

Burnley Local Plan Review Matrix – Appendix A to Executive Committee Report 12 July 2023

1. This matrix sets out a very high-level analysis of the performance of the Local Plan policies. For the proportionality of the exercise, it does not list every change in evidence or circumstance that has occurred since the examination or adoption of the Local Plan.
2. It does not provide a detailed analysis of the performance or set out any potential rewording of the policy. Further information on policy performance is set out in the [2021/22 Annual Monitoring Report](#).
3. Coding: The result have been coded. This coding is for information only as the decision on whether a policy would in fact be amended, deleted or added would be subject to due process including wide consultation and independent examination.
 1. **deleting** - policy may be deleted entirely, or deleted and its content/remaining content merged with another policy
 2. **amending** - policy could be amended to change its meaning
 3. **minor changes** - policy could be changed or updated to add clarity rather than to change its meaning
 4. **no change** - no change identified as necessary
 5. **new policy adding** - a new policy could be added, either to cover a new subject that the current plan is silent on, or to cover a matter that is currently within another policy but could benefit from being in a separate policy with additional wording
4. Any partial or full update of the Local Plan will require a Strategic Environmental Assessment, Sustainability Appraisal and Habitats Regulations Assessment. If allocations are being reviewed, this is likely to also require a full Appropriate Assessment.
5. This matrix does not take account of the changes in the Levelling Up and Regeneration Bill (LURB) relating to plan-making, or the draft 2023 NPPF.

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Vision	In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a five-year Climate Change Strategy in Feb 2022. Burnley's New Economy: A Strategy for Recovery and	No	No	Extended PD rights and Use Class Order changes mean more development will take place without regard to the Local Plan. At the time of preparing the Local Plan, the Climate	No	Progress towards achieving the Vision for Burnley in 2032 has been made. Delivery of the Vision also relies on actions beyond the Local Plan, in particular the availability of resources to the Council and others and national policy and legislation. Given	3

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	<p>Growth (Sep 2020) - Local Plan Vision is consistent with the strategy.</p> <p>Lancashire 2050 - A Strategic Framework for Lancashire (2023) – Consistent with Local Plan Vision.</p> <p>Charter Walk Shopping Centre was purchased by the Council in 2021 – this helps support the Vision for the town centre.</p> <p>Levelling Up funding for the further expansion of the University of Central Lancashire (UCLan), upgrades to Manchester Road railway station; improving links between the town centre and Turf Moor; accessibility upgrades to train stations; and new walking and cycling infrastructure to promote active travel all help support the Vision.</p>			Change Act 2008 established a legally binding target to reduce the UK's net carbon account by at least 80% in 2050 from 1990 levels. In 2019, the Act was amended to increase the target to 100% i.e. "net zero."		these constraints, whilst the precise wording of the Vision could be debated at length and fine-tuned e.g. to refer to climate change mitigation (in addition to adaptation already mentioned) and the role of Burnley as a University Town, it is still considered fit for purpose.	
Objectives: Delivering Sustainable Growth	In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a 5-year Climate Change Strategy in February 2022.	No	Increased emphasis on design quality and placemaking in current NPPF than in the 2012 version (including requirement for beauty and tree lined streets); and through the	Extended PD rights and Use Class Order changes mean more development will take place without regard to the Local Plan.	No	The Objectives are delivered through the individual plan policies and progress has been made. Delivery also relies on actions beyond the Local Plan, and in particular the availability	3

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<p>Population and Housing</p> <p>Economy and Employment</p> <p>The Natural Environment</p> <p>The Built and Historic Environment</p> <p>Accessibility, Transport and Other Infrastructure</p> <p>Community Involvement</p>	<p>Objective 1 refers to minimising the adverse impacts of climate change (i.e. adaption).</p> <p>Mitigation of climate change is not specifically mentioned but is implied through the other actions outlined including moving towards a low carbon economy, managing growth so that it takes place in the most appropriate locations, promoting energy efficiency and sustainable design and the re use of previously-developed land and buildings.</p> <p>Reducing the impact of transport emissions is not specifically mentioned but is similarity implied in Objectives 1, 6 and 9.</p> <p>The Population and Housing Objective (Objective 2) does not make specific reference to the existing housing stock, particularly vacants, but it does not exclude them. The text could be made clearer in this regard.</p>		<p>National Design Guide and National Model Design Code (2021).</p> <p>In the Objectives on the Built and Historic Environment, design quality is not specifically mentioned in respect of new development.</p>	<p>At the time of preparing the Local Plan, the Climate Change Act 2008 established a legally binding target to reduce the UK's net carbon account by at least 80% in 2050 from 1990 levels. In 2019, the Act was amended to increase the target to 100% i.e. "net zero."</p>		<p>of resources to the Council and others and national policy and legislation. Given these constraints, whilst the precise wording of the Objectives could be fine-tuned and they could be re-ordered, they are still considered fit for purpose.</p>	

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Policy SP1: Achieving Sustainable Development	Model policy based on 2012 NPPF wording not now advocated by Planning Inspectorate (PINS), but inspector was aware of this then recently changed stance at the Local Plan examination but didn't feel its deletion was necessary to achieve soundness.	The policy has been referred to in multiple appeals and has been applied as intended.	Clauses 3 a) and b) reflect policy in the 2012 NPPF which of course has now changed.	Extended PD rights and Use Class Order changes mean more development will take place without regard to the Local Plan.	n/a	The wording of this policy, although not in direct conflict with the current wording of the NPPF paragraph 11, differs from it which is unhelpful. For this reason and ideally it would be deleted entirely (and referred to instead in the supporting text).	1
Policy SP2: Housing Requirement 2012-2032	<p>New 2016-based sub national population and household projections (SNPP and SNHPs) released in 2018.</p> <p>New 2018-based SNPP and SNHPs released in 2020.</p> <p>2021 Census data on population released in 2022.</p> <p>2021 Census data on households released in 2023.</p> <p>The statistical data referencing permissions, demolitions and completions was correct as at adoption. Updated figures are published annually.</p> <p>Council action on filling of vacants is exceeding the estimates built into Policy SP2.</p>	<p>Only referred to in one appeal decision in relation to the size of sites anticipated to come forward to meet the windfall allowance in the policy.</p> <p>Harrogate Crescent APP/Z2315/W/21/3286494</p>	<p>Any update of this policy would be informed by the government's standard method - currently calculated using the 2014-based SNHPs ("unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals"). See Appendix B.</p> <p>Current NPPF also updates the approach to housing requirements for neighbourhood plans.</p>	More of overall requirement will be met by development which takes place without full planning control and regard to the Local Plan.	<p>Yes.</p> <p>New housing needs (SHMA-type) study. ¹</p> <p>The plan period would need to be extended to c2042 and the needs for this extended period assessed.</p> <p>New Employment Land Demand Study (ELDS).</p> <p>New Strategic Housing and Employment</p>	<p>The Plan remains 'up to date' and on track to deliver as intended. To date, actual population growth is exceeding the projection used to underpin the housing requirement and housing delivery is meeting the SP2 requirement with an average of 204 net additional dwellings delivered per annum; and is on track to deliver the overall requirement by 2032.</p> <p>The housing requirement is not required by national policy to be updated to take account of the standard method, and as set out in Appendix B, this would in any case not inform a meaningful housing number for Burnley or allow proper assessment of the different sizes, types and tenures</p>	4

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	The overall level of vacant properties has considerably reduced over the Plan period from 7.36% in 2012 to 4.5% in 2022. A vacancy rate of 3% is widely accepted as the normal rate to allow for market 'churn' which would mean that the borough now has just under 619 excess vacancies as opposed to 1.765 in 2012. (AMR Table 21)				Land Availability Assessment (SHLAA) to assess site availability and capacity. New Housing/ Empty Property Strategy to provide evidence on future vacant property programmes.	needed for different groups (NPPF para 62). The greater level of vacant properties filled by Council action than included in the policy is counted in assessing the housing land supply position. Any updated policy would need to consider if a greater level of supply can be factored in from the re-occupation of vacants. This would need to be based on evidence from an up to date Housing/Empty Property Strategy. If updated, the policy would be amended to reflect delivery/ commitments to date.	
Policy SP3: Employment Land Requirement 2012-2032	The statistical data referencing permissions, losses, under construction sites and completions was correct as at adoption. Updated figures are published annually in the monitoring report (AMR). Employment land and premises losses are running at a higher rate than anticipated in policy SP3. (AMR: Table 68)	No	The 2012 NPPF Paragraph 158 stated that the assessment of, and strategies for, housing, employment and other uses should be integrated; this advice is no longer included within the 2021 NPPF. The government's ambition to 'level up' the country and reduce regional disparities was a key plank of the	Extended PD rights and Use Class Order changes will contribute to the losses of employment land and premises to housing, retail and other 'town centre uses'.	Yes. New Employment Land Demand Study (ELDS), including additional evidence on sectoral split.	Although the Plan remains up to date and largely on track to deliver as intended, careful monitoring of losses, take up and demand is needed. Any updated policy would be amended to reflect delivery/ commitments to date.	4

