

**Worsthorne with Hurstwood Neighbourhood Development Plan Referendum:
Summary of Regulation 16 Consultation Representations - September 2025**

Organisation / Representor	Verbatim Comments
C Simpkin	I fully support the objectives of the above plan and approve of the draft document setting out how these objectives might be realized. Page 30 para 5.17: The Hurstwood Conservation Area Appraisal needs to be brought up to date.
D Ferrier	5.16 Regarding renovations and developments within conservation area. Although new developments should design their structures to follow the guidelines set out in this document (and the supporting documents where relevant), when it comes to work being done on existing structures, the stipulations of the conservation area must not unduly impinge on private property and individual free-market choice. Although encouragement is appropriate, stipulating that any replaced windows follow the aesthetics outlined in the document would not be. This would be especially the case when the occupier/owner of a property is replacing only one window. I have similar thoughts regarding other works. The plan seems to suggest re-roofing is an inappropriate repair. This will require clarification as re-roofing is sometimes an expensive but necessary repair for dwellings, in particular older structures. Again, this must make due consideration for private property and individual choice. On the other hand, in areas that are public realm, the Parish Council and Borough Council are free to design and build here within the confines of fiscal responsibility. 5.43 The mixture of 1 and 2 bedroom dwellings. Providing a good mix of dwellings is beneficial for the area. However, consideration must be had towards the wider makeup of the borough. In this sense, 1 bedroom dwellings may not be necessary for the Worsthorne and Hurstwood areas. This is due to the saleability of these types of dwellings and the type of structures that provide these - apartments. An increase in 2 bedroom and upwards dwellings in the village would be more in keeping with it's makeup. 1 bedroom dwellings can be more appropriately provided by town centre apartments such as mill conversions, for which Burnley still has adequate provision - both in regards to current availability and potential developments. Worsthorne and Hurstwood should not be required to encompass the requirements for the whole town. Rather it should complement the town by providing family homes of varying size (from small 2 bedroom semi-detached to 4 or 5 bedroom detached) in the town's suburbs and outer areas.

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	5.48 Traffic calming measures will be welcomed in areas of heightened risk such as the top of Ormerod St between the guesthouse and the Reading Rooms where vehicles travelling towards Extwistle Rd do so at speed when drivers exiting Raven Oak Ln cannot easily see down Ormerod St. However, consideration must be had towards balancing traffic calming and expedience. For instance, school traffic combined with traffic calming restrictions could compound to make driving in or out of the village at these times even more difficult. Furthermore, although 20mph is appropriate in Worsthorne village itself, this would not be so on Brownside Rd adjacent to Lindsey Park where the wider road, and relation of the houses to the road, mean that 30mph is correct as it is currently. I do note, however, the issue of vehicles driving up this road considerably faster than the limit. Therefore, measures must be considered in accordance with a 30mph limit.
Environment Agency	We note that the plan has been updated in accordance with our previous advice (reference NO/2024/115955/01-L01, dated 12 March 2024) and we have no further comments to make.
Historic England	Thank you for consulting Historic England in relation to the above consultation. We are the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the DCMS. We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure that our historic environment is properly understood, enjoyed and cared for. We do not wish to make comments on this version of Worsthorne Neighbourhood Plan. To avoid any doubt, this does not reflect our obligation to provide further advice or potentially object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment. Thank you once again for providing Historic England with the opportunity to comment. Please do keep us informed of any future progress on this plan.
Homes England	As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation. Homes England is the government's housing and regeneration agency. We will drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home. Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.

