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# **SA of the Burnley Local Plan Proposed Main Modifications**

## **Sustainability Appraisal Addendum Report**

Final Report  
Prepared by LUC  
March 2018

**Project Title:** Burnley Local Plan Proposed Main Modifications: Sustainability Appraisal Addendum Report

**Client:** Burnley Borough Council

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# Contents

<b>Non-Technical Summary</b>	<b>1</b>
Introduction	1
Methodology	1
Screening Proposed Main Modifications	2
Proposed Main Modifications Sustainability Appraisal Findings	2
Sustainability Appraisal Findings of 'the Plan as Modified'	2
Next steps	3
<b>1 Introduction</b>	<b>4</b>
Background and introduction	4
The Burnley Local Plan	5
Purpose of this SA Addendum Report	5
Structure of this SA Addendum Report	5
<b>2 Methodology</b>	<b>9</b>
Methodology	9
Reasonable alternatives	11
Consultation on the Local Plan and the SA Addendum Report	12
Monitoring implementation of the Local Plan	12
<b>3 Screening Proposed Main Modifications</b>	<b>13</b>
Introduction	13
Screening Proposed Main Modifications	13
<b>4 Sustainability Appraisal Findings for the Burnley Local Plan Proposed Main Modifications</b>	<b>21</b>
Introduction	21
Proposed Main Modifications Sustainability Appraisal Findings	21
Sustainability Appraisal Findings of 'the Plan as Modified'	23
Mitigation and Recommendations	30
<b>5 Conclusion</b>	<b>33</b>

## Tables

Table 1.1 SA work undertaken	4
Table 1.2 Requirements of the SEA Regulations and where they have been addressed in the SA Report and the SA Addendum Report	5
Table 2.1 Sustainability Appraisal Framework	9
Table 3.1 Summary of Proposed Main Modifications and their implications for the SA	14
Table 4.1 Possible mitigation for potential negative effects identified	30

## Figures

**No table of figures entries found.**





# Non-Technical Summary

## Introduction

This is the Non-Technical Summary of the Sustainability Appraisal (SA) of the Burnley Local Plan Proposed Main Modifications documenting the processes of SA incorporating Strategic Environmental Assessment (SEA).

On 20<sup>th</sup> July 2017, the Burnley Local Plan Proposed Submission and supporting documents were submitted to the Secretary of State for independent examination by a Government appointed Planning Inspector. Submitted alongside the Plan were the SA Report of the Proposed Submission Local Plan (SD 006; March 2017) and the Non-Technical Summary of that report (SD 007; March 2017). Examination hearings were held between November and December 2017.

Following the Examination Hearings, the Inspector proposed a number of Main Modifications which he considers necessary to make the Burnley Local Plan sound. These are published in a standalone document and should be read in conjunction with the SA Addendum Report. The following is an outline of the Proposed Main Modifications:

- Reduce the annual average housing requirement from 209 to 194 dwellings (changes to policies *SP2: Housing Requirement 2012-2032* and *HS1: Housing Allocations*).
- Reduce the employment land requirement from 90ha to 66ha and delete the proposed employment allocations on land currently in the Green Belt at Shuttleworth Mead South (EMP1/12) and Burnley Bridge Extension (EMP1/13) (changes to *SP3: Employment Land Requirement 2012-2032* and *EMP1: Employment Allocations*).
- Deletion of policy *HS7: Gypsy and Traveller Site Allocations*.
- Policy wording changes to eight other policies (*SP4: Development Strategy*; *SP7: Protecting the Green Belt*; *HS2: Affordable Housing Provision*; *HS3: Housing Density and Mix*; *HS8: Gypsy and Traveller Site Criteria*; *TC5: Uses within the Weavers' Triangle*; *IC3: Car Parking Standards* and *IC7: Taxis and Taxi Booking Offices*).
- Changes to the Housing Trajectory in Appendix 5; the Key Diagram; the Padiham Town Centre boundary map; and the Monitoring Framework (Table 10).

The SA Addendum Report considers the likely significant effects of the Burnley Local Plan Proposed Main Modifications. The Addendum takes forward the findings of the SA of the Proposed Submission Local Plan produced in March 2017 which accompanied the Burnley Local Plan Proposed Submission. In addition to presenting an appraisal of the Proposed Main Modifications, the SA Addendum Report presents an appraisal of 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report.

## Methodology

**Chapter 2** of the SA Report accompanying the Burnley Local Plan Proposed Submission describes in detail the methodology and approach used throughout the SA process, including the use of matrices, colour-coded assessments and narrative to present the findings, and describes any difficulties encountered during the SA process. For continuity, the SA Framework presented in Chapter 2 of the SA Report continues to form the basis for the SA work on the Proposed Main Modifications.

The Inspector has not identified alternative main modifications to address the issues of soundness which should then be subject to SA. Therefore, the SA Addendum Report does not contain an appraisal of reasonable alternatives to the Proposed Main Modifications.

## Screening Proposed Main Modifications

There are 17 Proposed Main Modifications which were screened with a view to identifying those that need to be given detailed consideration through SA on the basis that the modification has the potential to give rise to a significant effect. The Screening of the Proposed Main Modifications for their significance with regard to the SA process found that the majority of modifications (11 out of 17) are not likely to lead to significant effects, either alone or in combination, and were screened-out of further appraisal.

## Proposed Main Modifications Sustainability Appraisal Findings

The seven screened-in PMM will generally support positive effects previously identified and strengthen mitigation measures. The deletion of several sites from the Plan, particularly EMP1/12 and EMP1/13, removes significant negative effects previously identified for the SA objectives relating to landscape and environmental quality as these sites are either within the Green Belt or comprise Best and Most Versatile agricultural land. Site HS1/18 is within the Green Belt and recorded a significant negative effect for SA objective 14: **landscape and local character** in the SA Report. However, it should be noted that the site is considered to no longer fulfil green belt purposes and the previous SA referred to its contribution to landscape character which is not a green belt purpose. This site is still proposed to be removed from the Green Belt and included within the development boundary as 'white land'. It is proposed to be developed as an alternative provision free school. Therefore, the significant adverse effect previously identified for this site is revised to a minor negative effect for SA objective 14.

The significant positive effects identified for SA objectives 1: **economic performance**, 2: **the Borough's image**, 3: **deprivation in urban areas**, 5: **healthy labour market**, 6: **sustainable transport**, 7: **health** and 11: **access to services and jobs** for sites GT1, HS1/18, EMP/12 and EMP/13 will also no longer be experienced as these sites have been deleted as allocations from the Plan. The positive effects identified for HS1/13 and HS1/14 will be experienced as, although these sites are no longer housing allocations, they are considered as commitments (completions/under construction) in policy *SP2: Housing Requirement 2012-2032*.

## Sustainability Appraisal Findings of 'the Plan as Modified'

Generally the effect of the deletions on 'the Plan as modified' will not alter the overall conclusions of the SA Report with the exception of the effects identified for SA objective 12: **built environment**, 13: **biodiversity and geodiversity** and 14: **landscape and local character**. The effects for both SA objectives have been revised from mixed effects (minor positive/significant negative) to mixed effects (minor positive/minor negative).

For SA objective 12: **built environment**, the negative effect is reduced and not removed as the Plan will allocate sites in close proximity to designated heritage assets which may impact on their significance. However, additional evidence presented at the Examination demonstrates that none of the allocations proposed would, subject to the requirements of the plan, result in harm to the significance of heritage assets as any potential harm could be mitigated through design or layout.

For SA objective 13: **biodiversity and geodiversity**, the negative effect is reduced and not removed as the Plan will allocate development sites that are in close proximity to designated nature conservation sites which have the potential to cause disturbance, habitat loss and fragmentation. However, the Habitats Regulations Assessment of the Proposed Main Modifications concludes that there will be no adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area/ South Pennine Moors Special Area of Conservation.

