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# Non-Technical Summary - Sustainability Appraisal of the Proposed Submission of the Burnley Local Plan

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**Client:** Burnley Borough Council

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# Non-Technical Summary

## Introduction

- 1.1 This Non-Technical Summary relates to the Sustainability Appraisal (SA) of the Proposed Submission of the Burnley Local Plan, which was produced by LUC on behalf of Burnley Borough Council.
- 1.2 Sustainability Appraisal reports have been previously prepared for the following iterations of the Local Plan:
- [Issues and Options](#);
  - [Additional Sites Consultation](#);
  - [Preferred Options Local Plan](#).
- 1.3 The Sustainability Appraisal of the Proposed Submission of the Burnley Local Plan incorporates comments on the Preferred Options SA Report and additions or amendments to the proposed sites and policies that were made to the Proposed Submission of the Burnley Local Plan. For clarity, a summary of the changes between the Preferred Options Local Plan and the Proposed Submission Local Plan is set out in **Table 1**.

**Table 1 Summary of changes made to the Plan between Preferred Options and Proposed Submission Local Plan Stages**

Plan section	Summary of changes between Preferred Options and Proposed Submission
Vision and objectives	Minor wording changes
Strategic policies	Changes to housing delivery figures in Policy SP2: Housing Requirement 2012-2032 Changes to employment land delivery figures in Policy SP3: Employment Land Requirement 2012-2032 Minor wording changes to Policy SP4: Development Strategy Minor wording changes to Policy SP5: Development Quality and Sustainability
Housing	Amendment to the indicative number of dwellings of some residential allocations in Policy HS1 and wording changes to specific housing allocation policies. Minor wording changes to Policy HS3: Housing Density and Mix Minor wording changes to Policy HS4: Housing Developments Minor wording changes to Policy HS5: House Extensions and Alterations Proposed Submission Draft Local Plan has allocated residential sites HS1/35 (HEL/256): Lodge Mill, HS1/37 (HEL/260): Barden Mill, Barden Lane, and HS1/38 (HEL/019): Butchers Farm all of which were not considered at the Preferred Options stage. HS1/36 (HEL/105): Land West of Smithyfield Avenue, was previously incorporated within the larger site of HS1/15 (HEL/033): Heckenhurst Reservoir/Formers Heckenhurst Reservoir and is now assessed as a separate site. HEL/254: Land at Nelson Road, Saxifield has come forward as a reasonable alternative site option for the first time in the Proposed Submission Draft Local Plan. Boundary changes have been made to allocated residential sites HS1/3: Former William Blythe Site, HS1/7 (HEL/231): Ridge Wood, HS1/11 (HEL/066): Land at Burnley General Hospital and HS1/15 (HEL/033): Heckenhurst Reservoir/Formers Heckenhurst Reservoir. Site HS1/8: New Hall Street/Barden Lane has been removed as an allocation as it is no longer a reasonable alternative as the approved housing scheme is now under construction. Site HS1/8: New Hall Street/Barden Lane has been removed as an allocation as it is

Plan section	Summary of changes between Preferred Options and Proposed Submission
	no longer considered to be a reasonable alternative as the approved housing scheme is no under construction. HS1/22 Lawrence Avenue has been removed as an allocation.
Town Centres	Changes to Policy TC2: Development within Burnley and Padiham Town Centres Renaming of Policy TC5 to 'Uses within the Weaver's Triangle and minor wording changes made Minor wording changes to Policy TC6: District Centres Minor wording changes to Policy TC7: Hot Food Takeaways Minor wording changes to Policy TC8: Shopfront and Advertisement Design Boundary change has been made to site TC4/1: Former Pioneer, Curzon Street
Employment	Boundary changes have been made to allocated employment sites EMP1/2: Burnley Bridge Business Park, EMP1/7: Westgate and EMP1/12: Burnley Bridge Extension. Site EMP1/7: Westgate is considered to be on brownfield land rather than greenfield as previously assessed. The assessment matrix has been updated accordingly.
Historic Environment	Minor wording changes to Policy HE1: Identifying and Protecting Burnley's Historic Environment Minor wording changes to Policy HE2: Designated Heritage Assets Minor wording changes to Policy HE3: Non-Designated Heritage Assets Changes to Policy HE4: Scheduled Monuments and Archaeological Assets
Natural Environment	Minor wording changes to: Policy NE1: Biodiversity and Ecological Networks Policy NE2: Protected Open Space Policy NE4: Protected Trees, Hedgerows and Woodland Policy NE5: Environmental Protection: Minor changes to light pollution text and addition of text on unstable land
Climate change	Minor wording changes to Policy CC1: Renewable and Low Carbon Energy (not including wind energy) Minor wording changes to Policy CC2: Suitable Areas for Wind Energy Development Minor wording changes to Policy CC3: Wind Energy Development Minor wording changes to Policy CC4: Development and Flood Risk Minor wording changes to Policy CC5: Surface Water Management and Sustainable Drainage Systems (SuDS).
Infrastructure	Minor wording changes to Policy IC5: Protection and Provision of Social and Community Infrastructure. New Policy IC6: Telecommunications Policy IC6: Taxis and Taxi Booking Offices has been renumbered to IC7 and minor wording changes have been made.

- 1.4 Comments on the Sustainability Appraisal of the Preferred Options Local Plan have also been integrated into the SA Report. This has included updates to the assessment of site options considered at the Preferred Options stage, for example where changes have been made to the site appraisal assumptions or boundaries. For clarity, a summary of the changes made to the SA between the Preferred Options Local Plan and the Proposed Submission Local Plan is set out in **Table 2**.

**Table 2 Changes made to the SA report between Preferred Options and Proposed Submission**

Topic	Summary of changes made to SA report between Preferred Options and Proposed Submission
Biodiversity assumption (objective 13) – updated	Amendments to the housing, employment and Gypsy and Travellers matrices in relation to objective 13 for the following sites:

Topic	Summary of changes made to SA report between Preferred Options and Proposed Submission
<p>to specify the assessment reflects proximity to designated sites i.e. LNRs, SACs, SPAs and SSSIs and not local designations, including Biodiversity Heritage Sites.</p>	<p><u>Housing</u></p> <p>HEL/003: Park Road</p> <p>HEL/007 (HS1/12): Former AIT Site (formerly AIT Brush Street)</p> <p>HEL/011 (HS1/5): Former Baxi site, Padiham (formerly Former Baxi Site, Padiham – western part)</p> <p>HEL/014 (HS1/30): Brampton House</p> <p>HEL/021: South of Barclay Hills</p> <p>HEL/025 (HS1/22): Lawrence Avenue</p> <p>HEL/027 (HS1/19): Coronation Avenue</p> <p>HEL/028: Craggs Farm, Padiham</p> <p>HEL/033 (HS1/15): Heckenhurst Reservoir/Formal Heckenhurst Reservoir</p> <p>HEL/034 (HS1/3): Former William Blythe Site, Hapton</p> <p>HEL/039 (HS1/20): Gordon Street Mill, Worsthorne (previously Gordon Street Mill, Lennox Street – Mill only)</p> <p>HEL/040: Grove Lane, Padiham</p> <p>HEL/043 (HS1/1): Former Hameldon Schools Site (previously Former Hameldon Schools Sites, Kiddrow Lane)</p> <p>HEL/050: Honeyholme Lane</p> <p>HEL/055b (HS1/6): Lambert Howarth</p> <p>HEL/057: Riding Street</p> <p>HEL/058 (HS1/26): Land adjacent 2 Queens Park Road</p> <p>HEL/059 (HS1/31): Land adj 250 Brownside Road, Worsthorne (formerly Brownside Road &amp; Lennox Street, Worsthorne)</p> <p>HEL/060: Villiers Street</p> <p>HEL/065: Land at Brownside Farm</p> <p>HEL/066 (HS1/11): Land at Burnley General Hospital</p> <p>HEL/067 (HS1/17): Former Gardner's Site</p> <p>HEL/071 (HS1/2): Hollins Cross Farm</p> <p>HEL/074 (HS1/10): Higher Saxifield,</p> <p>HEL/075: Land at Melrose Avenue</p> <p>HEL/076: Land at North of Halifax Road</p> <p>HEL/077 (HS1/29): Land at Oswald Street</p> <p>HEL/086: Land at Glen View Road</p> <p>HEL/088: Land at Moseley Road</p> <p>HEL/090: Stoneyhurst Avenue</p> <p>HEL/091 (HS1/9): Red Lees Road, Cliviger</p> <p>HEL/092: Land at Red Lees Road (The Hollins)</p> <p>HEL/093: Land at Red Lees Road/Richmond Avenue, Cliviger</p> <p>HEL/094 (HS1/4): Land at Rossendale Road (formerly Land off Rossendale Road)</p> <p>HEL/100 (HS1/28): Land to rear of Bull and Butcher (formerly Rear of the Bull and Butcher, Manchester Road)</p> <p>HEL/102: Land South of Halifax Road</p> <p>HEL/104: Land to South-West of Burnley Road</p> <p>HEL/109 (HS1/21): Livingstone Mill</p> <p>HEL/112: Marlborough Street</p> <p>HEL/114: Middlesex Avenue</p> <p>HEL/123: Overtown Barn</p> <p>HEL/125 (HS1/23): Perseverance Mill, Padiham</p> <p>HEL/133 (HS1/25): Ridge Avenue</p> <p>HEL/135 (HS1/18): Former Ridgewood High School</p> <p>HEL/136 (HS1/16): Tay Street</p> <p>HEL/137: Rycliffe Street</p> <p>HEL/139 (HS1/32): Cleveland Road, South</p> <p>HEL/148: Thorneybank Industrial Estate</p> <p>HEL/152 (HS1/14): Waterside Mill (formerly Waterside Mill, Langham Street)</p> <p>HEL/153 (HS1/33): Whalley Road</p>



Topic	Summary of changes made to SA report between Preferred Options and Proposed Submission
	<p>HEL/192c (HS1/13): Peel Mill  HEL/208b: EW1/6 – Westgate  HEL/211: Land at Junction of Crown Point Road/Manchester Road  HEL/231 (HS1/7): Ridge Wood  HEL/249 (HS1/24): Land NE of Sycamore Avenue  HEL/250 (HS1/27): Former Dexter Paints</p> <p><u>Employment</u></p> <p>HEL/029c (EMP1/14): Stoneyholme Gas Works  HEL/036 (EMP1/11): George Street Mill  HEL/038 (EMP1/9): Innovation Drive  HEL/094b (EMP1/1): Land off Rossendale Road/Rossendale Road North  HEL/163 (EMP1/2): Burnley Bridge/Burnley Bridge Business Park  HEL/164 (EMP1/12): Burnley Bridge Extension  HEL/165 (EMP1/3): Knowledge Park/Vision Park  HEL/171 (EMP1/13): Eaves Barn Farm, Padiham/Shuttleworth Mead South  HEL/174 (EMP1/10): Widow Hill Road South  HEL/175 (EMP1/4): Widow Hill Road  HEL/189 (EMP1/5): Land South of Network 65  HEL/190 (EMP1/6): Balderstone Lane  HEL/208 (EMP1/7): Westgate  HEL/223 (EMP1/8): Thompson Centre/Thompson Centre Car Park</p> <p><u>Gypsy and Traveller Sites</u></p> <p>Oswald Street</p>
<p>Access to services assumption (objective 11) for employment sites – updated to refer to a distance of 1,200m from residential areas from the previous 600m used.</p>	<p>Amendments to the employment matrices in relation to objective 11 for sites:</p> <p>HEL/094b (EMP1/1): Rossendale Road North  HEL/163 (EMP1/2): Burnley Bridge Business Park  HEL/165 (EMP1/3): Vision Park  HEL/175 (EMP1/4): Widow Hill Road  HEL/189 (EMP1/5): Land South of Network 65  HEL/190 (EMP1/6): Balderstone Lane  HEL/208 (EMP1/7): Westgate  HEL/223 (EMP1/8): Thompson Centre Car Park  HEL/038 (EMP1/9): Innovation Drive  HEL/174 (EMP1/10): Widow Hill Road South  HEL/036 (EMP1/11): George Street Mill  HEL/164 (EMP1/12): Burnley Bridge Extension  HEL/171 (EMP1/13): Shuttleworth Mead South  HEL/029c (EMP1/14): Stoneyholme Gas Works</p>
<p>New Housing sites</p>	<p>Assessment of the following housing sites for the first time:</p> <p>HEL/256 (HS1/35): Lodge Mill  HEL/105 (HS1/36): Land West of Smithyfield Avenue  HEL/260 (HS1/37): Barden Mill, Barden Lane  HEL/019 (HS1/38): Butchers Farm  HEL/254: Land at Nelson Road, Saxifield (site brought forward as a reasonable alternative for first time but not allocated)</p>
<p>Revised housing site boundaries</p>	<p>Reassessment of the following housing sites based on revised boundaries:</p> <p>HEL/034 (HS1/3): Former William Blythe Site  HEL/231 (HS1/7): Ridge Wood  HEL/066 (HS1/11): Land at Burnley General Hospital  HEL/033 (HS1/15): Heckenhurst Reservoir/Former Heckenhurst Reservoir</p>
<p>Revised employment site boundaries</p>	<p>Reassessment of the following employment sites based on revised boundaries:</p> <p>EMP1/2: Burnley Bridge Business Park</p>

Topic	Summary of changes made to SA report between Preferred Options and Proposed Submission
	EMP1/7: Westgate EMP1/12: Burnley Bridge Extension.
Revised town centre site boundaries	Reassessment of the following town centre site based on a revised boundary: TC4/1: Former Pioneer, Curzon Street
Updated SFRA Data	Allocated site matrices have been updated with the Level 1 SFRA undertaken by Burnley Borough Council.
New policies	Appraisal of Policy IC6: Telecommunications for the first time.

