

## Comments on Infrastructure Delivery Plan Baseline Report

Section/Para	Consultees	Issues Raised	Recommended Response
1	Natural England	Natural England considers that this plan reflects our interest.	Support Noted.
3	Highways Agency	<p>3.0.4-3.0.8 - Whilst fully supportive of economic growth, the Highways Agency recognises the emerging tension between the drive for economic growth/ additional trips and the impact on the strategic road network (SRN). There is the potential for future housing development proposals to impact on the M65 and we would welcome working with the Council to understand these impacts and to ensure that the junctions are not a constraint to growth.</p> <p>3.0.15 - Our comments under 'Economic' (7.1.17) apply here.</p>	Noted, further consultation with the Highways Agency will be carried out during the preferred options and as the Local Plan develops.
	1 consultee	Only a rise in the number of good jobs, giving access to better shops, education and aspirational housing will see the town flourish, instead of being a dormitory for Manchester and Preston. It is difficult to rebuild the economy.	Noted, the preferred options identify a number of sites across the borough for employment growth in policy EMP1: Site Allocations.
4	English Heritage	<p>English Heritage welcomes the preparation of the draft Infrastructure Delivery Plan in support of the Local Plan. Our response covers the following:</p> <ul style="list-style-type: none"> <li>· recommendations for the evidence base to inform Infrastructure Delivery Plans;</li> <li>· the relationship of Infrastructure Delivery Plans in supporting a positive strategy for the conservation, enhancement and enjoyment of the historic environment as set out in a Local Plan;</li> <li>· suggestions on how the historic environment and heritage assets can contribute to the delivery of physical, green and social infrastructure in support of development, and where development may require investment in the historic environment due to the demands that new development places on the areas that host it; and</li> <li>· advice on ways in which improvements to the historic environment might be delivered through funding mechanisms such as developer contributions, including the</li> </ul>	<p>As part of developing the Local Plan evidence base, Conservation Area Appraisals are being developed and will be used to inform the development of the IDP.</p> <p>It is noted that historic buildings, structures and landscapes can have a pivotal role in the development, tourism, recreation and transport infrastructure a borough has.</p>

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		<p>Community Infrastructure Levy (CIL). Evidence Base</p> <p>We recommend that the Draft Plan is fully informed by an adequate, up-to-date and relevant evidence base for the historic environment and heritage assets. This is relevant for the consideration of infrastructure at a strategic level (local authority wide) as well as for individual strategic sites and for specific localities and 'area-based' plans. The evidence base will help to identify issues and opportunities for the area's historic environment and heritage assets. It will also contribute to a wider understanding of a place and how future development can best support the needs of existing and new communities. Furthermore the evidence base will aid in understanding and addressing the demands that new development may place on the areas that host it, and the potential implications and opportunities this may have for the historic environment. The evidence base is likely to include the national Heritage at Risk Register and any local at risk registers, conservation area appraisals and management plans, the Historic Environment Record, local lists, and historic characterisation studies as well as qualitative information gained through public surveys and the advice of local authority historic environment officers. We recommend early and ongoing discussions with the Council's historic environment officers. They are best placed to provide information on the historic environment; advise on local historic environment issues and priorities; indicate how heritage assets may be affected; and identify opportunities for securing wider benefits through the conservation and enhancement of the historic environment. A Positive Strategy for the Historic Environment Infrastructure is typically grouped according to three main categories covering physical, green and social (and community) infrastructure. Each of these categories can be broadly interpreted to include opportunities for the sustainable management of an area's historic environment and heritage assets. These opportunities can be important in delivering a positive strategy for the conservation, enhancement and enjoyment</p>	