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	<p>The three largest sites allocated to meet the residual requirement have permission/part permission, but are yet to be completed.</p> <p>Some of the smaller/brownfield sites have not yet come forward e.g. EMP1/4 Stoneyholme Gas Works, or are being proposed for alternative uses e.g. EMP1/7 Westgate - for retail.</p> <p>Site EMP1/6 has been approved for battery storage.</p> <p>Burnley's New Economy: A Strategy for Recovery and Growth (Sep 2020) – although with a wider remit than the Local Plan, the relevant parts are consistent with it.</p> <p>Lancashire 2050 - A Strategic Framework for Lancashire (2023) – a high level strategy that is consistent with the Local Plan.</p>		Conservative 2019 general election manifesto. The 2022 levelling up white paper defined what levelling up means in more detail, specifying 12 'missions' to be achieved by 2030, covering most aspects of government policy across the economy, public services, pride in place and devolution.		New SHLAA to assess site availability and capacity.	SP3 doesn't reflect the government stated 'levelling up agenda'.	
Policy SP4: Development Strategy	Clause 4): Development in the Open Countryside: Examples of the exceptions to policy clause 4) that are referred to in	Yes. The policy has been referred	The wording has changed but the thrust of national policy has not.	Extended PD rights and Use Class Order changes means more development (new build and change of	Yes.	Some updating would be beneficial, but the current NPPF and legislative requirements operate as a material	3

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	<p>paragraph 4.4.15 do not include EMP5 Rural Business & Diversification. Whilst they refer to Policy HS5 House Extensions and Modifications, that policy does not cover the rebuilding /replacement of existing dwellings.</p> <p>HMO and Small Flats SPD adopted April 2022.</p>	<p>to in multiple appeals and has been applied as intended and is consistently performing well.</p>	<p>Brownfield Land: Slight strengthening of the wording from “encouragement” in 2012 to “making as much use as possible” in 2021. However, in 2012 this was provided that it is “not of high environmental value” whereas in 2021 it is “except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity,” arguably a narrower test?</p>	<p>use) will take place without planning permission and regard to the Local Plan.</p> <p>This may result in new uses that are inappropriate to their location or loss of important existing facilities. (See Policy IC5)</p>	<p>New Plan Viability Assessment</p> <p>New Employment Land Demand Study (ELDS)</p> <p>New housing needs (SHMA-type) study.</p> <p>New SHLAA to assess site availability and capacity.</p>	<p>consideration and do not alter the overall thrust of this policy.</p> <p>Clause 1) Settlement Hierarchy: The approximate numbers of properties within the development boundaries has been re calculated – this does not affect the hierarchy.</p> <p>Clause 2) Development Boundaries: These have been used successfully to direct and control development in line with the development strategy and settlement hierarchy. They have not to date facilitated small-scale new build development to support and enhance existing service provision in small villages. In practice, in the small villages, small scale development is likely to protect existing service provision rather than enhance it.</p> <p>Success of the development boundaries relies in no small part on maintaining a 5-year housing land supply.</p> <p>At the time of adoption, the Local Plan housing trajectory</p>	

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						<p>anticipated that from an overall supply of 4,200 dwellings (made up of net additional dwellings completed and under construction, small sites with planning permission, re-occupied empty homes through Council action, allocations and an allowance for brownfield windfalls) 76% or 3,196 dwellings would come forward on previously developed (brownfield) land. Up to 31 March 2022 the supply from net additional dwellings and the re-occupation of empty homes, as per Policy SP2, has delivered 2,215 dwellings of which 92.8% or 2,056 dwellings have come forward on previously-developed (brownfield) land.</p> <p>Clause 4): Minor updating to the supporting text would be beneficial but is not essential.</p>	
Policy SP5: Development Quality and Sustainability	<p>Shopfront and Advertisement Design SPD adopted June 2019</p> <p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p>	<p>Yes.</p> <p>The policy has been referred to in multiple appeals and has been</p>	<p>With regard to energy efficiency and onsite renewable and low carbon energy generation, the wording of the current NPPF differs from that in the 2012 NPPF, key parts of which are</p>	<p>In 2019 the 2008 Climate Change Act was amended to replace the target to reduce the UK's net UK carbon account by at least 80% in 2050 compared to</p>	<p>Yes:</p> <p>New Plan Viability Assessment (if any specific design or</p>	<p>Some updating of this policy and its supporting text would be beneficial, but the current NPPF and legislative requirements operate as material considerations and do not alter the overall thrust of the policy.</p>	<p>3</p>

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	<p>HMO and Small Flats SPD adopted April 2022</p> <p>Planning for Health SPD adopted October 2022</p> <p>Residential Extensions SPD adopted Oct 2022</p> <p>Clause 1 - Energy Efficiency:</p> <p>In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a 5-year Climate Change Strategy in February 2022.</p> <p>BREEAM requirements under 1 c) are not being consistently applied.</p> <p>Clause 2 i) - whilst there is no particular issue with its wording, rear storage solutions for mid terrace properties are not proving effective for modern refuse and recycling requirements resulting in bins being left on driveways and in front gardens to the detriment</p>	<p>applied as intended and is consistently performing well.</p> <p>For residential extensions and alterations, SP5 is being used consistently, in combination with HS5 to dismiss poor design. Clauses 2(a) and 2(e) are being used in combination to dismiss development that causes unacceptable harm to the character and appearance of the area.</p>	<p>referenced in the Plan's supporting text.</p> <p>Whilst the essence remains the same, there is no longer any reference to a 'zero carbon buildings policy' in the NPPF (although this is still mentioned in the planning practice guidance), nor any reference to 'net zero'. The planning practice guidance still refers to the 80% target.</p> <p>The government stated in its December 2022 consultation on planning reforms that "As committed to in the Net Zero Strategy, we will carry out a fuller review of the National Planning Policy Framework following Royal Assent of the Bill, to ensure they contribute to climate change mitigation and adaptation as fully as possible."</p> <p>Energy Efficiency Standards:</p> <p>The Planning and Energy Act 2008 allowed local planning authorities to set and apply policies for energy efficiency</p>	<p>1990 levels with 100% (i.e. net zero).</p> <p>As a stepping-stone to a 'Future Homes Standard', in December 2021 the Government introduced an interim uplift in building regulations standards, effective from June 2022 that will result in an estimated 31% reduction in carbon emissions from new homes compared to the previous standards. The emphasis is on the adoption of a 'fabric first approach' with higher standards for the building envelope and improved airtightness, along with the use of low-carbon heating technologies.</p> <p>Extended PD rights and Use Class Order changes mean more development (new build and change of use) will take place without planning permission and regard to the Local Plan.</p>	<p>sustainability standards are proposed).</p>	<p>Areas that would benefit from minor updating include:</p> <ul style="list-style-type: none"> • Clause 1) and the relationship with the new building regulations and planned future homes standard. Similarly, the supporting text this policy aspect could benefit from updating. • The updating of the supporting text in relation to 'net zero'. • The links to health of this policy as referenced in the Planning for Health SPD. 	

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	of the quality of the street scene.		<p>standards in new homes that exceeded the requirements of the then Building Regulations. In 2015, the government set out in a Written Ministerial Statement (WMS) its policy expectation that local planning authorities should no longer set bespoke performance standards for new homes higher than Building Regulations and should consider reviewing their plans to remove any that existed. (The stated intention at the time was to revise the Building Regulations and introduce a 'zero carbon homes standard' in 2016 and to formally revoke the 2008 Act provision referred to above.) The WMS indicated that pending the commencement of the legislative changes, then planned for late 2016, local plans could still set energy performance levels (subject to robust evidence and viability testing) above the building regulations.</p> <p>The 2013 Deregulation Bill was enacted in March 2015, but</p>	<p>Whilst design and external appearance is often a prior approval matter for the exercise of new PD rights, the extent of control is limited; and changes of use within Class E do not require any form of impact assessment. Although these changes of use do not authorise external conversion works, the change in the use can still result in unsatisfactory development quality or bring about pressure for subsequent changes to accommodate the new uses.</p>			

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			<p>the clause revoking the relevant provision of the 2008 Act has never been brought into force. The 'zero carbon homes standard' and planned building regulations uplifts were dropped in 2015.</p> <p>At the time of the submission and examination of Burnley's Local Plan, the intention to enact the clause of the Deregulation Act referred to above and to move away from bespoke energy efficiency performance standards in local plans remained.</p> <p>The current planning practice guidance states that <i>"The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and</i></p>				

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			<p><i>will need to be based on robust and credible evidence and pay careful attention to viability. In this respect, planning authorities will need to take account of government decisions on the Housing Standards Review when considering a local requirement relating to new homes.” (27 03 2015)</i></p> <p>As set out above, this is not what the NPPF now says.</p> <p>The NPPG also says: <i>“Can a local planning authority set higher energy performance standards than the building regulations in their local plan? Different rules apply to residential and non-residential premises. In their development plan policies, local planning authorities:</i></p> <ul style="list-style-type: none"> - <i>Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes</i> 				