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Lead Local Flood Authority	Lancashire County Council is the Lead Local Flood Authority for the County Council's administrative area. The Flood and Water Management Act sets out the requirement for the Lead Local Flood Authority to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within its area. In the planning process, the Lead Local Flood Authority is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. Comments provided in this representation are advisory and it is the decision of the Local Planning Authority whether any such recommendations are acted upon. The comments given have been composed based on the extent of the knowledge of the Lead Local Flood Authority and information provided with the consultation at the time of this response. The Lead Local Flood Authority has reviewed the consultation details and maintains its position that it has no comments to make regarding the Neighbourhood Plan, as the plan contains no policies relating to surface water flood risk or surface water drainage that fall within our remit. As stated in our previous consultation response (dated 9 April 2024) and accepted by the Parish Council in the submitted Consultation Statement (February 2025), Policy CC4 (Development and Flood Risk) and Policy CC5 (Surface Water Management and Sustainable Drainage Systems) of the adopted Burnley Local Plan have been deemed appropriate for the neighbourhood by the Parish Council. I trust that you find these comments valuable. Should you wish for further information or clarification on the contents of this letter, please contact us at the email address provided
National Highways (1)	Thank you for the opportunity to comment on the Worsthorne with Hurstwood Parish Council Neighbourhood Plan Regulation 16 consultation. I can confirm that National Highways has no objection to this proposal. We have no specific comments with regard to the document but would wish to remain informed over future decisions on the Neighbourhood Plan, in accordance with Regulation 16 (iv) of the 2012 Regulations.
National Highways (2)	Thank you for the opportunity to comment on the above consultation. I can confirm that National Highways has no objection to this plan and have no specific further comments to make at this time.
Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.
The Coal Authority	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records indicate that within the Neighbourhood Plan area there are recorded coal mining features present at

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	surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. It is noted however that the Plan does not propose to allocate any new sites for development and on this basis the Planning team at the Coal Authority have no specific comments to make on this document.
The Worsthorne Estate	There has been no landowner engagement with this plan despite our client being a major stakeholder in the area. We are aware of the reallocation of housing numbers within Burnley Borough Council. However, we are not aware of the housing number having be recalculated since the reallocation. Our client remains open and able to be bringing forward residential development land in strategic locations within the parish.
United Utilities	Allocations for New Development Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Burnley. If this were to change, we would request early dialogue so that we can inform the site selection process and ensure any issues that are a concern to us are highlighted to you as early as possible. Our Assets It is important to outline the need for our assets to be fully considered in any proposals in the NP Area. UW will not allow building over or in close proximity to a water main. UW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances. Site promoters should not assume that our assets can be diverted. On occasion, an asset protection matter within a site can preclude delivery of a proposed development. It is critical that site promoters / applicants engage with UW on the detail of their design and the proposed construction works. All UW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services).

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	We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. We ask site promoters to contact U UW to understand any implications using the below details: Developer Services – Wastewater Tel: 03456 723 723 Email: SewerAdoptions@uuplc.co.uk Developer Services – Water Tel: 0345 072 6067 Email: Watermains@uuplc.co.uk Vision for Worsthorne and Hurstwood U UW welcomes the vision for Worsthorne and Hurstwood, which includes clear reference to minimise the impact on the environment and limiting climate change. The need for any development to be responsive to the climate emergency to ensure resilient and adapted sustainable communities, which are attractive and well designed is essential. Sustainability and climate resilience should be ‘golden threads’ that guide the preparation of planning policy. A critical element of climate resilience is sustainable water management and water efficient development, which we have considered further below. Objectives for Worsthorne and Hurstwood Reflecting the above, U UW requests that the NP includes an additional objective which is: • <i>To ensure that new development is responsive to the climate emergency through resilient and adaptable sustainable communities.</i> Policy WHNP1C – Nature Recovery and Biodiversity Net Gain (BNG) We are keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure which is often very geographically restricted and critical to meeting future growth and environmental drivers. We welcome flexibility within this policy to allow for off-site provision. This is particularly in respect of existing and new infrastructure sites. On-site provision may not be the most appropriate long-term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. BNG should be resilient to future pressures from further development. It is critical that land at and around our key infrastructure sites is not sterilised to ensure that we are able to flexibly and most