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		<p>of the historic environment as set out in the Local Plan in accordance with the National Planning Policy Framework (NPPF) (paragraphs 126, 157). Infrastructure The NPPF endorses the protection and enhancement of the historic environment as an integral part of sustainable development (paragraphs 7 and 9) and recognises the wider social, cultural, economic and environmental benefits it can bring (paragraph 126). There can often be a range of ways in which the historic environment and heritage assets can contribute to and benefit from the infrastructure and investment needs that are required to create and maintain places as sustainable communities. Physical Infrastructure Heritage assets can help to deliver a range of infrastructure needs associated with housing, economic development and sustainable transport networks. Historic buildings within or in the vicinity of a settlement may offer opportunities for residential reuse, including for affordable housing (e.g. Affordable Rural Housing and the Historic Environment, <a href="http://www.english-heritage.org.uk/professional/advice/advice-bytopic/heritage-and-growth/housing/affordable-rural-housing/">http://www.english-heritage.org.uk/professional/advice/advice-bytopic/heritage-and-growth/housing/affordable-rural-housing/</a>). Heritage assets can be economic assets in their own right and support the regeneration and economic growth of areas as well as the tourism economy. For example, the adaptive reuse and repair of historic buildings may offer opportunities for business or employment use in both urban and rural contexts (e.g. Constructive Conservation - Sustainable Growth for Historic Places, <a href="http://www.english-heritage.org.uk/professional/advice/conservationprinciples/constructive-conservation/constructive-conservation-sustainable-growth/">http://www.english-heritage.org.uk/professional/advice/conservationprinciples/constructive-conservation/constructive-conservation-sustainable-growth/</a> ; the reuse and conversion of historic farm buildings <a href="http://www.englishheritage.org.uk/professional/research/landscapes-and-areas/characterisation/farmsteads/">http://www.englishheritage.org.uk/professional/research/landscapes-and-areas/characterisation/farmsteads/</a>). More generally the investment in heritage assets (e.g. buildings at risk), and the wider historic character of a place (e.g. conservation areas at risk) may also serve to strengthen and reinforce the attractiveness of a place to retain and attract economic</p>	

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		<p>development and to stimulate and support the area's tourism offer. Investment could be directed to establishing or extending area-based schemes aimed at regenerating valued historic townscapes, as exemplified by Townscape Heritage Initiatives supported by the HLF and English Heritage's programme of Partnership Schemes in Conservation Areas. Specific opportunities may also exist to further develop the tourism offer of established heritage assets open to the public and their links to nearby settlements, as for example sites owned by the National Trust or English Heritage. The following publications illustrate other practical examples of where the protection and adaptation of historic places through active management (constructive conservation) has delivered social and economic benefits: Â· Valuing Places: Good Practice in Conservation Areas <a href="http://www.englishheritage.org.uk/professional/advice/conservation-principles/constructiveconservation/valuing-places/">http://www.englishheritage.org.uk/professional/advice/conservation-principles/constructiveconservation/valuing-places/</a> Â· Constructive Conservation In Practice <a href="http://www.englishheritage.org.uk/publications/constructive-conservation-in-practice/">http://www.englishheritage.org.uk/publications/constructive-conservation-in-practice/</a></p> <p>Improvements to the public realm in town and village centres can help encourage walking and cycling and support the delivery of sustainable transport objectives. Investment in the public realm can also support the delivery of the objectives for the historic environment through helping to deliver conservation area management plans and tackling issues related to conservation areas being identified as at risk. Improvements could include promoting community based de-cluttering audits and the better coordination of signage and street furniture as promoted through English Heritage's Streets for All programme. Improvements in the overall quality, character and indeed functioning of areas can also contribute to wider policy aims linked to tourism, the economy and the built environment. Practical guidance on community audits and managing, designing and maintaining the public realm is available at: <a href="http://www.helm.org.uk/server/show/nav.19637">http://www.helm.org.uk/server/show/nav.19637</a> . In</p>	

