

Burnley Town Centre - Public Realm Strategy

Supplementary Planning Document

Consultation Statement

This statement has been prepared in order to comply with the requirements of the Planning and Compulsory Purchase Act 2004, for the adoption of Supplementary Planning Documents by Local Planning Authorities.

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1. Introduction

- 1.1 Under the Planning and Compulsory Purchase Act 2004 it is a requirement to prepare and publish a Consultation Statement for a range of planning policy documents, including Supplementary Planning Documents (SPD's). This is a reflection of the Government's desire to "strengthen community and stakeholder involvement in the development of local communities". The Council formally adopted a Statement of Community Involvement (SCI) in September 2007, which sets out how the public will be consulted on new planning policy and significant planning applications. As the Statement of Community Involvement is now adopted, all such planning documents will be required to conform to its provisions.
- 1.2 This Consultation Statement has been prepared following the adoption of the Statement of Community Involvement, and aims to reflect the intentions of Government planning guidance for reporting on community involvement in the plan making process. It describes the involvement of stakeholders, the community, voluntary organisations and statutory consultees in the preparation of the Burnley Town Centre Public Realm Strategy Supplementary Planning Document (SPD). The Supplementary Planning Document and the Sustainability Appraisal (SA) Report, were made available during a period of statutory consultation in May 2011 for five weeks in accordance with the appropriate regulations.

2. Sustainability Appraisal

- 2.1 The Supplementary Planning Document aims to enhance relevant policies within the Burnley Local Plan with more detailed public realm design policies.
- 2.2 As part of producing the SPD a scoping study was undertaken highlighting the Council's intentions and considering whether a Sustainability Appraisal should be carried out for the SPD. This Report was made available to consultees during the period of consultation.

3. Officer and Member Consultation

- 3.1 Prior to the public consultation stage internal consultation was undertaken with Council Officers and key Members of the Council to ensure a robust and accurate draft document was produced.
- 3.2 Officers were consulted on the draft document during January 2011 for a period of two weeks, following which amendments were made. Details of which departments were consulted are given in Appendix 3.
- 3.4 The draft Supplementary Planning Document was finalised during February 2011 taking full account of the consultation responses from Officers and Members of the Council. This then received a decision from the Executive Committee on 9th February 2010 for it to be deposited on draft for four weeks of public consultation.

4. Consultation of draft Supplementary Planning Document

- 4.1 The draft Supplementary Planning Document was the subject of a four week formal public consultation from 7th March until 1st April 2011. The SPD together with its accompanying documents were placed on the Council's website, with reference copies made available at Contact Centre and Burnley and libraries in Burnley and Padiham.
- 4.2 In order to inform the public, groups, businesses and organisations that the consultation was taking place notice was placed on the Burnley Council website where copies were available to download. Allied with this a letter was sent to individuals or organisations on the Local Development Framework mailing list, informing them of where they could view the SPD documents and how to submit comments. Details of consultees are given in Appendix 1, 2 & 3.
- 4.3 In addition, a public open day was held in Burnley Town Centre at the Charity Arch on St James's Street between 10:00 and 15:00 on 10th March 2011. Posters were put up in the Market Hall, Contact Centre, the Town Hall and the Library to advertise the event, and copies of the document were also put in these locations for members of the public to view.
- 4.4 Consultees were informed that any comments they wished to make had to be submitted in writing or emailed to the Council by 4.30 p.m. on the 1st April. By this deadline period the Council had received 10 responses were received within a day of the consultation ending. Due to the relevance of the early comments submitted by Lancashire County Council on 2nd March 2010 in relation to a slightly older draft, and slightly late comments also from Lancashire County Council, the Council has decided to consider these with the other responses; resulting in a total of 12 consultation responses.
- 4.5 On completion of the consultation period, all the responses were gathered, read and assessed and a summary (included in Appendix 5) of the main points produced, together with proposed revisions to the SPD resulting from these comments.

Appendix 1 – Officer Consultation

Internal Consultation on the draft Supplementary Planning Document

The draft Supplementary Planning Document was circulated internally (via email) for comments on 18th January 2010 for a period of two weeks to the following departments within the Council:

- Development Control
- Building Control
- Streetscene
- Green Spaces
- Property Services
- Conservation Officer
- Highways & Engineers
- Environmental Health
- Legal Services
- Economic Regeneration and Business Support

Comments received were inserted into the SPD where relevant.

