Executive Board

Thursday, 10 January 2019
Time: 6.00 pm
Venue: Meeting Room A
Address: Blackburn Town Hall

AGENDA

Information may be provided by each Executive Member relating to their area of responsibility

1. Welcome and Apologies

2. Minutes of the Previous Meeting

3. Declarations of Interest

4. Equality Implications

The Chair will ask Members to confirm that they have considered and understood any Equality Impact Assessments associated with reports on this agenda ahead of making any decisions.

5. Public Forum

To receive written questions or statements submitted by members of the public no later than 4pm on the day prior to the meeting.

6. Questions by Non-Executive Members

To receive written questions submitted by Non-Executive Members no later than 4pm on the day prior to the meeting.

7. Youth MPs Update

To receive an update from the Youth MPs along with any issues they would like to raise.

8. Executive Member Reports

Verbal updates may be given by each Executive Member.

Leader

Health and Adult Social Care

PART 2 – THE PRESS AND PUBLIC MAY BE EXCLUDED DURING CONSIDERATION OF THE FOLLOWING ITEMS

Date Published: Wednesday, 02 January 2019
Harry Catherall, Chief Executive

EXECUTIVE BOARD
Thursday, 8th November, 2018

PRESENT

COUNCILLOR:	**PORTFOLIO:**
Councillor Mohammed Khan	Leader
Councillor Maureen Bateson MBE	Children, Young People & Education
Councillor Shaukat Hussain	Neighbourhood & Prevention Services
Councillor Andy Kay	Resources
Councillor Phil Riley	Regeneration
Councillor Jim Smith	Environment
Councillor Damian Talbot	Leisure & Culture
Councillor Brian Taylor	Health & Adult Social Care
EXECUTIVE MEMBER:	**NON-PORTFOLIO**
Councillor John Slater	Leader of the Conservative Group

	Item	Action
1	**Welcome and Apologies** The Chair, Councillor Mohammed Khan welcomed all present to the meeting. Apologies were received from the Youth MPs.	
2	**Minutes of the Previous Meeting** The Minutes of the meeting held on 11th October 2018 were agreed as a correct record.	**Approved**
3	**Declarations of Interest** No Declarations of Interest were received.	
4	**Equality Implications** The Chair asked Members to confirm that they had considered and understood any Equality Impact Assessments associated with reports on the agenda ahead of making any decisions.	**Confirmed**
5	**Public Forum** No questions had been received from members of the public.	
6	**Questions by Non-Executive Members** No questions had been received from Non-Executive Members.	
7	**Youth MPs Update** The Youth MPs were not present as they were attending the Annual Sitting in the House of Commons.	
8	**Executive Member Reports**	

	Item	Action

HEALTH AND ADULT SOCIAL CARE

8.1	**Day Services Review: Proposed Model for new Day Services Offer**	
	Members were reminded that the review of Day Care Services was prioritised as part of the Council's medium term financial strategy and agreed at the Finance Council in 2017.	
	The review of Day Care Services and the overall prevention strategy within Blackburn with Darwen had highlighted the opportunity to improve the model of delivery by developing a new offer of "day services" for residents who had or may develop social care needs, but were not accessing formal services at the present time. This would enable the Council to support a greater number of people with varying levels of need, as close to home as possible within the new Integrated Neighbourhood setting.	
	It was proposed that the Council would maintain the existing specialist offer for residents with the most complex needs ("Day Care") whilst developing a more diverse offer across its community assets of new "day services" for those residents able to maintain a higher degree of independence. In this way, more residents would be supported to access the right level of support in accordance with the principles of prevention, promoting independence, providing choice and control. Utilising community assets as a means to support people across the whole spectrum of need aligned to the wider vision around the development of an Integrated Neighbourhood offer that supported people to live well for longer.	
	The existing Day Care offer would continue to meet the needs of its current service users who experienced difficulties with dementia, frailty, learning disability and social isolation. If these service users wished to make use of opportunities available under the new day services offer, this would be facilitated whenever it was possible and appropriate. The Council was also reviewing and consulting around an appropriate model of provision for young people in transition from Children's services to Adult Social Care.	
	The proposed model of delivery for this new offer of day services sought to stimulate growth in the voluntary and community sectors within neighbourhoods and would support residents with all levels of physical, emotional and social well-being needs.	
	RESOLVED -	
	That the Executive Board agrees:	
	1) To approve the outline model proposed for Adult Social Care's new offer of "day services", giving wider and more intensive support from within a range of community settings for residents with qualifying	**Approved**

	Item	Action
	assessed needs.	
	2) That any decision to implement specific parts of the new “day services” offer is delegated to the Executive Member for Health and Social Care in consultation with the Director of Adults and Prevention.	**Approved**
	3) The use of the TIER descriptions (see Appendix1) as part of a strength based approach to assessment of needs to help ensure people access the correct level of support, within a community asset based Integrated Neighbourhood setting where possible.	**Approved**
	4) To approve the planned consultation with potential service users and carers across the borough to assist in continuing to develop the new “day services” offer, and the further formal consultation with young people transitioning from Children’s Services to Adult Social Care (along with their families, carers and other involved parties) regarding the development of an appropriate model of provision for this specific cohort.	**Approved**

CHILDREN, YOUNG PEOPLE & EDUCATION

Councillor Maureen Bateson verbally reported on the following:

- The Celebration of Achievement Awards at Ewood Park for Looked after Children.
- CSE Awareness week and the promotion of activities to raise awareness of the issues.
- A targeted inspection of the Council’s Prevention and Safeguarding services by Ofsted, with a letter to be published in late November/early December.

ENVIRONMENT

LEISURE AND CULTURE

NEIGHBOURHOOD AND PREVENTION SERVICES

Councillor Shaukat Hussain thanked the Community Safety Team for their work with the Fire Service, Police and volunteers to ensure a safe Bonfire Night.

REGENERATION

	Item	Action

Councillor Phil Riley reported that Blackburn Cathedral and the Festival of Making had both won awards at the Lancashire Tourism Awards held on 7th November 2018.

RESOURCES

Councillor Andy Kay verbally reported that in terms the forthcoming Budget Statement, any extra funding would be appreciated, but that it was expected that the funding would not be sufficient to meet the budget shortfall.

9	**Corporate Issues**	
9.1	**Quarterly Revenue Monitoring Report Quarter 2** A report was submitted which outlined the overall revenue financial position of the Council, highlighting any significant issues and explaining variations in the second quarter of the financial year. **RESOLVED –** The Executive Board is asked to approve: • the portfolio cash limit adjustments outlined in Appendix 1. • the Earmarked reserves position shown in Appendix 2 • the variations to revenue expenditure, as listed in Section 6, giving rise to a balance of £5.686 million in the unallocated General Fund revenue reserve.	**Approved**
9.2	**Quarterly Capital Budget Monitoring Report Quarter 2** The Executive Board reported on the overall financial position of the Council in respect of the Capital Programme as at 30th September 2018, highlighting key issues and explaining variations in the first 6 months of the financial year. **RESOLVED –** The Executive Board is asked: • to approve the revised capital programme as per Appendix 1, • to approve the variations to the programme shown in Appendix 2	**Approved**
10	**Matters referred to the Executive Board**	

	Item	Action
	None. Signed at a meeting of the Board on Thursday, 13 December 2018 (being the ensuing meeting on the Board) Chair of the meeting at which the Minutes were confirmed	

DECLARATIONS OF INTEREST IN

ITEMS ON THIS AGENDA

Members attending a Council, Committee, Board or other meeting with a personal interest in a matter on the Agenda must disclose the existence and nature of the interest and, if it is a Disclosable Pecuniary Interest or an Other Interest under paragraph 16.1 of the Code of Conduct, should leave the meeting during discussion and voting on the item.

Members declaring an interest(s) should complete this form and hand it to the Democratic Services Officer at the commencement of the meeting and declare such an interest at the appropriate point on the agenda.

MEETING: **EXECUTIVE BOARD**

DATE: **10th January 2019**

AGENDA ITEM NO.**:**

DESCRIPTION (BRIEF):

NATURE OF INTEREST:

DISCLOSABLE PECUNIARY/OTHER (delete as appropriate)

SIGNED :

PRINT NAME:

(Paragraphs 8 to 17 of the Code of Conduct for Members of the Council refer)

EXECUTIVE BOARD DECISION

REPORT OF:	Executive Member for Children's Services
LEAD OFFICERS:	Director of Children's Services
DATE:	13th December 2018

PORTFOLIO/S AFFECTED:	Children's Services
WARD/S AFFECTED:	All
KEY DECISION:	**YES** ☐ **NO** ☒

SUBJECT:
Fostering Service Quarter 2 Report 1st July to 30th September 2018

1. EXECUTIVE SUMMARY

This report provides information on the management and performance of the Local Authority's Fostering Service.

2. RECOMMENDATIONS

That the Executive Board:

Notes the Quarterly Report which is available on the Council's website.

3. BACKGROUND

The Fostering Service Regulations 2011 and the National Minimum Standards for Fostering Services requires that the Council Executive:

a) Receive written reports on the management, outcomes and financial state of the Fostering Service every 3 months;

b) Monitor the management and outcomes of the services in order to satisfy themselves that the service is effective and is achieving good outcomes for children;

c) Satisfy themselves that the provider is complying with the conditions of registration.

The report has been written to address the issues identified above. It will be taken into account by OFSTED in inspecting the service.

The report is for the second quarter of 2018 – 19, covering the period from 1st July to 30th September 2018 and provides an overview of the service.

4. KEY ISSUES & RISKS

1. The number of children in care increased in Quarter 2 with 17 additional children compared to the previous Quarter. The pressure on placements was significant particularly during the school holidays when many carers were away and a number of children unable to go on holiday with carers also needed short term placements.
2. In spite of the challenge, the Service managed to place 28 children new to the care system with in-house carers by asking carers to stretch their numbers and consider children outside of their normal range. The overall number of independent agency foster placements reduced in Quarter 2.
2. The new Permanence Team was launched in July. This Team now undertakes all assessment work relating to family and friends including regulation 24, viability and combined fostering /SGO assessments. The number of referrals in Quarter 2 stretched capacity in the Service to the absolute limit. As this type of court-ordered work has to be prioritised to enable court timescales to be met, the completion of mainstream assessments was compromised, delaying the approval of much needed new carer households.
3. Whilst the Service is on track to meet a target of approving 15 new foster carer households for the year, the demand for foster placements requires the Service to recruit, assess and approve as many new fostering households as possible. The Service is currently researching payment levels across the North West to determine whether Blackburn with Darwen is keeping pace and can compete in the recruitment marketplace.
4. Whilst the number of children in commissioned placements fell in Quarter 2, the commissioned placements budget is under great pressure. In Quarter 2, the Fostering Service was proactive in identifying foster placements for young people who are ready for family placements to move from their agency residential placements. At the time of writing, 5 young people have either returned to or are soon to be placed back in foster care.

5. POLICY IMPLICATIONS
No policy implications identified

6. FINANCIAL IMPLICATIONS
No financial implications have been identified from the report. The fostering budgets are closely monitored as part of the regular portfolio budget review.

7. LEGAL IMPLICATIONS
This report is required to meet statutory requirements as set out in the ‘National Minimum Standards for Fostering.’

8. RESOURCE IMPLICATIONS
No resource implications have been identified.

9. EQUALITY AND HEALTH IMPLICATIONS
Please select one of the options below. Where appropriate please include the hyperlink to the EIA.

Option 1 ☒ Equality Impact Assessment (EIA) not required – the EIA checklist has been completed.

Option 2 ☐ In determining this matter the Executive Member needs to consider the EIA associated with this item in advance of making the decision. *(insert EIA link here)*

Option 3 ☐ In determining this matter the Executive Board Members need to consider the EIA associated with this item in advance of making the decision. *(insert EIA attachment)*

10. CONSULTATIONS
None.

11. STATEMENT OF COMPLIANCE
The recommendations are made further to advice from the Monitoring Officer and the Section 151 Officer has confirmed that they do not incur unlawful expenditure. They are also compliant with equality legislation and an equality analysis and impact assessment has been considered. The recommendations reflect the core principles of good governance set out in the Council's Code of Corporate Governance.

12. DECLARATION OF INTEREST
All Declarations of Interest of any Executive Member consulted and note of any dispensation granted by the Chief Executive will be recorded in the Summary of Decisions published on the day following the meeting.

VERSION:	**1.0**

CONTACT OFFICER:	Alyson Hanson - Service Leader, Placement Services
DATE:	23rd October 2018
BACKGROUND PAPER:	Fostering Service Quarterly Report 1st July to 30th September 2018 - Quarter 2

Fostering Service Quarter 2 Report

1st July to 30th September 2018

Executive Report

Quarterly reports to the Executive Board are a requirement of the Fostering Service to meet Standard 25.7 of the National Minimum Standards for Fostering Services. They are a key part of the documentation considered by OFSTED when conducting a Service inspection.

Introduction

Blackburn with Darwen Borough Council's Fostering Service aims to ensure that:

- The best foster carers are recruited for our children;
- All placements receive high quality support, effectively targeted according to need;
- Children are found permanent families without delay; and
- Children and young people in foster care achieve the best possible outcomes.

Children in our Care in Foster Care

The number of children in our care has fluctuated during this year; it decreased significantly in Quarter 1 but increased again in Quarter 2.

	31st March 2018	30th June 2018	30th Sept 2018
Number of Children in our Care	377	343	360
Number of CioC in Foster Care	215 (57%)	209 (61%)	225 (62.5%)
Number of children in in-house foster care placements	118 (31%)	120 (35%)	139 (38.6%)
Number of children in family and friends foster care	48 (13%)	45 (13%)	45 (12.5%)
Number of children in independent fostering agency placements	49 (13%)	44 (13%)	41 (11.4%)

The availability of foster placements both in-house and through independent agencies remains challenging, particularly for older children and sibling groups. However, the Department has been able to keep the vast majority in foster care and of the 225 in foster care, 82% are in in-house placements including family and friends placements.

In-House and Agency Placements

Gender breakdown

	In-house	Family and Friends	Independent Fostering Agency
Male	86	16	27
Female	53	29	14

Age break down

Age	In-house	Family and Friends	Independent Fostering Agency
0 to 2	22	10	5
3 to 6 years	15	12	2
7 to 10 years	27	8	10
11 to 15 years	56	11	17
16 and 17 years	19	4	7
Total	139	45	41

New Referrals in Quarter 2

	No of children	Sibling Groups	Age 0 - 5	Age 6 - 11	Age 12+	Children placed in-house	Fostering Agency	Residential placements	Children didn't come in	Waiting to be placed
July	21	6	7	8	6	20	0	0	1	0
August	6	1	2	4	0	1	0	0	1	4
Sept	15	3	9	3	3	7	0	0	5	3
Q2 total	42	10	18	15	9	28	0	0	7	7

There were 42 new referrals in Quarter 2, evenly spread across the age range. There was a significant decrease in the number of referrals during August which is not unusual. 28 children actually came into care in Quarter 2 and were all placed with in-house foster carers. The remaining 7 children were waiting to be placed at the end of the Quarter. August was challenging, despite low numbers, because a number of carers were unavailable due to holidays and short break carers were fully committed to caring for children who could not go on holiday with their main carers for various reasons (usually because holidays had been booked prior to the placement being made).

Matching and Ethnicity

Two mixed black African children were placed with white British carers. Their two half siblings were already in this placement and doing well, the four siblings are now together and their cultural needs are being met.

An unaccompanied asylum seeking young person from Afghanistan was placed with an Asian foster carer.

Feedback from children in Foster Care

The feedback received from children in foster care is generally positive. Their views are obtained from:

- Participation in the VOICE and Junior VOICE groups;
- The work of the Participation Champions in the service;
- The Investing in Children assessment process;
- Participation in staff recruitment (interviews) and foster carer training;
- Contributing to the Annual Review report of the foster carers looking after them;
- A support group for birth children and grandchildren; and
- Social worker feedback for foster carer reviews.

Children, young people and their social workers made the following comments about placements when contributing to foster carer reviews in Quarter 2:

Some comments from children and young people include:

'They're like my new mum and dad now, thinking about mummy makes me sad'.

'I don't like people saying 'foster care', can you say 'my new family instead'.

'I love the food in this family'.

'I was happy when I went to London with Aunty and Uncle. I saw the Queen'.

'The thought of being moved again makes me sad. I am happy here'.

‘Me and their foster daughter have grown close and become really good mates’.

‘Aunty understands me and I have a nice and funny foster sister. Aunty treats me equal but sometimes I do things wrong and then I think Aunty is too strict and gets annoyed with me when I don’t wash my bowl and when I argue.’

Some children and young people prefer not to comment but are happy to tick the boxes indicating that they are happy with their foster carers.

Social Workers said:

Of family and friends foster carers:

‘Paternal grandparents take the time to spend with S and recognise that she has faced significant levels of loss, trauma and uncertainty. They provide S with the love and emotional reassurance that is needed to support this. A close and loving attachment is continuously observed from Paternal Grandparents towards S and this is certainly reciprocated by S herself.’

‘T feels confident to confide in C who has encouraged T to talk about her feelings and the court processes which has been exactly what she has needed. ‘

‘C and C’s needs are met to a high standard. C was a very withdrawn little girl due to the neglect she had suffered whilst living with birth parents. S and A have been very nurturing towards the children and are able to provide the emotional support needed to support the children. C is now a different little girl. She has a great relationship with her carers and is able to speak with them openly about her worries and now also speaks to myself when previously she withdrew to the point that she would not look at me.’

Birth Children said:

‘The last year has been great, E in particular is such a lovely young girl and it’s always a joy to have her around. E has gotten upset a couple of times when she has been staying with us, especially feeling like no one cares about her. ‘

‘I love being part of a fostering family. It’s nice to see other children go from sad face to a happy one’.

Promoting Children’s Health, Emotional Development, Education & Leisure

Foster families are provided with pre and post-approval preparation and training on the importance and availability of health, education and leisure services to enable them to help children achieve their potential and enhance their emotional wellbeing.

Looked After Children and young people are encouraged to participate in a variety of activities in which they can succeed and are supported in achieving better outcomes. All local looked after children and care leavers are provided with a Be Active card, which enables them to access free sport and leisure activities within the Borough. Foster carers are also provided with a MAX Card, which offers heavily discounted access to a range of leisure parks and facilities around the North West. This is funded by the Fostering Service in partnership with the Foster Carer Association.

Children in foster care have regular medicals at the statutory frequency appropriate for their age. There is a Designated Nurse for Looked After Children who takes an active role in following up health issues and assisting with health promotion work. Foster carers have a Health Passport for each child in their care which is a record of all of the child's health details. Public Health funding for 18 months has enabled the appointment of a specialist nurse to work with 'hard to reach' looked after children and care leavers.

There are currently 11 looked after children in foster care who are registered as having a disability. Foster carers are provided with the relevant training and support to meet the specific needs of the child they have in placement.

In relation to emotional wellbeing, looked after children have access to Clinical Psychology and related services through REVIVE and the East Lancashire Child and Adolescent Service (ELCAS) also known as Children and Adolescent Mental Health Service (CAMHS). The REVIVE Service is a partnership between Blackburn with Darwen Borough Council's Children's Services and East Lancashire Hospital Trust to provide emotional health support for children known to the Local Authority and is based at Duke Street. REVIVE delivers consultation to foster carers, training and direct intervention on emotional health and well-being. Feedback from foster carers following consultation is very positive. The REVIVE Service has delivered training to foster carers on self-harm and on attachments.

Staffing in the REVIVE team has increased over Q2, with 2 new Mental Health Practitioners; one who is seconded from ELCAS for 2 days a week, and another who started with the team full time in September. The Fostering Support worker now sits in the REVIVE Service but continues to support children in foster care and their foster carers along with other members of the Team.

49 referrals were made to the REVIVE Service in Q2, 22 of those in July. 8 of those referrals were made by the Children in our Care Team and 2 from the Fostering Team. 23 (47%) of the referrals were for children subject to a care order. 28 consultation slots were made available of which 23 were attended, and 5 were either not booked or not attended. Representatives of REVIVE attended the Foster Carers Association meeting in July. A Psychologist in clinical training joined the team in October and will be jointly facilitating a 12 session Nurturing Attachments course for foster carers starting in January.