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		<p>certain cases, the direct investment in a heritage asset might be required for supporting the development of an area. For example, this could include investment in the improvement and or maintenance of a historic bridge where it is part of the transport infrastructure for the planned development. Social and Community Infrastructure Historic buildings, including places of worship, can accommodate many social and community services and activities as well as represent a focus for the community in their own right. Investment in their continued or improved maintenance could be warranted in supporting and extending the capacity of existing infrastructure. Promoting the adaptive reuse of a vacant or underused building or facilitating the multiple-use of existing buildings for a wider range of community services might also offer the opportunity to support the repair and maintenance of historic buildings, particularly where identified nationally or locally as a building at risk. Practical examples of how heritage assets can be adapted to realise their potential as social and economic assets are available via the English Heritage website: <a href="http://www.englishheritage.org.uk/professional/advice/conservation-principles/constructive-conservation/">http://www.englishheritage.org.uk/professional/advice/conservation-principles/constructive-conservation/</a> . Specific guidance on caring for Places of Worship and new uses for former places of worship is available at: <a href="http://www.english-heritage.org.uk/publications/caring-for-places-of-worship/">http://www.english-heritage.org.uk/publications/caring-for-places-of-worship/</a> ; and <a href="http://www.english-heritage.org.uk/publications/new-uses-former-places-of-worship/">http://www.english-heritage.org.uk/publications/new-uses-former-places-of-worship/</a>. The community transfer of assets may also be an option for delivering infrastructure and the sustainable management of a heritage asset. Guidance and case studies for local authorities, public sector bodies and community groups on the transfer of ownership and the management of historic buildings, monuments or landscapes is available on the English Heritage website [Pillars of the Community: The Transfer of Local Authority Heritage Assets, <a href="http://www.english-heritage.org.uk/caring/get-involved/take-ownership/">http://www.english-heritage.org.uk/caring/get-involved/take-ownership/</a> ]. In supporting access to green space and encouraging walking</p>	

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		<p>and cycling, extensions to the public rights of way network can include improving access to heritage assets (e.g. canal network) and their improved interpretation and enjoyment. The provision of open space might also be linked to improving public access to historic landscapes in the vicinity of a settlement. Social and community infrastructure may also include cultural facilities such as a local museum. Investment may offer opportunities to widen and improve its use by existing and new communities as well as support the tourism economy.</p> <p>Green Infrastructure The historic environment and heritage assets can make a valuable contribution to green infrastructure networks and its wider functions, as for example in providing leisure and recreation opportunities, encouraging walking and cycling and strengthening local character. Historic places such as historic parks and gardens, archaeological sites, the grounds of historic buildings and green spaces within conservation areas can form part of a green infrastructure network as well as underpin the character and distinctiveness of an area and its sense of place. Other heritage assets can also offer a range of opportunities such as canal networks and churchyards and the wider countryside including networks of 'green-lanes', common land and historic parkland.</p> <p>Funding In the context of the Community Infrastructure Levy (see the Planning Act 2008; Community Infrastructure Guidance, April 2013; and CLG Community Infrastructure Levy - An overview, May 2011), a wide definition of infrastructure continues to be promoted in terms of what can be funded by the levy and is needed for supporting the development of an area. This can include:</p> <ul style="list-style-type: none"> <li>• Open space: as well as parks and green spaces and green infrastructure networks, this might also include wider public realm improvements encompassing historic areas and townscapes possibly linked to a Heritage Lottery Fund scheme and drawing on relevant conservation area appraisals, management plans and characterisation studies;</li> <li>• Repairs and improvements to and the maintenance of</li> </ul>	