For SA objective 14: **landscape and local character**, the negative effect is reduced and not removed as the Plan will no longer allocate employment sites in the Green Belt, however it will allocate a large area of greenfield land for development which could be to the detriment of the local landscape character.

## Next steps

The SA Addendum Report and this Non-Technical Summary will be published for consultation alongside the Burnley Local Plan Proposed Main Modifications in March/April 2018.

The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan's soundness.

Assuming that the Inspector is able to find the Plan 'sound', with any necessary main modifications, it will then be formally adopted by the Council. At the time of adoption, an SA Statement will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

# 1 Introduction

## Background and introduction

- 1.1 This Sustainability Appraisal Addendum Report has been prepared by LUC on behalf of Burnley Borough Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Burnley Local Plan. An integrated approach to the SA/SEA has been taken throughout the evolution of the Burnley Local Plan and the abbreviation 'SA' should be taken to refer to 'SA incorporating the requirements of SEA'.
- 1.2 The Burnley Local Plan has been subject to SA throughout its evolution. **Table 1.1** outlines the principal stages at which SA has been undertaken.

**Table 1.1 SA work undertaken**

Date	Plan Iteration	Accompanying SA Report
July 2012	-	SA Scoping Report
February 2014	Burnley Local Plan Issues and Options	SA of the Issues and Options
August 2014	Burnley Local Plan Issues and Options: Additional Sites	SA of the Issues and Options: Additional Sites
July 2016	Burnley Local Plan Preferred Options	SA of the Preferred Options Local Plan
March 2017	Burnley Local Plan Proposed Submission	SA of the Proposed Submission Local Plan
July 2017	Burnley Local Plan Proposed Submission Document and Schedule of Minor Modifications	-
February 2018	Burnley Local Plan Proposed Main Modifications	SA Addendum Report of the Proposed Main Modifications (this report)

- 1.3 On 20<sup>th</sup> July 2017, the Burnley Local Plan Proposed Submission and supporting documents were submitted to the Secretary of State for independent examination by a Government appointed Planning Inspector. Submitted alongside the Plan were the SA Report of the Proposed Submission Local Plan (SD 006; March 2017) and the Non-Technical Summary of that report (SD 007; March 2017).
- 1.4 Following the Examination Hearings, the Inspector proposed a number of Main Modifications which he considers necessary to make the Burnley Local Plan sound. These are published in a standalone document and should be read in conjunction with the SA Addendum Report. The following is an outline of the Proposed Main Modifications:
- Reduce the annual average housing requirement from 209 to 194 dwellings (changes to policies *SP2: Housing Requirement 2012-2032* and *HS1: Housing Allocations*).
  - Reduce the employment land requirement from 90ha to 66ha and delete the proposed employment allocations on land currently in the Green Belt at Shuttleworth Mead South (EMP1/12) and Burnley Bridge Extension (EMP1/13) (changes to *SP3: Employment Land Requirement 2012-2032* and *EMP1: Employment Allocations*).
  - Deletion of policy HS7: Gypsy and Traveller Site Allocations.
  - Policy wording changes to eight other policies (*SP4: Development Strategy*; *SP7: Protecting the Green Belt*; *HS2: Affordable Housing Provision*; *HS3: Housing Density and Mix*; *HS8: Gypsy and Traveller Site Criteria*; *TC5: Uses within the Weavers' Triangle*; *IC3: Car Parking Standards* and *IC7: Taxis and Taxi Booking Offices*).

- Changes to the Housing Trajectory in Appendix 5; the Key Diagram; the Padiham Town Centre boundary map; and the Monitoring Framework (Table 10).

1.5 The Inspector also stated that, as the Council has made a formal commitment to produce a separate Gypsy and Traveller Site Allocations Development Plan Document (DPD) and an amended version of the Habitats Regulations Assessment report (January 2018) has been prepared, progress can be made on the publication of the PMM for consultation<sup>1</sup>.

## The Burnley Local Plan

1.6 **Chapter 1** of the SA Report of the Proposed Submission Local Plan (March 2017) provides an outline of the contents and main objectives of the Burnley Local Plan. **Chapter 3** of the SA Report describes the relationship between the Burnley Local Plan and other relevant plans, programmes and environmental protection objectives; summarises the social, economic and environmental characteristics of Burnley Borough and identifies the key sustainability issues relevant to the preparation of the Local Plan and the SA. These chapters are supported by **Appendix 2** and **3** of the SA Report.

## Purpose of this SA Addendum Report

1.7 This SA Addendum Report considers the likely significant effects of the Burnley Local Plan PMM. The Addendum takes forward the findings of the SA of the Proposed Submission Local Plan produced in March 2017 which accompanied the Burnley Local Plan Proposed Submission. In addition to presenting an appraisal of the PMM, this report presents an appraisal of 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report. It is important to emphasise that this is an *addendum* to that SA Report and hence the two documents should be read together.

1.8 There is no requirement to repeat previous SA appraisals and this SA Addendum Report has been prepared in accordance with relevant guidance and legislative requirements, and seeks to be a proportionate assessment relevant to the stage of plan-making and in line with National Planning Policy Framework (NPPF) requirements for SA (paragraph 167).

1.9 Any Minor Modifications (such as the correction of spelling or grammar) are unlikely to result in significant effects and therefore do not need to be subject to SA or consultation.

## Structure of this SA Addendum Report

1.10 **Table 1.2** below signposts how the requirements of the SEA Regulations have been met within the SA Report and this SA Addendum Report.

**Table 1.2 Requirements of the SEA Regulations and where they have been addressed in the SA Report and the SA Addendum Report**

SEA Regulations' Requirements	Covered in the SA Report or the SA Addendum Report?
<b>Environmental Report</b>	
Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:	
(a) implementing the plan or programme; and	
(b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.	

<sup>1</sup> It should be noted that a further HRA Report relating to the Burnley Local Plan Proposed Main Modifications was undertaken in February 2018.

SEA Regulations' Requirements	Covered in the SA Report or the SA Addendum Report?
(Regulation 12(1) and (2) and Schedule 2).	
1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Chapter 1 and 3 and Appendix 2 of the SA Report.
2) 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 of the SA Report.
3) The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Appendix 3 of the SA Report.
4) 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 on the conservation of wild birds and the Habitats Directive.	Chapter 3 of the SA Report.
5) The environmental protection objectives, established at international, Community or Member State 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 of the SA Report.
6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in subparagraphs (a) to (l).	Chapter 4 and Appendices 5, 7, 8, 9 and 10 of the SA Report.  Chapters 3 and 4 of the SA Addendum Report.
7) 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 of the SA Report.  Chapter 4 of the SA Addendum Report.
8) 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 and Appendix 6 of the SA Report.
9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 5 of the SA Report.
10) A non-technical summary of the information provided under paragraphs 1 to 9.	A separate Non-Technical Summary document has been prepared to accompany the SA Report.  A Non-Technical Summary is presented at the beginning of the SA Addendum Report.