Appendix 2 - Specific Consultation Bodies Consulted on the Draft SPD

The Town and Country Planning (Local Development) (England) Regulations 2004 sets out the bodies local planning authorities should consult, if relevant (in addition to submitting documents to the Government Office for the North West which is also first point of contact for consultation with central government departments).

The following list of consultation bodies are those identified in list 1 of Appendix 3 of the adopted Burnley Statement of Community Involvement:

- North West Regional Assembly
- North West Development Agency
- Lancashire County Council
- Adjoining Local Authorities
 - Hyndburn Borough Council
 - Rossendale Borough Council
 - Calderdale Metropolitan District Council
 - Ribble Valley Borough Council
 - Pendle Borough Council
 - Padiham Town Council
- Parish Councils
 - Briercliffe Parish Council
 - Cliviger Parish Council
 - Dunnockshaw Parish Council
 - Habbergham Eaves Parish Council
 - Hapton Parish Council
 - Ightenhill Parish Council
 - Worsthorne – with – Hurstwood Parish Council
- The Environment Agency
- Natural England
- English Heritage
- Historic Buildings and Monuments Commission for England
- Network Rail (or its successor organisation (s))
- The Cumbria and Lancashire Strategic Health Authority
- Relevant telecommunications companies
- Relevant gas and electricity companies
- United Utilities
- Highways Agency
- Adjoining LSPs
- Any Government department or agencies who have large land holdings in the area covered by a LDD

Appendix 3 - General and Other Consultees

General consultation bodies are those identified in list 3 of Appendix 3 of the adopted Burnley Statement of Community Involvement:

- Voluntary bodies, some or all of whose activities benefit any part of the authority's area;
- Bodies which represent the interests of different racial, ethnic or national groups in the authority's area;
- Bodies which represent the interests of different religious groups in the borough;
- Bodies which represent the interests of disabled people in the borough; and
- Bodies which represent the interests of people carrying on business in the borough.

Other consultees are those identified in the adopted Burnley Statement of Community Involvement:

- Agriculture and Rural Development Commission
- British Waterways, canal owners and navigation authorities
- Burnley Chamber of Trade
- Coal Authority
- Commission for Architecture and the Built Environment
- Defence Estates
- District Youth & Community Office
- East Lancashire Healthcare Trust
- East Lancashire Education Team
- Equal Opportunities Commission
- Fire and Rescue Services
- Go Northwest
- Health and Safety Executive
- Lancashire Learning and Skills Council
- Lancashire Police – Liaison Officer

Appendix 7 - Summary of Consultation comments on the consultation draft SPD

The following section summarises the main comments received during the four week statutory consultation period from 7th March until 1st April 2011. The summary is presented in tabular form for ease of understanding. If required you may see the original consultation comments – please contact the Planning Policy unit to arrange on Tel: 01282 425011.

Consultee	Representation	Response
The Coal Authority	Having reviewed your document, I can confirm that we have no specific comments to make at this stage.	Comment Noted.
English Heritage	English Heritage supports the Public Realm Strategy and commends this to your members. We do not wish to comment in detail.	Support welcomed.
Lancashire CC Marcus Hudson	<p>I trust that the minor amendments and information that I include in this response are helpful and with their incorporation, it is felt that the SPD will make a valuable contribution to the renaissance of Burnley.</p> <p>Ecological and Archaeological Interests In seeking to establish the key principles for the design of new public realm the SPD misses a substantial opportunity to support green infrastructure and contact with nature. The SPD could take a more holistic approach.</p> <p>The map provided in Figure 3 includes the incorrect title at the top. This map does not represent Burnley in 1848. It is an extract from a revised OS 1:10,560 map dating to c.1860-1880. The correct map can be provided to the Council on request.</p> <p>It is important that the translation of national statements is incorporated in LDFs and their accompanying SPDs. With local policy it is recognised that Section 2.3 of the Town</p>	<p>Support welcomed.</p> <p>It is considered that the document supports the use of ample green space and nature, particularly with the inclusion of a Green Quarter. The document does take a holistic report, whilst accepting the characteristic of the different areas of the Town Centre.</p> <p>The map is considered to be correct, but is only indicative to show the historic function of the town.</p> <p>Comment Noted.</p>