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			<p>- Are not restricted or limited in setting energy performance standards above the building regulations for non-housing developments.” (15 03 2019)</p> <p>This text is also out of date as it does not reflect the new building regulations which exceed Level 4. (Level 4 was 20% above the former building regs but is now below the current).</p> <p>Design:</p> <p>There is an increased focus on design quality and placemaking in current NPPF than in the 2012 version (including requirement for beauty and tree lined streets); and through the National Design Guide and National Model Design Code (2021).</p>				
Policy SP6: Green Infrastructure	<p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>Developer Contributions SPD adopted Dec 2020.</p>	No	<p>NPPF: New reference to “access to healthy food” (first added to 2018 NPPF).</p> <p>Natural England Green Infrastructure Framework January 2023 Includes target</p>	Environment Act 2021: Mandatory 10% BNG is proposed to be brought into force in November 2023.	Updated evidence on GI may be necessary.	In anticipation of mandatory biodiversity net gain, use of the Natural England metric has become widespread and there is some cross-over with the audit referred to in clause 2 b) of this policy and the supporting text	2

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	<p>Planning for Health SPD adopted October 2022</p> <p>Residential Extensions SPD. Adopted Oct 2022.</p> <p>In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a 5-year Climate Change Strategy in February 2022.</p>		<p>for everyone to have access to high quality blue or green open space within a 15 min walk of their home.</p> <p>New urban greening factor scores for developments 0.3 for Commercial developments 0.4 for residential developments</p>	<p>Local Nature Recovery Strategy (LNRs) requirements brought into force April 2023. New Local Plans must have regard to these.</p> <p>Extended PD rights and Use Class Order changes mean more development will take place without regard to GI. Whilst PD/Use Class rights do not override protected habitats and species legislation, for PD rights prior approval of landscaping schemes is only relevant to the demolition and new build category and GI matters/policies cannot be considered in the exercise of other rights, except as part of assessing flood risk. (See Policy CC4 and CC5)</p>		<p>and as a result this has not been specifically taken forward. The metric and other supporting information as necessary, is being using to providing an equivalent analysis.</p> <p>The policy would therefore benefit from some minor updating in this regard, but this would not alter its thrust.</p> <p>Natural England’s GI framework would inform the GI standards in any new local plan, but again would not alter the trust of this strategic policy.</p>	

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<p>Policy SP7: Protecting the Green Belt</p>	<p>Residential Extensions SPD. Adopted Oct 2022</p> <p>“Inappropriate development” in the Green Belt since adoption:</p> <p>Crow Wood Hotel – very special circumstances demonstrated;</p> <p>Former William Blythes, Hapton – the unallocated part of site lies in the Green Belt – very special circumstances were demonstrated (approved prior to adoption).</p> <p>Such developments may require land to be removed from the Green Belt in the longer term.</p>	<p>Yes.</p> <p>Policy being used as intended to protect the Green Belt.</p>	<p>The current 2021 NPPF includes some minor wording changes to Green Belt policy from the 2012 version.</p> <p>It also adds changes of use of land for sport, recreation or, cemeteries and burial grounds in the list of exceptions for other inappropriate developments in the Green Belt (under clause 3) - thus clarifying a matter which had been disputed in some LPA areas where it was argued this was already implied under 2 b).</p> <p>More substantially, it now includes development which would “contribute to meeting an identified affordable housing need within the area of the local planning authority” in the list of exceptions for new buildings on brownfield sites under clause 2 f). This is in addition to the “limited affordable housing for local community needs under policies set out in the local plan (including policies for rural exception</p>	<p>No.</p>	<p>No.</p> <p>June 2016 Green Belt Review still relevant</p>	<p>The current NPPF would be a material consideration in any relevant decisions. Other than the changes identified, which will only be relevant in very limited circumstances where other Local Plan policies would continue to apply, Policy SP6 still reflects national policy and is being implemented to direct and control development accordingly.</p>	<p>4</p>

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			sites)” under clause 1 e) which is not restricted to brownfield sites.				
Policy HS1: Housing Allocations	<p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>Developer Contributions SPD adopted Dec 2020.</p> <p>Planning for Health SPD adopted October 2022</p> <p>The site choices flow from the strategic policies, in particular the requirement in SP2, and policies SP4 and SP5.</p> <p>Out of the 32 housing allocations, as at 31 March 2023:</p> <ul style="list-style-type: none"> • 5 are complete 	<p>Yes.</p> <p>Full weight given by the inspectorate to the allocations policy which is operating as intended.</p>	<p>The 2021 NPPF includes some changes that could affect the identification of sites in any new local plan but doesn't diminish the weight given to current allocations.</p> <p>It also states that in reviewing allocations in existing plans, there is a need to identify those sites which have no prospect of coming forward, look to reallocate sites for more suitable uses and, before plans are updated, support applications for alternative uses which would meet unmet needs.</p>	<p>Extended PD rights and Use Class Order changes could affect the delivery of allocated brownfield sites by diverting demand.</p>	<p>Yes.</p> <p>If this policy is to be updated, then Policy SP2 would also need to be updated and a new housing needs (SHMA-type) Study prepared. An updated ELDS may also be necessary.</p> <p>New SHLAA.</p>	<p>This policy has proved strong and effective in delivering plan-led housing development.</p> <p>Information on sites progress is shown in the Housing Trajectory which accompanies the annual Housing Land Supply Assessment.</p> <p>The indicative capacity numbers set out in the policy are proving to be reliable – with higher yields at some sites and, unsurprisingly as it was always known to be a conservative estimate, a small number of larger windfall sites have come forward which provide additional numbers to help meet the SP2 requirements.</p>	4

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	<ul style="list-style-type: none"> • 7 are under construction – one in part only – HS1/4 – Land at Rossendale Road • 2 have detailed planning permission • 2 have outline planning permission – one of which relates to only part of the allocated site HS1/5 – Former Baxi Site (1.87Ha) • 4 have detailed planning applications submitted – one is part of site HS1/4 – Land at Rossendale Road and one is a replacement application for a site currently under construction – HS1/22 – Former Dexter Paints <p>13 remain with no current planning status. Of these:</p> <ul style="list-style-type: none"> • 31% are owned by the Council or other public sector bodies. • 38.5% are brownfield • 38.5% are greenfield • 23% are part brown/part greenfield <p>Site HS1/5 Former Baxi Site:</p>					<p>There is still sufficient supply of sites to meet both the five-year land supply requirements and the overall plan requirement and sufficient flexibility was built into the supply to allow some sites not to come forward and as such an update of this policy is not considered necessary at the present time.</p> <p>Concerted action is needed over the coming years to unlock some of the more complex brownfield sites still to come forward.</p> <p>If the Plan was updated, this Policy would be amended to reflect delivery to date and to remove sites which will not come forward within the Plan period and add any new sites.</p>	

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	<p>77% (6.36Ha) of the site will not be developed due to flooding and technical issues.</p> <p>Site HS1/7 Ridge Wood: This is now considered unlikely to come forward in this plan period due to difficult ground conditions.</p> <p>Site HS1/14 Former Gardner site: This site is now considered unlikely to come forward in this plan period. Application FUL/2020/0204 approved to retain site in employment use.</p> <p>Site HS1/28 George Street Mill: Part of the site will be utilised for future phases of the University expansion (to be determined) with the remainder of the site to provide housing (number to be determined)</p>						
Policy HS2: Affordable Housing Provision	<p>Typing error in supporting text – corrected via erratum sheet/sticker.</p> <p>Developer Contributions SPD adopted December 2020. This sets out the expected</p>	Yes – no issues identified and policy working as intended.	<p>Yes.</p> <p>The NPPF 2018 widened the definition of affordable housing and included ‘starter homes’ and this revised definition remains in the 2021 version. A WMS issued in May</p>	Provision of housing via extended PD rights and use class order changes will further limit the ability to provide affordable housing through developer contributions.	<p>Yes.</p> <p>New housing needs (SHMA-type) study (or partial update)</p>	<p>Minor amendment required.</p> <p>Updating would be beneficial to align more closely with the revised national definitions of affordable housing but the current NPPF and legislative requirements operate as a</p>	3

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	<p>percentages of affordable housing by site type.</p> <p>HMO and Small Flats SPD adopted April 2022</p> <p>Planning for Health SPD adopted October 2022.</p> <p>A wide range of economic changes affect the need for affordable housing, including employment rates, wages levels, benefit levels and rules, house prices and rents, mortgage rates and availability; and the general cost of living.</p> <p>Demographic and social changes including overall population growth, immigration, changes to the age profile, ill-health and disability levels will also affect the need.</p> <p>Right to buy and any demolition will result in a loss of stock.</p> <p>New build and purchase by RSL will increase stock.</p> <p>Affordable housing delivery (including firm commitments) up</p>		<p>2021 introduced 'first homes' but this was not taken forward into the 2021 NPPF and so is of no weight or very little weight.</p> <p>It also includes an expectation that for major development, <i>"policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups."</i> Some further exemptions for specific development types are also included.</p> <p>The Developer Contributions SPD deals with this issue and explains how this policy change will be interpreted in Burnley.</p>	<p>To date this has affected 2 schemes but as these were brownfield sites of type 'W' (SPD) no affordable housing contributions would have been required in any event. (Ashworth House (57) and Stephen House (39))</p>	<p>New Plan Viability Assessment would be required.</p> <p>New SHLAA may be required.</p> <p>Developer Contributions SPD would also need to be revised.</p>	<p>material consideration and do not alter the overall thrust of this policy.</p> <p>National Policy also remains muddled and does not appropriately reflect Burnley's circumstances so is not particularly useful even if an updated policy were to be pursued.</p> <p>The evidence of affordable housing need requires refreshing to ascertain the ongoing need for affordable housing and the types of tenures required; and a revised position agreed if necessary. However, as Policy HS2 does not include a specific target and as there is likely to be at ongoing need for affordable housing demonstrated, Policy HS2 is unlikely to require updating. The Developer Contributions SPD may need to be updated.</p>	