SEA Regulations' Requirements	Covered in the SA Report or the SA Addendum Report?
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> <li>(a) current knowledge and methods of assessment;</li> <li>(b) the contents and level of detail in the plan or programme;</li> <li>(c) the stage of the plan or programme in the decision-making process; and</li> <li>(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</li> </ul> <p>(Regulation 12 (3))</p>	<p>Addressed throughout the SA Report and the SA Addendum Report.</p>
<b>Consultation</b>	
<p>When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies.</p> <p>(Regulation 12(5))</p>	<p>Consultation on the SA Scoping Report was undertaken with the relevant statutory environmental bodies from June 2012 to July 2012.</p>
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>(a) send a copy of those documents to each consultation body;</li> <li>(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees");</li> <li>(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</li> </ul> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	<p>Consultation was undertaken on the Burnley Local Plan Proposed Submission between March and April 2017. The SA of the Burnley Local Proposed Submission accompanied this document.</p> <p>Consultation on the Burnley Local Plan Proposed Main Modifications will be undertaken in March/April 2018. This SA Addendum Report will accompany this document.</p>
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <ul style="list-style-type: none"> <li>(a) notify the Secretary of State of its opinion and of the reasons for it; and</li> <li>(b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</li> </ul> <p>(Regulation 14 (1))</p>	<p>Not relevant as there will be no effects beyond the UK from the Burnley Local Plan.</p>
<b>Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)</b>	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</li> </ul> <p>(Regulation 16(1))</p>	<p>To be addressed after the Burnley Local Plan is adopted.</p>

SEA Regulations' Requirements	Covered in the SA Report or the SA Addendum Report?
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <p>(a) the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State,</p> <p>that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</p>	<p>To be addressed after the Burnley Local Plan is adopted.</p>
<b>Monitoring</b>	
<p>The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))</p>	<p>To be addressed after the Burnley Local Plan is adopted.</p>

1.11 Following this introductory Chapter 1, this Addendum Report is structured into four further chapters:

- **Chapter 2: Methodology** describes the approach that is being taken to the SA of the Burnley Local Plan Proposed Main Modifications.
- **Chapter 3: Screening of the Burnley Local Plan Proposed Main Modifications** screens the Proposed Main Modifications for their significance with regard to the SA process.
- **Chapter 4: Sustainability Appraisal findings for the Burnley Local Plan Proposed Main Modifications** summaries the SA findings of the Proposed Main Modifications and also considers the effects of the Local Plan as a whole.
- **Chapter 5: Conclusions** summarises the key findings from the SA of the Burnley Local Plan Proposed Main Modifications and describes the next steps to be undertaken.

## 2 Methodology

### Methodology

- 2.1 **Chapter 2** of the SA Report accompanying the Burnley Local Plan Proposed Submission describes in detail the methodology and approach used throughout the SA process, including the use of matrices, colour-coded assessments and narrative to present the findings, and describes any difficulties encountered during the SA process.
- 2.2 For continuity, the SA Framework presented in the SA Report continues to form the basis for the SA work on the PMM (see **Table 2.1** below).

**Table 2.1 Sustainability Appraisal Framework**

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 areas	3a. Will it improve economic, social and environmental conditions in the most deprived areas and for the most deprived groups? 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?	Material assets 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	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?	Climatic factors Human health

Headline SA Objectives	Sub-objectives	Relevant topic(s) as set out in the SEA Regulations
transport modes	6c. Will it improve access to and encourage the use of ICT?	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 assets	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? 12c. Will it protect and enhance the local distinctiveness of the built environment?	Cultural heritage, including architectural and archaeological 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?	Air Human health Soil

Headline SA Objectives	Sub-objectives	Relevant topic(s) as set out in the SEA Regulations
	15d. Will it protect the best and most versatile agricultural land? 15e. Will it maintain and enhance ground and surface water quality?	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

- 2.3 The PMM were screened for their significance in sustainability terms (**Chapter 3**). The Schedule of Proposed Main Modifications (February 2018) is published as a standalone document and should be read in conjunction with this SA Addendum Report. However, as some of the wording changes to policy are extensive, for clarity of presentation, a summary of the essence of the proposed changes is given as a reference for a statement on the likely implications of the modification for the SA and whether the PMM requires further SA (see **Table 3.1**).
- 2.4 Following this process, an appraisal of the screened-in PMM was undertaken (**Chapter 4**). Finally consideration was given to the cumulative, secondary and synergistic effects of 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report (also within **Chapter 4**).

## Reasonable alternatives

- 2.5 **Chapter 2** of the SA Report presents detailed information in relation to reasonable alternatives, specifically:
- Detailed information is provided in relation to the identification and appraisal of site options. This information is supported by **Appendix 5** which presents the SA matrices for unallocated reasonable alternative housing sites and **Appendix 10** which provides a summary of scores for these sites as well as reasonable alternative mixed-use and town centre sites.
  - Detailed information is presented in relation to the identification and appraisal of policy options. **Appendix 7** of the SA Report presents the SA matrices of the policy options considered at Issues and Options stage.
- 2.6 **Appendix 6** of the SA Report lists the reasonable site options that have been considered and provides Burnley Borough Council's reasons for selecting or rejecting each option.
- 2.7 The Inspector has not identified alternative main modifications to address the issues of soundness which should then be subject to SA. Therefore, the SA Addendum Report does not contain an appraisal of reasonable alternatives to the Proposed Main Modifications.

## Consultation on the Local Plan and the SA Addendum Report

Throughout the plan-making and SA process, comments made as a result of public consultation have been considered and responded to as appropriate. Burnley Borough Council is inviting comments on the Burnley Local Plan Proposed Main Modifications and this SA Addendum Report. Both documents are being published on the Council's website for consultation in March/April 2018. Consultation remains an important part of the ongoing and iterative SA process and any responses received will be considered by the Inspector in preparing his final report.

## Monitoring implementation of the Local Plan

- 2.8 Recommendations for monitoring the social, environmental and economic effects of implementing the Burnley Local Plan are presented in **Chapter 5** of the SA Report.

# 3 Screening Proposed Main Modifications

## Introduction

- 3.1 There are 17 Proposed Main Modifications (PMM) which are considered in this chapter with a view to identifying those that need to be given detailed consideration through SA on the basis that the modification has the potential to give rise to a significant effect. The PMM that are likely to have limited substantive implications, and in turn not likely to lead to significant effects, either alone or in combination, are identified and screened-out of further appraisal.

## Screening Proposed Main Modifications

- 3.2 **Table 3.1** overleaf summaries the PMM, identifies the implications of the modification for the SA and considers whether the PMM requires a detailed SA of the modification against the SA Framework.

**Table 3.1 Summary of Proposed Main Modifications and their implications for the SA**

Main Mod Ref	Plan Reference	Summary of Proposed Main Modifications – to be read in conjunction with the full text set out in the Schedule of Proposed Main Modifications	SA Implications	Further SA Required
MM1	Policy SP2: Housing Land Requirement 2012-2032	The requirement for housing in the Borough from 2012 to 2032 has been updated in line with the 2017 SHMA Addendum using the equivalent scenario and a similar adjustment for vacancies in new stock as in the Proposed Submission Plan. The Proposed Main Modification identifies a requirement for 3,880 net additional dwellings over the Plan period which equates to an indicative average of 194 dpa.	There is a need to deliver 300 fewer houses, equating to a change of 15dpa over the 20 year plan period i.e. a new requirement of 3,880 net additional dwellings (previously 4,180) equating to 194dpa (previously 209). HS1/13 and HS1/14 are no longer considered housing allocations as both sites are under construction and are now considered as commitments (completions/under construction) in policy <i>SP2: Housing Requirement 2012-2032</i> . HSP1/18 is also no longer considered to be a housing allocation, however, the parcel of land will be removed from the Green Belt and included within the development boundary as 'white land'. The removal of these sites as housing allocations will be assessed for their implications on the SA in MM7. Although there will be a reduction in the Plan target in policy <i>SP2: Housing Requirement 2012-2032</i> , this will only be a small reduction in the number of houses delivered over the plan period as set out in the revised trajectory. Therefore, the modification will not affect the scoring or overall conclusions of the SA for this policy. The amended policy will continue to support the significant positive effects identified for SA objective 8: <b>housing</b> .	<b>Screened-out</b> - The amended text does not necessitate altering the SA.
MM2	Housing Trajectory  Appendix 5 and Supporting Text			
MM3	Policy SP3: Employment Land Requirement 2012-2032	The requirement for employment land in the Borough from 2012 to 2032 has been reduced from 90 ha to 66 ha.	There is a need to deliver 24ha less employment land in the Borough over the plan period. The size of land allocated for employment development has been reduced for EMP1/2 to take into account the area of the site that is now complete and as such is considered in policy <i>SP3: Employment Land Requirement 2012-2032</i> as a commitment (under construction). EMP1/4 is no longer considered as an employment land allocation as it is under construction and is now considered in policy <i>SP3: Employment Land Requirement 2012-2032</i> as a commitment. Two sites, EMP1/12 and EMP1/13, are removed from the Plan and are no longer considered employment land allocations. The impacts of these changes will be assessed for their implications on the SA in MM12. Although there will be a reduction in the amount of employment land	<b>Screened-out</b> - The amended text does not necessitate altering the SA.