As well as mandatory First Aid training, foster carers also receive training on a variety of health-related issues including 'Infectious Diseases in Childhood' and 'Managing Medicine.' Phase 1 of a 'Healthy Homes' training package for carers has been developed.

In line with Standard 8 of the National Minimum Standards for Fostering Services, the Department implements a written education policy prepared in partnership with the Virtual Head Teacher and the Education Manager for Children in Our Care. The Virtual Head's role is to ensure that the educational needs of all Children in our Care are being met and that levels of achievement and aspiration among our children and young people are raised. Termly briefings are held with a group of social workers, managers and Designated Teachers and Head Teachers to consider ways to improve achievement and attainment.

The Pupil Premium allowance, previously paid to schools to support Children in our Care to achieve in school, is managed by the Virtual Head who has a system in place to administer and ensure the money is spent appropriately to further their educational achievements. The Virtual Head quality assures all Personal Education Plans (PEPs).

The Education Manager sits within the Children in our Care Social Work Service and, where necessary, actively intervenes with schools to promote the needs of children in foster care. As part of the preparation and assessment process and through the Foster Carer Agreement, foster carers are set a clear expectation that they will promote and support children's educational attainment. The ways in which foster carers meet children's educational needs are monitored through the foster carer review process and supervisory visits. Foster carers regularly receive training 'Promoting Educational Achievement for Children in Our Care'. The Education Manager attended the recent Foster Carer Forum to update carers on any new developments and to answer their questions about PEPs.

Results for 2018

At Key Stage 1, the way in which children are graded has changed as children have to score more than 100 marks in order to pass. The percentages below relate to the numbers who passed – the results in Maths were particularly positive.

Key Stage 1	Reading	Maths	Writing	WRM combined
CioC total / whole cohort	57.1%	64.3%	50.0%	50.0%
CioC total/ eligible children	66.7%	75.0%	58.3%	58.3%
BwD all	74.7%	76.0%	68.1%	64.0%
National all	75.5%	76.1%	69.9%	65.4%

At Key Stage 2 the way in which children are graded has also changed in the same way children again have to score more than 100 marks in order to pass. The percentages below relate to the numbers who passed.

Key Stage 2	Grammar, Punctuation & Spelling	Reading	Maths	Writing	WRM combined
CioC total/ whole cohort	43.8%	37.5%	43.8%	43.8%	37.5%
CioC total / eligible children	58.3%	50.0%	58.3%	58.3%	50.0%
BwD all	79.9%	74.3%	78.2%	77.0%	64.5%
National all	77.5%	75.1%	75.4%	78.2%	64.2%

Key Stage 4	GCSE Eng 4+	GCSE Maths 4+	GCSE Maths & Eng combined 4+	1 GCSE or equivalent
CioC total	30%	17%	17%	96%

39% of the Year 11 cohort had an Education Health and Care Plan and 97% are now currently identified as being in education, training or employment.

<u>Engagement with Children & Young People and the VOICE Group</u>

In Quarter 2 the VOICE group met monthly at Knott Street Community Centre and the majority of children who attended are in foster care. This venue was chosen as the facilities allow part of each session to be activity-based. The members of the group have been involved in a number of consultation activities to inform and shape services.

The young people have requested 'all about me'profiles for staff and are involved in the Journey to Fostering training programme for prospective carers. It is anticipated that birth sons and daughters may also be involved in this training for prospective carers in the future. The Voice Group and 'Sons and Daughters' group have recently taken part in a consultation event regarding the looked after children website. At the end of the Quarter, the group met at Pizza Hut to say goodbye and present gifts to the Participation Officer and a social worker who had been co-leading the Voice group and were leaving their posts. Three young people also contributed to the farewell event for Linda Clegg, DCS as she departed from Children's Services.

VOICE members and care leavers continue to attend Children & Young People Scrutiny Committee and Corporate Parenting Specialist Advisory Group, when appropriate.

Transitions

Children and young people in foster care are supported to make a positive transition to adult life so foster carers attend training on 'Transitions' which focuses on their role in developing young people's skills to live independently as they progress towards adulthood. The Children in Our Care Team and the Fostering Team encourage carers and young people to consider 'staying put' and the Leaving Care Service also delivers courses for foster carers to develop their understanding of this. The training has been positively evaluated by carers and most indicate a willingness to work with 'staying put'. Although finance causes carers the most concern, some are willing to receive housing benefit as part of their financial package and will consider changing their status to landlord. The Leaving Care Service attends Reviews to discuss Staying Put with foster carers for young people aged 17 years, who will turn 18 in 2018. The Service has also started some work to develop a 'staying close' option, which may be more suitable for a number of care leavers.

The Leaving Care Service is currently in the process of being reassessed for the Investing in Children award. The Service is also working hard to encourage and support care leavers into apprenticeships. A recent session at the library about apprenticeships was attended by 15 young people who all expressed an interest. The Service is also working in partnership with the Blackburn Rovers Community Trust to develop a 'Get Ready for Work' course aimed specifically at care leavers. From the training several young people were offered apprenticeships.

The Leaving Care Service has achieved an increase in the number of supported lodgings providers this year, which increases choice for young people leaving foster care and residential placements in favour of semi-independence. Participation levels continue to be good with young people delivering the Total Respect training and training for foster carers.

Some Care Leavers over the summer took part in the North West Leaving Care Football Tournament - we had a couple of young people taking part that are in foster care – Blackburn with Darwen did not win but as this is now becoming a younger team it is looking positive for the future.

The Leaving Care Service has 8 advisors who have now moved to Duke Street. 3 advisers are working with the 16 to 18 years age group resolving issues with accommodation, education, training and employment and staying put. 5 advisors are providing advice and guidance to the 21 to 25 years age group and in addition all advisers have a caseload of at least 20 18 to 21 year olds for whom they provide general support.

Care Planning

The Care Planning and Fostering (Miscellaneous Amendments) (England) Regulations 2015 provide a revised definition of 'permanence' for Children Looked After, including for the first time the definition of a long term foster placement. The responsibilities of the Local Authority in assessing the ability of the foster carer to meet the needs of the child now and in the future, and identifying any support services needed to achieve this are also set out. Local Authorities are required to achieve long term matching within reasonable timescales. The Regulations introduce new duties for ceasing to look after a child.

The Fostering Service

During Quarter 2 the Fostering Service restructured into 3 teams including a new Permanence Team which was launched on 1st July. The Permanence Team now completes all Special Guardianship assessments, all viability and combined assessments and Regulation 24 assessments. The number of referrals for this work far exceeded expectations in Quarter 2 and social workers from the other two fostering teams were allocated work on top of their mainstream work. This has caused some pressure in the Service as family and friends work has to be prioritised to meet court timescales and as a result some mainstream fostering assessments were delayed. Given the pressures on the commissioning budget, the need for prospective carers to be assessed and approved within statutory timescales is critical so that more children can be placed with in-house carers.

Foster Carer Resource

	Total number of foster carers	Mainstream	Short breaks carers	Family and Friends carers
Quarter 1	123	82	14	27
Quarter 2	123	81	14	28

Foster Carer Recruitment

During Quarter 2 there were 47 enquires, 10 registrations of interest (ROI's) and 2 approvals.

2018/19				
Month	**Enquiries**	***ROI**	**Approvals**	**Conversion**
Jul-18	23	4	1	17%
Aug-18	9	4	0	44%
Sep-18	15	2	1	13%

2018/19	Enquiries	*ROI	Approvals	Conversion
Quarter 1	35	10	5	29%
Quarter 2	47	10	2	21%

- ROI = Registration of Interest

At the end of Quarter 2 there were 2 prospective carer households at Stage 2 of assessment and 3 at Stage 1. In addition 7 potential applicants were booked to attend Journey to Foster training and a number of initial visits were also arranged and awaiting completion.

Recruitment Activity

The Service presented a stand at the Royal Lancashire Show in July, working alongside 2BR Radio for the weekend. Face-painting and a bubble machine drew people to the stand and 7 good enquiries were made as a result.

The number of enquiries dropped off in August as expected due to the summer holidays. However the Service continued to receive enquiries and a campaign (10,000 people targeted on Facebook and Instagram) aimed at existing foster carers who foster with other local authorities and independent fostering agencies brought in 5 enquiries. 4 of these are now in the process of transferring to Blackburn with Darwen.

The Fostering Information Evening in Quarter 2 was attended by 6 people whose interest was followed up after the event.

The Let's Foster website continues to be the main place for people to get their information and submit an enquiry. It will take 6 months for the new website to settle with Google's algorithms and start to move forward on the search pages. The Service should then start to see more traffic returning to the site. Work on information pages, news articles and events is ongoing.

The plan over the next 12 months is to put events on the Let's Foster website, You Can Foster website and FosterTalk website as well as on social media.

In Quarter 2 a number of adverts were placed to find placements for specific children. One advert aimed at finding foster carers for 3 siblings reached nearly 2000 people.

<u>Regional Campaign</u>

The regional 'You Can Foster' recruitment campaign has been live since September 2016 and has helped generate enquiries via the You Can Foster website.

Fostering Service Managers and the new Recruitment and Marketing Officer have been involved in the development of this campaign to ensure that Blackburn with Darwen Borough Council derives full benefit from it. The campaign is prioritising recruitment at a local level through the targeting of P.R, digital marketing and additional local activity.

<u>Foster Carer Retention</u>

Month	Resignations	Deregistrations
July	0	0
August	2 (family and friends)	0
September	1 (family and friends)	1

<u>Assessment</u>

Statutory guidance for fostering assessments is that they should be completed within 8 months, a timescale that is generally achieved. The quality of assessments remains good and is monitored by the Fostering Panel.

Foster Carer Training
During this Quarter, a new 2 year foster carer training programme was launched. The launch of the new online booking system and training booklet was provided to all carers. Three sessions to explain the new programme were delivered on the 5th September with a total of 85 carers in attendance throughout the day.

Courses available to carers during Quarter 2 included Paediatric First Aid (2 day course) and a Paediatric First Aid update.

Fostering Panel
Four Fostering Panels were held in Quarter 2 including an additional Panel to accommodate long term matchings.

July's Fostering Panel considered two long term matches, two 1st Annual Reviews for connected families and one mainstream assessment that was deferred from June as the applicants needed to complete additional safety work on their home. This work had been completed and they were approved at Panel.

August's Fostering Panel considered two long term matchings both of which were independent agency foster placements. The Panel also considered two reviews following allegations, three connected persons assessments and a mainstream 1st annual review.

September's Fostering Panel considered two connected persons assessments and a first review for a connected person. Two mainstream foster carer reviews following concerns were also presented. The Panel recommended continued approval of the first but did not recommend continued approval of the second. A review following an allegation was presented, as well as a mainstream assessment and the Panel felt able to recommend continued approval of both.

An extra permanence and matching panel was held at the end of September where three matching , and two mainstream and one independent agency placements were presented. Two young people attended their matching and this was a really positive experience for them.

Quality assurance reports are completed at the Fostering Panel by the panel advisor, chair and panel members and are then sent to the social workers and their managers. In the main the reports presented to the Fostering Panel have been of a good or outstanding standard. Where areas of service development are identified they are discussed at team meetings and taken forward by the service managers.

Evaluation questionnaires for applicants and carers attending the Fostering Panel are completed at the end of the Panel. All those completed have been positive and this has been fed back to the Panel.

Review Panel
During Quarter 2, 24 foster carer reviews were presented to the Annual Review Panel and 12 sets of carers attended. A total of 8 evaluation forms were received which all indicated that the carers' attendance at the Panel was positive. One evaluation form suggested that it would be nice to be provided with coffee whilst waiting for the Panel, and this will be fed back to Panel members to look at how this can be approved for carers.

Complaints
There were no complaints in Quarter 2.

Compliments

There were no compliments received during Quarter 2.

Allegations

During Quarter 2, there were 3 allegations. The first allegation was made by a foster carer's neighbour raising concerns in respect of the carer and ability to meet the needs of the child placed. This allegation was fully investigated and overseen by the LADO and it was deemed that the allegation was unfounded.

An allegation was made by a young person in relation to previous carers and their birth child. Section 47 enquiries were carried out resulting in a strategy meeting. The outcome of the allegation was unsubstantiated with a recommendation for the carers to return to main Panel for a full review.

The third allegation was made by a child's social worker following a placement move. During a statutory visit, a young person disclosed a number of concerns which resulted in a full investigation and LADO strategy meeting.

Specific Incidents and Restraints (including Bullying, Serious Illnesses and Accidents)

During Quarter 2 there was one specific incident report about a sibling group absconding from placement. The foster carers reported this to EDT (Emergency Duty Team) and notified the police. The two young people were later returned home by the police. There were 2 minor incidents in relation to the same child biting another whilst at nursery.

There was one incident of bullying reported by a foster carer because the older sibling in placement had verbally threatened the younger one. A care planning meeting was held with a recommendation for a referral to the REVIVE with ongoing work being carried out with the children to explore the issues.

Missing From Home

14 young people and 29 missing from home reports were made during Quarter 2. 12 reports involved one young person, a further 7 involved another young person and the remaining reports involved several different young people.

In all cases the correct missing from home procedures were followed and all young people returned to their placements safe and well. Procedures for young people who go missing include 'return home' interviews which are conducted by the Engage Service. This allows young people to talk to someone independent about why they have been missing and for the service to identify issues of concern.

Exemptions

Four exemptions were approved in Quarter 2. One was made for a sibling group of four and noted at the July Fostering Panel. It remains in place. A further exemption was made in August for an emergency placement which continues although a move is planned. A further short break exemption was made in August to allow two siblings to be placed whilst their main foster carers were managing a bereavement and to support the placement. A further exemption was made in September to accommodate a baby and this continues.

All exemptions have been noted at the Fostering Panel and are monitored closely by the supervising social worker. The Fostering Support Worker provides additional support and ensures that the children's views are heard and taken into account.

Engagement with Foster Carers

Blackburn with Darwen has a Foster Carer Association (FCA), which meets regularly and has an Elected Committee. Members of the Committee meet senior managers and the Executive Member on a quarterly basis. The Chair of the FCA sits on the Corporate Parenting Specialist Advisory Group. The FCA has its own website, which has been increasingly used to communicate messages and news.

At the request of foster carers, membership of the Fostering Network moved to Foster Talk that provides similar services to support foster carers. Foster carers also have access to independent support commissioned from the Fostering Network to provide support and advocacy services in the event of complaints or allegations.

A small group of foster carers are recruitment champions, who help drive recruitment forward and are involved with planning events, Skills to Foster preparation training, and manning recruitment stands and events.

The Fostering Service holds a foster carer forum every six months. The event offers carers the opportunity to present their views about a range of issues related to fostering and to be involved in the future development of the Service. The event takes place in October and will be reported on in Quarter 3.

Family and Friends Foster Care

During Quarter 2 the Permanence Team was launched. Two full time social workers were recruited to the Team along with the three supervising social workers already in post. The SGO Social worker moved from the CIOC team to the Permanence Team. The work of this Team is to complete all family and friends assessments including viabilities, Regulation 24 placements and combined assessments with an outcome of either family and friends fostering or Special Guardianship. This is from the Public Law Outline (PLO) pre-proceedings process through to care proceedings.

The number of viability and combined assessments referred through to the Team has been unprecedented with 30 viabilities being referred within 24 hours. In a period of 8 weeks there were 98 referrals for either viability, Reg 24 or combined assessments. 7 of these pieces of work have been referred from the CIOC Team and 91 of these assessments have been referred from the AST/RAST teams. This volume of referrals has put the Fostering Service under great pressure during this Quarter. There are currently 28 family and friends foster carers which is a low number compared to the number of SGOs that are being assessed and issued.

A Permanence Panel is now in place that sits every 2 weeks and ratifies SGOs. This Panel also oversees placements that are waiting to be matched long term to avoid drift and delay in achieving permanence plans. In addition the Panel tracks adoption cases, children on Care Orders at home and Section 20 matters.

There have been 42 combined assessments (some that have moved on from viabilities) and 76 viability assessments completed during this time period. When considering viabilities, there have been 19 that have progressed to combined assessments and there remain 28 ongoing. It is worth noting that there have been 29 viability assessments with an outcome of no further action due to the applicants withdrawing or their assessments being negative. This remains an area of development due to the significant amount of work being carried out on assessments that are not then utilised. This development work will be considered through the PLO pre-proceedings process and through Family Group Conferences in an effort to reduce the amount of viability assessments that need not be undertaken. Due to the high number of referrals in a very short time, the Team has very quickly reached capacity, meaning that social workers from the mainstream Fostering Team were allocated assessment work in order for the Permanence Team to deal with the demand and to ensure that all assessments were allocated without delay. There have been 13 pieces of work completed by the mainstream team, 9 of which were combined assessments and 4 have been viability assessments. This pressure is compromising the ability of the Service to complete the assessment and approval of much needed mainstream foster carers in a timely fashion as court-ordered assessments have to be prioritised.

During this Quarter, a team member has returned from long term sick leave but a team member who was on long term sick left. This post is currently being covered by an agency worker and out to advert.

Short Break Foster Care

There are presently 14 short break carers, who have provided 31 short break placements. Short break carers provide support to parents, other placements and emergency placements. Carers are matched to children, who have a wide range of additional and complex needs. A support group is in place for short breaks carers and they met during Quarter 2.

A meeting was also held with short break carers, managers in the Fostering Service and the Adolescent Support Unit (ASU) to discuss working more innovatively together around emergency placements particularly mid-week when ASU is not resourced to open for overnight stays. A number of carers were interested in helping with this and work to start developing support systems is due to start.

Training / Staff

All staff members have individual training and a development plan, which is linked to their annual appraisal and monitored during monthly supervision.

Placement Stability Table

The Department uses a definition of placement stability based on 3 or more placements in a 12 month period that is calculated on a cumulative basis over the year. The average for England is measured against the figures for 2013/14 when it was 10.7%; the comparable authority percentage for the same year was 10.1%. In Quarter 2, performance was 1.4% better than performance in the same period 12 months ago.

	April	May	June	July	Aug	Sept
LAC with 3 or more placements	0	1	2	4	8	10
Total number of LAC	361	357	343	352	355	360
% Stability of LAC placements 2018/19	0%	0.3%	0.6%	1.1%	2.3%	2.8%
% Stability of LAC placements 2017/18	0%	0%	2.2%	2.4%	4.3%	4.2%

Disruption meetings are held in order to identify learning and inform future planning for any child whose placement has been disrupted. A number of managers across Children's Services have been trained to chair these meetings.

Commissioned Placements

There was a significant decrease in the number of children in independent agency foster placements in Quarter 2. A number of placements ended and all new referrals were placed in house which accounts for this reduction. The number of agency residential placements is unchanged.

End of Quarter 1 2018/19	End of Quarter 2 2018/19
Independent Agency Residential Placements 28	Independent Agency Residential Placements 28
Independent Agency Fostering Placements 42	Independent Agency Fostering Placements 33

Budget

Current placement pressures in-house and across the independent fostering agency landscape continue to place the commissioning budget under pressure. The Case Tracking and Commissioning Panel monitors placements and ensures that there are robust plans for those that can be brought back to in-house provision without delay. The currently forecasted overspend on the commissioned placements budget is being offset to a degree by a corresponding underspend on the foster care payments budget. The financial position across both of these areas is closely monitored throughout the year.

Service Priorities for 2018/19

1. The Service has set a target of recruiting 15 new sets of foster carers in 2018/19. The Service will also undertake some targeted recruitment for individual children in need of long term placements. The Service will in addition undertake some innovative recruitment including some specialist carers to work alongside residential units and some short breaks carers to work alongside ASU in offering emergency placements.
Quarter 2 Update – There were two approvals in Quarter 2 bringing the total number of mainstream approvals to 7 in the first half of the year. The numbers in assessment currently indicate that the Service is on track to meet the target number of 15 though the pressure on the Service to prioritise court ordered family and friends assessments is a concern as it may cause some delay in the completion of mainstream assessments.

2. A team development day will be held in July 2018 once the 2 new social workers for viability assessments are in post.
Quarter 2 Update – The team development day has been delayed due to the summer holidays and the pressure of work in Family and Friends. It will now take place in November.