## The Burnley Local Plan

- 1.5 The Burnley Local Plan will set out the vision, objectives, strategy, policies and proposals for the spatial development of the Borough up to 2032, including the number of new homes required. It will identify site allocations relating to housing, employment and other uses, including sites for new development and redevelopment. Housing and employment sites will be allocated to meet the Borough's needs for the period up to 2032.
- 1.6 The key elements to be included in the Local Plan are:
- A spatial portrait of Burnley and the key issues facing the Borough.
  - A spatial vision and objectives setting out how the Borough will grow and develop by 2032.
  - A strategy for housing and employment growth and the strategic / overarching policies for development.
  - Policies by subject area.
  - Policies that will be used to control and manage development through the determination of planning applications in order to ensure that development contributes towards delivering the vision and objectives.
  - A monitoring and implementation framework, including a summary of the Infrastructure Delivery Plan.
- 1.7 The Local Plan will not include minerals and waste policies as minerals and waste planning is the responsibility of Lancashire County Council.
- 1.8 Once adopted, the new Local Plan will replace the saved policies from the Burnley Local Plan Review 2006. **Appendix 3** in the Proposed Submission of the Burnley Local Plan lists the policies that were saved from the 2006 Local Plan and shows which of the emerging policies in the new Local Plan will replace the 'saved' policies.

## Context for the Burnley Local Plan and the Sustainability Appraisal Process

- 1.9 The Borough of Burnley is located in the Pennines of East Lancashire at the confluence of the Rivers Calder and Brun. It is bisected by the M65 motorway which links the area to Colne and Nelson to the north and Blackburn and Preston to the west, and it is served by two rail lines, the cross Pennine route from York and Leeds to Preston/Blackpool North and the stopping service from Colne to Preston/Blackpool South. The Leeds and Liverpool Canal runs through the Borough and was one of the reasons for the town's expansion in the nineteenth century.
- 1.10 The development of textile mills, associated industries and housing during the Industrial Revolution resulted in Burnley's population virtually doubling every twenty years between 1801 and 1891. The character of the central parts of the two main settlements in the Borough, Burnley and Padiham, derives from this time.

- 1.11 The area of the whole Borough is 11,070 hectares (42 square miles), the majority of this being rural or moorland. The urban area of Burnley town covers approximately 1,544 hectares (six square miles) and Padiham, which is a market town four miles to the west of Burnley, covers 316 hectares (1.22 square miles).

## Sustainability Appraisal

### Introduction

- 1.12 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.13 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive<sup>1</sup>, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>2</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.
- 1.14 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance<sup>3</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Directive (transposed into UK law through the 'SEA Regulations'<sup>4</sup>). The SA/SEA of the Burnley Local Plan was prepared in line with this integrated approach and throughout the SA report and this Non-Technical Summary the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.
- 1.15 **Table 3** signposts how the requirements of the SEA Directive have been met within the SA Report.

**Table 3 Requirements of the SEA Directive and where these have been addressed in the SA Report**

SEA Regulation Requirements	Where it is covered in the SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
(a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 3 and Appendix 2.
(b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 and Appendix 3.
(c) The environmental characteristics of areas likely to be significantly affected	Chapter 3 and Appendix 3.

<sup>1</sup> SEA Directive 2001/42/EC

<sup>2</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

<sup>3</sup> <http://planningguidance.planningportal.gov.uk/>

<sup>4</sup> The Environmental Assessment of Plans and Programmes Regulations 2004, SI 2004 No. 1633.

SEA Regulation Requirements	Where it is covered in the SA report
(d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3.
(e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3 and Appendix 2.
(f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Chapter 4 and Appendices 5, 7, 8, 9 and 10
(g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 4.
(h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2.
(i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 5.
(j) a non-technical summary of the information provided under the above headings	This separate non-technical summary has been prepared to accompany the SA report.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Addressed throughout this SA report.
<b>Consultation:</b> <ul style="list-style-type: none"> <li>• authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)</li> </ul>	Consultation on the SA Scoping Report was undertaken between June and July 2012.
<ul style="list-style-type: none"> <li>• authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</li> </ul>	Consultation will be undertaken in relation to the Proposed Submission of the Burnley Local Plan between March and April 2017. The plan will be accompanied by the SA report and this Non-Technical Summary.
<ul style="list-style-type: none"> <li>• other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</li> </ul>	N/A
<b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</b>	

SEA Regulation Requirements	Where it is covered in the SA report
<p><b>Provision of information on the decision:</b></p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• the plan or programme as adopted</li> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• the measures decided concerning monitoring (Art. 9)</li> </ul>	<p>To be addressed after the Local Plan is adopted.</p>
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	<p>To be addressed after the Local Plan is adopted.</p>
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been met.</p>

### SA Stage A: Scoping

- 1.16 The SA process for the Burnley Local Plan began in June 2012 with the production of a draft [SA Scoping Report](#) which was prepared by LUC on behalf of Burnley Borough Council.
- 1.17 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the policy context and key sustainability issues. The SA Scoping Report presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to the Burnley Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
  - Baseline information was collected on environmental, social and economic issues in Burnley Borough. This baseline information provides the basis for predicting and monitoring the likely effects of policies and site allocations (including reasonable alternative options) and helps to identify ways of mitigating any adverse effects identified.
  - Key sustainability issues for Burnley Borough were identified.
  - A 'Sustainability Appraisal framework' was developed, comprising a list of SA objectives against which options and subsequently policies and site allocations would be appraised. The SA framework provides a clear way in which the sustainability impacts of implementing a plan can be described, analysed and compared. It sets out a series of sustainability objectives and associated sub-questions that can be used to 'interrogate' options and draft policies during the plan-making process. These SA objectives reflect the long-term aspirations of the Borough with regard to social, economic and environmental considerations. Throughout the SA process the performance of Local Plan options (and later policies and site allocations) are assessed against these SA objectives and sub-questions.
- 1.18 Public and stakeholder participation is an important part of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the Local Plan in making a contribution to sustainable development. The draft SA Scoping Report was published in June 2012 for a five week consultation period with the statutory consultees that existed at the time (Natural England, the Environment Agency and English Heritage (now Historic England)). Following the consultation, the comments received were addressed as appropriate and a final version of the Scoping Report was published in July 2012. **Appendix 1** of the full SA Report lists the comments that were received during the

consultation on the draft Scoping Report and describes how each one was addressed in the final version.

- 1.19 Some parts of the SA Scoping Report, namely the review of plans, policies and programmes and the baseline information, were updated as part of the preparation of the SA Report for the Issues and Options Local Plan in February 2014, the Preferred Options Local Plan in July 2016, and have again been reviewed and updated during the preparation of the SA Report for the Proposed Submission of the Burnley Local Plan. The updated versions of those parts of the Scoping Report are presented in **Appendix 2** and **Appendix 3** of the full SA Report.

*Changes to the SA framework*

- 1.20 The SA framework that was presented in the July 2012 SA Scoping Report was used during the appraisal of the Issues and Options Local Plan in February 2014 and again during the SA work that was undertaken to accompany the Additional Sites consultation in August 2014. At the Preferred Options stage, a small number of changes were made to some of the sub-objectives in the SA framework in order to ensure that they provided a robust and appropriate basis for the SA and covered only those issues that a Local Plan could actually influence. None of the changes affected the headline SA objectives. Where appropriate, the assumptions that were used in the SA of site options at the Preferred Options stage (presented in **Appendix 4** of the full SA Report) were also updated to reflect these minor changes to the SA framework. The SA work that was carried out previously in relation to the site and policy options for the Local Plan (presented in the February 2014 SA Report for the Issues and Options and the August 2014 SA document for the Additional Sites consultation) was also revised to reflect these changes, in order to ensure consistency with the Preferred Options stage.
- 1.21 **Table 4** presents the SA framework for the Burnley Local Plan, which includes 18 headline SA objectives along with their associated sub-questions. The table also shows how all of the 'SEA topics' (as listed in the SEA Regulations) have been covered by the SA objectives.
- 1.22 Some of the sub-objectives could be seen as relevant to more than one of the headline SA objectives (for example sub-objective 18c relating to the use of fossil fuels could be relevant to SA objective 17 which relates to the prudent use of natural resources, as well as SA objective 18 which relates to energy efficiency). However, to avoid duplication within the SA framework, which could result in effects being 'double counted', any such sub-objectives are attributed just once to the headline SA objective which they are considered to most strongly relate to.

**Table 4 Updated SA framework for the Preferred Options and Proposed Submission of the Burnley Local Plan**

Headline SA Objectives	Sub-objectives	Relevant topic(s) as set out in the SEA Regulations
1. To exploit the growth potential of business sectors and reduce disparities between local and sub-regional economic performance	1a. Will it help to diversify the borough's economy? 1b. Will it promote growth in key sectors of the local economy? 1c. Will it attract new business development to the borough? 1d. Will it increase, and improve the quality of, employment opportunities in the areas of most need? 1e. Will it contribute to low carbon economy?	Material assets Population
2. To develop and market the Borough's image	2a. Will it support the conservation and/or enhancement of high quality built, natural and historic environments within the borough? 2b. Will it promote the area as a destination for short and long term visitors, for residents and investors? 2c. Will it increase the economic benefit derived from the borough's natural environment? 2d. Will it promote the use of locally produced goods and materials?	Landscape Cultural heritage, including architectural and archaeological heritage Material assets
3. To reduce deprivation in urban and rural	3a. Will it improve economic, social and environmental conditions in the most deprived areas and for the most deprived groups?	Material assets

Headline SA Objectives	Sub-objectives	Relevant topic(s) as set out in the SEA Regulations
areas	3b. Will it enhance the viability and vitality of the town centres? 3c. Will it support and encourage the growth of rural businesses and rural diversification?	Population
4. To secure economic inclusion	4a. Will it encourage business start-up, especially in underrepresented groups? 4b. Will it improve physical accessibility to jobs through the location of sites and/or public transport links thereto being accessible from areas of high unemployment? 4c. Will it reduce poverty in those areas most affected?	Material assets Population
5. To develop and maintain a healthy labour market	5a. Will it address the skills gap and enable skills progression? 5b. Will it increase levels of participation and attainment in education? 5c. Will it provide a broad range of jobs and employment opportunities?	Population Material assets
6. To reduce the need to travel and increase the use of sustainable transport modes	6a. Will it reduce car and lorry traffic? 6b. Will it increase access to opportunities for safe walking and cycling and using of public transport? 6c. Will it improve access to and encourage the use of ICT?	Climatic factors Human health Material assets
7. To improve physical and mental health and reduce health inequalities	7a. Will it promote healthier lifestyles? 7b. Will it reduce health inequalities among different groups in the community? 7c. Will it reduce isolation for vulnerable people?	Human health Population
8. To improve access to a range of good quality, resource efficient and affordable housing	8a. Will it provide for an appropriate mix of housing to meet all needs, including affordable? 8b. Will it reduce the number of unfit and empty homes? 8c. Will it support the development of resource efficient housing?	Material assets Population
9. To reduce crime, disorder and the fear of crime	9a. Will it reduce actual levels of crime? 9b. Will it reduce the fear of crime? 9c. Will it encourage crime reduction through design?	Population
10. To increase social inclusion	10a. Will it enable groups and communities to contribute to decision making and be involved in implementation? 10b. Will it identify and engage with hard to reach stakeholders? 10c. Will it create a sense of belonging and wellbeing for all members of the community? 10d. Will it support community development? 10e. Will it improve relations between all members of the community? 10f. Will it reduce social exclusion? 10g. Will it reduce prejudice? 10h. Will it promote mixed communities?	Population Human health
11. To improve access to services, amenities and jobs for all groups	11a. Will it improve the range of quality of, and access to, cultural, sporting and leisure facilities including natural green spaces? 11b. Will it improve access to essential services and facilities? 11c. Will it improve physical access to employment opportunities?	Material assets Population
12. To protect and enhance the built environment and cultural heritage, including archaeological	12a. Will it protect and enhance the character and appearance of archaeological sites, historic buildings, townscape, landscape, parks and gardens and their settings? 12b. Will it improve access to buildings of historic/cultural value?	Cultural heritage, including architectural and archaeological