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	to 31 March 2022 has met the numeric need identified in the Local Plan/SHMA (1040) but not all of the need for specific types and tenures. This need was not expressed as a specific policy target.						
Policy HS3: Housing Density and Mix	HMO and Small Flats SPD adopted April 2022 Planning for Health SPD adopted October 2022. Analysis of delivery mix is set out in the AMR.	No	The 2021 NPPF introduced a requirement to ensure all new streets are tree-lined unless, in specific cases, there are clear, justifiable, and compelling reasons why this would be inappropriate. This can affect site density. The 2012 NPPF stated that local plans should “set out their own approach to housing density to reflect local circumstances.” The 2021 NPPF has additional advice on density including the setting of “minimum density standards for city and town centres and other locations that are well served by public transport” that “should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are	Yes. Extended PD rights mean more development (new build and change of use) will take place without planning permission and regard to the Local Plan and Policy HS3 is not relevant to any of the ‘prior approval’ matters.	Yes. New housing needs (SHMA-type study) New SHLAA and Plan Viability Assessment would be required.	No	4

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			<p>strong reasons why this would be inappropriate.”</p> <p>In essence therefore there is no change in policy but there is a greater requirement to justify the local standards.</p>				
Policy HS4: Housing Developments	<p>HMO and Small Flats SPD adopted April 2022 (see commentary below)</p> <p>Residential Extensions SPD adopted October 2022.</p> <p>Planning for Health SPD adopted October 2022.</p> <p>Developer Contributions SPD adopted Dec 2020.</p> <p>Policy is principally aimed at new build development but also covers new dwellings created through changes of use.</p> <p>The policy clauses 5-9) relating to the provision of open space could benefit from some minor alterations and clarifications.</p>	<p>Yes.</p> <p>Clause 3) (privacy and amenity etc):</p> <p>Regularly used and applied as intended including to dismiss appeals.</p>	<p>The 2021 NPPF introduced a requirement to ensure that all new streets are tree-lined unless, in specific cases, there are clear, justifiable, and compelling reasons why this would be inappropriate. This can affect open space provision in clauses 5-9).</p> <p>Natural England Green Infrastructure Framework January 2023</p>	<p>Extended PD rights allow increased amounts of housing development to take place without regard to the adaptable homes and open space requirements of this policy. The amenity aspects such as privacy standards can still be applied in considering prior approval matters</p> <p>2,243 net additional dwellings completed 2012-2023: 94% of dwellings created through planning applications (2112) and 6% through prior approval notifications (131).</p>	<p>Yes.</p> <p>New Plan Viability Assessment would be required.</p> <p>Updated Developer Contributions, Residential Extensions and Planning for Health SPDs.</p>	<p>Although the scope of this policy is reduced due to the expansion of pd rights, it remains effective and relevant where planning permission is still required - which is still for the majority of schemes. Updating would be beneficial to clauses 5) 7) and 9) (Open Space provision in new housing development), including cross reference to Policy IC5, but the Developer Contributions and Planning for Health SPDs assist here.</p> <p>Current NPPF and legislative requirements operate as material considerations and do not alter the overall thrust of this policy.</p>	3
New Policy:	HMO and Small Flats SPD adopted April 2022:	N/A	Revisions to the NPPF were issued in 2018, 2019 and 2021. The 2018 version added	The extended PD rights do not allow for conversion to C4 HMOs but do allow	Yes	New	5

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HMOs and student accommodation	The SPD adds additional policy interpretation to a number of Local Plan policies with regard to applications for HMOs and Small Flats including SP4, SP5, HS4, TC2 and 3 and IC3, CC4 and CC5; clarifying, for example, the Council's approach to the clustering of HMOs.		reference to 'healthy living conditions' which is retained in the 2021 version (Para 119) and states that "planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."	for C3 small HMOs – up to 6 people	New housing needs (SHMA-type) Study	The merits of introducing new separate policy as part of any Update could be considered, but it is not essential at the present time. The HMO and Small Flats SPD provides additional policy interpretation.	
New Policy: Specialist Housing	Applications for specialist housing are considered under the existing housing policies and other policies as appropriate, and this approach is successfully supporting delivery of specialist housing from age-restricted market housing and extra care flats to nursing homes and self and custom build. However, in an appeal at Astley House, the lack of a specific policy/requirement in the Plan weighed in favour of the scheme stating that there was "no policy obstacle in relation to housing need". APP/Z2315/W/20/3252022	N/A	National policy is unchanged in requiring the need for all types of housing and the needs of different groups in the community to be assessed and appropriately planned for. Updated planning practice guidance has been issued which now separates out guidance on housing needs for different groups and housing for older and disabled people from the guidance on overall housing needs.	No	Yes. Updated evidence from LCC would be required on supported housing and accommodation . The current information dating from 2018 is being updated.	New The merits of introducing new separate policy could be considered, but it is not essential.	5

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Policy HS5: House Extensions and Alterations	The Residential Extensions SPD adopted October 2022. The policy does not cover the rebuilding /replacement of existing dwellings.	Yes. HS5 is being regularly used in combination with SP5 to refuse poor design and is working as intended.	The current NPPF is stronger on design - See SP5.	Extended PD rights mean more development will take place without planning control and full regard to the Local Plan and these developments may in themselves set a precedent for those which remain within planning control.	No	Whilst no change to the policy wording is necessary, consideration could be given to expanding the policy to include replacement dwellings within or outwith the Development Boundaries or this could be within a new policy.	2
Policy HS6: Agricultural Workers' Dwellings	No	No	The NPPF now includes homes for "those taking majority control of a farm business" within the list of allowable isolated homes in the countryside.	Extensive PD rights to convert agricultural buildings to residential and other uses already limit the effectiveness affect this policy but do not make it unworkable.	No	The policy could benefit from some rewording of clause d) to reflect the extended PD rights but this is not essential. The current NPPF and legislative requirements operate as a material consideration and do not alter the overall thrust of this policy.	3
Policy HS7: Gypsy and Traveller Site Criteria	Planning for Health SPD adopted October 2022. Current GTAA assesses needs until 2026.	No	Planning Policy for Traveller Sites (PPTS) 2015 remains unchanged.	None	No	Policy sets out criteria for assessing windfall site suitability, and development standards on allocated and windfall sites. No change necessary.	4
Policy HS8: Gypsy and Traveller Site Occupancy Condition	Current GTAA assesses needs until 2026	No	Planning Policy for Traveller Sites (PPTS) 2015 remains unchanged.	n/a	No	No change necessary.	4

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New Policy: Gypsy and Traveller Site Allocation(s)	<p>Current GTAA assesses needs until 2026.</p> <p>The allocation of a sites/sites to meet need was to be pursued in a separate DPD, but could be incorporated into any updated Local Plan.</p>	n/a	<p>Planning Policy for Traveller Sites (PPTS) 2015 remains unchanged. However, the Appeal Court judgement in the case of Lisa Smith v Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391 found the definition to be discriminatory. The relevant planning appeal has been referred back to the Planning Inspectorate for redetermination and clarification from the government regarding the definition is awaited.</p>	n/a	<p>New needs assessment (GTAA) would be required in any case for the currently proposed Gypsy and Traveller Site Allocation(s) DPD</p>	<p>If this DPD is subsumed within an updated local plan, a new allocation policy would be required.</p>	5
Policy EMP1: Employment Allocations	<p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>Developer Contributions SPD adopted Dec 2020.</p> <p>The site choices flow from the strategic policies, in particular the requirement in SP3, and policies SP4 and SP5.</p>	<p>Yes.</p> <p>Site EMP1/2 APP/Z2315/W/22/3302561 Dismissed - height restriction. The inspector found that the overall mass (height and scale) would seriously harm</p>	<p>Although the current 2021 NPPF still places significant weight on the need to support economic growth and productivity, P81, its policy is arguably weaker in this regard than the 2012 version which stated that “The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.” P19</p>	<p>Extended PD rights and Use Class Order changes could affect this policy.</p> <p>Any sites allocated for B1b/c if approved without conditions restricting the use within Class E could potentially be lost to town centre uses. This could affect 6 of the 11 EMP1 allocations.</p>	<p>Yes.</p> <p>ELDS, SFRA, probably also specific highways evidence.</p>	<p>This policy has been reasonably effective but given the extent of losses, it is important to protect the remaining allocations and the protected employment sites and premises. (EMP2/EMP3).</p> <p>If the Plan was updated, this Policy would be amended to reflect delivery to date and to remove sites which will not come forward within the Plan period and add any new sites.</p>	3