3. The Fostering Service will restructure to take account of increased demand from family and friends, SGO and viability assessments.
Quarter 2 Update – The Service has restructured and the two additional social workers are in place. The acting manager has yet to be confirmed in post.

4. The Fostering Support Worker will work more closely with the REVIVE Service in the coming year in order to develop a more cohesive approach to supporting children, young people and foster carers, and to achieve improvements in placement stability rates. Fostering Support will continue to work closely with the Adolescent Support Unit so that young people can access short breaks and a wide range of activities. Fostering Support will continue to develop the Saturday Club for younger children in foster care.
Quarter 2 Update – The REVIVE Service continues to provide therapeutic and other support and consultations to carers and children in foster care as one of its main priorities.

5. The Service will develop a communication and engagement strategy using the FCA website as a focal point for communication. A focus group will be developed including foster carers to consider the potential for innovation as outlined above.
Quarter 2 Update – Carers have been consulted about communication and discussions have been held with the Team. It is felt that the FCA website is not suitable as a tool to meet the communication needs of the Service. It is hoped that the Let's Foster website can instead be developed with a foster carer log in area. This is under consideration at present.

6. Foster carer training will continue to develop but with less input from the Workforce Development Team. The Service will focus on the development of online training.
Quarter 2 Update – work to develop online training is ongoing. The team manager responsible for foster carer training is exploring numerous ways of improving access and the quality of foster carer training.

7. The management team will continue to monitor compliance with Fostering Regulations and National Minimum Standards and will increase the number of case file audits completed each month to support this.
Quarter 2 Update – The monitoring of compliance is ongoing and is central to the team manager role. The Service has not been able to record all areas of compliance on Protocol until very recently and new compliance forms and staff training have been provided in recent weeks to ensure that all areas are properly recorded on the system.

8. The Fostering Service will review the foster carer payment package by June 2018 and submit a report for consideration by the Senior Leadership Team. The review will consider whether the current level of payments is able to compete with that offered by neighbouring authorities and independent agencies based in the locality. The foster carer lease car scheme will form part of this review.
Quarter 2 Update – Proposals about the future of the car lease scheme are under consideration. Research work to compare foster carer payments with the Service's main competitors has been undertaken and is also being considered.

9. Panel development – The independent Panel Chair contract will go out to tender. This will take account of the need for the Panel to sit more frequently (every 3 weeks instead of monthly). The membership list will be developed to address difficulties in sustaining the pool of independent and social work members. A Panel Member training day will be held with a focus on family and friends fostering.
Quarter 2 Update – The Panel Chair contract has been awarded. It takes account of the need for additional Panels and provides Chairs for the main and annual review Panels. Maintaining a healthy central list which can meet the demand for additional Panels is a challenge but the list is operating effectively at present.

Alyson Hanson
Service Leader, Placement Services
23rd October 2018

EXECUTIVE BOARD DECISION

REPORT OF:	Executive Member for Children's Services Young People & Education
LEAD OFFICERS:	Director of Children's Services
DATE:	10th January 2019

PORTFOLIO/S AFFECTED:	Children, Young People & Education
WARD/S AFFECTED:	All
KEY DECISION:	**YES** ☐ **NO** ☒

SUBJECT: Adoption Service 6 Monthly Report

1. EXECUTIVE SUMMARY

To provide information on the management and performance of the Local Authority's Adoption Service.

2. RECOMMENDATIONS

That the Executive Board:

Notes this six monthly report.

3. BACKGROUND

This is the six monthly report of the Blackburn with Darwen Adoption Service, which is part of the Regional Adoption Agency (RAA), Adoption NoW. This is a consortium arrangement entered into by 6 local authorities in order to deliver more efficient and effective adoption services in line with the central government agenda for adoption.

Following the making of a Placement Order, all aspects of adoption in Blackburn with Darwen are now the responsibility of Adoption NoW. This includes the recruitment, assessment and approval of adopters, family finding and matching children with adopters and adoption support. Children remain looked after until the Adoption Order is made. Case holding for looked after children subject to a Placement Order is held by Adoption NoW; however, the social workers are based in Blackburn in order to maintain a close working relationship with other Children's Services professionals.

4. KEY ISSUES & RISKS

- The number of children referred for a 'Should be Placed for Adoption' decision is broadly similar to 12 months ago. 11 children all under the age of 5 years were referred in the first half of the year with 4 of the children being matched and placed, and 2 have had matches identified by the end of the period.

- On 30th September, 15 children were waiting to be placed, similar to the previous six month period. Included in the 15 children are 6 older boys, 2 sets of sibling pairs, a child with complex health needs waiting for their foster carer to be assessed and a child with developmental delay. 4 of the children waiting have experienced disruption and one of the children has now been re-matched. Children waiting are predominantly White British. There is a national shortage of adopters currently, and a consequence is that older children, siblings and children with additional needs are much harder to place. Adoption NoW has approved 67 sets of adopters since its inception in November 2017 with 30 adopters available at the end of September. 16 adopters have waited over six months predominantly because they want to adopt babies or very young children. The children waiting will be profiled at Exchange Days and Activity Days, both of which are now delivered in-house. Linkmaker and the Adoption register are also used to family find for these children.

- In the first half of the year, 7 children were placed for adoption, this is a lower number than usual; however, another 5 children were due to be matched and placed at the end of the time period under review. 6 out of the 7 children were placed with in house, Adoption Now adopters. This means that interagency fees are not payable for these children. 15 children were presented to Adoption NoW panels during the timeframe with 4 of these children either in concurrent foster placements or in Fostering For Adoption placements. A1 timescales (average time taken to place a child following their entry into the care system) were met in 60% of cases and A2 timescales (average time taken to match a child with an adoptive family once the Placement Order has been granted) were met in 47% of cases.

- Adoption Support is wholly delivered by Adoption NoW and is very busy with 401 open cases. Adoption NoW applied for £347,743 of Post Adoption Support Fund, with 23 Blackburn with Darwen children in receipt of this funding at the end of September 2018.

3. POLICY IMPLICATIONS

No policy implications identified

4. FINANCIAL IMPLICATIONS

As per the agreed financial model, there will be a gradual transition of resources from local authorities to the RAA over a two and a half year period. Based on the estimated current levels of operational expenditure to be combined initially, with Blackburn with Darwen contributing £103,958.41 towards non-staffing related operational expenditure, Blackburn with Darwen’s share of any surplus/deficit generated within the RAA would be in the region of 19% of the RAA total from 18/19 onwards.

Under the current model of Adoption, a system of interagency fees exists, which are payable between local authorities when placing a child with an adopter from another local authority. In the medium term, it is expected that increased efficiency in the recruitment of adopters within Adoption NoW will generate cost savings on interagency fees for participant local authorities.

5. LEGAL IMPLICATIONS

This report is required to meet statutory requirements as set out in the ‘National Minimum Standards for Adoption.’

8. RESOURCE IMPLICATIONS

No resource implications identified.

9. EQUALITY AND HEALTH IMPLICATIONS
Please select one of the options below. Where appropriate please include the hyperlink to the EIA.

Option 1 ☒ Equality Impact Assessment (EIA) not required – the EIA checklist has been completed.

Option 2 ☐ In determining this matter the Executive Member needs to consider the EIA associated with this item in advance of making the decision. *(insert EIA link here)*

Option 3 ☐ In determining this matter the Executive Board Members need to consider the EIA associated with this item in advance of making the decision. *(insert EIA attachment)*

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10. CONSULTATIONS

11. STATEMENT OF COMPLIANCE
The recommendations are made further to advice from the Monitoring Officer and the Section 151 Officer has confirmed that they do not incur unlawful expenditure. They are also compliant with equality legislation and an equality analysis and impact assessment has been considered. The recommendations reflect the core principles of good governance set out in the Council's Code of Corporate Governance.

12. DECLARATION OF INTEREST
All Declarations of Interest of any Executive Member consulted and note of any dispensation granted by the Chief Executive will be recorded in the Summary of Decisions published on the day following the meeting.

VERSION:	**1.0**

CONTACT OFFICER:	**Alyson Hanson**
DATE:	11th December 2018
BACKGROUND PAPER:	Adoption 6 Month report

Half Year Adoption Report

Including data from
1st April to 30th September 2018

Executive Report

Introduction

Achieving adoption for children contributes to improving outcomes for the most vulnerable children and young people in line with priorities outlined in other Council plans.

Adoption NoW has been operational for almost 1 year and as a Regional Adoption Agency provides adoption services on behalf of six Local Authorities – Bolton, Blackburn with Darwen, Bury, Rochdale, Oldham and Tameside.

The data relating to children remains local data relating to Blackburn with Darwen children; however, adoption support and recruitment data now covers the Region.

Adoption Agency Business - Children

Children with an Adoption Plan

During the first half of the year, 11 children, including a sibling group of 4, were presented to the Agency Decision Maker (ADM) for a Should Be Placed for Adoption decision (SHOBPA) decision. This is similar to the numbers in the previous year. All of those children are aged 5 years or under and all are white British. Four of these children are matched and placed, and another two have matches identified which are progressing. One child has significant health needs, and another requires ongoing therapeutic work before proceeding to match. One child is still mid proceedings and a Placement Order has yet to be made.

Age of Children presented for SHOBPA Decision	
Under 12 months old	6 children
2 to 5 years	5 children
5 to 7 years	0

The age profile of the children presented is broadly similar to that of 12 months ago with regards to the predominance of younger children; however, it is important to ensure that adoption continues to be considered positively for older children.

The ethnicity profile of the children presented continues to show a predominance of white British children having a plan for adoption. It is unusual however for there to be no children from other ethnic backgrounds.

Children Awaiting a Match

On 30th September 2018, there were 15 children with a plan for adoption (subject to a placement order) awaiting placement which is a similar number to those waiting as of 31st March 2018. Of those waiting, there are six single older boys one of whom has experienced a disruption and has been separated from his siblings in the last six months. There are two sibling groups of two, one child whose foster carers are being assessed as adopters and one child with significant developmental delay. There are six of the fifteen children waiting with a match pending. In the last 4 years, the number of children waiting has been as high as 38 (2013/14) and as low as 13 (2015/16).

There is a requirement to refer children waiting for placements to the Adoption Register (Adoption Match) within 3 months following the adoption decision should they not have a placement identified in this time. In the first half of the year, Blackburn with Darwen referred 11 children to the register.

Blackburn with Darwen	11 children referred
Bolton	3 children referred
Bury	5 children referred
Oldham	4 children referred

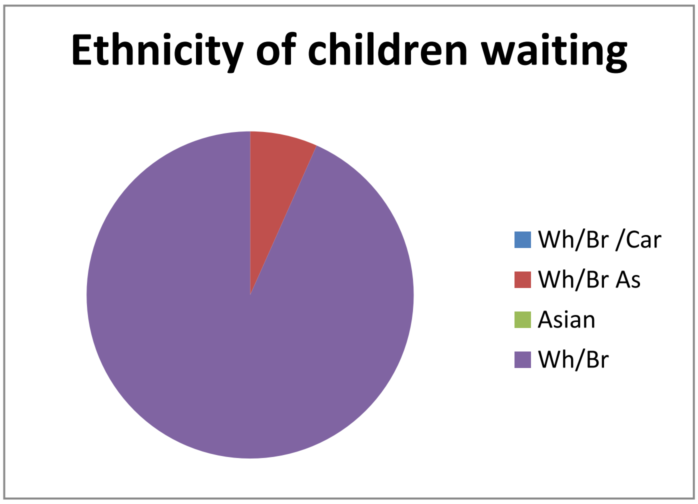
Tameside	6 children referred
Rochdale	32 children referred

The numbers referred by Blackburn with Darwen is reasonably high reflecting the fact that some children have waited for a match beyond the three month period. The number includes two sibling groups of two and seven single children.

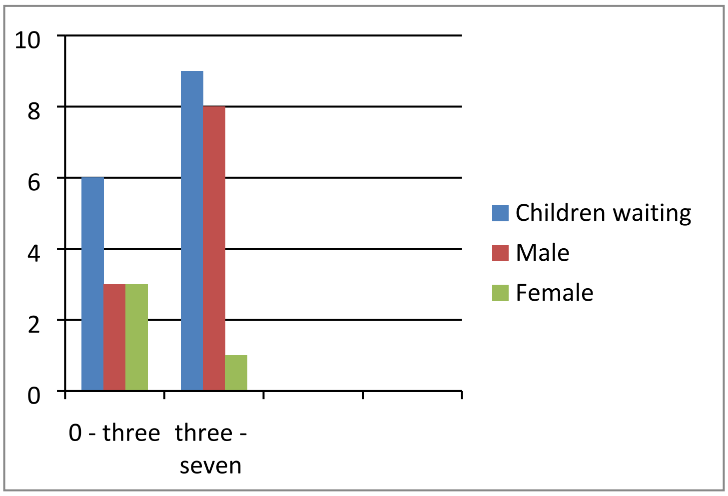
The number of approved adoptive families awaiting placements varied across the North West in the second half of the year. The six Adoption NoW local authorities have five families on the register three of whom live in the Blackburn with Darwen area.. These numbers are low because children are as far as possible matched with in house Adoption NoW adopters and there is therefore little need to refer adopters to the register as they generally have children placed soon after approval.

Four of the children waiting have experienced a disruption. There are three boys over the age of five years and one female baby whose prospective adopter was sadly diagnosed with cancer very shortly after placement.

One of the children waiting is of dual heritage and the rest are white British. It is quite unusual for there to be a such a predominance of white British children.



Age and Gender of children waiting



The age and gender profile of children waiting has changed slightly from the end of 2017/18 with a return to a predominance of older boys waiting. There are matches being considered for all but one of the younger children and the one without a potential match has uncertainties around future health and development. Continued efforts to match them will include them being profiled at Exchange days where adopters can come and discuss children available for adoption and all will be invited to attend an Activity day if this is appropriate for them. These run nationally and will also be run locally by Adoption NoW twice per year. Several Blackburn children were profiled at the recent Activity Day including two of the older boys and two sibling groups of two.

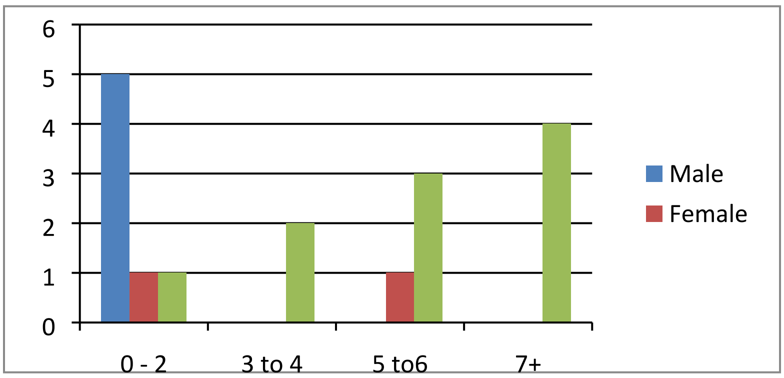
Family Finding Activity
Professional links and relationships have continued to result in some positive matches, especially within those local authorities and voluntary agencies which are now part of Adoption NoW. The regional placement group meeting has been redesigned and continues to operate on a monthly basis to encourage matches with local voluntary adoption agencies. Link Maker continues to be a useful tool, and children are also placed immediately on Adoption Match once a placement order is made if there are no families able to be explored from within Adoption NoW.

The development of Adoption NoW means that families that would have been approved by the six local authorities are all part of the same organisation and are immediately available to Blackburn with Darwen's children. In the first half of the year, 87% of children matched have been with Adoption NoW adopters (six out of seven). These placements do not incur an interagency fee.

Children Placed for Adoption
There have been 7 children placed with adopters in the first half of the year. This number is lower than usual in a six month period, although there are another five children about to be matched and placed with adopters.

Five of the children placed were of white British heritage, one of British / Caribbean heritage and 1 child of other than white British heritage.

Age and gender of children placed: -



Six out of seven children were placed with RAA adopters and the other child with other local authority adopters.

15 children were presented to panels for matching in this half of the year. Four of these were with concurrent or fostering for adoption carers. Of those matches presented to panel, 60% met the A1 target and 47% the A2 target. Two were judged by panel to be very good, eight were good and five were satisfactory.

The scorecard data for children placed and adopted within this six month period is as follows : -

Measure		BwD average
Placement Order to Matching (A2)	Scorecard Indicator - 121 days	111
Child entering care to starting adoption placement (A1)	Scorecard indicator – 426 days	457

These figures show that during the year, timescales were met between placement order to matching and the indicator is slightly over the national average for the scale measuring entering care to placement with adopters. The Scorecard measures are not 'counted' until the year after an Adoption Order has been made; therefore, these positive figures will not influence the published Scorecard results for some time yet.

Children Adopted
In the first half of the year, 12 children were adopted.

11 children met the scorecard timescales for A2 and 9 met the A2 timescales with two being slightly (by 4 days) over timescale. All but one of the children adopted are white British; the other is mixed heritage white Asian.

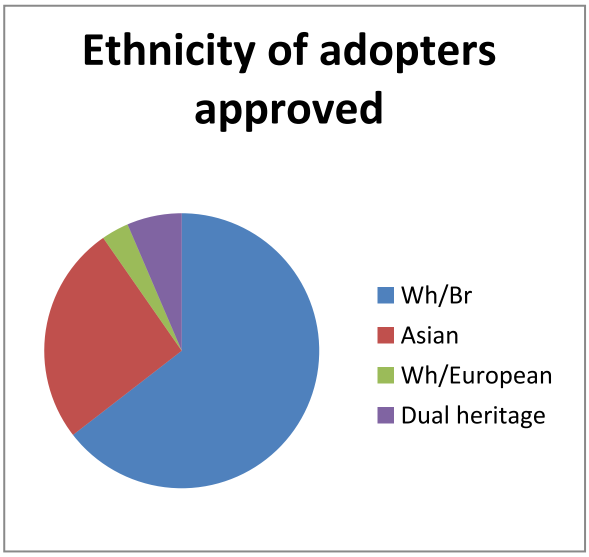
Most adoption orders have been made in a timely fashion despite birth parents requesting leave to contest in the majority of cases.

Adoption Disruption
There has been one disruption in the first half of the year. Within a couple of weeks of placement, an adopter was diagnosed with cancer. The baby girl returned to her previous foster carer at the request of the adopters and is about to be placed again with new adopters.

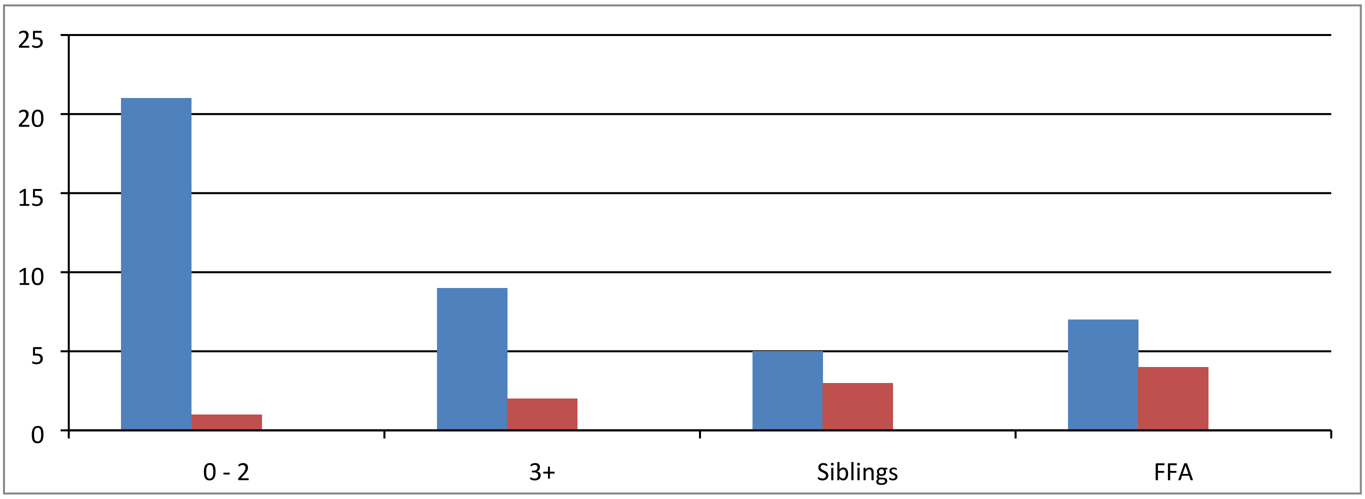
A disruption meeting is being arranged.