Headline SA Objectives	Sub-objectives	Relevant topic(s) as set out in the SEA Regulations
assets	12c. Will it protect and enhance the local distinctiveness of the built environment?	heritage
13.To protect and enhance the Borough's biodiversity and geo-diversity	13a. Will it protect and enhance existing designated wildlife and geological sites and species populations? 13b. Will it protect and enhance habitats and species, provide opportunities for new habitat creation and reverse the fragmentation of wildlife corridors?	Biodiversity Flora Fauna
14.To protect and enhance the Borough's landscape and local character	14a. Will it protect and enhance the character and appearance of the borough's landscape and countryside, maintaining and strengthening local distinctiveness and sense of place? 14b. Will it protect and enhance the accessibility of the landscape across the borough? 14c. Will it encourage the development of brownfield land in preference to greenfield?	Landscape Soil
15.To protect and improve environmental quality and amenity	15a. Will it maintain and improve local air quality? 15b. Will it reduce noise pollution? 15c. Will it reduce the amount of derelict, contaminated, degraded, unstable and vacant/underused land? 15d. Will it protect the best and most versatile agricultural land? 15e. Will it maintain and enhance ground and surface water quality?	Air Human health Soil Water
16.To mitigate and adapt to climate change	16a. Will it reduce or minimise greenhouse gas emissions? 16b. Will it contribute to the borough's ability to adapt to the impacts of climate change, including the ability of other species to adapt? 16c. Will it maximise the production and/or use of decentralised and renewable energy? 16d. Will it reduce or manage flood risk?	Climatic factors Water
17.To ensure the prudent use of natural resources and the sustainable management of waste.	17a. Will it minimise the demand for raw materials? 17b. Will it reduce the amount of minerals extracted and imported? 17c. Will it minimise the production of waste? 17d. Will it maximise waste recycling and reuse, reducing the amount of waste going to landfill? 17e. Will it encourage water efficiency and reduce demand?	Material assets Water
18.To increase energy efficiency	18a. Will it minimise the need for energy consumption? 18b. Will it increase energy efficiency (e.g. in buildings, transport modes, etc.)? 18c. Will it minimise the use of fossil fuels?	Climatic factors Material assets

### SA Stage B: Developing and refining options and assessing effects

- 1.23 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. It should be noted that any alternatives considered to the plan need to be 'reasonable'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan.



### *Identification and appraisal of site options*

- 1.24 Reasonable alternative options for residential, employment and other types of site allocations were identified initially in the February 2014 Issues and Options document. Potential development sites had been submitted to the Council on an ongoing basis as part of the Strategic Housing Land Availability Assessment (SHLAA), and some were also put forward by Burnley Borough Council.
- 1.25 An initial assessment was undertaken by the Council to identify and discount sites that were unsuitable or undeliverable. Sites over 0.4ha in size that had the potential to accommodate housing, Gypsy and Traveller pitches, employment, mixed-use or town centre development were subject to SA by LUC and the findings were presented in the February 2014 SA Report for the Issues and Options. As well as options for sites for built development, a number of areas of search for potential Local Nature Reserve designations were also identified and considered in the SA.
- 1.26 The site options that were subject to SA at the Issues and Options stage included:
- 24 residential site options.
  - One Gypsy and Traveller site option.
  - Nine employment site options.
  - Three mixed-use site options.
  - Four town centre site options.
  - Four areas of search for Local Nature Reserves.
- 1.27 A number of other site options were identified at the Issues and Options stage but were not subject to SA at that time because they either had planning permission or were already in the process of being developed. However, some of the sites that had planning permission at that time have still not been developed now and so remain as reasonable alternative options for allocation in the Local Plan. Therefore, they have now been subject to SA and the findings are included in the SA Report and this Non-Technical Summary. Where site options were previously omitted from the SA because they had planning permission and have since been developed, they have not been included in the SA Report as they are no longer available and so are not reasonable options for allocation in the Local Plan.
- 1.28 Following consultation on the Issues and Options in February 2014, a number of further reasonable site options were identified. These sites were submitted to the Council by land owners, developers and members of the public during the Issues and Options consultation. The additional reasonable site options identified in this way comprised:
- 12 residential sites.
  - One employment site.
  - Three Gypsy and Traveller sites.
- 1.29 These options were subject to SA by LUC and the findings were presented in the August 2014 document 'Issues and Options Additional Sites Sustainability Appraisal'. That document, which did not comprise a full SA report, was published by the Council as part of the Additional Sites consultation between August and October 2014.
- 1.30 Following the Additional Sites consultation, a number of other reasonable site options were identified by Burnley Borough Council through the SHLAA process. In addition, there were a small number of changes to the boundaries of sites that were appraised previously. These new site options were subject to SA at the Preferred Options stage.
- 1.31 Following the production and consultation on the Preferred Options Local Plan, five new reasonable alternative site options were again identified and these have also been subject to SA for the first time using the same methodology. Four of these have been allocated in the Proposed Submission of the Burnley Local Plan. In addition, there have been a small number of changes to the boundaries of sites that were appraised previously at the Preferred Options stage and the SA appraisal matrices have been updated accordingly (see **Table 1** and **Table 2**).

- 1.32 The SA findings for each group of allocated site options are presented in **Chapter 4** of the full SA Report and are described later in this Non-Technical Summary. **Appendix 9** of the full SA Report presents the matrices for these sites, and these matrices also incorporate any changes that have been made to the sites between Preferred Options and Proposed Submission stage as well as to the policy text which relates to site allocations.
- 1.33 **Appendix 5** of the full SA Report presents the matrices for unallocated reasonable alternative housing sites which have been subject to reappraisal at the Proposed Submission stage, based on the updated assumptions. **Appendix 10** of the full SA Report provides a summary of the scores for these sites as well as the reasonable alternative mixed-use and town centre sites. There were no reasonable alternative employment or gypsy and traveller sites considered at this stage.
- 1.34 The detailed SA matrices for sites which were previously appraised as reasonable alternatives but which are no longer reasonable have not been updated or included in the SA Report because there was no need to consider those sites at this stage in the SA process, however these can be found in the SA for the Preferred Options Local Plan. Sites which are no longer considered to be reasonable have therefore been discounted from the SA process at this stage. **Appendix 6** of the full SA Report provides a summary of the reasons why certain sites are no longer considered to be reasonable.
- 1.35 This Non-Technical Summary and the SA Report therefore presents the SA findings for the sites that are allocated in the Proposed Submission of the Burnley Local Plan, and for completeness, also summarises the SA findings for sites which are still 'reasonable'.

#### *Use of assumptions*

- 1.36 The assumptions presented in **Appendix 4** of the full SA Report have been slightly amended to take into account comments received from the Council on the SA of the Preferred Options Local Plan. These changes relate to objective 11 for employment sites and objective 13 for housing, employment and gypsy and traveller sites. The change to objective 11 assumptions involved assessing whether site options meet certain criteria, including whether employment sites are within 1,200m of a residential area rather than 600m as previously assessed at the Preferred Options stage. The change to objective 13 assumptions involved assessing the proximity of housing, employment and gypsy and traveller sites to designated nature or geodiversity sites only, rather than local sites.
- 1.37 The new site options that have been identified since the Preferred Options consultation in July 2016 have been appraised in line with the assumptions shown in **Appendix 4** and sites which are not allocated but which remain reasonable have been reappraised against these assumptions.
- 1.38 A small number of sites were considered to be reasonable options at the earlier stages of plan preparation and so were subject to SA then, but are no longer considered to be reasonable options by the Council (for example, because they are no longer available for development). In those cases, the earlier appraisal work has not been revised to reflect the updated assumptions because there was no need to be able to consider those sites on a consistent basis at this stage in the SA process. The only changes to those SA matrices were made at the Preferred Options stage was in relation to SA objective 13: biodiversity in order to correct some errors that were made previously in relation to inaccuracies in the data showing the location of Local Nature Reserves in the Borough. The SA matrices for those sites that are no longer considered to be reasonable options can be found in the SA report for the Preferred Options Local Plan.

#### *Reasons for the Council's decision making*

- 1.39 Burnley Borough Council officers took into account the findings of the SA as well as other relevant factors when deciding which sites to include as allocations in the Proposed Submission of the Burnley Local Plan and which site options to reject. **Appendix 6** of the full SA Report lists the reasonable site options that have been considered and provides Burnley Borough Council's reasons for selecting or rejecting each one. Some of the site options included in earlier stages of the SA are now referred to by different names than were used previously – where this is the case, both the previous and current site names are shown in the audit trail in **Appendix 6** along with the SHLAA reference codes.

- 1.40 The Preferred Options Local Plan states that the Burnley SHLAA (2016) provides details of the amount of land with the potential to accommodate new housing development and presents a pool of potential sites from which to select those to be allocated in the Local Plan, with these being selected on the basis of many factors including:

Housing:

- How they will help deliver the Plan's vision and objectives and support economic growth.
- How they fit with the Plan's overall spatial strategy set out in Policy SP4.
- Whether they collectively offer the quality and choice of housing to meet the needs and demands of all sections of the community.
- Their environment social and economic impacts, including as evaluated through the SA process.
- Their infrastructure requirements and potential community benefits.
- The comments received through plan consultation.

Employment:

- How they will help deliver the Plan's vision and objectives and support economic growth.
- How they would fit with the Plan's overall spatial strategy set out in Policy SP4.
- Whether they would collectively offer sufficient, and could offer the range, of sites to meet the needs and demands of business and provide a variety of employment opportunities for existing and new residents to achieve a more aspirational level of economic activity in the area.
- The environmental, social and economic impacts, including as informed by the SA and in particular the impact on commuting.
- The infrastructure requirements and potential community benefits.
- The comments received through the plan consultation.

*Identification and appraisal of policy options*

- 1.41 The Issues and Options document (February 2014) set out four alternative options relating to the broad spatial strategy for the Local Plan, which were:
- Focus on regeneration.
  - Focus on public transport corridors.
  - Focus on transformational growth.
  - Allow the market to lead.
- 1.42 These four options were subject to SA and the findings were presented in the February 2014 Issues and Options SA Report. Prior to that, draft versions of the SA matrices for the four options were presented in an Interim SA Report which Burnley Borough Council prepared in spring 2013 and sent out for consultation with the three statutory consultees that existed at the time (English Heritage (now Historic England), the Environment Agency, and Natural England). This interim report comprised a very early draft version of the SA report for the Issues and Options and did not at that stage include the appraisal of site options. The consultation was targeted at the statutory consultees only and the document was not made publicly available. The comments received during this interim consultation, along with an explanation of how they were addressed, can be found in **Appendix 1** of the full SA Report.
- 1.43 The Issues and Options consultation document also set out alternative policy approaches for the other policies to be included in the Local Plan; however these were not subject to SA at that time. Those options were subject to SA by LUC in early 2016 and the findings are presented in the SA report for the Preferred Options Local Plan. The SA work for the spatial strategy options was also updated to reflect slight changes to the wording of the options that were made between them being subject to SA and published in the Issues and Options consultation document. The fourth option (prepare no Local Plan and instead allow the market to lead) was discounted as it is not a

reasonable option due to being inconsistent with national policy. The SA matrices for the policy options can be found in **Appendix 7** of the full SA Report.

- 1.44 Once the Council had produced the Preferred Options Draft document in 2016, the more detailed draft policies were also subject to SA and the findings also summarised in the SA report for the Preferred Options Local Plan. Any changes made to these policies since the Preferred Options stage have been incorporated into the SA Report which this Non-Technical Summary relates to. Details of the changes to policy wording and the addition of new policies are set out in **Table 1**. The detailed SA matrices for the policies in the Proposed Submission of the Burnley Local Plan can be found in **Appendix 8** of the full SA Report.

### **SA Stage C: Preparing the Sustainability Appraisal report**

- 1.45 The full SA report describes the process that has been undertaken to date in carrying out the SA of the Proposed Submission of the Burnley Local Plan. It sets out the findings of the appraisal of reasonable alternatives, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan. It also describes the reasons for selecting or rejecting certain options during the preparation of the Local Plan. All of this information is summarised in this Non-Technical Summary.

### **SA Stage D: Consultation on the Proposed Submission Local Plan and SA Report**

- 1.46 Burnley Borough Council is inviting comments on the Proposed Submission Burnley Local Plan and the full SA Report which this Non-Technical Summary relates to. These documents will be published on the Council's website for consultation between March and April 2017.

### **SA Stage E: Monitoring implementation of the Local Plan**

- 1.47 Recommendations for monitoring the social, environmental and economic effects of implementing Burnley's Local Plan are presented in **Chapter 5** of the SA report and are summarised further ahead in this document.

## **Policy Context**

### **Review of Plans, Policies and Programmes**

- 1.48 The Burnley Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and regional levels.
- 1.49 During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the Local Plan. This review has been revised and updated since it was originally presented in the SA Scoping Report, in order to ensure that the review remains up to date. The updated review can be seen in full in **Appendix 2** of the full SA Report and the key findings are summarised below.
- 1.50 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Burnley Local Plan. These processes should both be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 1.51 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy;

however the international directives have been included in **Appendix 2** of the full SA Report for completeness.