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	<p>Out of the 11 site allocations, as of 31/03/22 there were:</p> <ul style="list-style-type: none"> • 5 without permission. • 3 with planning permission but with development not yet commenced. • 1 under construction. • 2 where part of the site has been completed and part not started. 	living conditions.	The 2012 NPPF Paragraph 161 bullet point 2 stated that reviews of land available for economic development should be undertaken at the same time as, or combined with, a SHLAA. This requirement is no longer included within the 2021 NPPF (but the NPPG identifies that LPAs may do this). It would be very odd not to look at both potentials at the same time?				
Policy EMP 2: Protected Employment Sites	No	No	Although the current 2021 NPPF still places significant weight on the need to support economic growth and productivity, P81, its policy is arguably weaker in this regard than the 2012 version which stated that “The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.” P19	Extended PD rights and Use Class Order changes affect this policy. UCO changes allow the change of use of certain B1a (offices), b (research and development) and c (light industrial) to other Class E uses such as retail. Extended PD rights permit certain changes of use to C3 housing, and certain schemes of demolition and redevelopment for housing, although the prior approval matters allow some of the most	Yes. Updated ELDS.	Despite the fact there will no longer be control over the loss of some B1 uses to wider Class E uses, and that control over loss to C3 uses (through change of use or new build) will be more limited, this policy is still necessary to help protect the existing B2/B8 employment uses on sites.	4

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				damaging schemes to be resisted.			
Policy EMP3: Supporting Employment Development	Clause 2) Loss of Sites and Premises does not make specific reference to loss of premises which are currently causing genuine conflicts with adjacent land uses e.g. residential. This issue is, however, referred to in clause 1) in relation to new and upgraded sites and premises.	Yes. No issues identified and policy working as intended.	The 2021 NPPF P123 states that LPAs should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to: a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space This new policy goes beyond those in the 2012 NPPF	Extended PD rights and Use Class Order changes affect this policy. UCO changes allow the change of use of certain B1a (offices), b (research and development) and c (light industrial) to other Class E uses such as retail (and vice versa). Extended PD rights permit certain changes of use to C3 housing, and certain schemes of demolition and redevelopment for housing, although the prior approval matters allow some of the most damaging schemes to be resisted.	No	Clause 2) Loss of Sites and Premises could include reference to loss of premises which are currently having substantially negative impact on surrounding land uses.	3

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			supporting the reuse of brownfield land but would not be applicable in Burnley. Whilst this change does not undermine Policy EMP3 it does make it a little more challenging to resist the loss of sites and premises which is regrettable.				
Policy EMP4: Office Development	Minor Typo in clause 4).	No	Despite the extended PD rights and Use Class Order changes which undermine this and related town centre policies, the NPPF remains unchanged and is consistent with Policy EMP4 for schemes where planning permission is required.	<p>Extended PD rights and Use Class Order changes considerably undermine this policy.</p> <p>Clauses 1) and 2) are partially undermined (new offices) but clauses 3) and 4) (loss of offices) are significantly undermined by the ability to change within Class E and the PD rights for conversion to residential, and certain schemes of demolition and redevelopment for housing, which affect ground floor premises.</p> <p>To date this has affected 7 schemes totalling 124 dwellings with an</p>	Yes: New Employment Land Demand Study (ELDS)	Delete and merge Policy would need to be comprehensively updated and probably would be amalgamated with TC2 as there is no longer any distinction in the UCO between retail and office use, but its town centre first thrust is still important and consistent with the NPPF.	1

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				application for a further 24 pending.			
Policy EMP5: Rural Business & Diversification	There has been some debate about clauses 1) and 2) and the definition of the 'wider open countryside' in clause 2) but the policy is operating as intended with this to mean the open countryside not immediately adjacent to Development Boundaries or an existing group of buildings.	Yes. Full weight given by the inspectorate to the policy in multiple appeals and it is operating as intended.	No material change to the NPPF. However, an additional paragraph (P85) has been added emphasising that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. The specific advice on such developments is consistent with the Local Plan.	Extended PD rights and Use Class Order changes affect this policy. More development (new build and change of use) will take place without regard to the Local Plan, and this could introduce uses in areas that would be contrary to this policy.	No	The policy could benefit from a reordering of its clauses/sub clauses but does not require any changes in substance.	3
Policy EMP6: Conversion of Rural Buildings	This policy applies to reuse of building for all new uses and not just for residential. It applies to buildings in use as well as redundant buildings. Whilst it generally works well it can be open to abuse either where buildings are recently erected for another purpose and then proposed to be converted e.g. to housing, and/or where buildings are still in productive use and a	Yes. Policy operating as intended.	In respect of conversion to residential, national policy is unchanged and only supports the re-use of redundant or disused buildings in isolated locations for new dwellings where (inter alia) it would enhance its immediate setting. It also supports the conversion of buildings in the open countryside in limited	Whilst extended PD rights and Use Class Order changes affect this policy, the PD rights for the conversion of agricultural buildings to commercial and residential uses were already extensive when the Local Plan was written.	No	Whilst the Policy is affected by the extended PD rights, it is still necessary for schemes where planning permission is required or where it is relevant to the consideration of a prior approval matter. It and/or its supporting text could benefit from some minor wording changes.	4

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	<p>new building is then required to accommodate the lost use. The policy wording could be tighter in respect of these circumstances, or the supporting text amplified.</p> <p>The policy is however working well and as intended.</p>		<p>circumstances for sustainable rural employment. The policy is amplified from the 2012 NPPF in respect of development outwith settlements. (See above)</p> <p>This national policy is also undermined by the extended PD rights.</p>				
Policy EMP7: Equestrian Development	Policy being used as intended.	No	No – See comment under EMP5.	No	No	No change necessary.	4
Policy TC1: Retail Hierarchy	Charter Walk Shopping Centre was purchased by the Council in 2021.	No	No	Extended PD rights and Use Class Order changes could undermine the vitality of the retail centres over time but are unlikely to fundamentally undermine centres' roles in the short and medium term.	Surveyed biennially already.	No change necessary.	4
Policy TC2: Development within Burnley and Padiham Town Centres	<p>Policy generally working well and as intended.</p> <p>Planning for Health SPD adopted October 2022 which affects the interpretation of Clause 1 d) and 3) and 4) in respect of takeaways.</p>	No	Policy TC2 differed slightly from the 2012 NPPF wording (which is unchanged in the current 2021 version) in respect of the sequential test for comparison retailing in Burnley.	<p>Extended PD rights and Use Class Order changes affect this policy and partially undermine it.</p> <p>UCO changes allow the change the of use within Class E anywhere without</p>	<p>Yes.</p> <p>New retail office and leisure study would be required.</p>	It is difficult to reconcile the NPPF approach to town centres with the recent Use Class Order changes and extended PD rights in particular; and whilst this policy is significantly undermined by these, to adopt a different policy approach i.e. not to	2

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	<p>Clause 8 b) is being used but is quite difficult to apply since it does not include any form of measurement.</p> <p>HMO and Small Flats SPD adopted April 2022.</p>		Despite the extended PD rights and Use Class Order changes which partially undermine it, the NPPF remains unchanged in its approach to town centres.	<p>any form of planning control, allowing the loss of retail issues on the high street and their relocation elsewhere.</p> <p>New PD rights allow the change of use to residential (C3) anywhere in the town centre, although the prior approval matters allow some of the most damaging schemes to be resisted.</p> <p>Where schemes require planning permission this can sometimes be conditioned to withdraw these rights.</p>		<p>protect town centres from loss of retail and other town centre uses would not be consistent with the NPPF so would fail the tests of soundness.</p> <p>This policy would benefit from incorporating what is currently Policy EMP4 office uses which are 'town centre uses'.</p>	
Policy TC3: Burnley Town Centre - Primary and Secondary Frontages	A biennial survey is carried out of uses and vacancies. There has been a reduction in the proportion of properties in A1/E(a) retail use since 2019. The 2021 survey results (which would have been affected by the coronavirus lockdown restrictions) showed a significant reduction, and the 2023 results show a recovery but not back to	No	The current NPPF no longer requires LPAs to define Primary and Secondary Retail Frontages but still requires plans to <i>“define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;”</i>	This policy reflects a longstanding tried and tested approach to protecting the core of the Primary Shopping Area (Primary Frontages) from loss of A1 retail uses, and the outer areas of the Primary Shopping Area (Secondary Frontages) from loss of wider retail	Yes. New Retail Office and Leisure Study would be required.	Primary and Secondary Frontages no longer seem to have a role, but the Primary Shopping Area does within larger Town Centres such as Burnley (they are one and the same in smaller Town Centres such as Padiham), and the current NPPF which operates as a material consideration retains a policy protection for Primary Shopping Areas and the	1