Main Mod Ref	Plan Reference	Summary of Proposed Main Modifications – to be read in conjunction with the full text set out in the Schedule of Proposed Main Modifications	SA Implications	Further SA Required
			delivered over the plan period, the modification will not affect the scoring or overall conclusions of the SA for this policy. The amended policy will continue to support the significant positive effects identified for SA objectives 1: <b>economic performance</b> and 5: <b>healthy labour market</b> .	
MM4	Policy SP4: Development Strategy and supporting text	The criteria for the acceptability of development proposals on allocated and unallocated sites have been amended, in addition to the supporting text on brownfield land and the open countryside.	This modification removes criteria from the policy which may affect the scoring and overall conclusions of the SA for this policy.	<b>Screened-in</b> – The amended policy requires SA.
MM5	Policy SP7: Protecting the Green Belt and supporting text	As the overall requirement for employment land has reduced from 90ha to 66ha, the text relating to the justification of development on the Green Belt to meet the previously identified shortfall of employment land has been removed.	The modification removes reference to the release of Green Belt land to meet the requirements for employment land which may affect the scoring and overall conclusions of the SA for this policy.	<b>Screened-in</b> – The amended policy requires SA.
MM6	Key Diagram	The Key Diagram illustrating the Plan’s allocations and, existing designations and infrastructure in the Borough has been amended.	The modification of the Key Diagram does not have any implications for the SA.	<b>Screened-out</b> – An SA of the amendment to the Key Diagram is not required.
MM7	Policy HS1: Housing Allocations	Three sites will no longer be considered as housing allocations in the Plan (HS1/13, HS1/14 and HS1/18).	The SA of this policy provides a general summary of the effects of developing all allocated housing sites. The removal of one site as a site for housing development (HS1/18) and the deletion of two sites as housing allocations as they are under construction and are now considered as commitments in policy <i>SP2: Housing Requirement 2012-2032</i> (HS1/13 and HS1/14) may affect the scoring and overall conclusions of the SA for this policy.	<b>Screened-in</b> – The amended policy requires SA.
	HS1/1 Former Hambledon Schools HS1/2 Hollins Cross Farm HS1/4 Land at Rossendale Road	The amended text removes reference to developing schemes of the highest quality which clearly and demonstrably contribute to increasing housing quality and choice across the borough, including satisfying the test set out in policy <i>SP4: Development Strategy 3 c) i and iii</i> (removed by MM4).	The requirement to develop schemes of the highest quality is partly addressed by another policy in the Plan i.e. policy <i>SP5: Development Quality and Sustainability</i> . The requirement to deliver a choice of housing across the borough is addressed by policy <i>HS3: Housing Density and Mix</i> .	<b>Screened-in</b> - The amended policy requires SA to take into account the removal of this text from the site specific policies.

Main Mod Ref	Plan Reference	Summary of Proposed Main Modifications – to be read in conjunction with the full text set out in the Schedule of Proposed Main Modifications	SA Implications	Further SA Required
	(Housing) HS1/9 Red Lees Road, Cliviger HS1/25 Ridge Avenue HS1/26 Land adjacent to 2 Queens Park Road HS1/28 Land to rear of Bull and Butcher HS1/30 Brampton House, Colne Road HS1/31 Land adjacent 250 Brownside Road HS1/32 Clevelands Road South HS1/36 Land West of Smithyfield Avenue HS1/38 Butchers Farm			
	HS1/5 Former Baxi Site	The amended text states that development of the site is dependent on the delivery by the Environment Agency of a wider flood alleviation scheme for Padiham.  The amended text removes reference to developing schemes of the highest quality which clearly and	The modification further strengthens the mitigation provided in the policy to protect the site from flooding which may affect the scoring and overall conclusions of the SA for this site.  The requirement to develop schemes of the highest quality is partly addressed by another policy in the	<b>Screened-in</b> – The site requires SA to take into account the mitigation proposed relating to flood risk and the removal of the text relating to developing schemes of the highest

Main Mod Ref	Plan Reference	Summary of Proposed Main Modifications – to be read in conjunction with the full text set out in the Schedule of Proposed Main Modifications	SA Implications	Further SA Required
		demonstrably contribute to increasing housing quality and choice across the borough, including satisfying the test set out in policy <i>SP4: Development Strategy 3 c) i and iii</i> (removed by MM4).	Plan i.e. policy <i>SP5: Development Quality and Sustainability</i> . The requirement to deliver a choice of housing across the borough is addressed by policy <i>HS3: Housing Density and Mix</i> .	quality.
	HS1/7 Ridge Wood supporting information	The amended text states that the site lies to the west of Queen’s Park Registered Park and Garden and development proposals will need to satisfy the requirements of Policy HE2.	The modification provides mitigation to protect and enhance the historic and built environment which may affect the scoring and overall conclusions of the SA for these sites.	<b>Screened-in</b> – These sites require SA to take into account the mitigation proposed relating to the historic environment.
	HS1/10 Higher Saxifield and supporting information	The amended text requires proposals of this site to recognise that the Grade II listed Saxifield Farmhouse lies immediately to the south of the site and to satisfy the requirements of Policy HE2.		
	HS1/13 Peel Mill	Housing allocation site HS1/13 has been deleted as the site was under construction as at 31 <sup>st</sup> March 2017 and is now considered as a commitment (completion/under construction) under policy <i>SP2: Housing Requirement 2012-2032</i> . As such, its development would not be subject to the policies set out in the Plan.	The deletion of HS1/13 and HS1/14 as housing allocations will have implications for the SA as the significant effects on the SA objectives associated with the sites will no longer be experienced.	<b>Screened-in</b> – The sites have been deleted and do not require SA, however, the effects of removing the sites should be considered as part of the appraisal of ‘the Plan as modified’.
	HS1/14 Waterside Mill	Housing allocation site HS1/14 has been deleted as the site was under construction as at 31 <sup>st</sup> March 2017 and is now considered as a commitment (completion/under construction) under policy <i>SP2: Housing Requirement 2012-2032</i> . As such, its development would not be subject to the policies set out in the Plan.		
	HS1/18 Former Ridgewood High School	Housing allocation site HS1/18 has been deleted.		
	HS1/20 Gordon	The amended text allows a flexible approach to the mix of dwelling types in line with policy <i>HS3:</i>	The amended text provides for a greater flexibility in the mix of dwelling types if the existing mill	<b>Screened-in</b> – The site requires SA to take into