- 1.52 The most significant development in terms of the policy context for the Burnley Local Plan has been the publication of the National Planning Policy Framework (NPPF) which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:

*"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."*

- 1.53 The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 1.54 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - the provision of health, security, community and cultural infrastructure and other local facilities; and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.55 In addition, Local Plans should:
- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
  - be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
  - be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
  - indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
  - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
  - identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
  - identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
  - contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.
- 1.56 National Planning Practice Guidance (NPPG) provides further guidance on national level planning policy. It sets out guidance on a wide range of issues that are relevant to development management, including in relation to topics such as flood risk, the natural environment, climate change and waste. The NPPG also provides additional guidance in relation to the preparation of Local Plans and the need for SA/SEA. The emerging Local Plan for Burnley must be in conformity with the higher level policy established in the NPPG.

## Baseline Information

- 1.57 Baseline information provides the context for assessing the sustainability of proposals in the Burnley Local Plan and it provides the basis for identifying trends, predicting the likely effects of the Local Plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.
- 1.58 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. As an integrated SA and SEA is being carried out, baseline information relating to other sustainability topics has also been included; for example information about housing, social inclusiveness, transport, energy, waste and economic growth. As with the review of relevant plans, policies and programmes, a number of amendments have been made to the baseline information since it was originally presented in the Scoping Report to address consultation comments received and to update the information, drawing on the most recent evidence sources. The updated baseline information is presented in **Appendix 3** of the full SA Report.

## Key Sustainability Issues

- 1.59 A set of key sustainability issues for Burnley Borough was identified during the Scoping stage of the SA and was presented in the July 2012 Scoping Report. In light of comments received during the Scoping consultation (see **Appendix 1** of the full SA Report) and the updated baseline information that has since been collated, a small number of amendments have since been made to the key sustainability issues.
- 1.60 In recognition of the SEA Regulation requirement (Schedule 2) that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme must be described in the Environmental Report (i.e. this SA/SEA report), **Table 5** describes the likely evolution of each key sustainability issue if the new Burnley Local Plan were not to be adopted. It should be noted that in the absence of the new Burnley Local Plan the context provided by the saved policies would be less significant than the policy framework provided by NPPF.

**Table 5 Key sustainability issues for the new Burnley Local Plan and likely evolution without the Plan**

Key sustainability issues	Likely evolution of the issues without implementation of the new Burnley Local Plan
<b>Social Issues</b>	
Relatively high percentage of people travelling to work by public transport, bicycle or on foot (although relative to the proportion of residents that work within 5 km of their workplace, Burnley's performance is worse than elsewhere).	High level of self-containment of the working population is likely to continue; however, policies TM5 (Footpaths within the Urban Boundary), TM7 (Cycling Network), TM8 (Quality Bus Routes) and TM9 (Rail and Railway Stations) in the adopted 2006 Local Plan would still apply and may have an ongoing effect in relation to increasing the levels of people travelling to work by public transport, bicycle or on foot, however the plan would indefinitely become outdated over time. Promoting sustainable transport is an important priority within national policy which would also apply – the NPPF requires development to be designed to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities.
Lower than average life expectancy, for both sexes, which has declined in recent years contrary to the regional trend.	Policy CF16 of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, protects the provision of community health facilities; however it is likely that the life expectancy trend will continue in relation to regional and national averages.
Significant public health problems relating to teenage conception, smoking, alcohol and obesity.	Policy CF16 of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, protects the provision of community health facilities; however it is likely that health trends will continue in relation to regional and national averages.
Higher than average number of vacant and unfit properties and a poor	Despite levels of vacant properties reducing slightly in recent years, the higher than average percentage is likely to remain in relation to regional and national averages. The trend in number of unfit properties is also likely to continue in relation to regional and national averages. Policy H9 (Regenerating Urban Areas and Neighbourhoods) of



Key sustainability issues	Likely evolution of the issues without implementation of the new Burnley Local Plan
housing mix.	the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, may have some ongoing positive effects in relation to improving property conditions in the Borough.
Low average house prices.	The house price trend is likely to continue in relation to regional and national averages with or without implementation of the Local Plan.
Targets for the building of new affordable housing are not being met. This could result in low income families moving into low quality or unfit housing.	Policy H5 (local housing needs) of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, requires a 10% affordable housing provision (or special needs housing provision) if the proposed development is for 25 dwellings or more, or of 1 hectare or more in site area. The NPPF also requires local authorities to meet the need for affordable housing on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. However, it is recognised that the reasons for failing to meet current targets are more circumstantial and are not due to a lack of appropriate policy. The likelihood of affordable housing targets continuing to be missed <sup>5</sup> will depend on a range of outside factors, particularly wider economic circumstances.
Higher levels of crime, particularly in relation to theft and criminal damage, than the regional and county averages.	Policy GP9 of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, requires all new development to contribute to improved security and crime prevention; however it is likely that crime trends will continue in relation to regional and national averages.
Higher levels of fuel poverty than the national average.	There are no policies within the NPPF, or the adopted 2006 Local Plan which would still apply in the absence of a new Local Plan that would specifically contribute to lowering levels of fuel poverty in the Borough. However, the NPPF and policy GP8 of the 2006 Local Plan, both support greater energy efficiency, which is likely to have a positive effect on energy use and associated costs. The trend is likely to continue in relation to the national average.
The number of people killed or seriously injured in road accidents is not falling, including pedestrians and cyclists. This may act as a deterrent to using more sustainable modes.	Transport policies within the adopted 2006 Burnley Local Plan, which would still apply in the absence of a new Local Plan, and policy BTC8 (movement in Burnley town centre) may help increase road safety in the Borough and encourage more sustainable modes of transport. The NPPF encourages the use of sustainable modes of transport; however there is no consideration of how road safety could influence transport mode choice. The existing planning policy is unlikely to significantly lower the number of people killed or seriously injured in road accidents.
<b>Economic Issues</b>	
Lower rates of economically active people than the regional average.	Economic activity trends are likely to continue. The adopted 2006 Local Plan allocates land for businesses, retail, and leisure (policies EW1 -EW3) and proposes expansions to existing employment sites. As the adopted Local Plan would remain in-place in the absence of a new Local Plan, there may be an on-going impact on levels of economic activity. The NPPF places a strong emphasis on sustainable economic growth, stating up front that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. It also states that in drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth. Therefore, economic activity trends may be worse without implementation of the new Burnley Local Plan, which is required to proactively meet the development needs of business and support an economy fit for the 21st century.
Low 'Gross Value Added' by the manufacturing sector.	The lower than average gross value added by the manufacturing sector is likely to continue in relation to regional and national averages, although as there is currently less reliance on the manufacturing sector than in previous years, this issue may cease to be a key sustainability issue for Burnley in the future.
High levels of deprivation in comparison to other districts.	Deprivation trends are likely to continue in relation to regional and national averages, although policies in the adopted 2006 Local Plan (e.g. policies EW1 -EW3) may have an ongoing positive effect on improving economic deprivation as a result of the provision of new employment land as these policies would still be valid in the absence of a new Local Plan. As above, due to the strong emphasis in the NPPF for the role local plans should play in supporting sustainable economic growth, the trend in high levels of deprivation may actually be worse without implementation of the new Burnley Local Plan.

<sup>5</sup> As outlined in Nathaniel Lichfield & Partners (2016) Burnley SHMA available at: <http://www.burnley.gov.uk/sites/default/files/Burnley%20SHMA%20Update%20May%202016.PDF>

Key sustainability issues	Likely evolution of the issues without implementation of the new Burnley Local Plan
High rates of unemployment compared to the regional average.	Employment trends are likely to continue. The adopted 2006 Local Plan allocates land for businesses, retail, and leisure (policies EW1 -EW3) and proposes expansions to existing employment sites. As the adopted Local Plan would remain in place in the absence of a new Local Plan, there may be an on-going impact on the issue of unemployment. As above, due to the strong emphasis in the NPPF for the role local plans should play in supporting sustainable economic growth, rates of unemployment may be worse without implementation of the new Burnley Local Plan.
Low earnings compared to the rest of the region and the country as a whole.	Trends in income levels are likely to continue in relation to regional and national averages, although the slightly declining reliance on the manufacturing sector that is already being seen may contribute to increasing average earnings.
Lower educational attainment and numbers of people enrolling in further education than the national average.	Trends in educational attainment and enrolment in higher education are likely to continue in relation to regional and national averages.
High reliance on employment in the manufacturing sector, a large proportion of which is low value added.	This trend may not continue as local trends already suggest a slight decline in the reliance on manufacturing sector, with the main sources of employment being within the public administration, education and health sectors (28.3%), and the distribution, hotels and restaurants sectors (25.3%). In addition, modernising and diversifying the local economy is one of the objectives of the adopted 2006 Local Plan, which would still remain in the absence of a new Local Plan.
<b>Environmental Issues</b>	
A relatively high proportion of high Grade Statutory Listed Buildings are on the Buildings at Risk Register, and a number of historic textile mills within the Borough are also considered to be at risk.	Policies E10 (Development affecting Listed Buildings) and E11 (Demolition of Listed Buildings) of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, may have a positive effect on lowering this trend (i.e. the proportion of listed buildings on the Buildings at Risk Register). The NPPF states that great weight should be given to the conservation of designated heritage assets when considering the impact of a proposed development, and local planning authorities should require any potential applicants to describe the significance of any heritage assets affected. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. This national policy would continue to apply in the absence of a new Local Plan.
Designated habitats of national and international importance are in unfavourable condition.	Policy E1 (Nature Conservation – Internationally and Nationally Important Sites) of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, restricts development that would have an adverse effect on the South Pennine Moors, which may help to improve this trend. In addition, the NPPF states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by following a number of principles including that proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. The NPPF also states that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. This national policy protection of national and internationally important nature conservation sites would continue to apply in the absence of a new Local Plan.
The number of properties at risk from flooding is increasing because of climate change and historic development on floodplains as well as the legacy of culverted watercourses.	Policy E8 (Development and Flood Risk) of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, restricts development that would increase the risk of flooding or would be at risk of flooding itself. The NPPF requires local planning authorities to ensure that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The Sequential Test should be applied in order to steer development away from areas at higher risk of flooding. This national policy would continue to apply in the absence of a new Local Plan, therefore the trend may not continue.
Certain waterbodies are failing to achieve Water Framework Directive targets.	Policy E8 (Waterbodies and Water Courses) of the adopted 2006 Local Plan would still apply in the absence of the new Local Plan. The policy states that proposals adjacent to the Leeds-Liverpool Canal, the Rivers Brun and Calder and other water features will not be permitted where the existing quality, amenity, recreation, nature conservation and wildlife value is adversely affected. The NPPF does not specifically address water quality but seeks to ensure that new developments do not contribute to water pollution. At present the ecological potential of water bodies in the Borough is currently failing to meet the criteria of the Water Framework Directive as per advice from the Environment Agency. The River Calder and River Brun are currently



Key sustainability issues	Likely evolution of the issues without implementation of the new Burnley Local Plan
	considered to be at "moderate ecological status" and the River Don at "poor ecological status". This trend is more likely to continue in the absence of the new Local Plan which offers opportunities to include specific and up to date local level policies relating to water quality.
Lower levels of household waste sent to reuse, recycling and composting than national average.	There are no policies within the National Planning Policy Framework, or the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, that specifically support the recycling of household waste. Whilst not directly related to this issue, the NPPF does support Green Belt provision that would encourage the use of brownfield land and the recycling of derelict and other land for development. Policies GP8 (energy conservation and efficiency), H15 (conversion and re-use for flats and bedsits) and E26 (green belt) of the adopted 2006 Local Plan also encourage recycling materials, buildings and brownfield land for development. The trend for household waste is likely to continue in the absence of the new Local Plan.
A large number of incidences of untidy land occur in the Borough. This can lead to environmental health problems and poor image.	Policies H8 (environmental improvements in existing residential areas), H9 (regenerating urban areas and neighbourhoods) and E33 (vacant and untidy land) of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, support the treatment of untidy land and the identification of suitable after-use when demolition or clearance is permitted. However, the trend would be likely to continue in relation to the national average.
There is a deficit in the provision of some types of open space across the Borough, and a surplus in others.	Policies CF3 (Protection of Open Space) and CF7 (Outdoor Recreation) of the adopted 2006 Local Plan, which would still apply in the absence of a new Local Plan, may help provide a more varied and balanced provision of open space across the Borough. The NPPF also sees accessibility to open space as an important contribution to health and well-being, and advises local planning authorities that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless it can be clearly shown that the open space is surplus to requirements. This national policy would continue to apply in the absence of a new Local Plan; therefore the deficit may be improved.

## Appraisal Methodology

- 1.61 The policy and site allocations within the Proposed Submission of the Burnley Local Plan and any changes made to unallocated reasonable alternative site options since the Preferred Options stage have been appraised against the SA objectives in the SA framework (see **Table 4**) with scores being attributed to each option or policy to indicate its likely sustainability effects on the SA objectives as follows:

++	The option or policy is likely to have a <b>significant positive</b> effect on the SA objective(s).
+	The option or policy is likely to have a <b>positive</b> effect on the SA objective(s).
0	The option or policy is likely to have a <b>negligible</b> or no effect on the SA objective(s).
-	The option or policy is likely to have a <b>minor negative</b> effect on the SA objective(s).
--	The option or policy is likely to have a <b>significant negative</b> effect on the SA objective(s).
?	It is <b>uncertain</b> what effect the option or policy will have on the SA objective(s), due to a lack of data.
+/-	The option or policy is likely to have a <b>mixture of positive and negative</b> effects on the SA objective(s).