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		<p>heritage assets where they are an infrastructure item as identified by the 2008 Act, such as educational or sporting or recreational facilities which may be hosted in a historic building or area</p> <ul style="list-style-type: none"> <li>· Maintenance and ongoing costs, which may be relevant for a range of heritage assets, as for example transport infrastructure such as historic bridges; and</li> <li>· 'In kind' payments, including land transfers - this could include the transfer of an 'at risk' building as part of a comprehensive regeneration scheme. Development specific planning obligations continue to offer further opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings and other heritage assets. English Heritage advises that Infrastructure Delivery Plans consider the full range of funding opportunities, including the Community Infrastructure Levy, which can serve to support the implementation of a positive strategy for the conservation, enhancement and enjoyment of the area's historic environment and heritage assets.</li> </ul>	
	Highways Agency	4.0.3 - The Highways Agency is keen to encourage and facilitate cycle routes and we are currently working with Sustrans to look at opportunities throughout the north west.	New and improved cycling opportunities can also be delivered through site allocations in the preferred options.
	1 consultee	There is no reference to the riverine environment, the river Calder, Brun and Pendle Water are vital in providing power, water and sewage disposal to Burnley and Padiham. The rivers are now recovering and provide fishing to many hundreds (possibly thousands) of anglers. The river contains internationally important species such as Atlantic Salmon and Eels.	Noted, the riverine environment is discussed in the preferred options spatial portrait.
	1 consultee	The reference to Gawthorpe Hall as a key tourist attraction in the Borough is noted and supported.	Noted. Gawthorpe Hall is discussed in the preferred options spatial portrait
<b>6</b>	Highways Agency	6.0.8-6.0.10 (CIL) - As far as the Highways Agency is aware, this funding is not ring fenced and as such we	The Council has not yet resolved to pursue CIL. A policy on Infrastructure and Planning Contributions (IC4) has

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		would still rely on entering into Section 278 Agreements with developer's over and above their CIL contributions. We would ask that this is made clear to the developer community.	been included in the preferred options which includes transport and highway matters as potential contributions. Specific policies also identify where such contributions may be required
<b>7</b>	Highways Agency	7.0.1 - The Highways Agency supports the economic aims of the IDP and is happy to engage with the planning and developer communities to deliver sustainable development and subsequently economic growth, whilst safeguarding the primary function and purpose of the strategic road network.	Support noted. The Council will engage with Highways England (The Highways Agency) through consultation on the preferred options and in further developing the IDP and plan wide viability assessment.
<b>7.1</b>	Highways Agency	7.1.1-7.1.2 - The Highways Agency welcomes reference to our Route Based Strategy's (RBS), which seek to address constraints on our network over an initial 5 year and ultimately 15 year horizon. With regard to the East Lancs Transport Masterplan, we have already recommended that this should accord with the RBS and focus on connectivity of the strategic road network (SRN) with the local network so that the strategic and local road networks are considered holistically. We are also working with Lancashire County Council(LCC) and the East Lancs authorities on the East Lancs Connectivity Study. 7.1.4-7.1.7 - The primary junctions which would experience a direct impact of development within Burnley are Junctions 8, 9, 10 and 11 but there is potential for mainline flows to be affected along the length of the M65 and A56. Improvements have already been completed at Junction J6 of the M65 to facilitate future development and growth, in collaboration with LCC and Blackburn Council. Our Pinch Point scheme at M65 Junction 5, within the M65 Gateway section is an important scheme that will help to improve traffic flows at this key location and will be delivered before the end of March 2015. 7.1.9 - 7.1.17 - We welcome the promotion and improvement of good transport infrastructure, services and facilities including the provision of direct rail links to Manchester, an area of employment opportunity.	Noted, the Burnley-Pendle Growth Corridor also identifies schemes which aim to improve the flow of traffic in the borough which could have an impact on the strategic road network which is discussed further in the Infrastructure and Connectivity chapter of the preferred options.
	Highways	7.1.1 - 7.1.2 -With regard to comments already provided	Noted, information regarding the RBS in relation to

