional transport hierarchy approach to travel, choices which prioritises active travel – walking and cycling, then provision of public transport, and lastly car travel, mirroring the carbon footprint of the different modes of travel.</p> <p>Development Management CPRE Lancashire was recently approached by a community representative for planning advice concerning a planning application for houses on an allocated site. The decision to consent left a community dissatisfied with the planning outcome. This is because there were some issues that in the local residents view were not adequately addressed (lack of public transport, local school places, etc). Despite the developer</p>	<p>The current definition of sustainable development for planning purposes is set out in the NPPF and this is carried forward into the adopted local plan.</p> <p>When discussing or assessing sustainable development it is important to refer to and address all three strands – economic, social and environmental.</p> <p>The primary focus of the SPD is in relation to air quality and the limiting and mitigation of harmful emissions. Reference to noise and light pollution is not considered necessary and may complicate the content making it less effective.</p> <p>The framework set by Burnley’s Local Plan, including the policies quoted by CPRE and the SPDs will help ensure that sustainable development is delivered. The local plan policies allow for applications, where appropriate, to be refused on climate change or air quality grounds.</p>
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			<p>seeking to make improvements, the local plan policy did not support officers to deliver a truly sustainable development. Therefore, CPRE Lancashire recommends that the SPD considers when an application will be refused on climate change and air quality issues. What will the criteria be? How will the Council be performance checked? How could an application be improved via mitigation to be acceptable for consent? How will conditions and obligations be enforced? The wording needs to ensure developers cannot use viability arguments to renege on responsibilities. Climate change and air quality is such an important issue.</p>	<p>CPRE do not explain why they do not consider the development (assumed to be the allocated housing site at Red Lees Road) is not sustainable when assessed against the national definition or the local plan or how the concerns expressed relate to this SPD?</p> <p>The Developer Contributions SPD which is currently being prepared sets out the Council's policy in relation to the hierarchy of potential contributions and how viability will be addressed. It also sets out how contributions will be monitored and enforced. .</p>
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