**Figure 1 Key to symbols and colour coding used in the SA of the Burnley Local Plan**

- 1.62 Where a potential positive or negative effect is uncertain, a question mark has been added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

- 1.63 The likely effects of policies and site allocations need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of policy or site allocation on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

### Assumptions applied during the SA

- 1.64 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of a large number of site options, a detailed set of assumptions for defining minor and significant effects was developed and applied. These assumptions are presented in **Appendix 4** of the full SA Report and were applied mostly through the use of Geographical Information Systems (GIS) data. Separate sets of assumptions were devised for the appraisal of residential, Gypsy and Traveller and employment site options, reflecting the fact that these various types of development could affect some of the SA objectives in different ways. Specific assumptions were not set out in relation to town centre and mixed-use site options, as those options were all slightly different in terms of what type of development the Council indicated could come forward at the sites and therefore it was not possible to devise a consistent set of assumptions with regards to their likely effects. For those types of site options, the assumptions for employment sites were therefore used as a starting point for the appraisal and were adapted as appropriate to take into account the specific types of development proposed (e.g. commercial, retail, leisure etc.)

### Data Limitations and Difficulties Encountered

- 1.65 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 1.66 When applying the assumptions (see **Appendix 4** in the full SA Report) to inform the SA of site options, distances were in most cases measured from the nearest point of a site to the nearest point of the feature(s) in question. However, the accessibility assessment that was undertaken by Burnley Borough Council (which informed the appraisal of options against SA objectives 4, 6, 7 and 11) involved measuring distances from the centre of each site option to the features in question. Despite this different approach for SA objectives 4, 6, 7 and 11, distances for all site options were measured in a consistent way for each SA objective so this difference in approach will not have resulted in inconsistencies between the appraisal findings for different site options against the same SA objective.
- 1.67 Data provided by the Council for Local Nature Reserves in 2014 was subsequently found to be inaccurate, and therefore the appraisal of all site options against SA objective 13 were updated to amend this inaccuracy.

### Sustainability Appraisal Findings for the Proposed Submission of the Burnley Local Plan

- 1.68 **Chapter 4** of the SA Report presents the SA findings for the policies and site allocations that are set out in the Proposed Submission of the Burnley Local Plan.
- 1.69 The detailed appraisal matrices for the policies are presented in **Appendix 8** and the matrices for the site allocations are presented in **Appendix 9** of the full SA Report. The detailed matrices for unallocated residential sites which have been subject to reappraisal between the Preferred Options and Proposed Submission stages in response to comments made at Preferred Options can be found in **Appendix 5**. The assumptions that were used in the appraisal of the site options are

set out in **Appendix 4**. **Appendix 6** presents an audit trail of the site options that have been considered and explains the Council's reasons for selecting or rejecting each one for inclusion in the Proposed Submission Draft Local Plan. Options the Council no longer considers to be reasonable alternatives sites are shaded grey in the audit trail. For completeness, **Appendix 7** sets out the sustainability appraisal findings for the policy options previously considered.

- 1.70 **Table 6** overleaf presents a summary of the SA scores for the Local Plan Vision and Objectives while **Table 7** presents a summary of the SA scores for all of the policies and proposals set out in the Proposed Submission of the Burnley Local Plan.

**Table 6 SA scores for the Local Plan Vision and Objectives**

Vision and Local Plan Objectives	SA Objectives																	
	1: Economic performance	2: The Borough's image	3: Deprivation in urban and rural areas	4: Economic inclusion	5: Healthy labour market	6: Sustainable transport	7: Health	8: Housing	9: Crime	10: Social inclusion	11: Access to services and jobs	12: Built environment	13: Biodiversity and geodiversity	14: Landscape and local character	15: Environmental quality and amenity	16: Climate change	17: Natural resources and waste	18: Energy efficiency
Vision	++	++	++	++	++	+/-	+	++	0	++	++	++	+	+	++	++	0	0
LPO 1	++	+	+	++	++	+	+	++	0	+	+	+?	+?	+?	+	++	+	++
LPO 2	+	+	++	+	+	0	0	++	0	0	0	0	?	?	0	0	?	0
LPO 3	++	++	++	++	++	0	0	0	0	0	0	?	?	?	0	0	?	0
LPO 4	+	+	++	++	+	+	+	0	0	+	++	0	0	0	0	+	0	0
LPO 5	0	+	0	0	0	0	+	0	0	+	+	+	++	++	+	+	0	0
LPO 6	0	+	0	0	0	0	+	0	0	+	+	+	+	+	++	0	0	0
LPO 7	0	+	0	0	0	0	+	0	+	0	0	++	0	+	0	0	0	0
LPO 8	0	+	0	0	0	0	+	0	0	0	0	++	0	+	0	0	0	0
LPO 9	++	+	0	++	0	++	0	0	0	0	+	0	?	?	?	++	0	0
LPO 10	+	+	0	0	++	0	0	0	0	0	+	0	0	0	0	0	0	0
LPO 11	0	+	0	0	0	0	0	0	+	++	0	0	0	0	0	0	0	0

**Table 7 Summary of SA scores for the policies and site allocations in the Proposed Submission of the Burnley Local Plan**

Policies	1: Economic Performance	2: The Borough's Image	3: Deprivation in urban and rural areas	4: Economic inclusion	5: Healthy labour market	6: Sustainable transport	7: Health	8: Housing	9: Crime	10: Social inclusion	11: Access to services and jobs	12: Built environment	13: Biodiversity and geo-diversity	14: Landscape and local character	15: Environmental quality and amenity	16: Climate change	17: Natural resources and waste	18: Energy efficiency
<b>Strategic Policies</b>																		
SP1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
SP2	+	0	+	+	+	+?	0	++	0	0	0	+/-?	-?	-?	-?	+/-?	-?	0
SP3	++	0	+?	+	++	+	+	0	0	0	0	+/-?	-?	-?	-?	+/-?	-?	0
SP4	++	+	++	+	0	++	+	+	0	+?	+	+/-?	+?	+++	+	++	+	+
SP5	+	++	0	0	0	++	+	+	+	+	+	++	+	++	+	++	++	++
SP6	+	++	0	0	0	+	+	0	0	+	+	++	++	++	+	++	0	0
SP7	0	+	+	0	0	+?	+	0	0	0	+	0	+	++	+	0	+	0
<b>Housing Policies</b>																		
HS1	0	+	+++	0	0	++	++	++	0	0	+	-?	-?	-?	-	-	+	0
HS2	0	+	+?	0	0	0	+	++	0	+	0	0	0	0	0	0	0	+?
HS3	0	+	+	+	0	+	+	++	0	+	0	0	0	+	+	+	0	0
HS4	0	+	0	0	0	0	+	++	+	+	+	+	+	+	++	+	0	+
HS5	0	+	0	0	0	0	+	0	0	0	0	+	0	+	+	0	0	+
HS6	0	0	+	0	0	0	0	+	0	0	0	0	0	+	0	0	+	0
HS7	0	++	0	0	0	++	++	++	0	0	++	--?	-?	0?	+	0	+	0
HS8	0	0	0	+	0	+	+	+/-?	0	+	+	+	+	+	+	0	+	0
HS9	0	0	0	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0
<b>Employment Policies</b>																		
EMP1	++	+	+	+	+++	+	+	0	0	0	+	--?	-?	-?	-	-	0	0
EMP2	++	0	+	+	+	+	0	0	0	0	+	0	0	0	0	0	0	0
EMP3	++	+	+?	+?	+	?	0	+?	0	0	+	+	+	+	+	+?	+?	0
EMP4	+	+?	+	+	+	+	+?	+?	0	0	++	+?	+?	+	+	+	+?	0
EMP5	+	+	+	+	+	-?	0	0	0	+	+	+?	-?	+	+/-?	-?	0	0
EMP6	0	+	0	+?	0	0	0	+?	0	0	0	+	+	+	+	0	+	0

Policies	1: Economic Performance	2: The Borough's Image	3: Deprivation in urban and rural areas	4: Economic inclusion	5: Healthy labour market	6: Sustainable transport	7: Health	8: Housing	9: Crime	10: Social inclusion	11: Access to services and jobs	12: Built environment	13: Biodiversity and geo-diversity	14: Landscape and local character	15: Environmental quality and amenity	16: Climate change	17: Natural resources and waste	18: Energy efficiency
EMP7	0	+	0	0	0	0	+	0	0	0	0	+?	+	++	+	0	0	0
<b>Retail and Town Centre Policies</b>																		
TC1	0	0	++	+	+	++	+	0	0	0	++	0	0	0	0	+	0	0
TC2	0	0	++	+	+	++	+	+	0	0	++	+	0	0	0	+	0	0
TC3	0	+	++	+	0	+	0	0	0	+	+	0	0	0	0	+	0	0
TC4	+	++	++?	+	+?	++	++	+	0	0	+	--?	-?	0	+	0	+	0
TC5	+	++	+	+	+	+	0	+	0	+	+	++	0	+	0	+	0	0
TC6	+	0	+	0	0	+	+	0	0	+	++	0	0	0	+	+	0	0
TC7	0	+	++	0	0	+/-	++	0	+	0	+	+	0	0	++	+/-	+	0
TC8	0	++	++	0	0	0	+	0	+	0	0	++	0	0	+	0	0	0
<b>Historic Environment Policies</b>																		
HE1	+/-?	+	0	0	0	0	0	0	0	+	0	++	0	+	0	0	0	0
HE2	-?	+	0	-?	0	0	+	-?	0	+	0	++?	+	+	0	0	0	0
HE3	0	+	0	0	0	0	0	0	0	+	0	++	0	+	0	0	0	0
HE4	-?	+	0	-?	0	0	0	-?	0	0	0	++	0	+	0	0	0	0
<b>Natural Environment Policies</b>																		
NE1	-?	+	0	-?	0	0	+	-?	0	0	0	0	++	+	+	+	0	0
NE2	0	+	0	0	0	0	++	0	0	0	++	+	+	+	+	+	0	0
NE3	0	+	0	0	0	0	0	0	0	0	0	+	+	++	+	+	0	0
NE4	0	+	0	0	0	0	0	0	0	0	0	+	++	+	+	+	0	0
NE5	0	0	0	0	0	+?	+	0	0	0	0	0	+	0	++	+	0	0
<b>Climate Change Policies</b>																		
CC1	0	0	0	0	0	0	0	0	0	+	0	+	+	++	++	+/-	+	+/-
CC2	0	0	0	0	0	0	0	0	0	0	0	+	0	++	+	++	0	++
CC3	0	0	0	0	0	0	+	0	0	+	0	+	+	++	++	+/-	0	+/-
CC4	0	0	0	0	0	0	+	+	0	0	0	+	+	0	+	++	0	0

Policies	1: Economic Performance	2: The Borough's Image	3: Deprivation in urban and rural areas	4: Economic inclusion	5: Healthy labour market	6: Sustainable transport	7: Health	8: Housing	9: Crime	10: Social inclusion	11: Access to services and jobs	12: Built environment	13: Biodiversity and geo-diversity	14: Landscape and local character	15: Environmental quality and amenity	16: Climate change	17: Natural resources and waste	18: Energy efficiency
CC5	0	0	0	0	0	0	+	0	0	0	+	+	+	+	+	++	0	0
<b>Infrastructure and Connectivity Policies</b>																		
IC1	0	0	0	+	0	++	++	0	0	0	+	0	0	0	+	++	0	0
IC2	0	+	0	+	0	++	+	0	0	0	+	0	0	0	++	+	0	0
IC3	0	0	0	+	0	++/-	+	0	+	0	+	+	0	0	++/-	+/-	0	0
IC4	+	+	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	0
IC5	0	0	++	0	0	+	++	0	+	++	++	+	0	0	0	+	0	0
IC6	0	+	0	0	0	0	+	0	0	0	0	+	0	+	+	0	0	0
IC7	0	0	+	0	0	+/-	0	0	+	0	0	+	0	0	+	+/-	0	0
<b>Residential Site Allocations included in Policy HS1</b>																		
HS1/1	0	0	+?	0	0	+	++	++	0	0	++	--?	-?	0	+	0	+	0
HS1/2	0	0	+?	0	0	+	++	++	0	0	++	-?	0?	-?	-	-	0	0
HS1/3	0	0	++	0	0	++	+	++	0	0	++	--?	-?	0	+	0	+	0
HS1/4	0	0	+++	0	0	+	-	++	0	0	++	--?	0?	-?	-	-	0	0
HS1/5	0	0	++	0	0	-	++	++	0	0	+	-?	-?	0	+	-	+	0
HS1/6	0	++	++	0	0	++	++	+	0	0	++	-?	0?	0	+	0	+	0
HS1/7	0	0	+++	0	0	+	++	+	0	0	++/-	--?	-?	-?	-	-	0	0
HS1/9	0	+	++	0	0	+	+	++	0	0	+	-?	-?	-?	-	-	0	0
HS1/10	0	0	0	0	0	+	++	++	0	0	++	--?	0?	-?	-	-	0	0
HS1/11	0	0	+++	0	0	+	++	++	0	0	++	-?	0?	0	+	0	+	0
HS1/12	0	++	+++	0	0	+	++	+	0	0	++	-?	-?	0	+	0	+	0
HS1/13	0	0	+?	0	0	++	++	+	0	0	++	-?	0?	0	+	0	+	0
HS1/14	0	0	+++	0	0	++	++	+	0	0	++	-?	-?	0	+	0	0	0
HS1/15	0	0	0	0	0	+	+	+	0	0	++	-?	-?	0	+	-	0	0
HS1/16	0	++	+++	0	0	++	++	+	0	0	++	-?	0?	0	+	0	+	0