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	Agency	by the Highways Agency with regard to our Route Based Strategies (RBS), I should also have mentioned that in order to avoid any potential duplication of our RBS activities, we would be happy to share with the Council any information that may be required from our RBS work.	Burnley and its surroundings would be welcomed during the preferred options consultation and in further developing the IDP and plan-wide viability assessment.
<b>7.2</b>	1 consultee	The Burnley sewage treatment works is creating a significant issue within the Boroughs main River Calder, particularly due to the quantity of phosphate discharged from the treatment plant. It would be beneficial if during development, that phosphate stripping was included, and that increases in the capacity of the treatment works were encouraged, not just to meet additional demand, but also to address issues associated with storm over flows that operate currently where the water treatment works cannot cope with current sewage quantities. This often leaves huge amounts of sewage fungus within the rivers Calder and Brun, in areas used by local residents and visitors to the borough, such as Crow Park, Padiham and Altham.	Noted, the sewage treatment issues will be discussed further with United Utilities during the preferred options consultation and in further developing the IDP and plan-wide viability assessment.
<b>Question 1</b> <b>Further transport and utility baseline information?</b>	1 Consultee	An important part of the transport infrastructure is the lineage between Burnley's main train stations.  Black cabs and taxi services should be included in the plan.	Taxi areas are provided at the main train stations, Burnley Manchester Road and Burnley Central Station. A specific taxi policy is within the preferred options (IC6).
<b>Question 2</b> <b>New transport and utility infrastructure?</b>	Network Rail	Impacts of proposals on existing railway stations: Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such	The recently redeveloped Manchester Road Station and the reopening of the Todmorden Curve providing a direct link to Manchester will support the Vision, Objectives and Policies of the Plan.  The preferred options include a policy relating to Infrastructure and Planning Contributions (IC4). The Council has not yet resolved to pursue CIL.

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		<p>railway improvements; it would also be appropriate to require contributions towards rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network. The National Planning Policy Framework states that councils should, 'work with...transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development...or transport investment necessary to support strategies for the growth of...other major generators of travel demand in their areas'. Also, 'encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plan, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.' The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impacts on the rail network. Developer contributions should be sort to mitigate the impacts of increased footfall at railway stations as a result of new residential or commercial development. The need to mitigate the impacts of increased footfall at railway stations with enhanced services (e.g. CCTV, CIS, increased car parking) should be considered as part of the S106 contributions in the same way as local services or highway works.</p>	
	United Utilities	<p>We support growth and sustainable development within the North West. Our aim is to proactively share our information; assist in the development of sound planning strategies, to identify future development needs and to secure the necessary long-term infrastructure investment. We wish to build a strong partnership with all Local</p>	<p>Noted, further discussions will occur during the preferred options consultation and in further developing the IDP and plan-wide viability assessment.</p>

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		<p>Planning Authorities [LPAs] to aid sustainable development and growth within the North West. We aim to proactively identify future development needs and share our information. This helps:</p> <ul style="list-style-type: none"> <li>- ensure a strong connection between development and infrastructure planning;</li> <li>- deliver sound planning strategies; and</li> <li>- inform our future infrastructure investment submissions for determination by our regulator.</li> </ul> <p>Water and wastewater services are vital for the future well-being of your community and the protection of the environment. When developing your Local Development Framework [LDF] and future policies you should consider the impacts on its community and environment and ensure infrastructure capacity is available. We have no specific comments to make at this stage, but wish to be included in further consultations and where necessary, the development of your future sustained economic growth plans and polices, to ensure that all new growth can be delivered sustainably and with the necessary infrastructure available in line with the Council's delivery targets. Our historical responses to your Local Development Framework consultations; planning applications; pre developer enquiries and planning policy liaison meeting comments are still valid and should be taken into consideration when developing your Local Plan and supporting policies.</p>	
	1 consultee	Burnley resembles and borders West Yorkshire and many other Pennine towns, villages and areas more closely than some Lancastrian ones (especially coastal). Burnley needs to be considered as having a unique and special environment, and the M65 should be extended east to the M1 and A1. Burnley should aim to become the Harrogate of Lancashire, opening up or extensive park land areas to modern housing, just as Harrogate has done.	The potential extension of the M65 to the M1 and A1 would be classed as national infrastructure and would be coordinated by the relevant transport authorities. Only schemes which are planned or could be funded or delivered by the development quantified in the plan can be included within it.
	1 consultee	As mentioned above, there should be additional investment into the Utilities infrastructure around sewage treatment, to remove storm overflows, and introduce phosphate	Noted, the sewage treatment issues will be discussed further with United Utilities during the preferred options consultation and in further developing the IDP and