<u>Adoption Agency Business - Adopters</u>

Adopter Recruitment
Adopter recruitment transferred to Adoption NoW from 20th November 2017. Recruitment of adopters now covers a much wider geographical area. Since the 20th November 2017, 67 adoptive families have been approved by Adoption NoW. As of 30th September, there were 30 adoptive families approved and available for a variety of children. The ethnicity of adopters does broadly reflect the ethnicity of children available for adoption; however, there are insufficient numbers being approved to meet the needs of all children across the Regional Adoption Agency.



Sorts of children adopters wish to take



Most of the adopters waiting were approved within the previous six months. Sixteen families have waited for at least 6 months for a placement and this has been for various reasons. Some Asian families have waited because they specifically want to adopt young babies and there have been a limited number available. Some of the dual heritage families have wanted to wait for a child, who reflects their existing family rather than take a child from a different ethnicity.

Most adopters are still wishing to take young babies with few long term concerns in relation to their wellbeing. The need is to recruit more adopters who can offer homes to older children up to the age of eight years old, those who can adopt brothers and sisters in groups of 2, 3 or 4, and those who can consider children with additional needs.

There are increasing numbers of adopters enquiring and as of 30th September there were 54 sets of adopters within the assessment process. 34 at stage 1 and 13 at stage 2 with some awaiting approval at panel.

The target number of adopters being approved has risen to 100 for the financial year 2018/19.

There are timescales for the approval of adopters and as of the end of Quarter two, 71% of all approvals were within timescale. For the majority outside of the timescales, the delays were adopter led although in some cases delays in receiving statutory checks has been the cause of the delay.

40 families were approved at panel in the first six months of the year.

Recruitment Activity

Nationally there is a shortage of adopters and numbers of children available are rising again as the looked after population nationally and locally rises. This happened shortly after many adopters had had to wait for long periods as a consequence of case law that changed the practise of the courts in terms of agreeing adoption plans for children. The message to the public was and still is to some extent that there are few young children available for adoption and that numbers have fallen significantly.

The recruitment strategy of Adoption NoW has been to dispel this myth going live with a campaign that visibly showed with balloons how many children there were available in this area alone.

The new recruitment team became fully staffed in June 2018 and recruitment campaigns have significantly increased in that timescale with attendance at 14 local events across the six local authority areas and beyond over the summer months, bill board campaigns, bus campaigns, a radio campaign and significant social media advertising. Early signs are that this activity has increased enquiries from prospective adopters.

A recruitment strategy and annual recruitment plan exists to support the need to recruit more adopters.

Adoption Panels

The adoption panels are all run by Adoption NoW and there is a panel at least weekly and when demand is high five times per month. One of the panels sits in Blackburn and the others in Rochdale and Bolton. The panels consider adopter approvals, matches and de registrations from all six local authorities. In all cases in the last six months, the panel recommendations were agreed by the Agency Decision Maker (ADM).

For every panel, panel members received the papers in sufficient time to enable them to read the papers thoroughly and in all Blackburn with Darwen cases, they had received sufficient information to consider the case and reach a conclusion. The majority of reports in relation to matches and approvals were considered to be good or excellent. Support plans were found to be appropriate to the child's needs. Timescales for approvals and matches were considered and the panel were satisfied with the explanations provided regarding any delay.

The need to improve timeliness of adopter assessments is part of the annual development plan for that service area. There is also a need to be more consistent with the matching paperwork across the six local authorities and this is also a focus of improvement activity over the coming year.

There are three panel chairs, who operate across the panels. Panel members from each of the six local authority areas were pooled and many have continued to service the newly arranged panels.

A six month panel report has been compiled by the independent chairs of the panels.

Adoption Agency Business – Adoption Support

Training and Support to Adoptive Parents

Preparation training for prospective adopters being assessed continues to run at least once a month across the region. Adoption NoW facilitate these groups. In addition, Adoption NoW has run preparation groups for second time adopters twice as this enables them to consider the specific issues around bringing a second child into the family. This has received positive feedback from adopters attending.

The Adoption Service recognises the value of ongoing training and support for adopters at different stages in the adoption process and their child's/children's development, to prevent family breakdown in later years and add quality of life to adoptive families. Post approval and post adoption training is now delivered by Adoption NoW and is spread across the region.

During the last six months, there has been a launch of adoption now, which over 200 people attended from the region. There has also been training delivered for adoptive parents on e-safety, promoting positive attachments – theraplay and PACE, the developing brain and starting your adoptive family. In addition, there have been coffee mornings, the continuation of a young people's group called Club Awesome and the establishment of a new therapeutic toddler group to add to the ones already running (as these are very popular).

There is a plan to deliver more social type events and training in accordance with the wishes that adopters expressed at the launch event when they and young people were consulted about what they wished to see running in order to support them.

Post Adoption Support

The adoption support team combines workers from across the six local authorities. Some staff had therapeutic training and there were also staff new to adoption support work. The team is based together in Bolton; however, it continues to deliver services locally to where families live.

The benefits of becoming a much larger service are that it is easier to match a family's needs with staff with the relevant skills, duty can be delivered on a daily basis so families can always get in touch if they need support and it is possible to run a wider variety of support groups and training events for adopters.

The Post Adoption Support Team provides a variety of services including supporting birth parents, adoptive parents and children with contact arrangements, facilitating direct contact for a number of children with their birth families, providing an access to records service for adult adoptees, and providing assessment of need and more individualised support to those adopted children and their families who are in greater need and respond to lower level queries with advice and one-off support.

Adoption support work

Total open cases	401
Assessments completed	39
Support cases open	325
Access to Records	76

All the assessments led to a service being provided and most resulted in applications to the Adoption Support Fund for therapeutic services.

Total monies applied for from the ASF in this period is £347,743 and it supports adopters as follows:-

Local Authority.	Number of children receiving funding for therapeutic support.	Pre-Adoption Order	Total
Blackburn with Darwen	21	2	23
Bolton	23	4	25
Bury	26	2	28
Tameside	35	4	39
Oldham	19	0	19
Rochdale	46	3	49

This money provides a variety of therapeutic interventions including Specialist psychological assessments, psychotherapy, therapeutic parenting programmes, attachment focussed parenting programmes, DDP, play therapy, theraplay, sensory processing integration therapy, therapeutic life story work, art therapy, drama therapy, EMDR, safebase programmes and After adoption camps.

On 31st March, a total of 401 cases were open to Post Adoption Support. This is a significant increase from the 311 open as of 31st March 2017.

In addition, birth parent support is offered through surgeries that occur weekly in each of the six local authorities. If birth parents require additional support then they can be referred to After Adoption, who are commissioned to provide that independent support.

Fast Track Adoption and Permanence Team
The fast track psychologist sits within the Revive team, which offers therapeutic and psychology services to Blackburn with Darwen children who are open to Children's Services whether at a Child In Need, Child Protection or Child Looked After level. This includes children progressing with plans for adoption and other permanence plans. The Child Support Officer who was previously part of the Fast Track Team has been seconded to Adoption NoW and she continues to be busy offering therapeutic support and advice to Blackburn with Darwen children and their carers.

Adoption Agency Business - Other

Non-agency adoptions
There have been no adoption orders made in the last six months in relation to a step parent adoption.

Inter-country adoption
Inter-country adoption services are rarely requested in Blackburn with Darwen but the Local Authority has a statutory obligation to provide or commission a service. The Borough remains part of a regional commission for inter-country adoption services provided by the Inter Country Adoption Centre.

Participation of Young People
During the last six months, Adoption NoW has consulted with a large group of children and young people at its launch event in May. Services being designed are in line with their expressed wishes. Creative ways continue to be used to encourage participation from children, who access post adoption support as well as those children who are awaiting adoption, especially, but not exclusively, those who are verbal.

A survey is planned as we approach the 1 year anniversary of Adoption NoW and smaller groups have run to continue to ascertain the views of adopters and young people.

Complaints
Neither Adoption NoW nor Children's Services have received any complaint in relation to Blackburn with Darwen children or families.

Allegations
There have been no allegations in the last six months.

Staffing
Over the last 6 months, the Service has operated with a core team of eight full time equivalent social workers, one child support officer who works 32 hours per week, a deputy team manager and a team manager. These staff are now seconded to Adoption NoW and support a much larger service.

The Service is fully staffed at present, although two workers have requested that they go part time so a full time post will be advertised in recruitment and assessment.

Budget

Net expenditure of £147,000 was incurred during the first half of the year, both on placing children with outside agencies and on regular adoption allowances. This is a reduction on the equivalent six month period from 2017/18 when expenditure was £200,792. Expenditure has reduced because Adoption NoW is more able to place children in house.

New Adoption Support fund applications have transferred to Adoption NoW (see above for amount claimed).

The operational budgets supporting adoption were transferred to Adoption NoW and combined with the budgets from the other five local authorities.

At the six month stage, there has been £220,000 income generated from adopter inter agency fees and the operational side of the budget is currently predicting some underspend. There are costs associated with posts in the RAA that had no budget line to support them; however, these are more than covered by the income being generated.

Team Development

Adoption NoW hold fortnightly team meetings where staff learn together and develop practise. In addition, there has been team building training in each of the work streams. In the last six months, there has been a two day course on therapeutic life story work run by Richard Rose, panel annual training and training in GDPR. Further training is planned for the coming six months including training in DDP, non violent resistance training, attachment based assessments and foetal alcohol syndrome. This is a benefit of the new regionalised approach in that pooled budgets allow for staff to be better equipped to manage children and families coping with transition and trauma.

A decision was made to reserve some ‘set up’ budget in order to skill staff up to meet the needs of families requiring support. This should prevent escalation of difficulties and enable staff to have a better understanding of the issues facing families to ensure the correct support is offered at the correct time.

Update on actions for the last 6 months

Action – Transfer good practice with regards to Child/Young People Participation into Adoption NoW and ensure that work with regards to incorporating their voice on panels is not lost – incorporate into the new panel member training and development programme.

Blackburn with Darwen’s Participation Manager has attended a manager’s meeting at Adoption NoW and progress will be made to ensure that Investors in children is awarded to the RAA. Young people were consulted prior to the RAA going live and have been consulted since at the launch event. Services are being designed on the basis of what they have told us they want.

A development plan exists within Adoption NoW to ensure continuous improvements are made to the service.

EXECUTIVE BOARD DECISION

REPORT OF:	Executive Member for Regeneration
LEAD OFFICERS:	Deputy Chief Executive
DATE:	10 January 2019

PORTFOLIO/S AFFECTED:	ALL
WARD/S AFFECTED:	All
KEY DECISION:	**YES** ☒ **NO** ☐

SUBJECT: Local Plan - Issues and Options Public Consultation

1. EXECUTIVE SUMMARY

1.1 Blackburn with Darwen Council currently has a Local Plan Core Strategy and a Local Plan Part 2: Site Allocations and Development Management Policies, that set out the land use planning strategy for the Borough up to 2026.

1.2 New planning regulations were published by Government in late 2017 that required local authorities to review Local Plans at least every five years from the date of their adoption. In response to the new regulations, an assessment of the two adopted local plans was undertaken.

1.3 The Council approved a new Local Development Scheme in February 2018 that set out the intention to develop a single Local Plan to replace the Core Strategy and Local Plan Part 2. This consultation on “Issues and Options” marks the first stage towards the development of a new local plan. The intention is to consult on the Issues and Options document in February and March 2019 for a period of six weeks.

1.4 The Issues and Options consultation document (see the Background Document) sets out the main points to consider in producing a new local plan. The consultation document covers the following matters:

- Vision and Strategic Objectives
- Growth Options
- Spatial Issues
- Thematic Issues covering employment, housing, public facilities, environment, quality of place, and access to jobs and services.

1.5 The key risks revolve around the need to update the existing adopted local plan and addressing the proposed growth options that feature in the Issues and Options document. The consultation on Issues and Options addresses both of these risks by demonstrating the Council’s intention to develop a new local plan; and seeking consultation responses on potential growth options.

2. RECOMMENDATIONS

That the Executive Board:

1. Agree that the Issues and Options Document should be approved for consultation;
2. Delegate to the Director of Growth & Development (in consultation with the Executive Member for Regeneration) any editorial amendments to the Issues and Options Document prior to its final publication for consultation.

3. BACKGROUND

3.1 Blackburn with Darwen Council currently has a Local Plan Core Strategy and a Local Plan Part 2: Site Allocations and Development Management Policies, that set out the land use planning strategy for the Borough up to 2026.

3.2 New planning regulations were published by Government in late 2017 that required local authorities to review Local Plans at least every five years from the date of their adoption. In response to the new regulations, an assessment of the two adopted local plans was undertaken. Key factors that needed to be considered with respect to the current local plans were:

- Progress on the delivery of development set out in the Core Strategy and the Local Plan Part 2, and an evaluation of the strategy set out in the plans;
- Government consultations including the Housing White Paper (2017) and the proposals for a Standard Housing Methodology; and
- The publication of a revised National Planning Policy Framework (NPPF) in July 2018 and updated Planning Practice Guidance (PPG) in September 2018.

3.3 The Council approved a new Local Development Scheme in February 2018 that set out the intention to develop a single Local Plan to replace the Core Strategy and Local Plan Part 2. This consultation on Issues and Options marks the first stage towards the development of a new local plan. The intention is to consult on the Issues and Options document in February and March 2019 for a period of six weeks.

3.4 The Issues and Options consultation document (see the Background Document) sets out the main points to consider in producing a new local plan. The consultation document covers the following matters:

- Vision and Strategic Objectives
- Growth Options
- Spatial Issues
- Thematic Issues covering employment, housing, public facilities, environment, quality of place, and access to jobs and services.

3.5 In each section the key issues are covered and where appropriate specific options are set out for consideration. Further detail on each section is set out below.

Vision and Strategic Objectives

3.6 The current local plan includes a vision and a number of strategic objectives that guide the overall approach to development in the Borough. The Issues and Options document seeks views on whether the Vision and Strategic Objectives should be amended in the new local plan.

Growth Options

3.7 The Issues and Options document covers the latest approach to deriving a housing requirement figure for the Borough based on the Government's Standard Housing Methodology. It is important to note that the Government has recently consulted on proposals to amend the current approach to the Standard Housing Methodology. This was mainly in response to the significant decline in projected housing numbers that resulted from the latest official 2016 household projections published by the Office for National Statistics in September 2018.

3.8 The document goes on to set out that national policy and guidance through the NPPF and PPG provides an opportunity for Councils to consider alternative levels of housing growth to that set by the Standard Housing Methodology. The PPG identifies that there may be circumstances that could justify a higher housing figure including where growth strategies are in place that suggest a higher level of housing delivery.

3.9 In response to the guidance in the PPG, the Council, in conjunction with Hyndburn Borough Council, commissioned a Housing and Economic Needs Assessment Study (HENAS). The HENAS sets out a number of options for the two Councils to consider with respect to future housing requirements. These are set alongside the Standard Housing Methodology. The study also provides possible options for employment land requirements. As part of the work, an economic forecast already utilised by the Local Economic Partnership (LEP) was used to generate a baseline forecast which implied a low growth scenario in terms of the delivery of jobs in the Borough. The consultants also produced an economic growth scenario that took account of local strategies and planned investment and as a result would be expected to lead to a high growth situation with respect to new jobs created over the plan period up to 2036.

3.10 Table 1 below provides a summary of the main options that are intended to be consulted on in the Issues and Options document.

Table 1 - Housing Growth Options

Scenario	Annual Housing Need	Job Growth (2018-2036)
Standard Housing Methodology	99 (157)	Low Growth
Economic Growth Scenario (2014 & 2014/2008 Household Rates)	360-410	High Growth

3.11 The Standard Housing Methodology figure is presented as two possible options. The first (99 dwellings per annum) is derived from the Government's proposals that were based on the 2016 based household projections. The second (157 dwellings per annum) reflects the Government's revised approach, consulted on from 26 October to 7 December, which uses the 2014 based household projections.

3.12 The HENAS report goes on to consider the application of economic forecasts utilising the 2016 household projections. In summary the study suggest that there will be a need for 110 dwellings per annum with the economic baseline forecast and a need for 285 dwellings per annum based on the economic growth scenario. The study goes on to state:

"Regarding the use of the 2016-based SNHP(Sub National Household Projections), it should be noted that the data (at least at a national level) has been subject to some criticism for potentially building in some degree of supressed household formation – this is due to ONS only using trends for the 2001-11 period. To some extent this has driven MHCLG to look to revise its Standard Method (as previously discussed).

Therefore it seems prudent to also run the economic scenarios against the previous (2014-based SNHP). Additionally, a sensitivity test has been developed to look at an alternative approach to HRRs. In this sensitivity, a 'part-return-to-trend' analysis has been developed, where the rate of household formation sits somewhere between figures in the 2014-based projections and those in an older 2008-based version."

3.13 The Economic Growth Scenario has considered a future where job growth in the order of around 5,000 jobs over the next 18 years is envisaged. The HENAS works through the potential housing need that would be associated with the Economic Growth Scenario which suggests a potential need for 360 to 410 new homes each year between 2018 and 2036 (dependent on the household projection approach used). The data indicates that this level of growth would help to ensure there are more people living in the Borough of working age. This will involve a reduction in the potential loss of working age population/households set out above. The study concludes:

"In terms of setting the housing need, the highest figures are probably most appropriate, this is because (particularly in the case of BwD) this scenario does remove potential suppression of household formation that may be built into the official projections."

3.14 The HENAS looks at two possible options for employment land requirements – one based purely on the job estimates contained in the economic growth scenario; and one based on a blended approach that applies the economic growth scenario jobs forecast for B1 (office or light industrial) uses and past completion rates for B2 (general industrial) and B8 (warehousing and distribution) uses. The two methods produce a potential floorspace requirement from 114,700 square metres to 228,200 square metres. The Issues and Options Paper therefore poses the question as to which of the two employment land options is considered the more suitable.

Spatial Options

3.15 The HENAS looks at two possible options for employment land requirements – one based purely on the job estimates contained in the economic growth scenario; and one based on a blended approach that applies the economic growth scenario jobs forecast for B1 (office or light industrial) uses and past completion rates for B2 (general industrial) and B8 (warehousing and distribution) uses. The two methods produce a potential floorspace requirement from 114,600 square metres to 251,400 square metres. The Issues and Options Paper therefore poses the question as to which of the two employment land options is considered the more suitable.

3.16 The rest of the spatial options section covers the following matters:

- Brownfield land – establishing an appropriate target for the delivery of development on brownfield land.
- The delivery of small sites as a result of the expectation set out in the NPPF.
- The need to review the three areas of safeguarded land, which are identified in the current local plan for development post-2026, given the timescale of the new plan to 2036 and whether any of this land will be required for release for development.
- The need for additional employment land allocations that address the quantum and quality of existing employment stock. A question is posed about the potential need for a review for the Green Belt if it is determined that employment land allocations cannot all be accommodated within the urban area or on the edge of the urban area in countryside not designated as Green Belt.

Thematic Issues

3.17 The protection of employment land is the issue considered within the employment theme of the

Issues and Options document. This picks up the expectation set out in the NPPF that existing land allocations need to be considered for alternative uses where their existing use is no longer required.

3.18 The housing theme asks questions about:

- Housing mix utilising evidence drawn from the HENAS;
- Whether the approach and criteria in the current policy on Houses in Multiple Occupation should be amended; and the references to apartments could be moved into a housing mix policy;
- Whether the approach and criteria in the current policy on Gypsy and Traveller Sites should be amended (work is in hand to update the evidence on Gypsy and Traveller needs);
- A question on the appropriate level for affordable housing, noting the NPPF's requirement for at least 10% delivery of affordable housing on all appropriate sites and the current local plan policy for 20% delivery on all sites; and
- Whether the plan should include the Government's technical standards for housing which will require local evidence to be produced to justify their inclusion.

3.19 Specific questions are then posed around policies for the town and district centres in the Borough including:

- Whether there is a need for specific allocations within the town and district centres;
- Is the current hierarchy of centres in the adopted local plan still correct;
- Should changes be made to existing town and district centre boundaries;
- Can greater flexibility be introduced in terms of the uses permitted within certain parts of the town and district centres within the Borough; and
- Are the existing thresholds used tor requiring retail impact assessments still correct?