Policies	1: Economic Performance	2: The Borough's Image	3: Deprivation in urban and rural areas	4: Economic inclusion	5: Healthy labour market	6: Sustainable transport	7: Health	8: Housing	9: Crime	10: Social inclusion	11: Access to services and jobs	12: Built environment	13: Biodiversity and geo-diversity	14: Landscape and local character	15: Environmental quality and amenity	16: Climate change	17: Natural resources and waste	18: Energy efficiency
HS1/17	0	++	++?	0	0	++	++	+	0	0	++	--?	0?	0	+	0	+	0
HS1/18	0	++	++?	0	0	++	++	+	0	0	++	-?	-?	--	+	0	+	0
HS1/19	0	0	++?	0	0	+	++	+	0	0	++/-	-?	-?	-?	-	-	0	0
HS1/20	0	0	++	0	0	+	+	+	0	0	++	--?	-?	0	+/-?	0	+	0
HS1/21	0	++	++?	0	0	+	++	+	0	0	++	-?	0?	0	+	0	+	0
HS1/23	0	0	++?	0	0	+	++	+	0	0	+	-?	-?	0	+	0	0	0
HS1/24	0	0	++?	0	0	++	++	++	0	0	++	--?	0?	0	+	0	+	0
HS1/25	0	0	++?	0	0	+	++	+	0	0	++/-	-?	-?	-?	-	-	0	0
HS1/26	0	0	++?	0	0	+	++	+	0	0	++	--?	-?	-?	-	-	0	0
HS1/27	0	0	++?	0	0	++	++	+	0	0	++	-?	-?	0	+	0	+	0
HS1/28	0	+	++?	0	0	+	-	+	0	0	++	-?	0?	-?	-	-	0	0
HS1/29	0	++	++?	0	0	++	++	+	0	0	++	-?	-?	-?	-	-	0	0
HS1/30	0	0	++?	0	0	+	++	+	0	0	++	-?	0?	-?	-	-	0	0
HS1/31	0	0	++	0	0	+	+	+	0	0	++	--?	-?	-?	-/?	-	0	0
HS1/32	0	0	++?	0	0	++	++	+	0	0	++/-	--?	0?	-?	-	-	0	0
HS1/35	0	0	++?	0	0	+	++	+	0	0	++	--?	-?	0	+	0	+	0
HS1/36	0	0	++	0	0	+	+	+	0	0	++	-?	--?	-?	-	-	0	0
HS1/37	0	0	++?	0	0	+	++	+	0	0	++	--?	0?	0	+	0	+	0
HS1/38	0	0	0	0	0	+	+	+	0	0	+	--?	-?	-?	-	-	0	0
<b>Employment Site Allocations included in Policy EMP1</b>																		
EMP1/1	+	0	++?	++?	++?	+	0	0	0	0	+	-?	+	0?	-	-?	0	0
EMP1/2	+	0	+	++?	++?	+	+	0	0	0	+	--?	-?	0	+	0	+	0
EMP1/3	+	++	++?	+	++?	++	+	0	0	0	+	--?	0?	-?	-	-	0	0
EMP1/4	+	0	+	0	++?	0	+	0	0	0	+	-?	0?	-?	-	-	0	0
EMP1/5	++	+	++?	0	++?	0	+	0	0	0	+	-?	-?	-?	-	-	0	0



Policies	1: Economic Performance	2: The Borough's Image	3: Deprivation in urban and rural areas	4: Economic inclusion	5: Healthy labour market	6: Sustainable transport	7: Health	8: Housing	9: Crime	10: Social inclusion	11: Access to services and jobs	12: Built environment	13: Biodiversity and geo-diversity	14: Landscape and local character	15: Environmental quality and amenity	16: Climate change	17: Natural resources and waste	18: Energy efficiency
EMP1/6	+	0	+	0	+	0	+	0	0	0	+	-?	-?	-?	-	-	0	0
EMP1/7	+	+	+++	+	+	++	+	0	0	0	+	--?	0?	0	+	0	+	0
EMP1/8	+	++	+++	+	+	++	+	0	0	0	+	--?	0?	0	+	0	0	0
EMP1/9	+	0	+++	+	+	-	+	0	0	0	+	-?	0?	0	+	0	+	0
EMP1/10	+	0	0	0	+	0	+	0	0	0	+	-?	0?	-?	-	-	0	0
EMP1/11	+	++	+++	+	+	++	+	+	0	0	++	-?	0?	0?	+	0	+	0
EMP1/12	++	0	+	+	+++	+	+	0	0	0	+	-?	-?	-?	-	-	0	0
EMP1/13	+	0	+	+	+	+	+	0	0	0	+	--?	-?	-?	--	-	0	0
EMP1/14	+	++	+++	+	+	-	+	0	0	0	+	--?	-?	0	+	0	+	0

## Cumulative and Synergistic Effects

- 1.71 **Table 7** above enables an assessment to be made of the likely significant effects of the emerging Local Plan as a whole on each of the SA objectives, i.e. an assessment of cumulative effects as required by the SEA Regulations. Under each of the SA objectives below, consideration is also given to ways in which the effects of the Local Plan may be mitigated, including through the implementation of other policies within the Local Plan itself.

### SA objective 1: To exploit the growth potential of business sectors and reduce disparities between local and sub-regional economic performance

- 1.72 The allocation and protection of approximately 90ha of employment land through policies EMP1: Employment Allocations and SP3: Employment Land Requirement 2012-2032 will help to make Burnley Borough more attractive to investors. This will provide employment opportunities to the benefit of local economic growth and should help to reduce disparities in terms of economic performance. It may also offer good opportunities for diversifying the local economy out of the service sector which currently dominates.
- 1.73 Measures in the Local Plan seeking to improve the sustainable transport network (such as policy IC1: Sustainable Travel) will help to improve access to jobs, particularly for those without a car. In addition, the population growth resulting from the delivery of the housing requirement (through policies HS1: Housing Allocations and SP2: Housing Requirement 2012-2032) will increase the size of the workforce within Burnley, which will help to support and sustain local economic growth.
- 1.74 New employment sites will be developed in accordance with other plan policies relating to standards for design and construction, so it is assumed that they will be high quality, increasing their attractiveness to investors.
- 1.75 There are a small number of historic and natural environment policies that could have a minor negative effect on this objective due to potentially limiting development that could otherwise have adverse effects on the historic or natural environment. However, overall, the Local Plan is likely to have a cumulative **significant positive** effect in relation to SA objective 1: economic performance. This effect is expected to be long-term and permanent.

### SA objective 2: To develop and market the Borough's image

- 1.76 The Local Plan makes good provision for protecting the image of the Borough and enhancing the built, natural and historic environment. In particular, policy SP5: Development Quality and Sustainability seeks to improve the Borough's image and promote it as a destination for visitors by requiring that new development is of high quality design which is respectful of existing local character. The particular requirements in the policy that apply to the nature and appearance of development near to key gateways will have especially positive effects on improving the Borough's image. In addition, policy SP6: Green Infrastructure seeks to protect, enhance and provide new elements of green infrastructure in the Borough. As such, it will help to improve the local natural environment and will also help to promote the Borough as an attractive destination for visitors.
- 1.77 Nine of the housing sites allocated through policy HS1: Housing Allocations are expected to have positive effects on this SA objective, seven of which would be significant. This is because these allocated sites are either within very close proximity of a key gateway or are in a defined regeneration area, and so would contribute to improving the quality of the built environment in those areas. The 14 employment sites allocated in policy EMP1: Employment Allocations include four sites that are either within or very close to a key gateway into the Borough, or that are within a defined regeneration area. High quality new employment development in those areas will again have a positive effect on the Borough's image.
- 1.78 Overall, a cumulative **minor positive** effect is likely for SA objective 2: the Borough's image. This effect is expected to be long-term and permanent.

### SA objective 3: To reduce deprivation in urban and rural areas

- 1.79 A number of Local Plan policies seek to foster the vitality and viability of local centres. Policy TC1: Retail Hierarchy seeks to focus retail development within the larger centres of Burnley (i.e. Burnley and Padiham). The provision of retail development within town centres in favour of out of town locations is expected to help improve the vitality and viability of these areas and will also help to create employment opportunities in areas which are accessible to most people.
- 1.80 Most of the housing sites allocated through policy HS1: Housing Allocations are expected to have significant positive effects on this SA objective either because they are either within or very close to a Decile 1 IMD area, where new development could contribute to reducing deprivation, or because they are within close proximity of a town centre or rural settlement where businesses would be supported by new housing development.
- 1.81 Overall, a **minor positive** cumulative effect is likely for SA objective 3: deprivation in urban areas. This effect is expected to be long-term and permanent.

### SA objective 4: To secure economic inclusion

- 1.82 The Local Plan provides for the development of 90 hectares of employment land to meet local needs (through policies EMP1: Employment Allocations and SP3: Employment Land Requirement 2012-2032) and to ensure that there are jobs available to meet the needs of the growing population. Policy SP4: Development Strategy focuses most development in the larger urban centres and within the identified development boundaries. As such, most new employment development is likely to be provided in areas where access to sustainable transport links is best and jobs will be accessible for most people. That policy also provides a hierarchy of development limiting development within smaller settlements. The allocation of this employment land, and the measures in the Local Plan to safeguard existing sites (policy EMP2: Protected Employment Sites), should result in the delivery of jobs to meet the needs of the growing population.
- 1.83 There are a small number of historic and natural environment policies that could have a minor negative effect on this objective due to potentially limiting development that could otherwise have adverse effects on the historic or natural environment. However, overall, the Local Plan is likely to have a cumulative **significant positive** effect in relation to SA objective 4: Economic inclusion. This effect is expected to be long-term and permanent.

### SA objective 5: To develop and maintain a healthy labour market

- 1.84 The Local Plan goes some way towards addressing the skills gap and increasing levels of participation and attainment in education. The scale of residential development proposed through the Local Plan could result in increased pressure on existing schools and colleges if provision was not made to meet the increased demand for school places. However, the Local Plan makes good provision for community facilities to meet the population's needs which is taken to also include educational facilities. The measures in the Plan relating to improvements to the sustainable transport network will help to ensure that more people are able to travel to schools and colleges by means other than car.
- 1.85 The provision of 90ha of employment land over the plan period as set out in policy SP3: Employment Land Requirement 2012-2032 (with sites being allocated through policy EMP1: Employment Allocations) is likely to encourage a higher number of businesses to invest in the Borough, which would result in an increase in the number of local employment opportunities in the Borough. These jobs may have associated opportunities for work-based learning and skills development.
- 1.86 Although a number of the site allocations and policies are unlikely to affect this objective, overall a cumulative **minor positive** effect is likely in relation to SA objective 5: healthy labour market. This effect is expected to be long-term and permanent.

### SA objective 6: To reduce the need to travel and increase the use of sustainable transport modes

- 1.87 While the scale of development proposed through the Local Plan will inevitably result in an increase in traffic, the Local Plan makes good provision for improvements to the sustainable transport network, particularly through policy IC1: Sustainable Travel and it requires new

development to be located in areas which are well served by walking and cycling infrastructure and public transport. In addition, Policy SP4: Development Strategy limits large scale development at the more rural locations of the Borough and aims to focus development in the main urban areas which will reduce the requirements for many residents to travel by car given that new development is more likely to be in close proximity to sustainable transport links and existing facilities and services in more developed locations.

- 1.88 Most of the housing sites allocated in policy HS1: Housing Allocations would have at least minor positive effects on sustainable transport as they are within 400m of a bus stop and/or 800m of a railway station which could be used by residents for commuting to work and accessing services and facilities. In addition, policy HS1: Housing Allocations makes specific reference to requiring improved walking and cycle links at some of the allocated sites. Four of the 14 employment sites allocated in policy EMP1: Employment Allocations would have significant positive effects on this objective as they would offer particularly good opportunities for people to commute via bus, rail or cycling/walking.
- 1.89 Overall a cumulative **significant positive** effect is likely in relation to SA objective 6: Sustainable transport. This effect is expected to be long-term and permanent.