Main Mod Ref	Plan Reference	Summary of Proposed Main Modifications – to be read in conjunction with the full text set out in the Schedule of Proposed Main Modifications	SA Implications	Further SA Required
	Street Mill and supporting information	<p><i>Housing Density and Mix</i> if the mill building is to be retained and converted.</p> <p>The amended text removes reference to developing schemes of the highest quality which clearly and demonstrably contribute to increasing housing quality and choice across the borough, including satisfying the test set out in policy <i>SP4: Development Strategy 3 c) i and iii</i> (removed by MM4).</p>	<p>building is to be converted for residential use which may affect the scoring and overall conclusions of the SA for this site.</p> <p>The requirement to develop schemes of the highest quality is partly addressed by another policy in the Plan i.e. policy <i>SP5: Development Quality and Sustainability</i>. The requirement to deliver a choice of housing across the borough is addressed by policy <i>HS3: Housing Density and Mix</i>.</p>	account the mitigation proposed relating to the historic environment and the removal of the text relating to developing schemes of the highest quality.
	HS1/34 and EMP1/11 George Street Mill	The amended text clarifies that this site is suitable for a range of uses and is not specifically included in the calculations of housing or employment land.	In addition to the uses previously assessed for this site (B1: Business and C3: Houses), the site is now considered suitable for uses under B1, C3, C2: Residential institutions and D1: Non-residential institutions.	<b>Screened-in</b> - The site requires SA to take into account that it is suitable for a wider range of uses.
MM8	Policy HS2: Affordable Housing Provision	The amended policy addresses the viability of delivering affordable housing on-site or off-site.	The amended text within the policy strengthens support for SA objective 8: <b>housing</b> . However, as a significant positive score is already identified for this SA objective, no change to the assessment is proposed.	<b>Screened-out</b> - The amended text does not necessitate altering the SA.
MM9	Policy HS3: Housing Density and Mix	The amended policy specifies that density should be informed by site specific considerations. It also identifies a minimum threshold for housing schemes to consider a mix of housing types.		
MM10	Policy HS7: Gypsy and Traveller Site Allocations and supporting text	Policy HS7 Gypsy and Traveller Site Allocations has been deleted. Identifying land for allocation to meet the need and demand for Gypsy and Traveller pitches and plots will now be addressed in a separate Gypsy and Traveller Sites Allocations DPD.	The SA of this policy focused on the allocation of one Gypsy and Traveller site (GT1: Site at Oswald Street, Burnley). The deletion of this policy and site from the Plan will have implications for the SA as the significant effects on the SA objectives associated with the policy/site will no longer be achieved (significant positive effects for SA objectives 2: <b>the Borough's image</b> , 7: <b>health</b> , 8: <b>housing</b> and 11: <b>access to services and jobs</b> ). Conversely the significant negative effects associated with developing this site will also not be experienced (SA objective 12: <b>built environment &amp; cultural heritage</b> ).	<b>Screened-in</b> – The policy/site has been deleted and does not require SA, however, the effects of removing this policy/site should be considered as part of the appraisal of 'the Plan as modified'.
MM11	Policy HS8: Gypsy and Traveller Site Criteria and supporting	The amended text gives additional policy support to proposals for the provision of transit and permanent pitches for Gypsy or Traveller use, or plots for Travelling Showpeople, where a demand exists. Further wording is added which states that the	The amended wording supports further pitch provision above already met need including on sites outwith the development boundary which may affect the scoring and overall conclusions of the SA for this policy.	<b>Screened-in</b> - The amended policy requires SA.

Main Mod Ref	Plan Reference	Summary of Proposed Main Modifications – to be read in conjunction with the full text set out in the Schedule of Proposed Main Modifications	SA Implications	Further SA Required
	text	provision of pitches and plots for Gypsies, Travellers or Travelling Showpeople must be for those who satisfy the definition set out in Appendix 1 of <a href="#">Planning Policy for Traveller Sites</a>		
MM12	Policy EMP1: Employment Allocations and supporting text	Three sites will no longer be allocated for employment development in the Plan (EMP1/4, EMP1/12 and EMP1/13). EMP1/4 is deleted as an allocation rather than being deleted from the plan entirely and it is still counted in policy <i>SP3: Employment Land Requirement 2012-2032</i> as a commitment (under construction) but its development would not be subject to the policies set out in the Plan.	The SA of this policy provides a general summary of the effects of developing all allocated employment sites and as a result the removal of three sites may affect the scoring and overall conclusions of the SA for this policy.	<b>Screened-in</b> – The amended policy requires SA.
	EMP1/2 – Burnley Bridge and supporting text	The size of the employment site has been reduced from 6.56 ha to 3.14ha to take account of an area of the site that is now under construction and as such it is considered in policy <i>SP3: Employment Land Requirement 2012-2032</i> as a commitment (under construction). The policy text has been updated to reflect this change.	The modification is not significant enough to change the scoring or overall conclusions of the SA.	<b>Screened-out</b> - The amended text does not necessitate altering the SA.
	EMP1/4 – Widow Hill Road	Employment land allocation EMP1/4 has been deleted as this development is under construction and is now considered as a commitment in policy <i>SP3: Employment Land Requirement 2012-2032</i> . As such its development would not be subject to the policies set out in the Plan.	The deletion of this site as an allocation from the Plan will have implications for the SA as the significant effects on the SA objectives associated with this site will no longer be experienced.	<b>Screened-in</b> – This site has been deleted and does not require SA, however, the effects of removing the site should be considered as part of the appraisal of 'the Plan as modified'.
	EMP1/9 – Innovation Drive	The amended text states that no development will be permitted within the boundary of the Biological Heritage Site.	Although reference is now made to protecting the BHS in the site specific policy, this is also referenced in the supporting text and as a result has already been taken into account during the SA of this site. Therefore, the impact of this modification will not change the scoring or overall conclusions of the SA.	<b>Screened-out</b> - The amended text does not necessitate altering the SA.
	EMP1/11 and HS1/34 George Street Mill (Mixed Use) and supporting	The site no longer has outline planning permission for a mixed use development and the policy text has been updated to reflect this change. The site is still suitable for mixed use development.	In addition to the uses previously assessed for this site (B1: Business and C3: Houses), the site is now considered suitable for uses under B1, C3, C2: Residential institutions and D1: Non-residential institutions.	<b>Screened-in</b> - The site requires SA to take into account that it is suitable for a wider range of uses.

Main Mod Ref	Plan Reference	Summary of Proposed Main Modifications – to be read in conjunction with the full text set out in the Schedule of Proposed Main Modifications	SA Implications	Further SA Required
	information			
	EMP1/12 – Burnley Bridge Extension	Employment land allocation EMP1/12 has been deleted.	The deletion of these sites from the Plan will have implications for the SA as the significant effects on the SA objectives associated with the sites will no longer be experienced.	<b>Screened-in</b> – The sites have been deleted and do not require SA, however, the effects of removing the sites should be considered as part of the appraisal of 'the Plan as modified'.
	EMP1/13 – Shuttleworth Mead South	Employment land allocation EMP1/13 has been deleted.		
MM13	Policy TC2: Development within Burnley and Padiham Town Centres and supporting text	The Padiham Town Centre boundary has been extended to include the Tesco store on Lune Street as suggested in the Retail, Leisure and Office Assessment.	The extension of the Padiham Town Centre boundary does not affect the scoring or overall conclusions of the SA for this policy. The amended policy will continue to support the significant positive effects identified for SA objectives 3: <b>deprivation in urban areas</b> , 6: <b>sustainable transport</b> , 11: <b>access to jobs &amp; services</b> .	<b>Screened-out</b> - The modification does not necessitate altering the SA.
MM14	Policy TC5: Uses within the Weavers' Triangle	The amended text requires retail developments above a certain threshold to undertake an Impact Assessment.	The impact of this modification will not change the scoring or overall conclusions of the SA. The amended policy will continue to support the significant positive effects identified for SA objectives 2: <b>the Borough's image</b> and 12: <b>built environment &amp; cultural heritage</b> .	<b>Screened-out</b> - The amended text does not necessitate altering the SA.
MM15	Policy IC3: Car Parking Standards	The amended text adds an additional criterion which supports the provision of charging points for ultra-low emission vehicles.	Although reference is now made to the provision of charging points for ultra-low emission vehicles in the site specific policy, this is also referenced in the supporting text and as a result has already been taken into account during the SA of this policy. Therefore, the impact of this modification will not change the scoring or overall conclusions of the SA.	<b>Screened-out</b> - The amended text does not necessitate altering the SA.
MM16	Policy IC7: Taxis and Taxi Booking Offices	The amended text redefines where proposals for taxi booking offices should be permitted. An additional criterion relating to clustering is also proposed.	These modifications may affect the scoring and overall conclusions of the SA for this policy.	<b>Screened-in</b> – The amended policy requires SA.
MM17	Table 10 Monitoring Framework	The Monitoring Framework has been amended to reflect the new requirements for housing and employment land in the Borough.	The modification of the Monitoring Framework does not have any implications for the SA.	<b>Screened-out</b> – An SA of the amendment to the Monitoring Framework is not required.