3.20 The document then goes on to ask whether the existing policy on health in the adopted local plan needs any amendment and suggests that the current 400 metre restriction on Hot Food Takeaways (use class A5) be included within local plan policy, rather than within a Supplementary Planning Document.

3.21 Environmental issues covered in the Issues and Options consultation include exploring the need for various forms of renewable energy and promoting energy efficiency in new development.

3.22 Quality of place revolves around three main areas in the Issues and Options document:

- Design, looking at the current policy in the local plan and how this may be amended in light of additional policy in the NPPF;
- Green Infrastructure with a particular question around the current flexible approach to public open space; and
- Biodiversity picking up the concept of net gain that is highlighted in the NPPF.

3.23 The final thematic issue covered is access to jobs and services. The Issues and Options document poses questions around the potential need to update existing parking standards and what provisions should be made for electric vehicles.

4. KEY ISSUES & RISKS

4.1 Inevitably the focus will fall on the growth options. The key point to note with respect to the Standard Housing Methodology and Economic Baseline Scenario options is that neither approach will support a positive economic future for the Borough. The key reason for this can be found in an analysis of the projected change in types of households within the Borough between 2018 and 2036 associated with these scenarios. The bulk of household growth is expected to be in those households headed by people aged 65 years or more (4,650 additional households). In contrast, there is expected to be a decline in households headed by people aged 16 to 64 (2,900 households). This will inevitably have an impact on the size of the working age population in the Borough and hence the ability of employers to grow their businesses within the area. The population projections that have informed the latest household projections suggest a reduction in the working age population (16 to 64 years old) of about 4,800 people. The growth in older persons (aged 65 years or more) is projected to rise by 7,000 people over the period 2018 to 2036.

4.2 The Issues and Options document suggests a continuation of the current local plan approach with respect to the location of development. It is considered that there are no reasonable alternatives in terms of the Spatial Option based on focusing development within Blackburn and Darwen. There is an opportunity for people to suggest alternative options but this will have to be supported with evidence to demonstrate why an alternative approach could be considered.

4.3 The review of existing employment land that is in hand will assist in determining the need for additional allocations. It will also inform whether the employment land allocations cannot all be accommodated within the urban area or on the edge of the urban area in countryside not designated as Green Belt. This in turn may necessitate a Green Belt Review.

4.4 The main area of risk at this stage is associated with a failure to develop a new local plan. The Core Strategy was adopted in 2011 and the evidence base that informed it is in some cases 10 years old. It is therefore clearly in need of review, notwithstanding the requirement, introduced by regulations in late 2017, to review local plans every five years. The other main risk is around a degree of uncertainty revolving around the application of the Standard Housing Methodology. The further round of consultation that Government has undertaken on the Standard Housing Methodology demonstrates that there is likely to be further guidance and announcements on its application. Moreover, based on the explanation in paragraph 4.1, it is clear that there is a need to consider alternative scenarios that will realise job growth for the Borough. This is in accordance with national policy and guidance.

5. POLICY IMPLICATIONS

5.1 The Issues and Options Consultation marks the first stage of developing the new local plan, which (once adopted) will replace the existing Local Plan. It allows the Council to test potential options for future housing and employment growth. Moreover, the Issues and Option document includes questions on a range of key matters that the local plan will need to address.

6. FINANCIAL IMPLICATIONS

6.1 The consultation on the Issues and Options document is covered by existing budgets allocated for the Local Plan.

7. LEGAL IMPLICATIONS

7.1 The Issues and Options public consultation is one of the stages necessary during preparation of a Local Plan, as required by the National Planning Policy Framework, the National Planning Practice Guidance, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Planning & Compulsory Purchase Act 2004. Progress with preparation of the new local plan will ensure compliance with the Council's statutory obligation for production of a Local Development Plan.

8. RESOURCE IMPLICATIONS

8.1 The consultation on the Issues and Options document is covered by existing resources and budgets allocated for the Local Plan within the Council's Growth Team.

9. EQUALITY AND HEALTH IMPLICATIONS
Please select one of the options below. Where appropriate please include the hyperlink to the EIA.

Option 1 ☒ Equality Impact Assessment (EIA) not required – the EIA checklist has been completed.

Option 2 ☐ In determining this matter the Executive Member needs to consider the EIA associated with this item in advance of making the decision. *(insert EIA link here)*

Option 3 ☐ In determining this matter the Executive Board Members need to consider the EIA associated with this item in advance of making the decision. *(insert EIA attachment)*

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10. CONSULTATIONS

The public consultation regarding this document will take place for 6 weeks during February – March 2019. Consultation will be undertaken using the Council website, direct mailing to statutory consultees and other interested parties who are registered on the Council's Local Plan database, and via other Council communication avenues such as social media. Public events and meetings will not take place at this stage in the local plan development.

11. STATEMENT OF COMPLIANCE

The recommendations are made further to advice from the Monitoring Officer and the Section 151 Officer has confirmed that they do not incur unlawful expenditure. They are also compliant with equality legislation and an equality analysis and impact assessment has been considered. The recommendations reflect the core principles of good governance set out in the Council's Code of Corporate Governance.

12. DECLARATION OF INTEREST

All Declarations of Interest of any Executive Member consulted and note of any dispensation granted by the Chief Executive will be recorded in the Summary of Decisions published on the day following the meeting.

VERSION:	**1**

CONTACT OFFICER:	**Helen Holland, Planning Strategy & Development Manager**
DATE:	3rd December 2018
BACKGROUND PAPER:	1. Issues and Options Document (for consultation)

	2. Sustainability Appraisal of the Issues and Options Document 3. Housing and Economic Needs Assessment

Appendix 1 - Policy Review

Core Strategy (2011)

Policy	Retain/ Retain with Changes/ Delete	Other Factors/Comments
Policy CS1: A Targeted Growth Strategy	Retain with changes	Policy will need to be reviewed to express a refreshed growth strategy.
Policy CS2: Typology of Employment Land	Retain with changes	Need to consider a simplification of the policy in terms of typology split (see Section 5 of the Issues and Options).
Policy CS3: Land for Employment Development	Delete	Combine with a revision of Policy 13 (Employment Land Allocations) in Local Plan Part 2 to set out new employment land requirement derived from updated evidence base; and resultant allocations.
Policy CS4: Protection and reuse of employment sites	Retain with changes	Consider links with Policies 14 (Primary Employment Areas) and 15 (Secondary Employment Areas) in Local Plan Part 2.
Policy CS5: Locations for New Housing	Retain with changes	Consider how the policy might be expressed in terms of any new strategy/spatial options developed. May be combined with the revised Policy CS1 to reflect new strategy.
Policy CS6: Housing Targets	Retain with changes	New target will be expressed in the local plan.
Policy CS7: Types of Housing	Delete	Revision to Policy 18 covering housing mix in the Local Plan Part 2 likely to replace any need to retain Policy CS7.
Policy CS8: Affordable Housing Requirements	Retain with changes	Additional evidence commissioned to inform need for various housing sectors/ groups of people. New evidence will need to be prepared to consider viability evidence to inform proposed levels of affordable housing
Policy CS9: Existing Housing Stock	Delete	May be combined with the revised Policy CS1 to reflect new strategy.
Policy CS10: Accommodation for Gypsies, Travellers and Travelling Showpeople	Delete	No need to retain as the policy set the context for Policy 20 (Accommodation for Gypsies and Travellers and Travelling Showpeople) in the Local Plan Part 2.

Policy CS11: Facilities and Services	Delete	Covered in more detail in various policies in Local Plan Part 2.
Policy CS12: Retail Development	Delete	Combine with Policy 29 (Assessing Applications for Main Town Centre Uses) in Local Plan Part 2.
Policy CS13: Environmental Strategy	Delete	Combine with a revision of Policy 9 (Development and the Environment) in Local Plan Part 2.
Policy CS14: Green Belt	Delete	Combine with a revision of Policy 3 (Green Belt) in Local Plan Part 2.
Policy CS15: Protection and Enhancement of Ecological Assets	Delete	Combine with a revision of Policy 9 (Development and the Environment) in Local Plan Part 2.
Policy CS16: Form and Design of New Development	Delete	Combine with a revision of Policy 11 (Design) in Local Plan Part 2.
Policy CS17: Built and Cultural Heritage	Delete	Combine with a revision of Policy 39 (Heritage) in Local Plan Part 2.
Policy CS18: The Borough's Landscapes	Delete	Combine with a revision of Policy 41 (Landscape) in Local Plan Part 2.
Policy CS19: Green Infrastructure	Delete	Combine with a revision of Policy 40 (Integrating Green Infrastructure & Ecological Networks with New Development) in Local Plan Part 2.
Policy CS20: Cleaner, Safer, Greener	Delete	Themes covered in the policy dealt with in more detail by various policies in Local Plan Part 2.
Policy CS21: Mitigation of Impacts / Planning Gain	Delete	Combine with a revision of Policy 12 (Developer Contributions) in Local Plan Part 2.
Policy CS22: Accessibility Strategy	Delete	Combine with a revision of Policy 10 (Accessibility and Transport) in Local Plan Part 2
Policy CS23: Tackling Worklessness	Delete	

Allocations and Development Management Policies (2015)

Policy	Retain/ Retain with Changes/ Delete	Other Factors/Comments
Policy 1. The Urban Boundary	Retain with changes	Retain wording around preferred location for development.
Policy 2. The Inner Urban Area	Delete	Consider deletion. Subject to further consideration of overall strategy and whether the concept of the inner urban areas is retained
Policy 3. The Green Belt	Retain with changes	Wording will need amendment to reflect NPPF updates.
Policy 4. Land for Development Beyond the Plan Period	Retain with changes	Section 4 of the Issues and Options document considers the need for release of current safeguarded areas within the period up to 2036. Areas of safeguarded land may still be required to be retained for development post 2036.
Policy 5. Countryside Areas	Retain with changes	Wording will need to be considered to pick up on NPPF para 170. Consider how to define what is meant by "…economic uses appropriate in nature and scale to the rural area"
Policy 6. Village Boundaries	Retain	
Policy 7. Sustainable and Viable Development	Delete first part covering sustainable development Retain second part covering viable development	The first part on sustainable development is sufficiently covered by NPPF. The second part on viability could be amalgamated with Policy 12 (Developer Contributions).
Policy 8. Development and People	Retain with changes	Need to consider potential additional points flowing from the NPPF (air quality; and fear of crime)
Policy 9. Development and the Environment	Retain with changes	Some amendments required to improve clarity of the policy
Policy 10. Accessibility and Transport	Retain with changes	May need some minor changes

Policy 11. Design	Retain with changes	There is a need to consider duplication with other policies within the current local plans.
Policy 12. Developer Contributions	Retain with changes	The policy will require considerable revision to account for the expectation that local plans set out developer contributions for sites/policies Incorporate viability elements from Policy 7
Policy 13. Employment Land Allocations	Retain with changes	Policy will require revision to include new proposed allocations (and retention of any current allocations not yet committed if appropriate).
Policy 14. Primary Employment Areas	Retain with changes	May require some minor changes dependent on how Policy CS4 in the Core Strategy is redrafted
Policy 15. Secondary Employment Areas	Retain with changes	May require some minor changes dependent on how Policy CS4 in the Core Strategy is redrafted
Policy 16. Housing Land Allocations	Retain with changes	Policy will require revision to include new proposed allocations (and retention of any current allocations not yet committed if appropriate).
Policy 17. Housing Development in Tockholes	Delete.	Consider deletion. Green Belt policy sufficient as allows for limited infilling & affordable housing.
Policy 18. Housing Mix	Retain with changes	Policy will require revision to consider approach to housing mix (advice set out in HENAS evidence base)
Policy 19. Apartment Development and Houses in Multiple Occupation	Retain with changes	Consider splitting the policy with apartments included in a redrafted housing mix policy; and a standalone policy to deal with Houses in Multiple Occupation.
Policy 20. Accommodation for Gypsies and Travellers and Travelling Showpeople	Retain with changes	Policy will require revision to consider findings from new GTAA study (joint with Hyndburn) and allocate site(s) if

		necessary.
Policy 21. Conversion of Buildings in the Countryside	Retain	
Policy 22. Replacement Dwellings in the Countryside	Retain	
Policy 23. Rural Workers' Dwellings in the Countryside	Retain	
Policy 24. Rural Exceptions	Retain	
Policy 25. Residential Curtilages		Is there a need for this policy or will other LP policies be sufficient in terms of amenity/design/parking etc? DM comment – doesn't cover new or retention of existing.
Policy 26. Town Centres – a Framework for Development	Retain with changes	May need some changes subject to recommendations from the retail study
Policy 27. District Centres – a Framework for Their Development	Retain with changes	May need some changes subject to recommendations from the retail study
Policy 28. Development Opportunities	Delete	The policy is superfluous if allocations are covered by other policies in the new local plan
Policy 29. Assessing Applications for Main Town Centre Uses	Retain with changes	May need some changes subject to recommendations from the retail study
Policy 30. Managing Specific Uses Within Town Centres	Retain with changes	May need some changes subject to recommendations from the retail study
Policy 31. Development in Defined Shopping Frontages	Retain with changes	Consider need for defined shopping frontages – NPPF doesn't require. There may be a case for retaining control of some uses in certain areas of Town Centre DM comments - Do we add viability market conditions to the criteria? Evidence of how long property has been vacant also needs to be included

Policy 32. Local and Convenience Shops	Retain with changes	May need some changes subject to recommendations from the retail study
Policy 33. Health	Retain	
Policy 34. Tourism	Retain with changes	Policy may need some changes to reflect on wording with respect to the West Pennine Moors
Policy 35. Protection of Local Facilities	Retain with changes	Only refers to buildings, should also refer to land and land associated with the buildings
Policy 36. Climate Change	Retain	
Policy 37. Wind Turbines	Retain with changes	Will need to be considered within the context of any new evidence base that assesses/ identifies areas suitable for wind development
Policy 38. Green Infrastructure on the Adopted Policies Map	Delete	Delete – other policies already covering Green Infrastructure
Policy 39. Heritage	Retain with changes	Consider inclusion on adverts in conservation areas and on listed buildings (Paragraph 132 of the NPPF)
Policy 40. Integrating Green Infrastructure & Ecological Networks with New Development	Retain	
Policy 41. Landscape	Retain with changes	Need to consider Delete reference to landscape break DM suggested alternative wording – see separate sheet. Include elements of CS18 here.
Policy 42. Equestrian Development	Delete	Delete policy – covered in other Local Plan polices
Policy 43. Outdoor Advertisements	Retain	
Policy 44. Telecommunications	Retain	
Policy 45. Major Road Schemes	Retain with changes	Policy will need to be updated to refer to any new major road schemes
Policy 46. Rail Freight	Retain	
Policy 47. The Effect of Development on Public Services	Retain with changes	Policy will need to reflect on how impacts can be assessed.

Blackburn with Darwen Local Plan – Issues and Options Consultation (v3)

1. Introduction

1.1 Blackburn with Darwen Council currently has an adopted Core Strategy (2011) and Local Plan Part 2: Site Allocations and Development Management Policies (2015). These two plans set out the land use planning strategy for the Borough up to 2026.

1.2 New planning regulations[1] were published by Government in late 2017 that required local authorities to review Local Plans at least every five years from the date of their adoption. Local Authorities will need to carry out an assessment of whether a Local Plan remains relevant and effectively addresses the needs of the local community, or whether policies need updating. Having carried out this assessment authorities must decide:

- that one or more policies do need updating, and update their Local Development Scheme to set out the timetable for updating their plan, and then update their plan; or
- that their policies do not need updating, and publish their reasons for this decision.

1.3 In response to the new regulations, an assessment of the two adopted local plans was undertaken. Key factors that needed to be considered with respect to the current local plans were:

- Progress on the delivery of development set out in the Core Strategy and the Local Plan Part 2 and an evaluation of the strategy set out in the plans;
- The publication of the Housing White Paper by the Government in February 2017[2] which proposed various changes that would directly impact on Local Plans. The key changes proposed through the White Paper included a new standardised housing methodology for local authorities to follow; and legislative proposals to make local plans a statutory requirement for local authorities and require reviews of plans at least every five years.
- A subsequent consultation on the standardised housing methodology in September 2017[3] by the Government that set out draft figures for housing need for each local authority in England.

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[1] The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 (http://www.legislation.gov.uk/uksi/2017/1244/contents/made)
[2] Housing White Paper (2017) (https://www.gov.uk/government/collections/housing-white-paper)
[3] Further details - https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals

- Consequential changes that flowed from the Housing White Paper including the publication of a revised National Planning Policy Framework (NPPF)[4] in July 2018 and updated Planning Practice Guidance (PPG)[5] in September 2018.
- Further consultation on the standard housing methodology that took place from October to December 2018[6].

1.4 The NPPF and PPG include references to the standard housing methodology. More detail is set out in section 3 of this consultation document on the current issues that need to be considered with respect to any proposed housing need for the Borough.

The Current Strategy

1.5 The current land use strategy for the Borough is set out in the two adopted plans: the Core Strategy (adopted in 2011); and the Allocations and Development Management Policies – Local Plan Part 2 (adopted in 2015).

1.6 The Core Strategy sets out a "targeted growth" approach to future development within the Borough to 2026. The Core Strategy is split into six spatial interventions that would contribute towards the targeted growth approach:

- Land Supply for Business Development in Higher Value Sectors
- Quantity, Quality and Mix of Housing
- Range and Quality of Public Facilities
- Protecting and Enhancing the Environment
- Quality of Place
- Access to Jobs and Services

1.7 The Allocations and Development Management Policies – Local Plan Part 2 is structured around the spatial interventions approach of the Core Strategy. It provides further detail by allocating specific sites for housing and employment uses; and sets out a suite of development management policies that provide clarity on how development proposals will be assessed.

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[4] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[5] https://www.gov.uk/government/collections/planning-practice-guidance
[6] https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need

1.8 The two plans collectively seek to deliver 9,365 homes[7] (in three phases consisting of 2,650 from 2011-16; 3,125 from 2016-21; and 3,600 from 2021-2026); and 66 Hectares of employment land, including land at Frontier Park in Hyndburn Borough Council's area. Allocations in the Local Plan Part 2 set out the detail of where housing and employment land will be delivered.

Developing the new Local Plan

1.9 The Council approved a new Local Development Scheme in February 2018[8] that set out the intention to develop a single Local Plan to replace the Core Strategy and Local Plan Part 2. This consultation on Issues and Options marks the first stage towards the development of a new local plan.

1.10 The plan is then scheduled to be consulted on at Publication stage (Regulation 19) in summer 2020 with a view to submitting the plan for examination towards the end of 2020. It is anticipated that the plan will be adopted in 2021 and will therefore look forward to 2036 to meet the expectation set out in paragraph 22 of the NPPF that strategic policies should look ahead over a minimum 15 year period from adoption.

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[7] Includes an allowance for bringing empty homes back into use.
[8] https://www.blackburn.gov.uk/Pages/Local-Development-Scheme.aspx

2. Vision/ Strategic Objectives

2.1 The Core Strategy set out a vision and strategic objectives for the Borough up to 2026. With the roll forward of the Local Plan to an end date of 2036, it is appropriate to consider whether the previous vision and strategic objectives expressed in the Core Strategy remain relevant.

2.2 The vision in the Core Strategy states:

"By 2026 Blackburn with Darwen will have consolidated its role as a centre of regional importance. It will have a growing economy, based on a highly skilled workforce, set within a unique and high quality environment.

"A much higher proportion of this skilled workforce will live within the towns of Blackburn and Darwen than is currently the case. High quality new housing will have been developed to meet their needs, much of it close to major public transport routes. Growing numbers of people will choose to live in the inner urban areas of Blackburn and Darwen, which will have seen a greater level of high quality private housing development than has been the case previously. Planning policies encouraging this will have been complemented by ongoing regeneration programmes and by a step-change in the quality of education provision in the Borough. Everyone, wherever they live, will find it easier to travel out of the towns and into the countryside without having to use their car.