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		stripping. Without this the rivers and the green spaces around them will continue to have litter (including sewage litter) strewn banks and degraded natural environment. Without quality of green spaces, ambitions to increase the attractiveness of Burnley as a tourist or residential destination will be inhibited.	plan-wide viability assessment.
<b>8.1</b>	Environment Agency	Page 25, 8.1: the key flood defence issues are identified in the report. Page 28, Green Infrastructure: any comments provided above in relation to the Issues and Options document also apply here.	Comment noted
	1 consultee	The possibility of a 'brast' from Pendle Hill has not been mentioned. A brast occurs when saturated peat tears itself, lots of water and stones from the hillside. In one raging torrent it makes its way into the Pendle Water and then off into the River Calder near to sewage works. But water in the Calder is then unable to get into the river and so it 'backs up' flooding the local farm land and threatening the estates. This last occurred in the mid -60s, and was a famous flood at Barley and Barrowford, but also affected Burnley.	Noted. The Council's updated Strategic Flood Risk Assessment (SFRA) will examine flood risk from all sources and include a review historical flood events in the borough. In addition to considering sources of flood risk such as river flooding, surface water, groundwater flooding etc, it will examine 'residual risk' from, for instance, culvert blockages, failure of flood defences or reservoirs. Cooperation with neighbouring authorities such as Pendle will also form part of the Assessment.
	1 consultee	Development in an area, especially flood zones, puts properties at risk – not only immediate properties, but those downstream too. All development should not only consider whether the development is at risk, but also provide equivalent or greater flood storage and water retention activities to mitigate for loss of flood storage capacity and protect downstream areas.	The preferred options includes policies specifically relating to Development and Flood Risk (CC4) and Surface Water Management and Sustainable Drainage Systems (SUDS) (CC5).
<b>8.2</b>	Highways Agency	Open Space and Green Infrastructure - The Highways Agency supports the promotion of healthy lifestyles through the protection of open spaces and green infrastructure, which expand the opportunities for walking, cycling, leisure, recreation and sport.	Support noted. The preferred options includes policies relating to Protected Open Space (NE2) and Green Infrastructure (SP6).
	Consultee	The final map does not look far enough eastward and is Lancashire biased. A full 360 degree plan is required.	The map is directly taken from the Green Infrastructure (GI) Strategy. The GI Strategy describes the linkages to surrounding boroughs but does not display the links on the map as it was deemed that it would be difficult to read the map with too much information on it.

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	1 consultee	The GI strategy is a true reflection of how development should provide green benefits to people and wildlife.	Support noted. A policy relating to Green Infrastructure is included within the preferred options (SP6).
<b>8.3</b>	1 consultee	Under 8.2.16 - would like to see the IDP contain provision for not just retention and replacement of GI assets such as woodland and street trees in new development but look for opportunity to expand and increase this resource. New development provides opportunities to create new communities with good access to trees, woods and other types of natural greenspace. There is increasing evidence that access to natural greenspace can provide a wide range of social, economic and environmental benefits for local communities.	The preferred options includes a policy relating to Green Infrastructure (SP6) and a number of the proposed the site allocations also include specific requirements relating to green infrastructure requirements.
<b>Question 3</b> <b>Further environmental baseline information?</b>	Environment Agency	Page 32, Question 3: As part of the North Area gravel modelling project looking in to the effect of gravel on flood risk a site on the River Calder in Padiham is being surveyed. The results of this survey are due in spring 2014. Further works within the timescale of this plan are not yet confirmed.	Noted. The Council's updated Strategic Flood Risk Assessment (SFRA) will examine flood risk from all sources in consultation with the Environment Agency and other relevant partners. The preferred options include a policy relating to Development and Flood Risk (CC4).
	The National Trust Consultee	Gawthorpe Hall/Park/Estate is not included in the list of green flag parks as it is not a Council owned facility and therefore is not subject to the 'green flag' regime, however it should specifically referred to in the list of green infrastructure facilities given its high level of use.	Noted. Gawthorpe Hall is discussed further in the Spatial Portrait of the preferred options.
<b>Question 4</b> <b>Increase/improve environmental provision?</b>	Environment Agency	Page 32, Question 4: it is likely that flood defences will require improvement to deal with the predicted effects of climate change. The amount of GI and the functionality of GI will bring multiple benefits. In the upland catchment changes in land management to increase the levels water retention and infiltration would be desirable. Increased flood storage in the river valleys upstream and downstream of the main urban areas should be investigated and, at the very least, land that is currently flood plain or has the potential to function as flood plain should be protected from development. This would have benefits for Burnley and Padiham and also settlements in the Lower Ribble catchment. In the built areas water	Flood defence issues will be reviewed in the Council's updated Strategic Flood Risk Assessment and also by Lancashire County Council, the Lead Local Flood Authority. Informed by sequential approach based on Environment Agency Flood Zones, the preferred options include policies relating to Development and Flood Risk (CC4) Green Infrastructure (SP6) and Surface Water Management and Sustainable Drainage (SUDS) (CC5).