## 4 Sustainability Appraisal Findings for the Burnley Local Plan Proposed Main Modifications

### Introduction

- 4.1 This chapter presents an appraisal of the screened-in Proposed Main Modifications (PMM). It also considers the cumulative, secondary and synergistic effects of 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report.

### Proposed Main Modifications Sustainability Appraisal Findings

#### MM4 - Policy SP4: Development Strategy

- 4.2 The PMM amends the criteria for the acceptability of development proposals within the development boundaries on allocated and unallocated sites, in addition to the supporting text on brownfield land and the open countryside. It now only applies policy SD4 clause (3) to unallocated sites and removes the additional quality and sustainability requirements for greenfield sites. The requirements specified in other policies in the Local Plan, particularly in policy *SP5: Development Quality and Sustainability* provide for some mitigation for the loss of these requirements as do the site specific allocation requirements set out in policy *HS1: Housing Allocations*. The minor positive effect previously identified for policy SP4 in relation to SA objective 18: **energy efficiency** is revised to a negligible effect as the policy no longer refers to the need for proposals to demonstrate high sustainability standards.

#### MM5 - Policy SP7: Protecting the Green Belt

- 4.3 The PMM removes reference to the release of Green Belt land in order to meet the requirements for employment land provision. The mixed effect (significant positive/minor negative) previously identified for policy SP7 in relation to SA objective 14: **landscape and local character** is revised to a significant positive effect. The minor negative effect identified in the SA Report is removed as there is no longer a requirement to release Green Belt land to meet the requirements for employment land provision in the Borough. While this modification is a positive revision that will contribute to the protection and enhancement of the Borough's landscape and local character, the policy already scores a positive effect for objective 14, which will remain the case under MM5.

#### MM7 - Policy HS1: Housing Allocations and site specific policy requirements

- 4.4 For site HS1/5, the amended site specific policy further strengthens the mitigation provided in the policy to protect the site from flooding. A minor negative effect was previously identified for SA objective 16: **climate change** in the SA Report. This is revised to a negligible effect as the amended text strengthens the mitigation provided in the policy by including additional information which states that the development of the site is dependent on the delivery by the Environment Agency of a wider flood alleviation scheme for Padiham. Furthermore, no built development will be permitted to commence within the areas of Flood Zone 2 and 3 until the scheme has been completed to an extent that the site can be safely occupied and its development will not cause or exacerbate flooding elsewhere.
- 4.5 For sites HS1/7 and HS1/20 uncertain significant negative effects were previously identified for SA objective 12: **built environment & cultural heritage** in the SA Report. The amended supporting information for HS1/7 recognises that the site lies to the west of Queen's Park Registered Park and Garden and highlights that development proposals are required to satisfy the requirements of policy HE2: Designated Heritage Assets while the amended policy for HS1/20

provides greater flexibility on housing mix if the conversion of the existing mill building for residential use forms part of the scheme. The effects are revised to minor negative effects as there is still potential for the development of these sites to have an adverse impact on their adjacent designated heritage assets (albeit not a significant effect).

- 4.6 Due to the expanded range of uses for the mixed use site EMP1/11 and HS1/34, the uncertain minor positive effect expected for SA objective 5: **healthy labour market** is revised to an uncertain significant positive effect as it is possible that the site may incorporate schools, colleges or training centres under use class D1 which would increase levels of participation and attainment in education. The range of quality, and access to, public services and facilities under use class D1 and C2 would have a positive effect on SA objective 11: **access to services and jobs**, however, as a significant positive effect is already identified for this SA objective, the score is not revised.
- 4.7 The significant positive effects previously identified for SA objectives 2: **the Borough's image**, 3: **deprivation in urban areas**, 6: **sustainable transport**, 7: **health** and 11: **access to services and jobs** for sites HS1/13, HS1/14 and HS1/18 will no longer result as these sites have been deleted as allocations. Sites HS1/13 and HS1/14 are however under construction for housing. Site HS1/18 is within the Green Belt and recorded a significant negative effect for SA objective 14: **landscape and local character** in the SA Report. However, it should be noted that the site is considered to no longer fulfil green belt purposes and the previous SA referred to its contribution to landscape character which is not a green belt purpose. This site is still proposed to be removed from the Green Belt and included within the development boundary as 'white land'. It is proposed to be developed as an alternative provision free school. Therefore, the significant adverse effect previously identified for this site is revised to a minor negative effect for SA objective 14.
- 4.8 For 14 site specific policies (HS1/1, HS1/2, HS1/4, HS1/5, HS1/9, HS1/20, HS1/25, HS1/26, HS1/28, HS1/30, HS1/31, HS1/32, HS1/36 and HS1/38), the removal of text relating to developing schemes to high sustainability standards will result in negligible effects for SA objective 18: **energy efficiency**. The requirements specified in other policies in the Local Plan, particularly policy *SP5: Development Quality and Sustainability* and *HS3: Housing Density and Mix* provide some mitigation for the loss of this requirement.
- 4.9 The SA of policy HS1 provides a general summary of the effects of developing all allocated housing sites. Removing three housing sites from the Plan will not alter the scoring or overall conclusions of the SA for this policy. The amended policy will continue to support the significant positive effects identified for SA objectives 2: **the Borough's image**, 6: **sustainable transport**, 7: **health** and 8: **housing**. The impact of removing HS1/18 which has a significant negative effect on SA objective 14: **landscape and local character** does not alter the overall minor negative effect identified for developing all the allocated housing sites.

#### **MM10 - Policy HS7: Gypsy and Traveller Site Allocations**

- 4.10 The significant positive effects previously identified for SA objective 2: **the Borough's image**, 7: **health**, 8: **housing** and 11: **access to services and jobs** for policy HS7 and the associated Gypsy and Traveller site (GT1) will no longer be experienced as this policy/site has been deleted from the Plan. Conversely the uncertain significant negative effect associated with developing the one Gypsy and Traveller site will also not be experienced (SA objective 12: **built environment & cultural heritage**).

#### **MM11 - Policy HS8: Gypsy and Traveller Site Criteria**

- 4.11 The amended policy states that where unmet need or demand exists, the Council would consider sites close to, but not necessarily within existing settlements/development boundaries, where these remain close to essential services. Therefore, the minor positive effects identified for SA objectives 4: **economic inclusion**, 6: **sustainable transport**, 10: **social inclusion** and 11: **access to services and jobs** are revised to mixed effects (minor positive/minor negative) as, although sites outwith existing settlements/development boundaries should remain close to essential services, access to jobs, community and leisure facilities and opportunities to use sustainable modes of transport may be more limited as these tend to be concentrated within existing settlements/development boundaries. Furthermore, locating new sites outwith existing

settlements/development boundaries would limit opportunities to create mixed and inclusive communities and to ensure that the Gypsy and Traveller communities are not segregated.