	<p>Centre SPD mentions two documents; the Burnley Wildlife and Habitat Survey and the Burnley Greenspace Strategy, however, it is not clear how these integrate with the Public Realm SPD.</p> <p>Specific Highways Interests The roads surrounding the Weavers’ Triangle and Town Centre areas are strategically important routes and any interventions may cause cumulative effects upon adjacent network links. This wider area should also be observed for detrimental effects as any changes to the highway must maintain the operational integrity of the greater network.</p> <p>There may be merit in the carrying out of a full signing audit (vehicle and pedestrian/cyclist) of the area to assist in maintaining the safety and integrity of the network if de-cluttering is deemed desirable.</p> <p>The use of the word “signage” should be replaced with the correct word “signing”</p>	<p>Comment Noted.</p> <p>Comment Noted.</p> <p>The word “signage” is considered appropriate.</p>
<p>Lancashire CC Alisdair Simpson, Sustainable Travel</p>	<p>General Though many of the problems faced by cyclists in the town centre are similar to pedestrians and picked up anyway, the draft strategy does not mention cycling.</p> <p>The town centre is an important destination for cyclists and as important for through journeys by bicycle, as the ring road round the town centre is not attractive to cycle on.</p> <p>The main problem for cyclists is crossing the ring road to get the town centre. Once inside the town centre there is a network of relatively quiet streets outside the pedestrian</p>	<p>Comment Noted.</p> <p>Comment Noted.</p> <p>Comment Noted.</p>