"People will work at a range of locations throughout the urban area. Traditional industries will remain important, but some older industrial areas and premises will have been redeveloped for new, higher value business uses, supported by regeneration activity within and beyond the Council. Many more people will work in and around both the Borough's Town Centres. The Borough will also be connected to major employment areas beyond its boundaries, which will provide some of the highest-skilled and highest value jobs in the area.

"Blackburn will play a role as the sub-regional centre for Pennine Lancashire, providing the widest range of high-order services in the area. Darwen will have developed in its role as a market town. Our rural areas will remain unspoiled by substantial new development, but our villages will have a better choice of housing for local people, and the rural economy as a whole will be stronger thanks to continuing diversification and a greater role for tourism.

"At a local level we will see more facilities located close to one another, so that people do not have to use their cars as much as in the past. The quality of design and environmental performance of new development will have improved beyond recognition.

"The Borough will be recognised for the quality of its environment. Its contribution to climate change will have been minimised and measures put in place to adapt to changing weather patterns. There will be a high degree of protection for its most important assets, both natural and man-made. The unique landscape setting will have been preserved and its upland areas managed in ways which promote biodiversity and protect important habitats. This will have been complemented by projects enhancing environmental quality within the built-up areas."

2.3 The Core Strategy set out 11 strategic objectives:

A) Create conditions allowing a change in emphasis to a higher-wage, higher skill economy, while continuing to support traditional industries

B) Retain and attract skilled and qualified people to live in the Borough

C) Ensure that local people benefit from economic growth and have sustainable access to services and facilities

D) Improve the quality of the local environment and the Borough's physical setting

E) Increase levels of demand both for existing housing stock and for new development in inner urban areas

F) Minimise the Borough's environmental footprint

G) Be ready for the effects of climate change

H) Consolidate the roles of the main settlements in the Borough: Blackburn as a sub-regional centre; Darwen as a market town with a distinct identity

I) Widen the range of activities taking place in the Borough's town centres

J) Ensure that the Borough's rural areas and villages have a sustainable future

K) Promote the development of mixed communities

2.4 It is an appropriate time, with the publication of this Issues and Options consultation, to consider whether the vision and strategic objectives remain relevant to planning for growth in Blackburn with Darwen up to 2036.

2.5 The Vision, as expressed in the Core Strategy, is now considered to be too long. It is therefore the intention that the plan should be guided by a vision that is shorter and focussed on the key aspects that the plan will seek to deliver over the period of 2018 to 2036.

2.6 The Strategic Objectives are considered to reflect what should be achieved through the delivery of development expected to be set out in the new local plan. It is therefore proposed that no changes need to be made to the Strategic Objectives.

QUESTION 1: Do you agree that the Vision should change?

QUESTION 2: What are the main points you would like to see reflected in a new vision for the emerging local plan?

QUESTION 3: Do you agree that the Strategic Objectives should not change? If not what changes do you suggest should be made to the Strategic Objectives?

3. Growth Options

National Policy

3.1 The NPPF sets out how local plans should include strategic policies that set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development. The NPPF states:

"*Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.*" (paragraph 23)

Housing

3.2 Section 5 of the NPPF deals with delivering a sufficient supply of homes. Paragraph 60 of the NPPF confirms the Government's expectation that local plans are based on a standard method for calculating how many new homes are required (standard housing methodology). It is recognised that exceptional circumstances may justify an alternative approach but any alternative approach needs to reflect current and future demographic trends and market signals.

3.3 Further guidance on how the standard housing methodology will be applied is provided in the updated PPG[9]. The PPG states:

"*Strategic plan-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.*"

3.4 The standard housing methodology is based on two pieces of information from national data sources. The first is the household projections, which are published by the Office for National Statistics (ONS). The second aspect is the latest housing affordability data again published by ONS. Full details of the calculation that is applied can be obtained in the PPG[10].

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[9] The guidance can be accessed at the following website address - https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

[10] See Paragraph: 004 Reference ID: 2a-004-20180913 (Housing and Economic Development Needs Assessment)

3.5 The PPG provides guidance[11] on where circumstances may justify a higher housing figure to be set out in a local plan including:

- where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals);
- where strategic infrastructure improvements are planned that would support new homes;
- where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground.

3.6 The PPG also highlights that local authorities can consider previous delivery levels and in the case where that delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need. Evidence contained in any recent assessment of housing need, including Strategic Housing Market Assessments (SHMA) can also be factored in.

3.7 An important caveat to bear in mind is that the Government set out an intention in the Planning Practice Guidance to consult further on the standard housing methodology. The Government subsequently undertook a consultation that ran from 26th October to 7th December 2018[12]. The consultation proposed three changes to the guidance set out in the PPG update of September 2018:

- For the short-term, to specify that the 2014-based data will provide the demographic baseline for assessment of local housing need.
- To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology; and
- In the longer term, to review the formula with a view to establishing a new method that meets the principles in paragraph 18 above by the time the next projections are issued.

3.8 The Council will consider any further proposals with respect to the standard housing methodology as it prepares the new Local Plan.

[11] PPG - Housing need assessment (Paragraph: 010 Reference ID: 2a-010-20180913)
[12] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf

Economic Development

3.9 Section 6 of the NPPF sets out how local plans should include policies to help deliver economic growth. It specifically states at paragraph 81:

"Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."

Growth Options

3.10 In responding to the changes set out in the revised NPPF and PPG, additional evidence has been commissioned by the Council in conjunction with Hyndburn Borough Council. The main reason for a joint study was to account for the fact that Blackburn with Darwen and Hyndburn are within a joint housing market area. The NPPF is clear that it is preferable that local authorities look at housing market areas as the basis for how they plan for future housing need. In addition, there are clear economic linkages between the two Boroughs.

3.11 The two Councils commissioned a Housing and Economic Needs Assessment Study (HENAS) that considered the potential housing and employment land requirements for the two Boroughs. The study set out the housing figure generated by the Government's standard housing methodology derived from the 2016 based household projections which for Blackburn with Darwen are 99 dwellings per annum. The recent consultation by the Government on the Standard Housing Methodology generates an alternative figure of 157 dwellings per annum. The differences can be explained as follows;

- The figure of 99 dwellings per annum uses the latest national statistics for household projections (known as the 2016 based household projections); and
- The figure of 157 dwellings per annum uses the alternative national statistics suggested by the Government in their current consultation on the standard housing methodology. This approach uses the previous national statistics for household projections (known as the 2014 based household projections).

3.12 The HENAS report also looked at additional scenarios to consider alternative approaches to deriving a potential level of housing growth.

- Two alternative approaches based on demographic projections that utilised the 2016 based population projections but applied two sensitivity tests (applying mid-year estimates population data; and considering a longer time scale for migration trends over a ten year period); and
- Two economic forecasts (baseline and an alternative growth based approach) with consideration given to the 2016 household projections and an approach that considers the 2014 household projections; and a mix of 2014/2008 household projections.

3.13 A key issue to consider with the standard housing method figure are the components of household change that make up the overall growth in households in the Borough. Table 1 below sets out the projected changes in households, using the 2016 based projections, that compares those headed by people of working age (16-64 years old) and people who in general have retired (65 years and above). The table clearly illustrates that the delivery of 99 homes per year would largely be a result of the increasing demand by households headed by people aged 65 or more years. The other key message in Table 1 is the significant reduction in households headed by people aged 16 to 64 years. This loss of working age households will inevitably have an impact on any economic strategy for the Borough with fewer people of working age to fill any new jobs created by employers.

Table 1 – Household Growth (2018-2036)

Year	Ages 16 - 64	Ages 65 and above
2018	42,950	14,250
2036	40,050	18,900
Change 2018 - 2036	-2,900	4,650

3.14 The HENAS report shows that the sensitivity tests applied to the demographic projections demonstrate relatively little change when compared to the standard housing methodology approach. When the mid-year population data is substituted in there is essentially no change compared to the standard housing methodology with the forecast suggesting a need for 100 dwellings per annum. When the 10 year migration trends are applied the forecast increases to 162 dwellings per annum. When compared to the options that account for a forecast change in economic growth that are set out below neither of the sensitivity tests will lead to a level of housing growth that will support job growth within the Borough.

3.15 The HENAS report goes on to consider the application of economic forecasts utilising the 2016 household projections. In summary the study suggest that there will be a need for 110 dwellings per annum with the economic baseline forecast and a need for 285 dwellings per annum based on the economic growth scenario. The study goes on to state:

"*Regarding the use of the 2016-based SNHP(Sub National Household Projections), it should be noted that the data (at least at a national level) has been subject to some criticism for potentially building in some degree of supressed household formation – this is due to ONS only using trends for the 2001-11 period. To some extent this has driven MHCLG to look to revise its Standard Method (as previously discussed).*

Therefore it seems prudent to also run the economic scenarios against the previous (2014-based SNHP). Additionally, a sensitivity test has been developed to look at an alternative approach to HRRs. In this sensitivity, a 'part-return-to-trend' analysis has been developed, where the rate of household formation sits somewhere between figures in the 2014-based projections and those in an older 2008-based version."

3.16 The HENAS report sets out the results that are derived from the additional approaches (using the adjusted household formation rates noted above) which range from around 360 dwellings per annum (using the 2014 household projections) to 410 dwellings per annum (when a household formation rate between the 2014 and 2008 household projections is used). The study concludes:

"*In terms of setting the housing need, the highest figures are probably most appropriate, this is because (particularly in the case of BwD) this scenario does remove potential suppression of household formation that may be built into the official projections*."

3.17 The reference to the suppression of household formation is important to consider in terms of opportunities for younger persons between their mid-twenties and mid-forties to be able to enter home ownership. The supply of additional homes derived by the higher housing numbers seeks to address the past ten years of a significant reduction in opportunities for home ownership for this younger age group; whilst also meeting the economic aspirations of the Borough in terms of job growth.

3.18 Table 2 below sets out the range of potential growth options with respect to housing requirements based on the standard housing methodology and the economic growth scenarios described above. Given the current advice with respect to the 2016 household projections (see paragraph 3.14 above) the potential growth options of 110 dwellings per annum and 285 dwellings per annum do not feature in the table below.

Table 2 – Housing Growth Options

Scenario	Annual Housing Need	Job Growth (2018-2036)
Standard Housing Methodology	99 (157)	Low Growth
Economic Growth Forecast (2014 household projections adjusted)	360	High Growth
Economic Growth Forecast (2014/2008 household projections adjusted)	410	High Growth

3.19 The NPPF and PPG are clear that the standard housing method should be used to determine the **minimum number of homes** to be delivered in an area. Paragraph 3.5 above notes the circumstances highlighted in the PPG where higher levels of housing growth may be contemplated in a local plan. In the case of Blackburn with Darwen, the current adopted local plan clearly sets out a growth strategy to deliver significant amounts of new housing and employment development. Moreover, the Borough is part of the Pennine Lancashire Housing Zone with sites in South East Blackburn being developed for new housing. The application of the 2014 household projections is in line with the latest Government consultation on the standard housing methodology which recommends the use of the 2014 projections. The further adjustment suggested by the application of an approach that sits between the 2014 and 2008 household projections seeks to address the suppression of household formation within the younger aged population within the Borough.

3.20 The Integrated Appraisal that accompanies the Issues and Options sets out the sustainability considerations with respect to each option and should be read alongside this document whilst considering the proposed growth options.

QUESTION 4: Which of the Growth Options do you consider the most appropriate to include in the Local Plan?

QUESTION 5: Do you have any alternative option(s) that could be considered in the Local Plan? What evidence do you have to support any alternative option(s)?

3.21 In terms of employment land, the HENAS report considered the level of employment land likely to be required as a result of labour demand estimates derived from the growth based economic forecast. The study also considered the potential demand for new employment land if growth continued in a similar trend to the previous levels of employment land completions. This was done to account for the view that completions data provided a better representation of the likely employment needs for B2 and B8 use classes, whereas the labour demand estimates were a better indicator for B1 use class needs.

3.22 Tables 3 and 4 below set out the potential floorspace requirements that flow from the using either the labour demand estimates for all B classes or the blended approach as described above. The figures in the tables are based on estimates for 2016 to 2036 and therefore would require any completions over the past two years (2016-2018) to be taken off to derive the proposed need for 2018 to 2036.

Table 3: Option 1 – Using the Economic Growth Forecast for all B Class uses

Employment Use Class	Floorspace (Sq M)[13]
B1	55,800
B2	-15,100
B8	73,900
All B Class	114,600

Table 4: Option 2 – Using a blended approach (Economic Growth Forecast for B1 uses and past completions rates for B2 and B8 uses)

Employment Use Class	Floorspace (Sq M)
B1	55,800
B2	74,600
B8	121,000
All B Class	251,400

QUESTION 6: Which of the Employment Land Options do you consider the most appropriate to include in the Local Plan?

QUESTION 7: Do you have any alternative option(s) that could be considered in the Local Plan? What evidence do you have to support any alternative option(s)?

[13] Figures rounded to nearest 100 square metres

4. Spatial Options

National/Local Policy Framework

4.1 The NPPF provides some policy expectations and guidance that will have an influence on how the new local plan sets out a spatial strategy for the Borough. Paragraphs 21 and 23 of the NPPF set out the need for strategic policies that identify the pattern and scale of development including the need for specific site allocations and a key diagram that illustrates the broad location of development. The NPPF (paragraph 68) also sets out that local authorities should,

> "…*identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved*."

4.2 The current approach to the spatial strategy for the Borough is set out in the Core Strategy. The policies in the Core Strategy were constructed around a main theme of a "Targeted Growth Strategy". This was expressed in the Core Strategy under six spatial policy interventions:

- Land supply for business development in higher-value sectors;
- Quantity, quality and mix of housing;
- The range and quality of public facilities;
- Environmental protection and enhancement;
- Quality of place;
- Access to jobs and services

4.3 The policy interventions in turn led to a spatial approach in the Core Strategy that focussed on development within the urban area of the Borough. It was also recognised that there was a need to diversify the mix of housing available within the Borough and deliver additional employment opportunities. This would require the development of some sites on the edge of the urban area. Safeguarded land was identified for future development opportunities beyond the plan's time horizon (post 2026). The Core Strategy also sets the approach to rural areas with a focus on development to meet local needs within the villages in the Borough.

4.4 The Local Plan Part 2 carried through the six targeted growth strategy themes from the Core Strategy. Specific allocations for employment and housing development were identified in the plan.

4.5 The preparation of the Local Plan Part 2 was informed by a review of the Green Belt within the Borough. As a result of the review a number of sites were allocated for housing development within the plan period (up to 2026) and three areas were allocated for development beyond the plan period (safeguarded sites). The intention is that the three safeguarded sites will only be considered for release for development as a result of a local plan review.

4.6 The key issues to consider in developing the spatial strategy for the new local plan include assessing:

- The balance of housing development in terms of the split between the delivery of sites within urban areas and any potential need for development beyond the urban area either as extensions to the existing urban area or for development in rural areas primarily within the villages of the Borough.
- The delivery of small sites as a result of the expectation set out in the NPPF.
- The need to review the three areas of safeguarded land given the timescale of the new plan to 2036 and whether any safeguarded land will be required for release for development.
- The need for additional employment land allocations that address the quantum and quality of existing employment stock.

Balance of Housing Development and Small Sites

4.7 The Core Strategy and Local Plan Part 2 set out a clear spatial approach comprising the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns. The production of the new local plan provides an opportunity to maintain this approach or to examine whether there is a need to adjust the approach in terms of the balance between development in the inner urban areas and elsewhere.

QUESTION 8: Should the new local plan continue with the current approach in delivering regeneration in the urban areas whilst developing a more diversified housing offer through allocations on the urban edges of Blackburn and Darwen?

QUESTION 9: Are there any alternative spatial options that should be considered? What evidence do you have to support any alternative option(s) that you suggest?

4.8 The Core Strategy set out a target of delivering at least 65% of new housing on brownfield (previously developed) land. The evidence base that informed that target is now over 10 years old and therefore the new plan provides an opportunity to consider whether the target remains appropriate. Paragraph 117 of the NPPF states:

"*Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*"

4.9 Monitoring by the Council shows that a significant amount of housing development has been delivered on brownfield sites since the adoption of the Core Strategy in 2011. Between 2011 and 2016, all new housing development (100%) was delivered on brownfield land. The figure has fallen in the past two years (71% in 2016/17 and 37% in 2017/18) which can be attributed to new sites coming forward for housing on the urban edges of Blackburn and Darwen.

QUESTION 10: Should the local plan set out a specific target for brownfield development and if so what should the target be? Can you provide evidence to support you view on any target suggested for brownfield development?

4.10 It has been noted above that the NPPF sets out an expectation for the inclusion of small sites either within the local plan or via the brownfield register that each local authority must maintain. The Council's latest brownfield register[14] lists 33 sites within the Borough that have been identified as suitable for housing development with 18 of the sites (55%) under one hectare in size. The current housing allocations in the Local Plan Part 2 are all larger than one hectare which is a function of the fact that the plan only allocated sites that could accommodate 50 or more dwellings.

4.11 The Council will assess housing sites received through the call for sites exercise and existing known sites as part of the Strategic Housing Land Availability Assessment (SHLAA) exercise. This will consider whether there are sufficient small sites to meet the minimum 10% target set in the NPPF. It will necessitate the allocation of sites of one hectare or below in the plan alongside the current supply already identified through the brownfield register.

Question 11: Do you have any views on the proportion of small sites that should be delivered in the local plan? Can you provide evidence to support you view?

[14] http://www.blackburn.gov.uk/Pages/Brownfield-register.aspx

Safeguarded Land

4.12 Three areas of land are currently identified for development beyond the plan period (post 2026) in the Local Plan Part 2 (Policy 4). The policy in the plan seeks to ensure these areas of safeguarded land are protected from piecemeal change or development prior to any further consideration of the need for planned development. The appropriate time for this consideration is at the point of the review of the local plan and it is therefore timely to consider whether any changes should be proposed in the new local plan.

4.13 The new plan will include allocations for housing and employment needs up to 2036. Based on the current understanding of future supply and potential growth set out in the new local plan it is anticipated that there may be a need to consider allocations on safeguarded land before 2036. No specific decisions have been made on the amount of safeguarded land that will need to be allocated. Moreover, there is no specific view on the location of any new allocation within the safeguarded land areas. The Council will need to undertake a full appraisal of any area identified as suitable for release in the safeguarded areas in line with the requirement set out in Policy 4 of the Local Plan Part 2.

QUESTION 12: Do you agree that safeguarded land should be reviewed in the new local plan? If so, do you have any preference in terms of which of the three areas should be considered?

Employment Land Allocations

4.14 The current Local Plan Part 2 identifies a total of 43.5 hectares of employment land allocations. Land is also provided at Frontier Park on the edge of Blackburn (in Hyndburn) to meet additional employment needs for the Borough. Monitoring by the Council suggests around an annual average of 5.7 hectares (gross) of employment land has been delivered in the Borough over the past 12 years.

4.15 The Council has commissioned additional evidence to assess the current portfolio of employment land (existing key sites and allocations in Local Plan Part 2). The output from this study will assist in determining the potential scale of need that may be delivered though new allocations in the emerging local plan. Previous work undertaken on behalf of the Council[15] highlighted the key trends and requirements for each of the three main B class use sectors (Table 5).