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	2019 levels. Not all of this change is accounted for through vacancies.		The practice guidance (NPPG) does state that LPAs may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres.	<p>and ancillary uses, cafes, offices etc.</p> <p>Extended PD rights and Use Class Order changes significantly undermine this policy.</p> <p>The Class E Use Class Order changes undermine clause 2) in particular as they allow change of use without any form of planning control to a wide variety of non-A1 retail uses.</p> <p>The new PD rights allowing a change of use from Class E to residential (C3) is subject to a limited prior approval process which, although it allows some of the most damaging schemes to be resisted, undermines both clauses 2) and 3), but 3) in particular.</p>		<p>range of uses permitted within them – if they require planning permission.</p> <p>However, the Class E Use Class Order changes mean that this policy can no longer operate to protect comparison retailing uses in the Primary Shopping Area (Primary or Secondary frontages) - this is now reliant solely on the market (outwith Charter Walk which the Council owns).</p> <p>The aspect of the policy which would protect from loss of broader town centre uses in the Primary Shopping Area e.g. to residential would still be of some limited relevance as the PD rights have some limitations but the resulting percentages loss would be much than Policy TC3 currently sets out.</p> <p>This Policy could be deleted, and the remaining effective aspects incorporated into Policy TC2, or it could be replaced with a new/significantly amended policy for “Burnley’s Primary Shopping Area.”</p>	

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Policy TC4: Development Opportunities in Burnley Town Centre	One of the two allocated sites has planning permission and is being redeveloped i.e. TC4/1 Pioneer Place, Curzon Street.	No	No	Extended PD rights and Use Class Order changes affect the policy in so far as the acceptable uses are concerned, but don't affect its overall thrust.	Yes. New retail office and leisure study would be required to address capacity beyond 2026.	Whilst one of the two allocated sites has planning permission, the development is not yet complete and there is potential for a second phase of development so a policy would continue to be necessary. Any update would reflect facts on the ground and any new allocations required. Depending on the mix of uses eventually delivered on these sites, they could be incorporated into a future Primary Shopping Area or remain in the wider Town Centre.	3
Policy TC5: Uses within the Weavers' Triangle	This policy supports a mixture of uses within the Weavers' Triangle including residential and town centre uses. Whilst it is silent on educational uses, these have been forthcoming.	No	No	Whilst extended PD rights and Use Class Order changes limit planning control within the Weavers' Triangle, this particular policy supports a wide range of uses and so the changes are not incompatible with it and in any event are restricted in respect of designated heritage assets.	Canalside Conservation Area Appraisal requires updating.	No change to this policy is considered necessary, although the supporting text in para 5.3.45 could be updated to reflect the growing concentration of education and associated uses. See also comment on the Vision.	4
Policy TC6: District Centres	The boundaries need to be kept under review as some of the District Centres already have a	No	None	Extended PD rights do undermine this policy somewhat, but the prior approval procedure allows	Surveyed biennially already.	Would benefit from some updating to reflect Use Class Order changes but remains relevant and necessary.	3

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	high percentage of non-commercial/community uses.			some aspects of the policy to remain effective. The Use Class Order changes (Class E) do not affect the policy as the policy supports a wide range of these uses.			
Policy TC7: Hot Food Takeaways	<p>Planning for Health SPD (adopted October 2022)</p> <p>The SPD provides further interpretation of this policy in relation to opening hours under clause 4) and unacceptable concentration ('clustering') under clause 3a) (Page 60).</p> <p>It also clarifies the intention and application of Clause 2) in relation to takeaways outside of Town and District Centres. (Page 59)</p>	<p>Yes.</p> <p>The policy was interpreted as intended.</p>	<p>New reference to "access to healthy food" was added to the 2018 NPPF.</p> <p>The current NPPF no longer requires LPAs to define Primary and Secondary Retail Frontages but maintains the need to define Primary Shopping Areas. The planning practise guidance (NPPG) does state that LPAs may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres. (See also Policy TC3 discussion)</p>	<p>The Use Classes Order changes now identify Hot Food Takeaways as a <i>Sui Generis</i> use (they were A5) which still allows control over new premises.</p> <p>However, many restaurants which offer a hot food takeaway service fall within use class E(b) (previously Class A3) and these can now be widely created without planning permission from other uses within Class E.</p>	No	<p>Some minor changes to reflect the Use Classes Order changes and to specifically incorporate the link to health currently referred to in the supporting text would be beneficial.</p> <p>Some minor changes to reflect the additional guidance and interpretation set out in the Planning for Health SPD would be beneficial. However, they are not urgent as the SPD and changes to the NPPF in relation to healthy food are material considerations which allow the policy to function adequately and largely as intended.</p>	2
Policy TC8: Shopfront & Advertisement Design	Shopfront and Advertisement Design SPD adopted June 2019.	Yes.	There is an increased focus on design quality and placemaking in the current NPPF than in the 2012 version	Extended PD rights to demolish and rebuild will limit the effectiveness of this policy.	No	No change is necessary but the supporting text and/or the policy could be amended to include advice on premises which have	4

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		Policy operating as intended.	(including requirement for beauty and tree lined streets); and through the National Design Guide and National Model Design Code (2021).	<p>Changes of use within Class E do not allow works of alteration.</p> <p>The new PD rights allowing changes of use from Class E to residential (C3) are restricted in conservation areas and on listed buildings but elsewhere these can become an issue.</p> <p>Some of the PD rights allow external changes and these matters are subject to prior approval, whilst others do not (separate planning permission for these is still needed), but nevertheless simply changing the use from for example a shop to a house can result in unsatisfactory development quality or bring about pressure for subsequent changes to accommodate the new use.</p>		been changed to non-commercial uses under extended PD rights.	

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Policy HE1: Identifying and Protecting Burnley's Historic Environment	Local List SPD adopted April 2022. The Council is working towards a full review of the current local list. Preparatory work has included the adoption of the Local List SPD and ongoing involvement in the Lancashire Local List project.	Yes. No issues identified and policy working as intended.	No	Extended PD rights and Use Class Order changes mean more development will take place without regard to the Local Plan. Whilst PD rights are restricted for designated heritage assets, including conservation areas and listed buildings they are not for non-designated heritage assets.	No	HE1 remains relevant and necessary and in accordance with the NPPF.	4
Policy HE2: Designated Heritage Assets: Listed Buildings; Conservation Areas; and Registered Parks and Gardens	Residential Extensions SPD adopted Oct 2022.	Yes. No issues identified and policy working as intended.	No	None	No	HE2 remains in accordance with the NPPF.	4
Policy HE3: Non-Designated Heritage Assets	Local List SPD adopted in April 2022. Residential Extension SPD. Adopted Oct 2022. Review of Local List Itself not yet started but some preparatory work has including through the Lancashire Local List Project.	Yes No issues identified and policy working as intended.	No	Whilst PD rights have never been restricted for non-designated heritage assets, unless these happen to be within conservation areas, the extended PD rights and Use Class Order changes mean more development will take place without regard to this policy.	Review of Local List	No change to this policy is necessary. The policy reflects national policy and is being implemented insofar as it is able, to conserve and enhance non-designated heritage assets when determining planning applications.	4

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				Whilst in some circumstances conversion works remain subject to planning control and in others prior approval is required, the latter cannot consider Policy HE3.			
Policy HE4: Scheduled Monuments and Archaeological Assets	Local List SPD adopted iApril 2022.	No	None	No	No	No change to this policy is necessary.	4
Policy NE1: Biodiversity and Ecological Networks	Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020. Residential Extensions SPD adopted Oct 2022.	Yes. No issues identified.	The 2012 NPPF sought net gains via the planning system <i>“where possible.”</i> The current NPPF seeks to <i>“minimise impact on and provide net gains for biodiversity”</i> through policies <u>and</u> decisions, but also includes somewhat contradictory text seeking to avoid significant harm to biodiversity and where it cannot be avoided, adequately mitigating or compensating for it i.e. without a net gain.	The general biodiversity duty referred to in para 5.5.1 has been amended by the Environment Act 2021 to include <u>“conservation and enhancement”</u> of biodiversity and the Act includes other provisions requiring proactive biodiversity actions, including a 10% mandatory biodiversity net gain for certain development schemes - this clause of the Act is not yet in force; and	Yes. An update of the Biological Heritage Sites BHS's is planned via LCC. Local Nature Recovery Strategies (to be prepared by LCC in consultation). These may replace the current	The policy and supporting text would benefit from some updating to reflect the new and emerging legislative changes, including the proposed mandatory BNG. Current NPPF and legislative requirements operate as material considerations and do not alter the overall thrust of this policy, most parts of which remain fully up to date.	2

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				<p>the preparation of Local Nature Recovery Strategies.</p> <p>Extended PD rights and Use Class Order changes mean more development will take place without regard to the Local Plan. Whilst PD rights are restricted within SSSIs and do not override protected species legislation, wider biodiversity impacts and net gain cannot be considered.</p>	Woodland and Grassland Ecological Networks		
Policy NE2: Protected Open Space	<p>Error on printed Policies Map (being hand corrected)</p> <p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>Planning for Health SPD adopted October 2022</p>	No	No	No	<p>Yes.</p> <p>Updated Open Space Assessment (appendix to Green Spaces Strategy) and potential to include privately owned sites in conjunction with parish councils/amenity groups.</p>	<p>The Policy could perhaps benefit from some minor updating to aid clarity because there have been some queries about the words in clause 1) about retaining the “fundamental purpose and nature of the site as open space”. This is intended to allow appropriate changes in the function of the particular open space (or part thereof) providing it remains as open space.</p>	3