	<p>area that are relatively attractive to cycle on.</p> <p>Where practical the aim of the strategy should be to make it more attractive to cycle in the town centre, ensuring that there is good permeability through the town centre for cyclist.</p> <p>Cycling in the pedestrian area I have no strong views about cycling in the pedestrian area. Whilst cycling is allowed in several pedestrian areas, perhaps outside main shopping hours and St James St is quite wide, there are alternative routes in Burnley Town Centre and the length of the pedestrian streets is quite short. Figure 14 in the report shows a cyclist illegally cycling up Curzon St, so perhaps should be removed.</p> <p>Contraflow cycling Allowing two way cycling in one way streets is a way of increasing permeability for cyclists through the town centre and provide them with better alternatives than the inner ring road. A contraflow cycle lane is currently being introduced in Nelson Town Centre. There is already a contraflow cycle lane in Burnley in Temple St. Croft St for example might be a good street to allow contraflow cycling on.</p> <p>Cycle parking The provision of cycle parking is something that the strategy has not picked up on. Providing cycle parking is a way of encouraging people to cycle into town centres, but if badly sited can be a hazard to pedestrians and add to the street clutter</p>	<p>Comment Noted.</p> <p>Comment Noted. Figure 14 is only indicative.</p> <p>Comment Noted. Contraflow cycle lanes may be considered as individual schemes are developed.</p> <p>Comment Noted. Cycle parking will be considered as individual schemes are developed.</p>
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	<p>Cobbles Some councils have used flat paving at the side of cobbled streets to make them easier to cycle in.</p> <p>Surplus carriageway space In some streets there is surplus carriageway space that might be better set as footways.</p> <p>Pedestrian Signing Small maps attached to lamp columns are an alternative to signs, though not everybody can read maps. Exeter has quite a good network of pedestrian signing via small maps attached to lamp columns and bus stops.</p> <p>Bank Parade – St James Street Pedestrian links between Bank Parade and St James St are poor. Is there any way they could be improved, perhaps by riverside path through the car park from Hill St.</p> <p>Viaduct Park Is there any chance of getting a through route through the college grounds along the river to link with the path from Holme road to Pendle Way.</p> <p>Yorkshire St / Centenary Way Roundabout The removal of the roundabout would benefit cyclists and pedestrians. Roundabouts have a poor safety record for cyclists.</p> <p>Sandygate / Westgate / Queens Lancashire Way Rd There is a need to make it easier for cyclists and pedestrians to cross the road in the vicinity of this roundabout.</p>	<p>Comment Noted.</p> <p>Comment Noted.</p> <p>Comment Noted. Lancashire County Council do not support maps attached to lamp columns on health and safety grounds.</p> <p>Comments noted. A pedestrian link between Bank Parade and St James’s St has not been ruled out, and may be considered as proposals are developed in more detail.</p> <p>This has been considered, but is private land, and such a footpath causes too many security concerns for Burnley College, as it will open up the campus more to the general public.</p> <p>Support welcomed.</p> <p>Comment Noted. Improvements for pedestrians in this area have already been made, however there are significant congestion issues already. Any new crossing points will only add to the problems.</p>
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<p>Lancashire CC Mike Kirby</p>	<p><i>Comments were submitted 2nd March in relation to a slightly older draft not set out in Limehouse (online planning document tool), therefore some of the paragraph numbers do not match up.</i></p> <p>Lancashire County Council support the idea and the key principles behind the public realm strategy but it should be noted and accepted that designs or bespoke treatments such as surfacing and street furniture requires the full agreement from LCC where these materials or changes form part of the highway infrastructure / network. The highway authority will take particular note of the following criteria, safety, design, standards, movement, fitness for maintenance, repair, replacement and the future availability of items/ materials.</p> <p>1.20 The objectives should also include:</p> <ul style="list-style-type: none"> • The town centres importance as a public transport hub serving the wider regional area. • Support of sustainable transport and safe / reliable movement of people and goods. <p>3.19 Point 6 requires a minor correction “..... incorporating <u>former</u> Burnley College....”</p> <p>3.35 Paragraph should be deleted. The construction of Burnley College / UCLan is complete.</p> <p>3.42 It is noted that no reference is made of the architectural merit of the magistrates building Curzon Street and Standish Street.</p> <p>3.59 The purpose of street lighting is to prove a safe</p>	<p>Support is welcomed.</p> <p>Comments noted. It is considered that the objectives in the document are sufficient. Whilst public and sustainable transport are important, they are not the key functions of this document.</p> <p>Comments accepted. Text has been amended.</p> <p>Comments accepted. Text has been amended.</p> <p>Comments noted. This document focuses on the public realm, rather than specific buildings.</p> <p>Comments noted. LCC will be consulted where appropriate.</p>
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	<p>environment for its users. During the design stage of a lighting scheme consideration is given to purpose, location, luminance, safety during operation (glare) etc.</p> <p>3.60 Any external source of lighting must be agreed with LCC and be effectively screened from view of highway users on the public highway. This is required to avoid glare, dazzle or distraction to users on the public highway network.</p> <p>4.2 Changes to crossing points must satisfy design criteria and satisfy needs of all users and located on the appropriate desire lines.</p> <p>4.3 Whilst the concept of “the Emerald Ring” is attractive in planning terms, it is necessary to fully consider and satisfy all consequences of any planting on the function, construction and maintenance of the highway (including footway etc.), also including safety to all users and their vehicles. Any planting within the highway boundary will require Highway Authority approval.</p> <p>Guideline PRF3: The introduction of tighter radii and junction tables needs to be carefully balanced against the needs for delivery / service or other vehicles etc. Design standards, highway safety and needs for all users including vulnerable road users and the visually impaired will need to be satisfied.</p> <p>Guideline PRF4: A shared surface should be synonymous with the prioritisation of pedestrian needs over those of those of the driver and not as suggested in Guideline PRF4.</p> <p>4.9 All motorised vehicles should be “subservient” to</p>	<p>Comments noted. LCC will be consulted where appropriate.</p> <p>Comments accepted. Text has been amended.</p> <p>Comments noted.</p>
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	<p>pedestrians. Private vehicles travelling through these areas should not be proposed as significant issues including safety; user conflict etc would need to be overcome to the satisfaction of LCC.</p> <p>4.11 Tight radii and narrow carriageway widths will increase the incidence of larger vehicles overrunning the footway at junctions resulting in significant safety concerns or impacting on efficiency, delay and safety on the mainline for vehicles, however sensitive design could include selective narrowing (where appropriate) along a link may be beneficial to vehicle speed reduction and the pedestrian environment.</p> <p>Guideline PRF5: Changes to crossing points must satisfy design criteria and satisfy needs of all users and located on appropriate desire lines. If a crossing point is strategically important then the crossing at a wide paved intervention in the carriageway may lead to conflict between pedestrian / vehicles (as neither group will be sure who have right of way), however is dependent on crossing type and design. Could be a valuable tool in a shared surface approach where it is evident to all users that the pedestrian has the right of way (requires sensitive design satisfying all concerns and issues).</p> <p>4.14 Any de-cluttering as described must not impede on the safety of any users (motorised and non-motorised) including vulnerable road users and the visually impaired; the provision of information to support efficient movement on or through the network or the integrity of the highway network or its assets and will be subject of to an appropriate safety audit / evaluation.</p>	<p>Comments accepted. LCC will be consulted where appropriate.</p> <p>Comments accepted. LCC will be consulted where appropriate.</p> <p>Comments accepted. LCC will be consulted where appropriate.</p>
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	<p>4.17 It is noted that the derelict car park is now a surfaced contract car park. Consideration should be given to the impact on Burnley’s overall Car Parking Strategy. The provision of car parking and or its relocation may influence pedestrian routes and desire lines into the town centre. Footpaths set back from the highway should be on direct desire lines with consideration of user safety and perception of safety, maintenance and replacement.</p> <p>Public Art Strategy, any public art installations that are destined for erection within the highway should obtain the necessary approvals from the highway authority and Borough Council is advised to enter into an early dialogue with the County Council for each location considered.</p> <p>Street Furniture, street furniture selection and location will be with the Highway Authorities approval in every case unless the Borough Council enters into an agreement whereby they take on the responsibility for supply maintenance and replacement.</p> <p>5.23 States that cobbles are not good for pedestrians (vulnerable road users visually / mobility impaired prams, etc.) or motorists, but the document suggests that they are good as speed reducing features and could be used at junctions. In addition cobbles are not an ideal surface treatment for cyclists also the level of grip / stability under foot/ wheel can be influenced by cobble size, shape and also weather conditions. The overall highway/ movement benefits for all modes (motorised, non-motorised) is very limited and generally should not be proposed.</p> <p>5.56 Note that there is a desire to create two-way working</p>	<p>Comments accepted. The Burnley Car Parking Strategy will be consulted where appropriate.</p> <p>Comments accepted. LCC will be consulted where appropriate.</p> <p>Comments accepted. LCC will be consulted where appropriate.</p> <p>Comments noted. Cobbles are considered to be appropriate where they complement the existing character of the area. Cobbles will only be proposed where suitable.</p> <p>Comments noted.</p>
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	<p>on the lower section of Standish Street to improve circulation in the areas part of the Oval Development (Curzon Street retail development).</p> <p>5.62 It is important that continuity is provided in materials (where appropriate) with committed and future developments such as the Oval Development (Curzon Street retail development).</p> <p>5.73 Note, as part of the associated highway works for the proposed redevelopment of the Kierby Hotel (planning permission refused) it was recommended by the Highway Authority that access to the car park be reversed and taken from Church Street. This recommended change would provide a wider route choice (using Yorkshire Street roundabout) for hotel users. The one way working as proposed in the document may lead to an increase in the incidence of U-turns on Church Street resulting in possible vehicle conflict and associated safety concerns.</p> <p>5.77 Note the Wellington public house has planning permission (and signage) as a Turkish Kebab Restaurant.</p> <p>5.81 The use of junction tables on Harry Potts Way would not be acceptable. It is a sports venue once /twice a week during the season at which time this section of carriageway is closed. This route is also used as the high vehicle route for HGV's travelling to Todmorden and any vertical deflections would not be welcomed.</p> <p>Appendix C: The County Council as the Highway Authority will need to be consulted at an early stage to agree materials, implementation maintenance regimes etc. It is</p>	<p>Comments noted.</p> <p>Comments noted. Any proposals for this site are on private land, and outside direct control of Burnley Council. The proposals in the Public Realm Strategy are merely indicative. LCC will be consulted as and when planning applications are submitted for this site.</p> <p>Comments noted.</p> <p>Comments noted. The proposals in the Public Realm Strategy are merely indicative. LCC will be consulted as and when proposals are put forward.</p> <p>Comments accepted.</p>
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	<p>noted that a key funding source will be through developer via S278 and S106 agreements. It is envisaged that S106 requests will be made by the Local Authority and not the County Council. In all cases S278 requirements should take precedence over S106 financial contributions.</p>	
<p>Mr Millard</p>	<p>Concerns about the lack of Plain English:</p> <ul style="list-style-type: none"> • Punctuation - St. Jame’s Street St Peters’ Church, Magistrates’ Court; • Linear distance should be referred to in miles; • Wrong names – Place de Vitry sur Seine, Cow Lane; • Superfluous apostrophes e.g. 1960’s; and • Water Taxi Access – rather puzzling. <p>Footpath outside Mechanic Theatre, Manchester Road Footpaths are for the free flow of pedestrian traffic, the purpose of which is protected by law (Highways Act). There is sufficient space to outside the Town Hall and in Yorke Street for people to congregate if necessary. Manchester Road, being a major road and a bus route requires the four traffic lanes to be preserved.</p> <p>Hammerton Park Never heard of this, but I am assuming it is the piece of grassland on the north side of Hammerton Street (Queen’s Lancashire Way) between the river and the road. A riverside pedestrian route, in the true sense of the term, would be difficult and dangerous, it having to go through two culverts. Access would be very difficult. Sounds like a silly idea.</p> <p>Yorkshire Street / Centenary Way Whilst appreciating the need for a user-controlled</p>	<p>Comments accepted. Text has been amended.</p> <p>Comments noted. The proposals in the Public Realm Strategy are merely indicative, and may not be developed strictly as sketched.</p> <p>Comments noted. A riverside pedestrian route will delivered in a sensible functional manner.</p> <p>Comments noted. It is considered that slowing down the traffic in</p>