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		attenuation and storage should be retrofitted and designed into development to reduce the rates of run-off from impervious surfaces.	
	1 consultee	It is essential Burnley improves its flood defences. This can be achieved from soft engineering and delivering the GI strategy. Areas of flood plain such as at Grove Lane, above Townley Park, and many other areas should be reconnected to rivers, so that in flood events water is stored here and not increasing river levels downstream and flooding properties. These flood plains should flood naturally, which brings biodiversity and flood risk benefits.	Flood defence issues will be reviewed in the Council's updated Strategic Flood Risk Assessment and also by Lancashire County Council, the Lead Local Flood Authority.  Informed by sequential approach based on Environment Agency Flood Zones, the preferred options include a policies relating to Development and Flood Risk (CC4) Green Infrastructure (SP6) and Surface Water Management and Sustainable Drainage (SUDS) (CC5).
	The Woodland Trust Consultee	The Environment Agency and the Forestry Commission are publishing data from their Woods for Water project which includes opportunity mapping showing areas where new woods could provide the maximum benefit in terms of flood alleviation and water quality improvements.	Noted. The preferred options include policies relating to Green Infrastructure (SP6) and Trees, Woodland and Hedgerows (NE4).
<b>Question 5</b> <b>Further social baseline information?</b>	Environment Agency	Page 40, Question 5: fishing is a recreational pastime that has not been included. Our records show that there are club fishing permits available on Cant Clough Reservoir and Cliviger fish ponds. Rowley Lake, the pond on adjacent to Netherwood Road and the Leeds-Liverpool Canal are also regularly used by anglers. It is likely the fishing rights on these waterbodies and rivers in the borough will be held by the landowner or a club.	Fishing is discussed within the spatial portrait of the preferred options.
	Sport England	Sport England is currently working with the Council to prepare a Playing Pitch Strategy. This will result in a site specific action plan by sub area that will provide the basis for the provision for outdoor sport associated with housing growth. Burnley's evidence base for sport is not complete. The district does not have an up to date Playing Pitch Strategy, although it is underway, and no corresponding strategy covering built sport facilities (such as pools, halls, artificial grass pitches etc) - this is despite such a requirement being clearly set out in para.73 of the NPPF. Unfortunately it is built sports facilities that are the type of infrastructure that would need to be provided through a	A Playing Pitch Strategy is currently being developed jointly with Pendle and Rossendale Councils and this draft study together with a Burnley Indoor Sports Facilities Review (February 2015) have informed the preferred options.  The preferred options include a policy relating to Infrastructure and Planning Contributions (IC4) and the Protection and Provision of Social and Community Infrastructure (IC5).