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Policy NE3: Landscape Character	No	Policy referred to in 11 appeals since Local Plan adoption. Where issue was determinative, the appeals dismissed were due to the significant harm caused to the character and appearance of the surrounding countryside.	No material change to the NPPF.	Extended PD rights and Use Class Order changes mean more development will be take place without requirement 2 consider landscape impact except in very limited circumstances.	No	No change is necessary.	4
Policy NE4: Trees, Hedgerows and Woodland	Residential Extensions SPD. Adopted Oct 2022.	No	The 2021 NPPF introduced a requirement to ensure all new streets are tree-lined unless, in specific cases, there are clear, justifiable, and compelling reasons why this would be inappropriate.	Whilst they would not cut across existing tree protections, the extended PD rights and Use Class Order changes will further limit the ability to require landscaping schemes etc.	No.	The supporting text could benefit from some minor updating to reflect the revised NPPF policy and BNG but it is not essential.	4
Policy NE5: Environmental Protection	Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted December 2020. (Validation Checklist needs to be	Yes. A hot food takeaway appeal was	The air quality strategy for England - GOV.UK (www.gov.uk) 28 April 2023. This strategy states that, in summary, local authorities	Changes of use within Class E under the Use Class Order do not allow for the consideration of any impacts.	No	The policy remains relevant and necessary and in accordance with the NPPF.	4

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	<p>updated to highlight the requirements of the SPD to applicants.)</p> <p>HMO and Small Flats SPD adopted April 2022</p> <p>Planning for Health SPD adopted October 2022</p> <p>Residential Extensions SPD. Adopted Oct 2022.</p>	<p>dismissed in part due to fact that noise impacts could not be mitigated or controlled through condition. A café bar appeal was allowed on the basis that noise impacts could be mitigated or controlled through condition.</p> <p>Policy working as intended.</p>	<p>should exercise their functions, and use the powers available to them, in a way which improves and maintains air quality.</p> <p>The implementation of Policy NE5, supported by the Air Quality Management SPD, sits within the delivery framework identified in the strategy.</p>	<p>In December 2021 the government introduced changes to the Building Regulations (Part S), effective from 15 June 2022 to require the installation of infrastructure (charging points and/or cabling) for the charging of electric vehicles for certain building projects. The projects covered include most new dwellings with 'associated' (on site) parking spaces.</p>			
Policy CC1: Renewable and Low Carbon Energy (not including Wind Energy)	<p>In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a five-year Climate Change Strategy in Feb 2022.</p> <p>A small number of proposal have been submitted/approved for battery storage facilities to</p>	No	None	N/A	<p>Yes.</p> <p>New Employment Land Demand Study (ELDS)</p> <p>New SHLAA to assess site</p>	<p>Policy could be amended to include battery storage facilities to support renewable energy development.</p> <p>The supporting text would benefit for updating to reflect revised legislation and new statistics.</p>	2

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	support wider renewable energy development. Such developments are not currently within the scope of this policy unless they are directly part of a specific renewable energy generation scheme. Residential Extensions SPD. Adopted Oct 2022.				availability and capacity.		
Policy CC2: Suitable Areas for Wind Energy Development	In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a five-year Climate Change Strategy in Feb 2022.	No	None	None	Possibly	No change	4
Policy CC3: Wind Energy Development	In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a five-year Climate Change Strategy in Feb 2022.	No	No. The 2015 Written Ministerial Statement (WMS) on local planning which included changes to national policy on wind energy development (now incorporated into the NPPF) was taken into account in preparing the Local Plan.	None	No	No change to the Policy is necessary. The supporting text referring to the 2015 WMS would benefit from some minor updating to reflect that this national policy is now within the NPPF but this is not essential.	4
Policy CC4: Development and Flood Risk	Flood Zone information is regularly Updated by EA. Flood Risk Climate Change Allowances have also been updated. These affect future	Yes. No issues identified.	The 2021 NPPF incorporates some wording changes, further emphasising the need to assess flood risk from all sources in plan making and decision taking (as was done in	All the extended PD rights, apart from the enlargement of dwellinghouses through additional storeys, include flood risk in the prior	Yes: An updated Strategic Flood Risk Assessment (SFRA) would be	The policy and its supporting text would benefit from some updating in relation to current national policy and flood risk data, but the revised national policy operates as a material	3

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	<p>Strategic Flood Risk Assessments to support plan-making and Site-Specific Flood Risk Assessments to support planning applications. These will be taken into account by the EA and LLFA in their planning application responses.</p> <p>Residential Extensions SPD. Adopted Oct 2022.</p> <p>HMO and Small Flats SPD adopted April 2022</p> <p>Local Flood Risk Management Strategy for Lancashire 2021-27.</p>		<p>Burnley’s SFRA for the Local Plan).</p> <p>The most significant impact of the wording changes is for windfall sites. NPPF p162 now refers to flood risk “areas” not just fluvial flood risk “zones” and as a result major new build development on windfall sites in flood zone 1 may also need to carry out a Sequential and Exception Test where sites are “at risk of flooding”. (Clause 4) and 5))</p> <p>Site Specific Flood Risk Assessments (Clause 6) require the consideration of risks from any source and cover many aspects of the Exception Test. The need for a Site Specific Flood Risk Assessment would now be extended to sites of less than 1 hectare in Zone 1 in wider circumstances than clause 6 a) currently sets out. There is guidance available for applicants on the requirements. Flood risk assessments if you're applying for planning permission (www.gov.uk)</p>	<p>approval matters, allowing this policy to be applied.</p> <p>Changes of use within Class E under the Use Class Order changes do not allow for the consideration of any flood impacts.</p>	<p>required - Part 1 definitely and Part 2 also if the site allocations are to be revisited.</p>	<p>consideration and does not alter the overall thrust of Policy CC4. The latest data is used by the EA and LLFA in their planning application responses.</p>	

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			<p>For allocated sites there is no change in this regard as all risks/risk areas were considered.</p> <p>A significant refresh of the planning practice guidance on Flood Risk and Coastal Change was published in 2022 which reflects the 2021 NPPF.</p>				
Policy CC5: Surface Water Management and Sustainable Drainage Systems (SuDS)	<p>Residential Extensions SPD. Adopted Oct 2022.</p> <p>HMO and Small Flats SPD adopted April 2022.</p>	<p>Yes.</p> <p>Used to justify conditions by Inspector at Harrogate Crescent APP/Z2315/W/21/3286494</p>	<p>The 2021 NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. It also adds that plans should make as much use as possible of natural flood management techniques, using opportunities provided by new development and improvements in green/other infrastructure.</p> <p>This approach is already reflected in Policy CC5 and SP6. See also commentary on Policy CC4 above.</p>	<p>All the extended PD rights, apart from the enlargement of dwellinghouses through additional storeys, include flood risk in the prior approval matters allowing some aspects of this policy to be applied.</p> <p>Changes of use within Class E under the Use Class Order changes do not allow for the consideration of this policy.</p>	No	The supporting text would benefit from some updating in relation to the current NPPF and planning practice guidance but no change is necessary to the policy.	4

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<p>Policy IC1: Sustainable Travel</p>	<p>In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a 5-year Climate Change Strategy in February 2022.</p> <p>Developer Contributions SPD adopted December 2020.</p> <p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>Planning for Health SPD adopted October 2022.</p> <p>Residential Extensions SPD. Adopted Oct 2022.</p>	<p>Yes.</p> <p>Policy operating as intended.</p>	<p>No</p>	<p>At the time of preparing the Local Plan, the Climate Change Act 2008 established a legally binding target to reduce the UK's net carbon account by at least 80% in 2050 from 1990 levels. In 2019, the Act was amended to increase the target to 100% i.e. "net zero."</p> <p>Extended PD rights and Use Class Order changes means more development can take place without regard to this policy.</p> <p>The Class E reforms allow no consideration of impacts for changes of use within Class E.</p> <p>The new PD rights allow the consideration of certain prior approval matters, and these include Transport and Highways Impacts.</p> <p>The thresholds in Table 9 in Appendix 8 now have to</p>	<p>Potentially new highway evidence depending on the scope of an update.</p>	<p>No change necessary.</p>	<p>4</p>