[15] BE Group (2015) Commercial Market Property Study

Table 5: Business Needs identified by BE Group Research

Type	Meeting Needs		
	Micro Businesses	**Small/Medium Businesses**	**Large Businesses**
Industrial	Units of up to 500 sqm Both good quality and moderate/ affordable leasehold options Locations with good M65 access are clear priority	Grow on units of up to 1,000 sqm Mid-range options of 500-5,000 sqm to provide grow-on space for established local firms and allow some relocation within and to Pennine Lancashire Both good quality and moderate/ affordable leasehold options Locations with good M65 access are clear priority	Larger 5,000-50,000 sqm units to meet major growth requirements and be competitive in the sub-regional and potentially regional markets Good quality freehold options, both speculatively built and design and build Both good quality and moderate/ affordable leasehold options
Warehousing	Local warehouse options in excess of 2,000 sqm Both good quality and moderate/ affordable leasehold options Locations with good M65 access are clear priority	Local warehouse options in excess of 2,000 sqm Both good quality and moderate/ affordable leasehold options Locations with good M65 access are clear priority	Big shed options of 20,000 sqm+ Good quality freehold options, both speculatively built and design and build Both good quality and moderate/ affordable leasehold options
Offices	Serviced, leasehold suites of 20-75 sqm Both good quality and moderate/ affordable leasehold options	Larger self-contained options, unlikely to exceed 500sqm each Both good quality and moderate/ affordable leasehold options Locations with good M65 access are clear priority	Occasional larger office requirements, up to around 2,000 sqm each For the foreseeable future it is assumed these will be design and build options rather than speculative schemes Locations with good M65 access are clear priority

4.16 Section 3 set out the two options for future employment needs and resultant allocations. If option 2[16] is pursued there may be implications for where allocations are located given the likelihood that additional land may need to be considered in the vicinity of the M65. The vast majority of the land adjacent to the M65 is currently designated as Green Belt. Any proposals for allocations

[16] Blended approach (Economic Growth Forecast for B1uses and past completions rates for B2 and B8 uses)

within land identified as Green Belt would trigger the need for additional evidence. The scope of the work would assess the Green Belt and determine whether an exceptional circumstances case could be demonstrated to justify the removal of land from the Green Belt to subsequently be allocated for employment land purposes.

QUESTION 13: What are your views on where any additional employment land should be allocated?

QUESTION 14: Do you have any views on whether a Green Belt review may be necessary to accommodate future employment land allocations?

5. Thematic Issues

5.1 Section 1 noted the overall approach of the Core Strategy and Local Plan Part 2 was based on six policy interventions. This section considers the remaining key issues to consider within each policy intervention theme.

Employment

5.2 Section 3 on Growth Options highlights the expected quantum of development required over the period 2018 to 2036 and section 4 considers the potential spatial issues in allocating additional employment land in the new plan. Evidence has been commissioned to assess the current portfolio of employment land (existing key sites and allocations in Local Plan Part 2). The output from this study will assist in determining the potential scale of need that may be delivered though new allocations in the emerging local plan.

Protection of Employment Land

5.3 The Core Strategy includes Policy CS4 that sets out how existing employment land will be protected or re-used for alternative employment uses. This is supported by further policies in the Local Plan Part 2 (Policy 14 and Policy 15) that identify primary and secondary employment areas where employment land will be protected. The new local plan will consider the current supply of employment land and ensure policies protect employment land. There will be a need to ensure any policy approach is sufficient flexibility in circumstances where it can be demonstrated that employment land is no longer required. This reflects the Government's approach set out in paragraphs 120 and 121 of the NPPF.

QUESTION 15: Should there be more flexibility in the approach in the employment policies to allow for alternative uses where it can be demonstrated that employment land is no longer required? What mechanisms and criteria should be included in the policies to consider whether the loss of employment would be acceptable?

Housing

5.4 Section 3 provides the policy framework with respect to what local plans should set out in terms of strategic policies for the level of housing growth. It also highlights the expected quantum of development required over the period 2018 to 2036. There are other housing matters that the NPPF states should be considered in a local plan including the delivery of a mix of housing in terms of size, type and tenure; the delivery of housing in rural areas; and how affordable housing can be delivered. Further guidance is provided in the PPG in the

Housing Need Assessment section. Gypsy and Traveller needs are dealt primarily in a separate Government guidance note published in 2015[17].

Housing Mix

5.5 Paragraph 61 of the NPPF identifies the need to assess the mix of housing to be provided within a plan including the size, type and tenure. Policy CS7 in the Core Strategy and Policy 18 in the Local Plan Part 2 set out the current approach to housing mix.

5.6 The Housing and Economic Needs Assessment provides an evidence base and guidance on an appropriate mix of housing types. Table 6 sets out the recommendations from the study with respect to housing mix. The mix is broadly consistent with the current policy approach set out in the Core Strategy and Local Plan Part 2.

Table 6: Housing Mix by Tenure and Size – n.b. figures subject to change in final version of HENAS

Housing Tenure/ Size	**1-bed**	**2-bed**	**3-bed**	**4+ bed**
Market	0-5%	35-40%	40-45%	15-20%
Affordable home ownership	20-25%	45-50%	25-30%	0-5%
Affordable housing (rented)	30-35%	30-35%	25-30%	5-10%

QUESTION 16: Do you agree with the proposed mix of housing set out in Table 6? If not, what mix of housing would you suggest and what evidence do you have to support your proposals?

Houses in Multiple Occupation (HMO)

5.7 Policy 19 in the Local Plan Part 2 sets out how the Council will only exceptionally support the development of bedsits, bed and breakfast and hostel accommodation. The policy includes criteria that are used to consider any development proposals submitted to the Council. It is proposed that the new local plan will continue to follow this policy approach.

QUESTION 17: Do you agree that the Council should continue to follow the policy approach set in Policy 19 of the Local Plan Part 2? Do the criteria in the policy need any amendments or are there any additional points that should be included?

[17] https://www.gov.uk/government/publications/planning-policy-for-traveller-sites

QUESTION 18: Is there merit in splitting the policy so that apartment development is dealt with in a housing mix policy and a standalone policy is written to cover Houses in Multiple Occupation?

Gypsy and Traveller, and Travelling Showpeople Needs

5.8 Policy 20 in the Local Plan Part 2 identifies the number of pitches needed for Gypsies and Travellers over the plan period up to 2026. At the time of adoption of the plan no further need was identified for plots for travelling showpeople. The Council has commissioned jointly with Hyndburn Council new evidence to assess the accommodation needs for Gypsies and Travellers, and travelling showpeople. The study will inform any proposed allocations within the new local plan and provide guidance to assist in the development of specific policies to include within the plan. The current policy includes criteria that are used to assess proposals for pitches for Gypsy and Traveller, and plots for traveling showpeople.

QUESTION 19: Do you agree that the Council should continue to follow the policy approach set in Policy 20 of the Local Plan Part 2? Do the criteria in the policy need any amendments or are there any additional points that should be included?

Affordable Housing

5.9 The NPPF identifies in paragraph 62 that planning policies should specify the type of affordable housing required, and expect it to be met on-site. Off-site provision or financial contributions can be acceptable but would require robust justification. The definition of what constitutes affordable housing has been widened in the updated NPPF[18] covering four main categories:

- Affordable housing for rent;
- Starter homes;
- Discounted market housing; and
- Other affordable routes to home ownership (shared ownership, relevant equity loans, other low cost homes for sale; and rent to buy)

5.10 The NPPF also sets out a minimum level of 10% affordable housing to be delivered on sites of 11 dwellings or more (paragraph 64) with certain exceptions noted (sites solely for build to rent; specialist accommodation for a group of people with specific needs; self-build projects; sites exclusively for affordable housing – entry level of rural exceptions sites). The Core Strategy

[18] See Annex 2: Glossary of the NPPF

(Policy CS8) currently states an overall target for affordable housing of 20% to be delivered across all sites, subject to any specific deliverability issues.

5.11 The Housing and Economic Needs Assessment study has analysed the need for affordable housing and considered the range of potential tenures that can deliver any identified need. The study addresses the different types of affordable housing as set out in the expanded definition in the NPPF and concludes:

"*Overall, this analysis suggests that the additional categories of affordable housing set out in Annex 2 of the NPPF are unlikely to meet any need in BwD and Hyndburn; put simply, the typical cost of housing to buy in the area (in the second-hand market) is sufficiently affordable such that there is no need for a discounted new build product*.

There may be cases where the Council could accept 'affordable home ownership'; for example where this supports viability or to help diversify stock in some areas. However, the analysis is clear that the majority (all) additional affordable homes should be of a rented tenure."

5.12 The Council will commission further evidence to consider the viability of the delivering affordable housing. This will help to inform whether there is a need to define a specific percentage rate for affordable housing from sites of 11 dwellings or more that is higher than the 10% suggested by Government in the NPPF.

QUESTION 20: Do you consider the Council will need to set a specific percentage share for affordable housing that is higher than the Government's minimum level of 10%? If so, what do you suggest the level should be and what evidence do you have to support the rate you suggest?

Technical Standards

5.13 The Government has in recent years produced a national set of technical standards and the PPG provides guidance on the various standards[19]. The PPG states:

"*Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather*

[19] https://www.gov.uk/guidance/housing-optional-technical-standards

evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans."

5.14 The NPPF identifies that local plans can incorporate the technical standards where it is justifiable to include them (see paragraphs 127 and 150 of the NPPF). The Council can therefore incorporate the technical standards within the plan subject to producing an evidence base that justifies their inclusion.

QUESTION 21: Should the Council incorporate the national technical standards into the local plan? If a decision was taken to do so, what evidence do you have that would assist in providing the justification for their inclusion in the plan?

Public Facilities

Blackburn & Darwen town centres

5.15 The NPPF identifies in paragraph 85 that planning policies and decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation.

5.16 Local Plan Part 2 Policy 26 sets out the current framework for developing the Borough's town centres which focuses on:

- Strengthening and focusing the shopping offer;
- Expanding the role of the town centres;
- Protecting and enhancing the leisure offer and developing an evening economy; and
- Establishing a vibrant town centre residential population.

5.17 The overall aim for Blackburn and Darwen town centres within the new local plan will be to continue to encourage a positive and flexible approach to planning for their future. This will ensure that the Borough's town centres can respond to rapid changes in the retail and leisure industries, as required by NPPF paragraph 85(a).

5.18 A Supplementary Planning Document (SPD) for Blackburn Town Centre has been prepared which provides additional details on the town centre framework and identifies a number of investment areas within Blackburn town centre which have development potential for specific uses.

QUESTION 22: Do you agree with the current framework for developing the Borough's town centres?

QUESTION 23: Should the new local plan allocate sites within Blackburn and Darwen town centres for specific uses? Or is it sufficient to identify them within a Supplementary Planning Document?

5.19 NPPF paragraph 85(a) requires planning policies to define a network and hierarchy of town centres and promote their long-term vitality and viability. Core Strategy Policy CS12 sets out the Borough's hierarchy of centres and considers the scale of retail investment that should be encouraged in each centre and also the type of retail use appropriate to these centres. The current hierarchy is:

1. Town Centres;
2. District Centres;
3. Local Centres;
4. Neighbourhood Centres

QUESTION 24: Do you agree with the current hierarchy of Town and District Centres in the Borough?

5.20 NPPF paragraph 85(b) requires planning policies to define the extent of town centres and primary shopping areas, making clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

5.21 The existing Local Plan Part 2 identifies these boundaries on the Policies Map which make clear where our town centre policies apply.

QUESTION 25: Should there be any changes to the Blackburn and Darwen town centre boundaries?

QUESTION 26: Should there be any changes to the Primary Shopping Area boundaries?

District centres

5.22 Local Plan Part 2 Policy 27 identifies a number of District Centres within the Borough which perform principally a 'local needs' retail role. These are:

- Brownhill, Blackburn
- Roe Lee, Blackburn
- Little Harwood, Blackburn
- Bastwell, Blackburn
- Whalley Range, Blackburn
- New Bank Road, Blackburn
- Johnston Street, Blackburn
- Higher Eanam, Blackburn
- Whalley Banks, Blackburn

- Audley Range, Blackburn
- Bolton Road, Blackburn
- Mill Hill, Blackburn
- Ewood, Blackburn
- Duckworth Street, Darwen

5.23 As part of the new local plan preparation, the Council has commissioned a Retail Study which will inform policies relating to Town and District Centres. It will also propose any amendments required to the Town and District Centre boundaries.

QUESTION 27: Do you agree with the current list and boundaries of the Borough's District Centres?

Primary & secondary shopping frontages

5.24 In order to manage the balance of uses in the Borough's retail cores and District Centres, and to ensure that change in the town centres happen in a way that allows the retail cores to remain viable into the future, Local Plan Part 2 Policy 31 identifies primary and secondary shopping frontages.

5.25 The aim of this policy is to ensure a 'critical mass' of shops is retained, avoiding concentrations of non-retail units in an individual frontage which can undermine the primary retailing function of key areas.

5.26 However, NPPF no longer requires local planning authorities to identify primary and secondary frontages and instead places greater focus on town centres being able to respond to rapid changes in the retail and leisure industries.

QUESTION 28: Should we continue to identify primary and secondary frontages and have specific policies relating to these areas?

QUESTION 29: Should the Council continue to encourage retail uses within primary frontages or should a more flexible approach be taken with a greater range of uses being allowed?

Retail impact assessments

5.27 NPPF paragraph 89 requires an impact assessment to be prepared for retail and leisure development proposed outside town centres, which are not in accordance with an up-to-date plan and which are over a proportionate, locally set floorspace threshold.

5.28 Local Plan Part 2 Policy 29 sets out a series of local floorspace thresholds for geographical areas in the Borough where an impact assessment would be required. Table 7 below sets out these local thresholds:

Table 7: Local Retail Floorspace Thresholds

Location of development	Floorspace threshold	Centres required to be assessed for potential impact
Within 500m of any district centre boundary or a local centre/parade of shops	250 sqm	All district centres or local centres/parades of shops within 500m
Darwen urban area (south of M65)	500 sqm	Darwen town centre plus all district centres/local centres/parades of shops within 500m
Blackburn urban area (north of M65)	1,000 sqm	Blackburn town centre plus all district centres/local centres/parades of shops within 500m
Any location outside the defined urban area	100 sqm	To be determined on a case by case basis

QUESTION 30: Do you agree we should continue to set local floorspace thresholds for requiring an impact assessment? If yes, should any changes be made to the thresholds?

Health

5.29 Blackburn with Darwen continues to experience significantly higher than average levels of poor health among its population. Particular health issues within the Borough relate to obesity and related illnesses, diseases related to smoking, and the effects of alcohol. Local Plan Part 2 Policy 33 specifically deals with the impact of development on health.

5.30 In order to provide additional details on this policy, the Council has adopted a 'Planning for Health' Supplementary Planning Document which sets a 400 metre distance restriction on the creation of new takeaways in proximity to all educational facilities in the Borough. It also sets controls over the sale of alcohol in proposals for new local/convenience shops and sets out controls over the health impacts of shisha cafes.

QUESTION 31: Do you agree that the new local plan should include a policy on health? If so, should it cover any health issues not currently addressed by Local Plan Policy 33?

QUESTION 32: Should the 400 metre restriction on Hot Food Takeaways (use class A5) be included within local plan policy, rather than within a Supplementary Planning Document?

Environment

Renewable energy & energy efficiency of new development

5.31 The Government has identified the role of renewable and low carbon energy sources in working towards national targets to reduce greenhouse gas emissions, which contribute towards a changing climate.

5.32 Paragraph 151 of the NPPF states that local plans should consider identifying suitable areas for renewable and low carbon energy development in addition to supporting community-led initiatives for renewable and low carbon energy (paragraph 152, NPPF).

5.33 Government has also stated that wind farm developments should only be granted planning permission if the site is identified as a 'suitable area' in a Local Plan or a Neighbourhood Plan and the proposal has the backing of the affected local community[20].

QUESTION 33: Which renewable technologies do you think are most suitable for large scale proposals in the Borough? Please provide additional information as to why you deem these to be suitable.

QUESTION 34: Should we identify suitable sites for renewable energy, including onshore wind, in the new local plan?

QUESTION 35: If so, which areas of the Borough would be appropriate and for which types of technology (for example, wind turbines, solar photovoltaic panels)?

5.34 The Government has indicated that sustainable construction standards and the energy performance of buildings are likely to be best dealt with via Building Regulations and not planning.

5.35 To assist in reducing greenhouse gas emissions from new development in the Borough, Policy 11 of Local Plan Part 2 requires development to take advantage of opportunities to maximise environmental sustainability. This includes optimising energy and other resource use and performance through building shape, orientation, servicing, detailing and materials in addition to minimising the need to travel and minimise car use through attention to the design, layout and permeability of development.

QUESTION 36: Should the new local plan continue to encourage energy efficiency in new developments?

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[20] House of Commons: Written Statement (2015) https://www.parliament.uk/documents/commons-vote-office/June%202015/18%20June/1-DCLG-Planning.pdf

QUESTION 37: What policies should be included to promote renewable energy and low carbon technologies?

QUESTION 38: What policies should be included to ensure that issues relating to climate change, such as flooding, are tackled?

Quality of Place

Design

5.36 NPPF paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

5.37 The existing Local Plan Part 2 includes a detailed design policy (Policy 11) which focuses on the seven aspects of good design set out in our Core Strategy: character, townscape, the public realm, movement and legibility, sustainability, diversity and colour. Additional guidance on our design requirements are set out in the adopted Residential Design Guide Supplementary Planning Document and Borough Design Guide.

QUESTION 39: How can we improve design quality within the Borough?

QUESTION 40: Does the existing Local Plan policy and supporting design guidance set out in the Supplementary Planning Document and Borough Design Guide provide sufficient detail on design expectations of development within the borough?

Green infrastructure

5.38 Policy 40 of Local Plan Part 2 aims to achieve the enhancement and extension of the Borough's green infrastructure. The policy adopts a flexible approach to open space provision, with the Council working alongside developers to determine the most appropriate means of providing open space for residents.

5.39 The policy is supported by the Green Infrastructure & Ecological Networks Supplementary Planning Document which provides information for applicants and developers to ensure that proposals for development make the most of opportunities to improve existing, and create new green infrastructure.

5.40 Decisions on the most appropriate means of green infrastructure provision is informed by the Council's Open Space Audit and Assessment which assesses the quantity, quality and accessibility of existing open spaces in the Borough. As part of the new local plan work, an updated Open Space Audit &

Assessment and Playing Pitch Strategy will be prepared to inform our policies on green infrastructure.

5.41 While growth and intensification may mean some loss of existing green spaces and trees, the scope to mitigate for this should be achieved through developing appropriate local plan policies.

QUESTION 41: Should we continue to be flexible with how new public open space is delivered or should we set a specific amount of open space to be delivered as part of new development?

5.42 NPPF paragraph 99 gives Local and Neighbourhood Plans the ability to designate areas of open spaces of particular value to a community as 'Local Green Space' subject to meeting a number of criteria[21].

QUESTION 42: Should the Local Plan identify and designate Local Green Space ?

Biodiversity

5.43 The environmental test of sustainable development requires planning policy and planning decisions to help to improve biodiversity. NPPF paragraph 174(b) suggests that it will be up to local planning authorities to prepare their own policies on how to identify and pursue opportunities for securing measurable net gains[22].

5.44 Local Plan Part 2 Policy 9 sets out the current approach to protecting the borough's habitats and species, and ecological networks. Further details on this policy are set out in the Green Infrastructure & Ecological Networks Supplementary Planning Document.

QUESTION 43: What policies should we include in the local plan to ensure the delivery of biodiversity net gains in developments?

QUESTION 44: How should we measure net gain?

Access to Jobs and Services

Parking standards

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[21] NPPF para.100

[22] NPPF para.174

5.45 The provision of car parking is an integral part of the design and layout of new development. The Council has adopted parking standards which are expected to be provided on new residential developments.

5.46 There are a growing number of electric vehicles on the roads and future parking standards should take this into account, including the ease of access to charging points.

QUESTION 45: Do you agree with the Council's current standards or are there changes you would like to see made?

QUESTION 46: What provisions should the new local plan make for electric vehicles?

Assessment of Core Strategy and Local Plan Part 2 Policies

5.47 Appendix 1 of this consultation document sets out a schedule that provides a broad assessment of the policies from the Core Strategy and Local Plan Part 2. It categorises the policies into three categories as follows:

- Retain policy (no change required)
- Retain policy (changes required including amalgamation of policies)
- Delete policy

5.48 The schedule does not set out a definitive position on what the Council intends to do with the policies contained within the existing plans. We would be interested to receive any views on our proposals set out in the schedule.

QUESTION 47: Do you have any points you wish to make with respect to the assessment of current policies in the Core Strategy and Local Plan Part 2 set out in the schedule in Appendix 1?

6. Next Steps

6.1 The consultation on Issues and Options runs for six weeks from XX February to YY March. Once the consultation concludes the Council will consider all the comments sent in. Further evidence will need to be commissioned throughout 2019 to inform the development of the proposals and policies in the plan. The plan is then scheduled to be consulted on at Publication stage (Regulation 19) in summer 2020 with a view to submitting the plan for examination towards the end of 2020.