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	appropriately respond to future growth and environmental drivers. Policy WHNP2 – Worsthorne and Hurstwood Neighbourhood Design Guide <i>Sustainable Design – Sustainable Water Management</i> Within the Design Guide, we note that there is some helpful references to the sustainable management of water, which is a critical element of the response to climate change. Although we welcome these references, we recommend that the Design Guide expands on sustainable water management as set out below. <i>Water Efficiency</i> Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/d) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. In this regard, we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following additional wording in the Design Guide regarding water efficiency. <i>‘All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.</i> We also suggest that wider non-residential development should also be the subject of water efficiency requirements as per the below recommended wording: <i>‘All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM ‘Excellent’ standard.’</i> We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reduction noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills. <i>Sustainable Drainage</i> <i>We recommend the following wording for inclusion in the Design Guide.</i>

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	<i>'Where required by the local planning authority, applications must be supported by a strategy for foul and surface water management. Surface water must be discharged in accordance with the surface water hierarchy in national planning practice guidance.</i> <i>The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.</i> <i>Applications will be required to incorporate sustainable drainage which is proportionate to the nature and scale of the proposal. The sustainable drainage must be multi-functional wherever possible, and designed in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain.</i> <i>Explanatory Text</i> <i>Application of the hierarchy for managing surface water is a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available.</i> <i>Foul and surface water drainage must be considered early in the design process. Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.</i> <i>The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low-lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated</i>

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	<i>flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.'</i> <i>Groundwater Source Protection Zone and Public Water Supply Catchment Land</i> <i>UUW wishes to highlight that large sections of the NP area are in a groundwater source protection zone and on land used for public water supply catchment purposes. These designations reflect the public water supply assets that are owned and operated by UUW within, and adjacent to, the area. We request that the Design Guide includes the following text:</i> <i>In consultation with the Council and relevant statutory bodies, applicants must, where required, demonstrate no unacceptable impact on the water environment (including groundwater) and public water supply resources resulting from the design, construction and operation of proposed development. Where necessary, development proposals must include measures to protect the water environment and public water supply resources. Development proposals must accord with the latest national guidance on Groundwater Source Protection Zones.</i> <i>Explanatory Text</i> <i>The area of the Neighbourhood Plan is the location for public water supply catchment land and groundwater source protection zones. These are public water supply resources which must not be adversely affected by development proposals.</i> <i>Investment in Future Infrastructure</i> <i>In this investment period (2025-30), UUW is proposing the biggest investment in water and wastewater services across the North West in over 100 years. This is influenced by a number of drivers including the construction of new facilities to take account of new environmental requirements, growth, the need to respond to the carbon challenge, or the need to invest in new updated infrastructure.</i> <i>The drivers for this investment include the Environment Act 2021, which has set a requirement to progressively reduce storm spills into the environment. T o m e t t h i s obligation significant future investment in our</i>

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	wastewater assets (treatment and network) is required. Such investment will be constrained by engineering circumstances to determine the most appropriate location for additional storage to reduce spills. This may necessitate investment in constrained and protected locations in our urban and rural environments such as local green space, open countryside and green belt. Consistent with meeting its obligations, U UW requests that NP policy is worded to recognise that infrastructure improvements, located within protected land, are appropriate forms of development. We also request wider support for water and wastewater infrastructure investment that is ultimately beneficial to the environment, biodiversity, watercourses and facilitates identified growth so that our investment can be delivered in the most timely and effective manner. U UW requests the support of all bodies for future investment in infrastructure in order to be able deliver water and wastewater infrastructure investment in a timely manner. U UW wishes to highlight that it owns assets which are currently situated in t h e N P a r e a . Upgrades to these assets may be required in the future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet environmental drivers and the infrastructure requirements of proposed future development in the region. The following policy wording is recommended: <i>‘The Neighbourhood Plan supports water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives including development proposals for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.’</i> This policy would enable us to ensure we can continue to meet the growth and development aspirations of the region, by ensuring that fundamental infrastructure requirements are met and that we are able to respond to the need for investment in our assets to protect the environment, maintain water supply and reduce flood risk.