### **SA objective 7: To improve physical and mental health and reduce health inequalities**

- 1.90 The Local Plan proposes improvements to the walking and cycle network which will help to improve levels of day-to-day activity, benefitting health. Increased walking and cycling may also be facilitated by the location of most development in urban areas where journey times to access jobs, services and facilities are likely to be shorter (through policy SP4: Development Strategy).
- 1.91 The protection and enhancement of open space and green infrastructure through policies NE2: Protected Open Space and SP6: Green Infrastructure in particular will also encourage and enable more people to engage in active recreation which will benefit health. In addition, most of the allocated housing sites included in policy HS1: Housing Allocations would have significant positive effects on health as they provide access to an existing GP surgery and are within 400m of a cycle route which could be used by new residents. Jointly, this would have benefits for promoting healthy lifestyles. Almost all of the employment sites allocated in policy EMP1: Employment Allocations would have minor positive effects on health. While employment site allocations would generally not have significant effects on this objective, most of the allocated sites offer opportunities to commute via bicycle or on foot which would benefit health and for a number of the sites, policy EMP1 specifies that new links would be provided as part of the development.
- 1.92 While the population growth that will result from the residential development proposed through the Local Plan could put pressure on healthcare facilities such as existing GP surgeries, provision is made through the Plan for improvements to community facilities to support the new development (e.g. policy IC5: Protection and Provision of Social and Community Infrastructure). While healthcare services are not always referred to specifically, this is taken to be included within community facilities.
- 1.93 Overall a cumulative **minor positive** effect is likely in relation to SA objective 7: health. This effect is expected to be long-term and permanent.

### **SA objective 8: To improve access to a range of good quality, resource efficient and affordable housing**

- 1.94 The Local Plan makes provision for the development of at least 4,180 new homes between 2012 and 2031 to meet the objectively assessed housing need for the Borough and allocates 34 new residential sites through policy HS1: Housing Allocations. Policy HS2: Affordable Housing Provision relates specifically to the provision of good quality affordable housing in the Borough. A range of measures are set out through which the Council will support the provision of affordable housing, and affordable housing will be required on all housing developments over a certain threshold. In addition, policy HS3: Housing Density and Mix sets out criteria that will ensure that housing developed as a result of other Local Plan policies is appropriate for meeting local needs.
- 1.95 Despite a number of negligible effects and a small number of historic and natural environment policies that could have a minor negative effect on this objective (due to potentially limiting housing development that could otherwise have adverse effects on the historic or natural

environment) overall, a cumulative **significant positive** effect is likely in relation to SA objective 8: housing. This effect is expected to be long-term and permanent.

#### **SA objective 9: To reduce crime, disorder and the fear of crime**

- 1.96 Almost all of the policies in the Local Plan will not have a direct effect on this objective, although policy HS4: Housing Developments requires that the design of new housing should be in line with policy SP5: Development Quality and Sustainability, which states that buildings should be designed with safety and security of occupants and passers-by in mind, helping to reduce crime and the fear of crime through natural surveillance.
- 1.97 In general this SA objective will be affected by the design and layout of new development (e.g. the incorporation of lighting) which will not be detailed until the planning application stage, hence the sites allocated under policies HS1: Housing Allocations and EMP1: Employment Allocations will all have negligible effects on this objective.
- 1.98 Overall a cumulative **negligible** effect is likely in relation to SA objective 9: Crime.

#### **SA objective 10: To increase social inclusion**

- 1.99 The measures included in the Local Plan to provide employment land and increase economic growth (as described under SA objective 4 above) will help to reduce social exclusion by increasing the range and quality of available jobs. This will in turn help to address social deprivation. As described under SA objective 5 above, the Local Plan also makes good provision for affordable housing delivery which will further address this objective.
- 1.100 Although the majority of policies and site allocations would have a negligible effect, overall a cumulative **minor positive** effect is likely in relation to SA objective 10: social inclusion. This effect is expected to be long-term and permanent.

#### **SA objective 11: To improve access to services, amenities and jobs for all groups**

- 1.101 The Local Plan makes good provision for improving access to services, particularly through policy IC5: Protection and Provision of Social and Community Infrastructure which directly addresses accessibility and the provision of social and community infrastructure in the Borough, and requires such facilities to be provided where new development will increase demand. Replacement facilities are also to be provided nearby if an existing facility is lost. The policy also requires new facilities to be provided at locations which are accessible by walking, cycling and public transport. These measures should mean that the housing growth proposed through the Local Plan will not place undue strain on existing services and facilities.
- 1.102 In addition, policy TC2: Development within Burnley and Padiham Town Centres would result in the majority of retail development and other main town centre uses being focused within the more developed areas of the Borough which are expected to be accessible to most residents, including by public transport. This is expected to include employment opportunities as well as essential services and facilities.
- 1.103 The majority of residential sites allocated through policy HS1: Housing Allocations are likely to have significant positive effects on this objective as they are within close proximity of a range of community services and facilities as well as being within reasonable public transport travel time of key Borough services. While a small number of sites would result in the loss of existing publicly accessible green space, this is the case for only four of the 34 allocated sites. The majority of employment sites allocated through policy EMP1: Employment Allocations are also likely to have minor positive effects because they are within walking distance of existing housing development, so residents there could easily access the jobs created.
- 1.104 Overall a cumulative **significant positive** effect is likely in relation to SA objective 11: Access to services and jobs. This effect is expected to be long-term and permanent.

#### **SA objective 12: To protect and enhance the built environment and cultural heritage, including archaeological assets**

- 1.105 The scale of housing and employment development proposed through the Local Plan could adversely affect heritage assets and their settings. A number of the allocated sites are within

very close proximity of designated heritage assets sites meaning that the setting of these heritage assets could be significantly affected. However, the effects of new development on cultural heritage and the wider built environment are to some extent uncertain until detailed proposals for particular sites come forward and the exact scale, design and layout of the new development is known. Opportunities may also exist for developments to enhance the setting of nearby heritage features, particularly where high quality new development would replace an existing derelict site.

- 1.106 The Local Plan makes good provision for the protection and enhancement of cultural heritage assets through policies specifically addressing this issue, in particular policy HE1: Identifying and Protecting Burnley's Historic Environment, the purpose of which is to protect, enhance and raise awareness of the historic environment within the Borough, and policy HE2: Designated Heritage Assets which seeks to prevent substantial harm or loss of designated heritage assets including their setting.
- 1.107 Overall a cumulative **mixed (minor positive and significant negative)** effect is likely in relation to SA objective 12: built environment although this is currently uncertain. Effects on this objective are expected to be long-term and permanent.

### **SA objective 13: To protect and enhance the Borough's biodiversity and geo-diversity**

- 1.108 The scale of development proposed through the Local Plan could affect biodiversity and geodiversity, particularly because a lot of the development is proposed on greenfield sites (although it is recognised that brownfield sites can still harbour valuable biodiversity). The development of greenfield land could result in the loss of valuable habitat and disturbance to species, particularly during the construction phase. In addition, a large number of residential and employment sites, as allocated through policies HS1: Housing Allocations and EMP1: Employment Allocations, are likely to have negative effects on biodiversity and geodiversity due to their close proximity to designated nature conservation sites and potential for causing disturbance, habitat loss and fragmentation.
- 1.109 The Habitats Regulations Appraisal identified in-combination effects on the South Pennine Moors Phase 2 SPA from housing site allocations and policies through potential offsite habitat loss, offsite noise, vibration and light disturbance and increased recreational pressure. In-combination effects of increased recreational pressure was also identified as a potential impact on the South Pennine Moors SAC as a result of population increase within Burnley Borough.
- 1.110 In addition, the effects of new development on Burnley's biodiversity and geodiversity are to some extent uncertain until detailed proposals for particular sites come forward at the planning application stage. It may even be possible to incorporate biodiversity enhancements into new developments, for example through the provision of green infrastructure.
- 1.111 Despite these potential negative effects, the Local Plan does make good provision for the protection and enhancement of biodiversity and geodiversity, particularly through policy NE1: Biodiversity and Ecological Networks, the primary aim of which is to protect biodiversity in the Borough including at designated sites, while ensuring that any impacts are mitigated or compensatory measures are implemented. A number of other policies in the Local Plan also make reference to the protection of biodiversity and the measures seeking to improve green infrastructure in the Borough (particularly policy SP6: Green Infrastructure), which will benefit habitat creation and improve connectivity.
- 1.112 Overall a cumulative **mixed (minor positive and significant negative)** effect is likely in relation to SA objective 13: Biodiversity and geodiversity although this is currently uncertain. Effects on this objective could be either permanent or temporary, depending on whether they occur as a result of construction or during the operational phase of development.

### **SA objective 14: To protect and enhance the Borough's landscape and local character**

- 1.113 The development of 4,180 new homes in the Borough (as set out in policy SP2: Housing Requirement 2012-2032) and 90ha of employment land (as proposed in policy SP3: Employment Land Requirement 2012-2032) would involve the development of a large total area of greenfield land which could be to the detriment of the local landscape character. A large number of the residential and employment sites allocated through policies HS1: Housing Allocations and EMP1: Employment Allocations are on greenfield land. However, the effects of new development on the



landscape are largely uncertain at this stage as they will depend on factors such as the design of new development which will not be known until the planning application stage.

- 1.114 The Local Plan does make provision for enhancing and protecting the landscape character of the Borough through appropriate design, the incorporation of screening and landscaping of development proposals, in particular through policies NE5: Landscape Character and SP5: Development Quality and Sustainability.
- 1.115 Overall, a cumulative **mixed (minor positive and significant negative)** effect is likely for SA objective 14: landscape and local character although this is currently uncertain. Effects on this objective are expected to be long-term and permanent.

#### **SA objective 15: To protect and improve environmental quality and amenity**

- 1.116 The Local Plan proposes large amount of residential and employment development which may affect the amenity of existing residents, particularly in terms of traffic or disturbance during the construction phase. In addition, approximately half of the residential sites allocated through policy HS1: Housing Allocations are on greenfield land which could result in the loss of high quality agricultural soils, although it is noted that most are not within Grade 3 agricultural land (the highest quality land within Burnley Borough). Likewise, most of the employment sites allocated through policy EMP1: Employment Allocations are on greenfield land where new development would lead to the loss of soils, but again the majority of the allocated sites are not in areas of high quality agricultural land.
- 1.117 The Local Plan does include some mitigation for the potential effects of new development on environmental quality and amenity. In particular, policy NE5: Environmental Protection specifically relates to environmental protection and seeks to ensure that development does not have adverse effects on air quality, light, noise and water quality and that contaminated land is fully remediated prior to development.
- 1.118 Overall, a cumulative **mixed effect (minor positive and minor negative)** is likely for SA objective 15: environmental quality and amenity. Effects on this SA objective could be either permanent or temporary depending on whether they relate to amenity impacts during construction, or more permanent impacts such as the loss of high quality soils.

#### **SA objective 16: To mitigate and adapt to climate change**

- 1.119 Policies in the Local Plan require new development to be located in areas of low flood risk and to respond and adapt to climate change through the management of flooding i.e. through SuDs, in particular policies CC4: Development and Flood Risk and CC5: Surface Water Management and Sustainable Drainage Systems (SUDs). However, many of the residential and employment sites allocated through policies HS1: Housing Allocations and EMP1: Employment Allocations are on greenfield land (which would lead to a reduction in the amount of permeable land in the Borough) or are on brownfield land within high flood risk areas. However, most of the development sites allocated through the Local Plan are outside of areas of high flood risk.
- 1.120 The scale of development proposed through the Local Plan will inevitably result in an increase in greenhouse gas emissions from built development but this will depend to some extent on the design of development which cannot be determined at this stage. In terms of emissions from vehicle traffic, the Local Plan makes good provision for improvements to the sustainable transport network, and requires new development to be located in areas which are well served by walking and cycling infrastructure and public transport particularly through policy IC1: Sustainable Travel. In addition, Policy SP4: Development Strategy limits large scale development at the more rural locations of the Borough and aims to focus development in the main urban areas, which will reduce the requirements for many residents to travel by car given that new development is more likely to be in close proximity of sustainable transport links and existing facilities and services in more developed locations. However, there will inevitably be an increase in overall traffic within the Borough as a result of the growth proposed.
- 1.121 Overall a cumulative **mixed (minor positive and minor negative)** effect is likely in relation to SA objective 16: climate change. Effects on this objective are expected to be long-term and permanent.

### SA objective 17: To ensure the prudent use of natural resources and the sustainable management of waste

- 1.122 The scale of new development proposed through the Local Plan will inevitably result in an increase in overall waste generation, but not on a per capita basis. Levels of recycling will be determined largely by the behaviour of individuals; however policy SP5: Development Quality and Sustainability encourages design measures in new developments, which are likely to reduce requirements for excessive resource consumption, including support for the appropriate re-use of existing materials already on site during the construction phase. Many of the development sites that are allocated through policies HS1: Housing Allocations and EMP1: Employment Allocations are located on greenfield land and so there will be limited opportunities to reuse materials onsite, however there are also a number of sites allocated on brownfield land where these opportunities may exist.
- 1.123 Overall a cumulative **mixed (minor positive and minor negative)** effect is likely in relation to SA objective 17: Natural Resources and Waste. Effects on this objective are expected to be long-term and permanent.