Section/Para	Consultees	Issues Raised	Recommended Response
		<p>CIL mechanism rather than S.106 agreement mechanisms. There is some identification of existing built sports facilities in the Infrastructure Delivery Plan. The IDP however does little more than identify some of the Districts existing provision. Sport England would have expected the section to consider; -All forms of supply of the sports facility type. Peak time supply -The distribution of the facility type -Peak time demand for the facility demand -Current adequacy of facility distribution -Adequacy of peak supply relative to demand by the end of the Plan period -Adequacy of facility distribution at the end of the plan period Since Burnley has not undertaken a built sports facility strategy it does not have an evidence base which allows it to make such analysis. The need for housing growth to be matched by a suitable expansion and growth in sports facility provision has not been considered - and as such there is the danger that existing sports facilities will become overcrowded during the Plan period. More problematically, and less tangibly however is the possibility that rather than seek to access over-stretched sports facilities, Burnley residents will decide not to participate in sport and physical activity.</p>	
	Theatres Trust	<p>Item 156 of the National Planning Policy Framework (NPPF) states that local planning authorities should set out strategic priorities for their area in the Local Plan. This should include policies to deliver the provision of health, security, community and cultural infrastructure and other local facilities. Your infrastructure plan does not include any cultural infrastructure despite the NPPF being quoted, as above, at para 6.0.4 - community and cultural infrastructure. Section 9.3 only deals with sporting activities with public art as a nod to culture. Burnley has theatres, a cinema, art galleries and museums, libraries, craft centres, pubs with music performance areas etc. None of these are included in the document. In a new section of Health and Well-being within the recently published National Planning Practice Guidance (NPPG) it is recommended that a range of issues should be considered through the plan-making and decision-making processes including social and cultural wellbeing. Although it doesn't</p>	<p>Cultural infrastructure is identified within the preferred options, in particular in policies IC5: Protection and Provision of Social and Community Infrastructure, and IC4: Infrastructure and Planning Contributions.</p>

Section/Para	Consultees	Issues Raised	Recommended Response
		specify what is meant by the term 'well-being', we suggest that well-being is having a sense of satisfaction with life. Social and cultural well-being includes the un-measurable personal experiences that make us happy and content. Such experiences are intangible, not financially rewarding, and can either be active (sports) or passive (theatre). The provision of a variety of community infrastructure for tourism (cultural heritage) and town centre vitality (cultural facilities) etc. are vital for their contribution to residents' and visitors' life satisfaction. This takes the issues of 'health' much further than access to doctors, and we suggest that section 9.2 should be re-aligned to reflect the NPPG so that this section also includes cultural well-being for the provision of cultural facilities.	
	1 consultee	Fishing is hugely popular and is classed as sport. This should be included.	Fishing is discussed within the spatial portrait of the preferred options.
<b>Question 6</b> <b>Need to increase/improve social provision?</b>	1 consultee	Burnley needs to increase its support to the Arts, sport and leisure to increase the standards of living and encourage people to value their areas. Encouraging a sense of pride and ownership is crucial to bringing together communities.	The arts, sport and leisure are identified within the preferred options, in particularly in policies IC5: Protection and Provision of Social and Community Infrastructure, and IC4: Infrastructure and Planning Contributions.
	1 Consultee	Burnley and the surrounding area have their own particular climate – colder, wetter, more overcast and more frost than areas of lower elevation. This is not considered when health and planning policy is considered.  Rain limits opportunities to exercise – parks should have covered walkways to enable people to do this in all weather.	Policy SP5: Development Quality and Sustainability discusses the design of developments. The Plan aims to deliver sport and recreational opportunities to suit all tastes to encourage healthier lifestyles
<b>10</b>	1 Consultee	Burnley would benefit from an attraction like a theme park. It would also benefit from the reinstatement of daily trains to London. Mills could be turned into art venues ad Burnley into the arts centre of the art world, with some blue sky thinking. This will create a place that people want to come to.  Light, not heavy industry is the way forward.	In additional to setting out provision for known development needs, the plan set a framework for responding to 'windfall' development proposals that could come forward.  The reinstatement of the Todmorden Curve has enabled a direct train service to Manchester with easier access to trains to London.

Section/Para	Consultees	Issues Raised	Recommended Response
		Older houses should be listed.	<p>A mixture of employment sites have been identified in the preferred options to provide a range of employment opportunities, for both light and heavy industries.</p> <p>The plan also set out policies for the protection of the historic environment and the maintaining of a local list.</p> <p>New statutory listings can be submitted by any person via Historic England to the Secretary of State for Culture, Media &amp; Sport.</p>