#### **MM12 - Policy EMP1: Employment Allocations and site specific policy requirements**

- 4.12 No significant effects, either positive or negative, were previously identified for EMP1/4 and therefore its deletion as an employment land allocation from the Plan will not have a significant impact with regard to the SA.
- 4.13 Sites EMP/12 and EMP/13 are within the Green Belt and previously recorded significant negative effects for SA objective 14: **landscape and local character** in the SA Report. Furthermore, EMP/13 is also classified as Grade 3 Best and Most Versatile agricultural land and further significant negative effects were identified for SA objective 15: **environmental quality and amenity**. The significant adverse effects associated with these sites will no longer be experienced as they will not be allocated for employment development in the Local Plan. Conversely, the significant positive effects in relation to SA objectives 1: **economic performance** and 5: **healthy labour market** will also not be experienced.
- 4.14 The SA of policy EMP1 provides a general summary of the effects of developing all allocated employment sites. Removing three employment sites from the Plan will not alter the scoring or overall conclusions of the SA for this policy. The amended policy will continue to support the significant positive effects identified for SA objectives 1: **economic performance** and 5: **healthy labour market**. The impact of removing two sites with previously identified significant negative effects on SA objectives 14: **landscape and local character** and 15: **environmental quality and amenity** does not alter the overall minor negative effect identified for developing all the allocated employment sites.

#### **MM16 - Policy IC7: Taxis and Taxi Booking Offices**

- 4.15 The amended text in the policy redefines where proposals for taxi booking offices should be permitted. Proposals for new taxi booking offices will now be considered within Burnley Town Centre outside of the Primary Shopping Frontages; within Padiham Town Centre; or within a defined District Centre. The policy previously identified that proposals should be directed to Burnley Secondary Shopping Frontage. The modification will not affect the scoring or overall conclusions of the SA for this policy as the SA appraised this policy based on the premise that it directs new taxi booking offices to central locations.
- 4.16 An additional criterion relating to avoiding clustering of similar uses is also included in the amended policy. While this modification is an addition that will contribute to the protection and improvement of environmental quality and amenity, the policy already scores a minor positive effect for objective 15: **environmental quality and amenity**, which will remain the case under MM16.

### **Sustainability Appraisal Findings of 'the Plan as Modified'**

- 4.17 The SA findings for 'the Plan as modified' are described below by SA objective, thereby updating the appraisal findings presented within the SA Report.

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

- 4.18 The allocation and protection of at least 66ha 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.
- 4.19 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.

- 4.20 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.
- 4.21 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**

- 4.22 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.
- 4.23 Eight of the housing sites allocated through policy *HS1: Housing Allocations* are expected to have positive effects on this SA objective, six 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 11 employment sites allocated in policy *EMP1: Employment Allocations* include six 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.
- 4.24 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**

- 4.25 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.
- 4.26 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.
- 4.27 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**

- 4.28 The Local Plan provides for the development of at least 66 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.

- 4.29 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**

- 4.30 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.
- 4.31 The provision of at least 66ha 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.
- 4.32 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**

- 4.33 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.
- 4.34 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 11 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.
- 4.35 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**

- 4.36 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*).

- 4.37 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.
- 4.38 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.
- 4.39 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**

- 4.40 The Local Plan makes provision for the development of a minimum of 3,880 new homes between 2012 and 2032 to meet the objectively assessed housing need for the Borough and allocates 32 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, subject to viability, through 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.
- 4.41 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**

- 4.42 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.
- 4.43 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.
- 4.44 Overall a cumulative **negligible** effect is likely in relation to SA objective 9: Crime.

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

- 4.45 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.

- 4.46 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**

- 4.47 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.
- 4.48 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.
- 4.49 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 32 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.
- 4.50 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**

- 4.51 The scale of housing and employment development proposed through the Local Plan could adversely affect heritage assets and their settings. Seventeen allocated housing and employment sites are within very close proximity of designated heritage assets meaning that the setting of these heritage assets could be significantly affected. Potential historic environment impacts, particularly setting impacts, were noted as likely to have been overstated in the SA scoring of sites due to the nature of the SA assessment, which being desk-based, meant this was unavoidable and this is noted in the SA Report (para 4.44 page 36), in the Site Assumptions, and the individual site appraisals. To address this concern, the site appraisals also included the specific high level comments of the Council's Principal Planner (Design and Heritage), where relevant. During the Local Plan Examination, supplemental information was prepared for the Inspector by the Council in the form of Housing Site Factsheets [EL1.002c] and for Historic England [EL3.072] which inter alia addressed the issues of intervisibility and setting impacts. The Council's conclusion on this matter [EL2.013i para 8.8] was that none of the allocations proposed would, subject to the requirements of the plan, result in harm to the significance of heritage assets as any potential harm could be mitigated through design or layout.
- 4.52 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.

- 4.53 Overall a cumulative but uncertain **mixed (minor positive and minor negative)** effect is identified in relation to SA objective 12: built environment. Effects on this objective are expected to be long-term and permanent.

#### **SA objective 13: To protect and enhance the Borough's biodiversity and geodiversity**

- 4.54 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 minor 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.
- 4.55 The Habitats Regulations Assessment, which has been revised to reflect the Burnley Local Plan Proposed Main Modifications, identified four policies (*SP2: Housing Requirement 2012-2032*; *SP3: Employment Land Requirement 2012-2032*; *HS1: Housing Allocations*; and *EMP1: Employment Allocations*) and six housing allocations (*HS1/9*, *HS1/15*, *HS1/20*, *HS1/31*, *HS1/36* and *HS1/38*) as having Likely Significant Effects (LSE) alone. It concluded that there would be no adverse effects on the integrity of the South Pennine Moors SPA as a result of off-site habitat loss or from off-site noise, vibration or light from the cumulative effects of these sites. Furthermore, the site allocations are considered unlikely to be important in contributing to the maintenance of breeding migratory populations of SPA birds and therefore will not result in adverse effects on the integrity of the SPA. There is likely to be an increase in the number of trips to the South Pennine Moors Phase 2 SPA/ South Pennine Moors SAC from the increased population within Burnley, however, an increase in recreational use of the SPA/SAC can be managed within acceptable margins if a Visitor Management Plan is implemented.
- 4.56 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.
- 4.57 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.
- 4.58 Overall a cumulative **mixed (minor positive and minor 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**

- 4.59 The development of at least 3,880 new homes in the Borough (as set out in policy *SP2: Housing Requirement 2012-2032*) and a minimum of 66ha 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. Although a large number of the residential and employment sites allocated through policies *HS1: Housing Allocations* and *EMP1: Employment Allocations* are on greenfield land, no allocations are within the Green Belt. 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..
- 4.60 The Local Plan makes 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*.

- 4.61 Overall, a cumulative **mixed (minor positive and minor 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**

- 4.62 The Local Plan proposes a 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* will involve the development of greenfield land (ten sites are wholly greenfield) which could result in the loss of high quality agricultural soils, although it is noted that these are not within Grade 3 agricultural land (the highest quality land within Burnley Borough). Just under half 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 these allocated sites are not within Grade 3 agricultural land.
- 4.63 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.
- 4.64 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**

- 4.65 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)*. A number 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. However, most of the development sites allocated through the Local Plan are outside of areas of high flood risk.
- 4.66 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 and factors outwith the Local Plan e.g. building regulations. 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.
- 4.67 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**

- 4.68 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 and factors outwith the Local Plan e.g. 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 and the incorporation of adequate and carefully designed for storage bins and recycling containers. 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.

4.69 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**

4.70 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*.

4.71 Although planning applications will be assessed against the plan policies, the effects that individual development sites allocated in the Local Plan will have on energy efficiency are difficult to determine at this stage and will be influenced by factors such as the design of the development and building regulation standards.