### SA objective 18: To increase energy efficiency

- 1.124 Policies in the Local Plan require new development to meet high standards of energy efficiency and encourage developments to make use of on-site energy supplies from renewable and low carbon energy sources and to incorporate measures to minimise energy consumption, in particular policy SP5: Development Quality and Sustainability. The provision of renewable energy development, in particular wind, is supported through policies CC2: Suitable Areas for Wind Energy Development and CC3: Wind Energy Development.
- 1.125 The effects that individual development sites allocated in the Local Plan will have on energy efficiency cannot be determined at this stage and will instead be determined by factors such as the design of development and building regulation standards.
- 1.126 Overall, a cumulative **minor positive** effect is likely for SA objective 18: Energy efficiency. Effects on this objective are expected to be long-term and permanent.

## Mitigation and Recommendations

- 1.127 **Table 8** identifies the policies that are expected to provide mitigation for the potential significant negative effects identified for the Proposed Submission document. Note that only those SA objectives for which potential significant negative effects were identified have been included in the table. Fourteen out of the 18 SA objectives are unlikely to be negatively affected (at a significant level) by the policies or site allocations in the Proposed Submission of the Burnley Local Plan.

**Table 8 Possible mitigation for potential negative effects identified**

SA objectives for which potential negative effects have been identified	Negative effects identified	Local Plan policies providing possible mitigation
12: Built Environment	Proximity of proposed sites to designated heritage assets	<p>Policy HE1: Identifying and protecting Burnley's Historic Environment seeks to protect, enhance and promote the elements that contribute to the distinct identity of the borough.</p> <p>Policy HE2: Designated Heritage Assets states that proposals affecting designated heritage assets and or their settings will be assessed in order to identify harm.</p> <p>Policy HE4: Scheduled Monuments and Archaeological Assets provides for the protection of Scheduled Monuments or other archaeological assets and their settings through the requirement for an assessment of significance and impact to accompany a proposal.</p>



SA objectives for which potential negative effects have been identified	Negative effects identified	Local Plan policies providing possible mitigation
		<p>The site specific policies under Policy EMP1:</p> <p>EMP1/2: makes provision for a landscaping scheme and retention of established trees and shrubs adjacent to the Leeds and Liverpool Canal.</p> <p>EMP1/3: makes provision for retention of existing trees and shrubs.</p> <p>EMP1/7: requires a building of landmark quality at the west of the site and conservation of the heritage assets adjacent to the site.</p> <p>EMP1/8: requires high quality architecture and design reflecting the character and appearance of the surrounding listed buildings and conservation area.</p> <p>EMP1/13: requires a landscaping scheme including retention of existing trees and new screening planting.</p> <p>EMP14: requires an appropriate hard and soft landscaping scheme providing adequate screening and appropriate boundary treatment.</p> <p>TC4: requires high quality, locally distinctive materials.</p> <p>Site specific policies under policy HS1:</p> <p>HS1/1: requires a scheme of the highest quality.</p> <p>HS1/3: requires appropriate landscaping and boundary treatment.</p> <p>HS1/4: requires a scheme of the highest quality. The supporting information notes the need to retain and sensitively incorporate a listed feature into the development scheme.</p> <p>HS1/7: requires a scheme of the highest quality.</p> <p>HS1/10: requires a scheme of the highest quality and appropriate landscaping and boundary treatment. The supporting information also notes the potential for below ground archaeology and the requirement for a desk top archaeological assessment.</p> <p>HS1/17 does not include any specific design references.</p> <p>HS1/20: requires a scheme of the highest quality. The supporting information notes the proximity to the Conservation Area.</p> <p>HS1/24: does not include any specific design references.</p> <p>HS1/26: requires a scheme of the highest quality. The supporting information notes the proximity to a registered park and garden and the need to consider impact on setting.</p> <p>HS1/31: requires a scheme of the highest quality. The supporting information notes the proximity to the conservation area.</p> <p>HS1/32: requires a scheme of the highest quality.</p> <p>HS1/35: does not include any specific design references to reflect the proximity to the listed building.</p> <p>HS1/37: does not include any relevant references to reflect the proximity to the listed buildings.</p> <p>HS1/38: requires a scheme of the highest quality.</p>
13: Biodiversity and geodiversity	Proximity of proposed sites to designated nature or geological conservation sites	<p>Policy NE1: Biodiversity and Ecological Assets requires the protection and enhancement of biodiversity including for sites of national and international importance.</p> <p>HS1/36: requires appropriate landscaping and boundary treatment and that new planting on the site to accord with Policy NE3.</p>
14: Landscape and local character	Site allocation within the Green	Policy NE3: Landscape Character supports the sensitive location and design of new development, including the integration of key

SA objectives for which potential negative effects have been identified	Negative effects identified	Local Plan policies providing possible mitigation
	Belt	landscape features, appropriate landscaping and consideration of key views.  HS1/18: outline planning permission has been granted for the site. The policy discusses appropriate screening in relation to the adjacent M65 and primary and nursery school.
15: Environmental quality and amenity	One site allocation results in loss of grade 3 agricultural land	None of the policies provide mitigation for the loss of grade 3 agricultural land.

- 1.128 The policies identified in Table 8 provide mitigation for the significant negative effects identified. In relation to potential negative effects on the built environment and cultural heritage a small number of site specific policies (HS1/24, HS1/35 and HS1/37) do not make specific provision in relation to the nearby designated heritage assets. Although the overarching historic environment policies provide mitigation, the site specific policies could be amended to ensure recognition of the site specific issues identified.

## Monitoring

- 1.129 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Plan in question. **Table 9** sets out a number of suggested indicators for monitoring the potential significant (positive and negative) sustainability effects of implementing the Burnley Local Plan.

**Table 9 Proposed Monitoring Framework for Burnley's Local Plan**

SA objectives	Proposed monitoring indicators
1. To exploit the growth potential of business sectors and reduce disparities between local and sub-regional economic performance	<ul style="list-style-type: none"> <li>Amount of new employment land delivered.</li> <li>Claimant count (includes Jobseekers Allowance and some Universal Credit claimants. Source: Office for National Statistics – Claimant count by unitary and local authority)</li> </ul>
2. To develop and market the Borough's image	<ul style="list-style-type: none"> <li>Number of visitors to the Borough.</li> <li>Estimated amount of income from tourism.</li> <li>No. and % of vacancies of commercial properties within the Primary and Secondary frontages</li> </ul>
3. To reduce deprivation in urban and rural areas	<ul style="list-style-type: none"> <li>Amount of town centre vacant floorspace.</li> <li>No. of A1 premises lost to other uses in Primary Frontages.</li> <li>No and % A1 retail units in Secondary Frontages.</li> <li>Town centre footfall.</li> </ul>
4. To secure economic inclusion	<ul style="list-style-type: none"> <li>Percentage of people living in fuel poverty.</li> <li>Number of new business start-ups.</li> <li>Claimant count (includes Jobseekers Allowance and some Universal Credit claimants. Source: Office for National Statistics – Claimant count by unitary and local authority)</li> <li>Affordable home completions.</li> <li>Average (mean) house prices.</li> </ul>
5. To develop and maintain a healthy labour market	<ul style="list-style-type: none"> <li>Number of new education facilities.</li> </ul>

SA objectives	Proposed monitoring indicators
	<ul style="list-style-type: none"> <li>• Qualifications of the working age population.</li> </ul>
6. To reduce the need to travel and increase the use of sustainable transport modes	<ul style="list-style-type: none"> <li>• Method of travel to work.</li> <li>• Railway station footfall.</li> <li>• Bus patronage levels.</li> <li>• Number of Travel Plans implemented with new development.</li> <li>• Road Casualties: overall Road Casualties: people killed or seriously injured Road Casualties: children killed or seriously injured</li> </ul>
7. To improve physical and mental health and reduce health inequalities	<ul style="list-style-type: none"> <li>• Method of travel to work.</li> <li>• Life expectancy.</li> <li>• Number of new healthcare facilities provided.</li> <li>• Infant mortality rates.</li> <li>• Obesity rates.</li> <li>• Number of people living with a disability.</li> <li>• Percentage of people regularly participating in sport.</li> <li>• National standards such as 'Green Flag' for parks and open spaces.</li> </ul>
8. To improve access to a range of good quality, resource efficient and affordable housing	<ul style="list-style-type: none"> <li>• Affordable housing completions.</li> <li>• Affordability ratios</li> <li>• Number of people in housing need.</li> <li>• Annual housing completions – total houses built, types, sizes and tenures.</li> <li>• Total vacant dwellings.</li> <li>• Total number of Gypsy and Traveller pitches available.</li> <li>• New pitches and plots approved and provided per annum (allocations &amp; windfall development)</li> <li>• Number of statutory homeless people.</li> <li>• Number or proportion of local authority homes falling below Decent Homes Standards.</li> </ul>
9. To reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> <li>• Crime – notifiable offences recorded by the police (district level).</li> <li>• Street level crime data.</li> </ul>
10. To increase social inclusion	<ul style="list-style-type: none"> <li>• Indices of multiple deprivation</li> <li>• Amount of new and loss of community facilities (sqm).</li> </ul>
11. To improve access to services, amenities and jobs for all groups	<ul style="list-style-type: none"> <li>• Amount of new and loss of community facilities (sqm).</li> <li>• Amount of vacant town centre floorspace.</li> <li>• Amount of indoor sports facilities, playing pitches and publicly accessible green spaces.</li> <li>• Amount of new residential development within 1200m of key local services.</li> <li>• Amount of new residential development within 30 minutes public transport time of key borough services.</li> </ul>
12. To protect and enhance the built environment and cultural heritage, including archaeological assets	<ul style="list-style-type: none"> <li>• Number of entries on the Heritage at Risk Register.</li> <li>• Number of Conservation Areas with character appraisals.</li> <li>• Number of buildings on the local list demolished.</li> </ul>
13. To protect and enhance the Borough's biodiversity and geo-diversity	<ul style="list-style-type: none"> <li>• Amount of greenfield land lost to development.</li> <li>• Quality and condition of SSSIs.</li> <li>• Area of SSSIs in adverse condition as a result of development</li> <li>• Number of planning approvals with conditions to ensure works to</li> </ul>

SA objectives	Proposed monitoring indicators
	<p>manage/enhance the condition of SSSI/SAC/SPA/Ramsar features of interest</p> <ul style="list-style-type: none"> <li>• Number of Biological Heritage Sites</li> <li>• Number of Biological Heritage Sites in Positive Management</li> <li>• BAP habitat - created/ managed via planning obligations</li> </ul>
14.To protect and enhance the Borough's landscape and local character	<ul style="list-style-type: none"> <li>• Percentage of new development taking place on brownfield land.</li> <li>• Use of Natural England's 'ANGSt' standards for green space.</li> </ul>
15.To protect and improve environmental quality and amenity	<ul style="list-style-type: none"> <li>• Percentage of residential development completions on previously developed and greenfield land per annum.</li> <li>• Number of watercourses failing to meet WFD quality targets.</li> <li>• Number of Air Quality Management Areas declared.</li> <li>• Number of noise related complaints submitted to the Council.</li> </ul>
16.To mitigate and adapt to climate change	<ul style="list-style-type: none"> <li>• Greenhouse Emissions Per Capita by Local Authority (CO2) Number of flood incidences.</li> <li>• Number of properties built in areas of flood zones 3.</li> <li>• Number of planning permissions granted contrary to EA advice.</li> <li>• % of new major housing developments approved incorporating SUDS</li> <li>• Number of people using cars to travel to work.</li> </ul>
17.To ensure the prudent use of natural resources and the sustainable management of waste.	<ul style="list-style-type: none"> <li>• Proportion of household waste recycled.</li> <li>• Amount of commercial waste recycled.</li> <li>• Amount of waste sent to landfill.</li> </ul>
18.To increase energy efficiency	<ul style="list-style-type: none"> <li>• % of electricity consumption met by renewable energy in the Borough</li> <li>• Installed renewable energy capacity through the planning system</li> </ul>

## Conclusions

- 1.130 The proposed site allocations and policies as set out in Proposed Submission of the Burnley Local Plan have been subject to a detailed appraisal against the SA objectives which were developed at the Scoping stage of the SA process in this SA report.
- 1.131 A key consideration for Burnley's Local Plan is the need to achieve a balance between the aim to achieve regeneration and economic growth in the Borough, and the need to protect and enhance the valuable natural and historic environment. The Proposed Submission of the Burnley Local Plan proposes a large amount of housing, employment and other development across Burnley to meet the future requirements of the Borough; therefore the SA has identified the potential for negative effects on many of the environmental objectives including biodiversity, cultural heritage and the landscape, although recognises that there may also be opportunities for the new development to help deliver enhancement of biodiversity and heritage assets through creation of new green infrastructure or improving derelict sites and the historic environment. However, the Local Plan also includes a wide range of development management-style policies, aiming to protect and enhance the economic, social and environmental conditions of the Borough. These should go a long way towards mitigating the potential negative effects of the overall scale of development proposed.

### Next steps

- 1.132 The SA Report and this Non-Technical Summary will be published for consultation alongside the Local Plan Proposed Submission Draft between March and April 2017.
- 1.133 Following this consultation the Local Plan and accompanying SA Report will be submitted to the Secretary of State for public examination. Any proposed modifications to the Proposed Submission

of the Burnley Local Plan arising out of this process may require SA, which will be consulted upon as necessary.

LUC  
March 2017