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				be interpreted according to the new use classes.			
Policy IC2: Managing Transport and Travel Impacts	<p>Developer Contributions SPD adopted December 2020.</p> <p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>Planning for Health SPD adopted October 2022.</p> <p>Residential Extensions SPD adopted Oct 2022.</p>	<p>Yes.</p> <p>No issues identified and policy operating as intended.</p>	No	<p>Extended PD rights and Use Class Order changes means more development can take place without regard to this policy.</p> <p>The Class E reforms allow no consideration of impact for changes within Class E.</p> <p>The new PD rights allow the consideration of certain prior approval matters, and these include Transport and Highways Impacts.</p> <p>The thresholds in Table 9 in Appendix 8 now have to be interpreted according to the new use classes.</p>	Potentially new highway evidence depending on the scope of an update.	No change necessary.	4
Policy IC3: Car Parking Standards	<p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>HMO and Small Flats SPD adopted April 2022</p>	<p>Yes.</p> <p>Several appeals - policy working as intended.</p>	The 2021 NPPF includes new next in relation to setting maximum parking standards in local plans (requiring “clear and compelling justification “). Burnley’s Local Plan is consistent with this policy.	At the time of preparing the Local Plan, the Climate Change Act 2008 established a legally binding target to reduce the UK’s net carbon account by at least 80% in 2050 from 1990 levels. In	No	<p>The changes to The Building Regulations (Part S) affect clause 8) which is now somewhat obsolete (and the relevant part of Appendix 9).</p> <p>Appendix 9 could benefit from some additional clarification in</p>	3

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	<p>Planning for Health SPD adopted October 2022</p> <p>Residential Extensions SPD adopted October 2022</p> <p>Appendix 9 does not specifically state that the standards set out in its main table refer to on-site/in curtilage parking (though this is implied); or that the visitor requirement for residential developments can be on-street where this would not conflict with Policy IC3. Note 1 could have made this clearer.</p> <p>In Appendix 9 the parking space dimensions are referred to in point 2 and require a width of no less than 2.4m. LCC highways requested an additional space where required for pedestrian access to the property increasing the required width to 3.2 metres based on Guidance from Residential Roads and Footpath Design Bulletin 32.</p> <p>In order to satisfy clause 1) the requirements of Policy IC1 in relation to providing safe convenient access, developers are being asked to incorporate</p>			<p>2019, the Act was amended to increase the target to 100% i.e. “net zero.”</p> <p>In December 2021 the government introduced changes to the Building Regulations (Part S), effective from 15 June 2022 to require the installation of infrastructure (charging points and/or cabling) for the charging of electric vehicles for certain building projects. The projects covered include most new dwellings with ‘associated’ (on site) parking spaces.</p> <p>Extended PD rights and Use Class Order changes means more development can take place without regard to the parking standards.</p> <p>The Class E reforms allow no consideration of impact for changes within Class E.</p>		<p>relation to residential visitor parking and note 1, but this would not alter the application of the policy.</p> <p>Although there have been changes to the Use Classes Order which affect Appendix 9, it is possible to translate the standards to these new use classes. The standards themselves remain relevant.</p> <p>The Policy and Appendix 9 still operate effectively and are consistent with national policy.</p>	

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	this additional width where necessary.			The new PD rights allow the consideration of certain prior approval matters and these include Transport and Highways Impacts, including parking.			
Policy IC4: Infrastructure and Planning Contributions	<p>Developer Contributions SPD adopted December 2020.</p> <p>Air Quality Management: Protecting Health and Addressing Climate Change SPD adopted Dec 2020.</p> <p>In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a 5-year Climate Change Strategy in February 2022.</p>	<p>Yes.</p> <p>Operating as intending to secure relevant contributions.</p>	None	Extended PD rights and Use Class Order changes mean more development will take place without planning control and regard to the Local Plan and the NPPF. Infrastructure contributions can only be sought in relation to the matters approved through the prior approval process.	Updated Infrastructure Delivery Plan.	The policy remains effective and consistent with national policy and is supported by the Developer Contributions SPD - no change is necessary.	4
Policy IC5: Protection and Provision of Social and Community Infrastructure	<p>Planning for Health SPD adopted October 2022</p> <p>The supporting text does not cross refer to policy HS4 (provision of open space in new housing developments).</p>	No	<p>New reference to “access to healthy food” added to 2018 NPPF.</p> <p>Natural England Green Infrastructure Framework January 2023</p>	Whilst the supporting text to the policy recognises that the council has limited control over the loss of social and community infrastructure (through its closure or change to other uses), the widening of PD rights and Use Class changes have further weakened the	<p>Playing Pitch Strategy (PPOSS) already being updated to cover period 2023 to 2033.</p> <p>Green Spaces Strategy would be updated in</p>	<p>No change to the Policy is necessary.</p> <p>The current NPPF and legislative requirements operate as a material consideration but not alter the overall thrust of this policy.</p> <p>The supporting text could be amended to cross refer to policy</p>	4

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				level of control (with the exception of shops and recreational facilities that fall within Local Community use Class (Class F2)). Where new infrastructure is required, restrictions could be applied to ensure the infrastructure remains available.	due course in any event. Indoor Sports Provision Strategy. Updated Infrastructure Delivery Plan (IDP)	HS4 (provision of open space in new housing developments) and updated to reflect new evidence and PD/Use Class Order changes.	
Policy IC6: Telecommunications	No.	Yes. No issues identified and policy operating as intended.	No change to thrust of policy - updated to reflect latest technology.	Extended PD rights have further weakened the level of control	No	The supporting text would benefit from some updating in relation to the current NPPF but no change is necessary to the policy.	4
Policy IC7: Taxis and Taxi Booking Offices	In July 2019 the Council declared a climate emergency. To support this declaration the Council adopted a five-year Climate Change Strategy in Feb 2022. The operating model and booking process for some taxi firms has changed which may lessen the overall need for taxi booking offices. The demand for electric vehicle charging equipment will have increased	No	None	Clause 1 a) could be affected over time by the Use Class Changes – see TC2 and TC6.	No	The supporting text would benefit from some updating in relation to the current NPPF and planning practice guidance but no change is necessary to the policy.	4

Policy or Section	Errors, omissions, or changed local strategy or circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Is new evidence required (if Policy to be updated)?	Conclusion: What, if any change is needed and how necessary or urgent is any change?	Code
	but the policy is flexible to accommodate these changes.						
Appendix 1: Glossary	No	No	Changed definition of affordable housing The term Strategic Housing Market Assessment (SHMA) is no longer used in national policy or practice guidance.	N/A	No	Updating would be beneficial but is not essential or urgent.	3
Appendix 2: Reference List	No	N/A	N/A	N/A	N/A	Updating would be beneficial but is not essential or urgent.	3
Appendix 3: List of Superseded Policies	No	No	N/A	N/A	N/A	No change necessary	4
Appendix 4: Designated Heritage Assets	Yes, in terms of numbers of LB entries there is a net increase of 1 (309)	No	N/A	N/A	No	Updating would be beneficial but not essential or urgent as the data is updated annually and published in the AMR	3
Appendix 5: Housing Trajectory	The housing trajectory in Appendix 5 was always a snapshot in time and requires annual updating. It relates to Policy SP2.	N/A The current trajectory is that which would be tested.	See Policy SP2.	4 means more housing will come through as windfall development than the initial trajectory predicted.	Yes – See Policy SP2	It is updated annually and would also be reconsidered in any new plan. See discussion Policy SP2.	2
Appendix 6: Main and Small Villages (Tiers 3 and 4) Audit of Facilities - April 2016	Facilities unchanged. Approx number of properties recalculated using GIS data. See Policy SP4.	No	N/A	N/A	Would be updated in-house at the time.	Minor change to number of properties – does not affect the application of policy.	3

Policy or Section	Errors, omissions, or changed local strategy or circumstance (not including national policy changes)	Tested on appeal?	NPPF or other national policy change implications	Changes to legislation, including PD/Use Class Order changes	Is new evidence required (if Policy to be updated)?	Conclusion: What, if any change is needed and how necessary or urgent is any change?	Code
Appendix 7: Protected Open Spaces	No	No	None	None	Would require an update of the exercise to identify and map the protected open spaces.	The list of sites and their boundaries would be reviewed if this policy were to be included in an update of the Local Plan.	3
Appendix 8: Transport Assessments and Travel Plans	See comments under Policy IC2	See comments under Policy IC2	See comments under Policy IC2	See comments under Policy IC2	See comments under Policy IC2	See comments under Policy IC2	3
Appendix 9: Car Parking Standards	See comments under Policy IC3	See comments under Policy IC3	See comments under Policy IC3	See comments under Policy IC3	See comments under Policy IC3	See comments under Policy IC3	2

Abbreviations:

ELDS: Employment Land Demand Study

EA: Environment Agency

LHN: Local Housing Need derived through the standard method

LCC: Lancashire County Council

LLFA: lead local flood authority (LCC)

LPA: Local Planning Authority

NPPF: National Planning Policy Framework

NPPG: National Planning Practice Guidance

PD: Permitted Development

PDR: Permitted Development Right

PSA: Primary Shopping Area

RSL: Registered Social Landlord

SHLAA: Strategic Housing (and Employment) Land Availability Assessment

SHMA; Strategic Housing Market Assessment

SPD: Supplementary Planning Document

UCO: Use Classes Order

WMS: Written Ministerial Statement

End Notes

¹ The terms Strategic Housing Market Assessment (SHMA) is no longer used in national policy or practise guidance this still an assessment/assessments of local housing needs, (numbers types) very similar to the SHMA