	<p>pedestrian crossing at the Church Street exit, I can't see how scaling down the roundabout would help in any way. A signalised junction would probably slow down traffic causing problems in Yorkshire Street up to The Wellington and to the Tesco junction.</p> <p>Yorkshire Street and route to Turf Moor Para 5.8.5. refers to turf Moor having frontage in Yorkshire Street. The short times that crowds are in Brunshaw Road and Yorkshire Street do not present any real problems. Areas round sporting venues are usually busy. The building of a new stand would not greatly reduce any problem, and would have little effect on Yorkshire Street west of The Wellington.</p>	<p>this area will make it more pedestrian friendly and therefore more attractive to pedestrians. This has the potential to lead to a higher pedestrian footfall, increased activity and potentially, improved business activity.</p> <p>Comments noted. This area receives a lot of pedestrian footfall during the football season, and can leave a lasting impact upon people's impressions of the town. Improvement in this area will lead to an improved perception and image of Burnley to residents and visitors.</p>
<p>Environment Agency Gemma Jackson</p>	<p>We have no objection in principle to the SPD. However we wish to make the following comments:</p> <p>4.19 We support the inclusion that drainage systems should be sustainable and designed to cope with extreme downpours.</p> <p>Surface water run-off can be managed through the use of sustainable drainage systems and we advocate their use.</p> <p>The River Calder flows through part of the SPD area as illustrated on Page 4. The River Calder is a designated 'main river' and therefore under the terms of the Water Resources Act 1991 and the Land Drainage Bye Laws, the prior written consent of the Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the River Calder. Early consultation with the EA is therefore recommended for any development in close</p>	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>Comments noted.</p> <p>Comments accepted. The EA will be consulted at the appropriate stage when individual proposals are developed.</p>