4.72 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**

4.73 The recommendations for mitigating the potential negative effects of implementing the Burnley Local Plan presented in **Chapter 4** of the SA Report have been updated in light of the Proposed Main Modifications (see **Table 4.1**). All references to sites and policies which have been deleted from the Plan have been removed. Furthermore, reference has been made to the mitigation proposed in the PMM, particularly in the site specific policies for the housing and employment sites.

4.74 Note that only those SA objectives for which potential significant negative effects were identified have been included in the table. Sixteen out of the 18 SA objectives are unlikely to be negatively affected (at a significant level) by the policies or site allocations in the Burnley Local Plan (previously SA objectives 14 and 15 were also significantly affected by the allocation of EMP1/12 and EMP1/13; however these sites have been deleted by the PMM and therefore significant adverse effects on these objectives are no longer recorded).

**Table 4.1 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 <i>HE1: Identifying and protecting Burnley's Historic Environment</i> seeks to protect, enhance and promote the elements that contribute to the distinct identity of the borough.</p> <p>Policy <i>HE2: Designated Heritage Assets</i> states that proposals affecting designated heritage assets and or their settings will be assessed in order to identify harm.</p>

SA objectives for which potential negative effects have been identified	Negative effects identified	Local Plan policies providing possible mitigation
		<p>Policy <i>HE4: Scheduled Monuments and Archaeological Assets</i> 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> <p>The site specific policies under Policy <i>EMP1: Employment Allocations</i>:</p> <p>EMP1/2: makes provision for a landscaping scheme.</p> <p>EMP1/3: makes provision for retention of existing trees and shrubs.</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>EMP1/14: requires an appropriate hard and soft landscaping scheme providing adequate screening and appropriate boundary treatment.</p> <p>Policy <i>TC4: Development Opportunities in Burnley Town Centre</i> requires high quality, locally distinctive materials.</p> <p>Site specific policies under Policy <i>HS1: Housing Allocations</i>:</p> <p>HS1/3: requires appropriate landscaping and boundary treatment.</p> <p>HS1/4: The supporting information notes the need to retain and sensitively incorporate a listed feature into the development scheme.</p> <p>HS1/7: The supporting information states that the site lies to the west of Queen’s Park Registered Park and Garden and development proposals will need to satisfy the requirements of Policy HE2.</p> <p>HS1/10: The supporting information also notes the potential for below ground archaeology and the requirement for a desk top archaeological assessment. It also states that the grade II listed Saxifield Farmhouse lies immediately to the south of the site and development proposals must satisfy the requirements of Policy HE2.</p> <p>HS1/20: supports the conversion of the existing mill building for residential use. The supporting information notes the proximity to the Conservation Area.</p> <p>HS1/24: does not include any specific design references to reflect the proximity to the Canalside Conservation Area.</p> <p>HS1/26: The supporting information notes the proximity to a registered park and garden and the need to consider impact on setting.</p> <p>HS1/31: The supporting information notes the proximity to the conservation area.</p>
13: Biodiversity and geodiversity	Proximity of proposed sites to designated nature or geological conservation sites	<p>Policy <i>NE1: Biodiversity and Ecological Assets</i> requires the protection and enhancement of biodiversity including for sites of national and international importance.</p> <p>Site specific policy under Policy <i>HS1: Housing Allocations</i>:</p> <p>HS1/9/15/20/31/36/38: requires an ecological survey to accompany the planning application which identifies any Protected Species and South Pennines SPA qualifying species present.</p>

4.75 The policies identified in **Table 4.1** provide mitigation for the significant negative (including uncertain) 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. The SA Report of the Burnley Local Plan Proposed Submission recommended that the site specific policies could be amended to ensure recognition of the site specific issues identified. As stated previously, during the Local Plan Examination, supplemental information was prepared for the Inspector by the Council in the form of Housing Site Factsheets [EL1.002c] and for Historic England [EL3.072] which inter alia addressed the issues of intervisibility and setting impacts. The Council's conclusion on this matter [EL2.013i para 8.8] was that none of the allocations proposed would, subject to the requirements of the plan, result in harm to the significance of heritage assets as any potential harm could be mitigated through design or layout and the Inspector has not identified the need for a PMM to address this recommendation in order to find the Local Plan sound.

## 5 Conclusion

- 5.1 This SA Addendum Report considers the likely significant effects of the Burnley Local Plan Proposed Main Modifications (PMM). In addition to presenting an appraisal of the PMM, this report presents an appraisal of 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report.
- 5.2 The Screening of the PMM for their significance with regard to the SA process found that the majority of modifications (10 out of 17) are not likely to lead to significant effects, either alone or in combination, and were screened-out of further appraisal.
- 5.3 The seven screened-in PMM will generally support positive effects previously identified and strengthen mitigation measures. The deletion of several sites from the Plan, particularly EMP1/12 and EMP1/13, removes significant negative effects previously identified for the SA objectives relating to landscape and environmental quality as these sites are either within the Green Belt or comprise Best and Most Versatile agricultural land. Site HS1/18 is within the Green Belt and recorded a significant negative effect for SA objective 14: **landscape and local character** in the SA Report. However, it should be noted that the site is considered to no longer fulfil green belt purposes and the previous SA referred to its contribution to landscape character which is not a green belt purpose. This site is still proposed to be removed from the Green Belt and included within the development boundary as 'white land'. It is proposed to be developed as an alternative provision free school. Therefore, the significant adverse effect previously identified for this site is revised to a minor negative effect for SA objective 14.
- 5.4 The significant positive effects identified for SA objectives 1: **economic performance**, 2: **the Borough's image**, 3: **deprivation in urban areas**, 5: **healthy labour market**, 6: **sustainable transport**, 7: **health** and 11: **access to services and jobs** for sites GT1, HS1/18, EMP/12 and EMP/13 will also no longer be experienced as these sites have been deleted as allocations from the Plan. The positive effects identified for HS1/13 and HS1/14 will be experienced as, although these sites are no longer housing allocations, they are considered as commitments (completions/under construction) in policy *SP2: Housing Requirement 2012-2032*.
- 5.5 Generally the effect of these deletions on 'the Plan as modified' will not alter the overall conclusions of the SA Report with the exception of the effects identified for SA objective 12: **built environment**, 13: **biodiversity and geodiversity** and 14: **landscape and local character**. The effects for these SA objectives have been revised from mixed effects (minor positive/significant negative) to mixed effects (minor positive/minor negative). For SA objective 12, the negative effect is reduced and not removed as the Plan will allocate sites in close proximity to designated heritage assets which may impact on their significance. However, additional evidence presented at the Examination demonstrates that none of the allocations proposed would, subject to the requirements of the plan, result in harm to the significance of heritage assets as any potential harm could be mitigated through design or layout. For SA objective 13, the negative effect is reduced and not removed as the Plan will allocate development sites that are in close proximity to designated nature conservation sites which have the potential to cause disturbance, habitat loss and fragmentation. However, the Habitats Regulations Assessment of the PMM concludes that there will be no adverse effect on the integrity of the South Pennine Moors Phase 2 SPA/ South Pennine Moors SAC. For SA objective 14, the negative effect is reduced and not removed as the Plan will no longer allocate employment sites in the Green Belt, however it will allocate a large area of greenfield land for development which could be to the detriment of the local landscape character.

### Next steps

This SA Addendum Report and the Non-Technical Summary will be published for consultation alongside the Burnley Local Plan Proposed Main Modifications in March/April 2018.

- 5.6 The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan's soundness.
- 5.7 Assuming that the Inspector is able to find the Plan 'sound', with any necessary main modifications, it will then be formally adopted by the Council. At the time of adoption, an SA Statement will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.