	proximity to the River Calder.	
Network Rail	This appears to align with the proposed station development at Burnley Manchester Road, we hope that the Council have kept this in mind in relation to the Weavers' Triangle development.	Comments noted. Manchester Road Station falls within the Weavers Triangle area, and therefore under the controls of the Weavers Triangle Public Realm Strategy.
Natural England	<p>While we welcome this opportunity to comment, the specific topic(s) of the SPD does not significantly relate to our interests. Therefore on this occasion we do not wish to give detailed comments, but we have provided brief comments concerning Habitats Regulations Assessment Screening and the Biodiversity Duty introduced by the Natural England and Rural Communities Act 2006. We would stress that the absence of comments or direct involvement on individual plans or proposals is simply an expression of our priorities. It should not be taken of course of implying a lack of interest or indicating either support for, or objection to, any plan.</p> <p>Habitats Regulations Assessments SPDs must be screened in relation to the Habitats Regulations. If not already undertaken, the Council will need to undertake a screening to determine whether an Appropriate Assessment is required. This screening is necessary even where there are no European designated sites within a plan area, since possible impacts on sites outside the borough also need to be considered.</p> <p>Biodiversity Duty All local authorities have a Duty to have regard to the conservation of biodiversity in exercising their functions. The duty aims to raise the profile and visibility of biodiversity, to</p>	<p>Comments noted.</p> <p>Comments noted. A habitat screening was undertaken as part of the Camlin Lonsdale Study, which formed the basis of this SPD.</p> <p>Comments noted. Regard has been given to the conservation of biodiversity of Burnley Town Centre as part of the development of this document.</p>

	clarify existing commitments with regard to biodiversity and to make it a natural and integral part of policy and decision making.	
Rosendale Council	There are no direct cross-border impacts on Rosendale. The two strategies are welcomed as they will help create a clear framework for pre-application discussions and planning decisions and hopefully will lead to an enhanced public realm.	Comments noted.
National Planning Casework Unit	There is no need to send LDF material to the National Planning Casework Unit.	Comments noted.
Theatres Trust	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and, although we have read the document, this consultation is not directly relevant to the Trust's work, therefore we have no comment to make but look forward to being consulted on further LDF documents especially the core strategy, development control policies, planning obligations and the Burnley Town Centre AAP.	Comments noted.