CAPITA

Blackburn with Darwen Borough Council

Integrated Appraisal of Local Plan Issues and Options

December 2018

Quality Management

Title	Blackburn with Darwen Borough Council Integrated Appraisal of Local Plan Issues and Options	
Date	17.12.2018	
Project Code		
Client	Blackburn with Darwen Borough Council	
Prepared by	Laura Craddock	
Checked by	Martin Craddock	
Authorised by	Jackie Palmer	

CAPITA

Contents

1. Non-technical Summary

1.1 The following non-technical summary informs consultees and the general public about the process of Integrated Appraisal in plain English, avoiding the use of technical terms. The production of a non-technical summary is a requirement of EU law.

Introduction

1.2 Blackburn with Darwen Borough Council is preparing a new planning document that will provide a long-term vision for the area and will contain policies and guidance that will be used to guide development until 2036. This planning document will be known as the Local Plan.

1.3 The new Local Plan would replace the existing planning documents for the Borough: Core Strategy (2011) and Local Plan Part 2: Site Allocations and Development Management Policies (2015).

1.4 Preparing a Local Plan involves several stages. This consultation on Issues and Options marks the first stage towards the development of a new Local Plan.

1.5 A Draft Local Plan is then scheduled to be consulted upon in summer 2020. It will then be submitted towards the end of 2020 to an independent Planning Inspector for their consideration and for a public examination. It is anticipated that the new Local Plan will be adopted by the Council in 2021 and will set out the planning guidance for the Borough therefore up to 2036.

1.6 European Directive 2001/42/EC (the "SEA Directive") requires that Strategic Environmental Assessment (SEA) is carried out on plans and programmes that are likely to have significant effects on the environment. UK law in the form of the Planning and Compulsory Purchase Act 2004 also requires that Sustainability Appraisal (SA) has to be carried out during the production of Local Plans to make sure that social, environmental and economic issues are taken into account during preparation. SA covers wider social and economic effects of plans, as well as the more environmentally-focused considerations of SEA. SEA and SA can be satisfied through a single process.

1.7 The assessment to be carried out on the emerging Local Plan will be an "Integrated Assessment" that will include:

- SA/SEA: to assess the effects of the Local Plan across a range of environmental, social and economic issues.
- Equalities Impact Assessment (EqIA): to assess the effects of the Local Plan in terms of equalities issues, with a particular focus on disadvantaged or excluded groups of people. EqIA helps identify where we can promote equality of opportunity.
- Health Impact Assessment (HIA): to assess the effects of the Local Plan on the health and well-being of the population and its ability to access health-related facilities and services. This also addresses equalities issues and has some overlap with Equalities Impact Assessment.

1.8 IA, incorporating the requirements of SA/SEA, has been carried out by Capita on behalf of Blackburn with Darwen Borough Council for the Local Plan Issues and Options. That is what this report is about.

Scoping

1.9 A scoping stage is required as part of the IA. Scoping involves setting the context for the IA by considering the current situation on the environment, communities and the economy, and relevant plans and programmes that guide and manage the area. It includes identifying the main issues that affect the area and the area's characteristics. This information helps us to understand what would be the best way for the area to develop in the future to address the area's issues and characteristics. A report setting out this process was produced by Capita for Blackburn with Darwen Borough Council and consulted upon for five weeks ending 13 November 2018.

1.10 From this 2018 scoping exercise, 13 IA objectives were derived that were deemed appropriate to test new Local Plan proposals against to ensure they were addressing the issues that Blackburn with Darwen faces. They cover social, environmental and economic elements. Readers are directed to the Scoping Report for more information on the process.

1.11 The 13 IA objectives are:

1. Create a diversified, high quality and forward looking urban and rural economy with a sustainable tourism sector, high and stable levels of employment where everyone is afforded the skills and opportunities to share and contribute to greater, sustainable prosperity.
2. Support vibrant town centres.
3. Reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure and develop strategic transport and communications infrastructure.
4. Promote equality of opportunity and reduce levels of deprivation and disparity.
5. Promote and support healthy living environments and lifestyles for all residents, and access to health services while targeting action to reduce health inequalities.
6. Afford everyone in the Borough with equality of access to the range of open space, sport facilities and community services and facilities they require in meeting their needs.
7. Enable all people to have a choice of decent homes, in a range of tenures, sizes and types, to meet their needs, including affordable homes.
8. Conserve, enhance and promote Blackburn with Darwen's townscape character, high quality natural landscape, and cultural and historic environment, maintaining and strengthening local distinctiveness and sense of place.

9. Maintain and enhance areas and networks of multifunctional green infrastructure and ecological networks and geodiversity, including designated wildlife sites, protected species and irreplaceable habitats, as a resource to support wildlife, amenity and recreation.
10. Avoid and reduce all forms of pollution.
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.
12. Limit and adapt to climate change through sustainable use of energy reduction of greenhouse gases, and avoiding needless loss of, and making best use of, natural resources.
13. Reduce flood risk to people and property, and maintain and improve the quality of ground and surface waters.

Carrying out the IA

1.12 The 13 IA Objectives are used to assess the sustainability effects on Blackburn with Darwen of the emerging Local Plan. To assist in the IA assessment, each IA Objective has a set of decision-aiding questions, as set out in Table 1 below.

IA Objective	Assessment Criteria: Will the Local Plan…
1. Create a diversified, high quality and forward looking urban and rural economy with a sustainable tourism sector, high and stable levels of employment where everyone is afforded the skills and opportunities to share and contribute to greater, sustainable prosperity.	• Protect and enhance the vitality and viability of existing employment areas? • Support economic development in areas that are easily accessible by sustainable transport? • Provide a variety of employment land and mixed-use development sites to support a varied and robust economy? • Provide and/or support a range of employment opportunities over the plan period? • Help to add to the economic prosperity and potential of the local area? • Contribute to sustainable growth in tourist facilities and jobs? • Ensure and maintain a sufficient labour force (in terms of volume and skills)? • Provide for training opportunities and skills development in the local community? • Provide and support high quality education facilities? • Allow for access to existing educational facilities?
2. Support vibrant town	• Protect and enhance the vitality and viability of town

IA Objective	Assessment Criteria: Will the Local Plan…
centres.	centres? • Support appropriate retail, leisure and/or employment opportunities in town centre locations to aid urban regeneration?
3. Reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure and develop strategic transport and communications infrastructure.	• Promotes public transport, walking and cycling? • Encourage development within accessible distances of services and facilities? • Ensure that transport infrastructure is sufficient to accommodate existing needs and potential growth? • Promotes strategic links within the wider area? • Ensure that communications infrastructure can enable and support future growth?
4. Promote equality of opportunity and reduce levels of deprivation and disparity	• Ensure equality of opportunity and equal access to facilities / infrastructure for all? • Avoid negative impacts based on 'protected characteristics', as defined in the Equality Act 2010? • Ensure that the needs of different places in the borough are equally addressed? • Reduce fear of crime, the incidence of crime and anti-social behaviour? • Encourage the involvement of local people in community activities? • Reduce the proportion of people living in deprivation by improving conditions relating to all domains of the Indices of Multiple Deprivation? • Enable investment in areas suffering from high levels of deprivation? • Foster good relations between different people?
5. Promote and support healthy living environments and lifestyles for all residents, and access to health services while targeting action to reduce health inequalities.	• Support healthier lifestyles and improvements in determinants of health? • Ensure there is sufficient capacity in healthcare facilities to accommodate the population? • Avoid loss of existing healthcare facilities? • Support a living environment with opportunities for outdoor leisure?
6. Afford everyone in the Borough with equality of access to the range of open space, sport facilities and community services and facilities they require in meeting their needs.	• Ensure everyone can access sports facilities and open space? • Avoid loss of existing open space? • Ensure a range of facilities and services to support the existing and future population?
7. Enable all people to have a choice of decent homes, in a range of tenures, sizes and types, to meet their needs, including affordable homes.	• Ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected housing needs? • Contribute towards an adequate supply of affordable housing? • Help to improve the quality of the existing housing

IA Objective	Assessment Criteria: Will the Local Plan…
	stock?
8. Conserve, enhance and promote Blackburn with Darwen's townscape character, high quality natural landscape, and cultural and historic environment, maintaining and strengthening local distinctiveness and sense of place.	• Create a high-quality environment in which to live and/or work? • Promote high quality design? • Conserve, enhance or promote heritage assets? • Conserve, enhance or promote townscape character? • Conserve, enhance or promote natural landscapes?
9. Maintain and enhance areas and networks of multifunctional green infrastructure and ecological networks and geodiversity, including designated wildlife sites, protected species and irreplaceable habitats, as a resource to support wildlife, amenity and recreation.	• Avoid unacceptable harm to designated wildlife sites, protected species and irreplaceable habitats? • Avoid fragmentation of habitats and/or landscapes? • Avoid the loss of green infrastructure? • Support an increase in the amount and quality of the green infrastructure network? • Conserve and protect geodiversity?
10. Avoid and reduce all forms of pollution.	• Bring contaminated land back into beneficial use? • Avoid potential increase to levels of contamination? • Promote an improvement in air quality? • Avoid the creation and risk of noise pollution?
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	• Ensure capacity in waste management facilities to deal with existing and future development? • Help to minimise waste generation? • Promote movement up the waste hierarchy?
12. Limit and adapt to climate change through sustainable use of energy reduction of greenhouse gases, and avoiding needless loss of, and making best use of, natural resources.	• Minimise and has resilience to the impacts of climate change? • Minimise emissions of greenhouse gases? • Promote sustainable construction? • Promote energy efficiency? • Support low carbon and renewable energy schemes? • Promotes public transport, walking and cycling? • Support the development of previously developed land and other sustainable locations? • Avoid the loss of the best and most versatile agricultural land? • Avoid the needless sterilisation of minerals? • Avoid consuming greater volumes of water resources than are available?
13. Reduce flood risk to people and property, and maintain and improve the quality of ground and surface waters.	• Avoid development in areas with known flooding or drainage constraints? • Avoid an increase in flood risk? • Avoid risk to the quality of any watercourse or water

IA Objective	Assessment Criteria: Will the Local Plan…
	body? • Promote means to avoid, mitigate or adapt to flood risk? • Ensure sufficient capacity in the drainage and foul water network? • Protect water features from pollution and, where possible, create a net benefit by improving water quality?

Table 1: IA Objectives and decision-aiding questions

1.13 The Issues and Options document considers 11 Strategic Objectives that set out the key components required to meet the overarching vision of the Local Plan. It is appropriate to test them through the IA process. The Strategic Objectives form the direction for future Local Plan policy and proposals that will be assessed in full through this IA. Reflecting this, the Strategic Objectives themselves have been subject to an overarching review of the likely effects against each IA Objective in a simple matrix, but have not been subject to detailed assessment.

1.14 The assessment through this simple matrix did reveal some potential conflicts. These include between IA Objectives and Strategic Objectives that promote development and those that promote environmental sustainability. The assessment serves as a useful tool in identifying where there are cases that mitigation may be required in the Local Plan policies to minimise adverse effects.

Overview

1.15 This report is the result of an assessment of the Blackburn with Darwen Local Plan Issues and Options Consultation against the 13 Integrated Appraisal (IA) Objectives developed through a scoping process.

1.16 The Issues and Options IA assessment of the emerging Local Plan considers the sustainability, health and equality implications of:

- 11 strategic objectives that would deliver the overarching vision of the emerging Local Plan.
- Three housing growth options.

- Two employment land growth options.
- Three spatial options and the alternative of not pursuing each.

1.17 The assessment of the 11 strategic objectives has been a useful exercise in identifying potential conflict between meeting these strategic objectives and ensuring the Local Plan would be in line with the aims of sustainable development. The conflict tends to arise between economic and environmental objectives. The assessment has highlighted that the emerging Local Plan must contain sufficient policy coverage so that when applied as a whole, negative impacts can be avoided or mitigated, and positive effects can be enhanced.

1.18 Pursuing Housing growth option 1 has been assessed as not representing a positive strategy in that it would only provide for the minimum assessed local housing need. This would see a continuing unsustainable trend of an increasing population of older people and a reduction in working age people within the Borough.

1.19 Housing growth options 2 and 3 are based upon an uplift to meet economic growth scenarios. Both options result in an uplift in housing need to accommodate the potential workforce required to be resident in the Borough. Growth option 3 results in a higher level of housing need because of an adjustment to household formation rates that increases the number of homes required to accommodate the resident population. Both options would increase housing opportunities that would help to rebalance the Borough's age profile and support economic growth. This higher level of growth is assessed as having potentially greater environmental implications than growth option 1, including loss of green infrastructure. On the assumption that Growth option 2 secures sufficient additional homes to accommodate the economic growth scenario it would on balance be the option that best meets the Borough's growth requirements whilst minimising loss of green infrastructure.

1.20 Employment land growth options 1 and 2 are both based upon and would provide for the same number of initial jobs identified through an economic growth forecast.

In that respect they are both considered to represent positive economic strategies in the shorter to medium term that would cumulatively work to support the local economy, the vibrancy of the town centres, the lowering of deprivation and housing opportunities.

1.21 Employment land growth option 2 has additionally been adjusted to reflect past take up trends. To be fully realised, Employment land growth option 2 would require almost twice as much land as option 1. As there is provision in total for additional floorspace within Employment land growth option 2, this would support a greater number of additional jobs than option 1, provide greater range of choice and flexibility to the employment market and therefore represent a stronger economic option over the longer term. However, pursuing Employment land growth option 2 is identified as potentially requiring development of Green Belt land for the floorspace requirements to be met. This would require the identification of exceptional circumstances.

1.22 Three spatial options have been assessed. Spatial Option 1 would continue the spatial approach of the Core Strategy and Local Plan Part 2. This option is comprised of the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns. Whilst the specific impact of the spatial option as a whole would depend upon the final balance struck in directing development between the urban edge and inner urban areas, the strategy is generally seen as a balanced approach to supporting the inner urban areas whilst delivering additional edge of town development to meet growth needs. To not pursue this strategy could result in unmanaged development within the Borough that would not have the same economic and social benefits and would be at risk of greater environmental harm.

1.23 Spatial Option 2 and Spatial Option 3 represent more proactive strategies focused upon the release of specific areas of safeguarded land and Green Belt land to meet housing and employment needs. At this time it is unclear to what extent the areas of land identified would be required to meet development needs. The option to utilise such sites would clearly result in positive effects against objectives for housing delivery and economic growth but will have potential environmental effects that would require mitigation. Spatial Option 3 would require the release of Green Belt and, as noted above, would require further work to ascertain if exceptional circumstances exist to justify its loss. If the exceptional circumstances can be proven to exist, a Green Belt review should be undertaken to ascertain the most appropriate areas of loss.

1.24 Separate EqIA and HIA will also be published in due course based upon Blackburn with Darwen Borough Council’s established templates for assessing the authority’s policy documents and proposals. However, each of the options considered in this document have specifically been tested against IA Objectives that include IA Objective 4 to Promote equality of opportunity and reduce levels of deprivation and disparity and IA Objective 5 Promote and support healthy living environments and lifestyles for all residents, and access to health services while targeting action to reduce health inequalities.

2. Introduction

2.1 Blackburn with Darwen Borough Council currently has an adopted *Core Strategy* (2011) and *Local Plan Part 2: Site Allocations and Development Management Policies* (2015). These two plans set out the land use planning strategy for the Borough up to 2026. Local Planning Authorities should review their land use plans at least every five years from the date of their adoption, assessing of whether they remain relevant and can effectively address the needs of the local community. Based on this assessment, the Council has decided it is appropriate to work towards the adoption of a new plan. This new planning document will provide a long-term vision for the area and will contain policies and guidance that will be used to guide development until 2036. This planning document will be known as the Local Plan.

2.2 "Issues and Options" marks the first stage towards the development of the Local Plan. The Issues and Options will be consulted upon, seeking input upon:

- Whether the 11 Strategic Objectives set out in the Core Strategy remain relevant to planning for growth in Blackburn with Darwen up to 2036.
- Three proposed alternative options for the future amount of housing growth in the area.
- Two proposed alternative options for the future amount of economic growth in the area.
- Three proposed options for the future spatial distribution of growth in the area.

2.3 A Draft Local Plan is then scheduled to be consulted upon in summer 2020. It will then be submitted towards the end of 2020 to an independent Planning Inspector for their consideration and for a public examination. It is anticipated that the new Local Plan will be adopted by the Council in 2021 and will set out the planning guidance for the Borough therefore up to 2036.

3. Sustainability Appraisal/Integrated Appraisal

3.1 Sustainability Appraisal (SA) is a requirement under Regulation 39 of the Town and Country Planning (Local Development) (England) Regulations 2004, for Local Plans. It incorporates the requirement under European Directive 2001/42/EC for a Strategic Environmental Assessment (SEA).

3.2 European Directive 2001/42/EC requires SEA to be carried out on a range of plans and programmes including Local Plans. SEA is the process of systematically assessing strategic policies, plans and programmes, to ensure that significant environmental effects that might arise from them are identified. Once identified, these effects are then communicated to decision-makers, mitigated and monitored. It is also a key requirement of the SEA process that opportunities for public involvement are provided. This document conforms to these requirements.

3.3 SA can be broadly defined as:
"the formal, systematic and comprehensive process of evaluating the environmental, social and economic effects of a policy, plan or programme, or its alternatives, including the preparation of a written report on the findings of that evaluation, and using the findings in publicly accountable decision-making." [1]

3.4 The Government states that the purpose of SA "*is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives*"[2]. It is an iterative process, which identifies and reports on the likely significant effects of the plan and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.

1.1

[1] Adapted from Therivel, R. et al (1992) "Strategic Environmental Assessment", London, Earthscan
[2] Strategic environmental assessment and sustainability appraisal, National Planning Practice Guidance, MHCLG, 2015

3.5 One of the key functions of SA is to illustrate the benefits and risks of different development options and policy choices to enable a transparent decision-making process. This should facilitate effective public consultation on alternative courses of action, and ultimately help to justify why specific options were chosen against others.

3.6 The term 'sustainable development' has been commonly used since the early 1990s, growing in importance since the Earth Summit in Rio de Janeiro in 1992. There are numerous definitions of sustainable development. The most widely used international definition is: "*Development which meets the needs of the present without compromising the ability of future generations to meet their own needs*"[3]

3.7 The planning system has an important role to play in promoting and enabling sustainable development, particularly through the plan making process. The legislation states that the function must be exercised with the objective of contributing to the achievement of sustainable development[4]. The NPPF[5] sets out a "presumption in favour of sustainable development", which runs through both plan-making and decision-taking. This involves three overarching objectives:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open

1.1

[3] From 'The Bruntland Report' – Bruntland, G. (Ed) (1987) 'Our Common Future: The World Commission on Environment and Development' Oxford, Oxford University Press
[4] Planning and Compulsory Purchase Act 2004, chapter 39
[5] National Planning Policy Framework, MHCLG, 2018

spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

3.8 The Government requires SA of Local Plans in addition to SEA to ensure that plans are balanced and integrate environmental, social and economic objectives to secure the best overall outcome for the area. Both processes are incorporated into this document.

3.9 SEA and SA will be joined by an assessment of the emerging Local Plan's predicted impact upon health and equality. Together this will be known as an Integrated Assessment (IA). The IA will include three separate but complementary assessments in order to inform the development of the Local Plan. These are:
- SA/SEA: to assess the effects of the Local Plan across a range of environmental, social and economic issues.
- Health Impact Assessment (HIA): to assess the effects of the Local Plan on the health and well-being of the population and its ability to access health-related facilities and services. This also addresses equalities issues and has some overlap with Equalities Impact Assessment.
- Equalities Impact Assessment (EqIA): to assess the effects of the Local Plan in terms of equalities issues, with a particular focus on disadvantaged or excluded groups of people. EqIA helps identify where we can promote equality of opportunity.

3.10 Separate EqIA and HIA will also be published in due course based upon Blackburn with Darwen Borough Council's established templates for assessing authority proposals.

4. Scoping

4.1 The first step of the SA process is "scoping". NPPG[6] describes this as "setting the context and objectives, establishing the baseline and deciding on the scope" and advises on five stages, as set out in Table 2.

Stage 1: Identify other relevant policies, plans and programmes, and sustainability objectives	Identifies environmental, social and economic objectives contained in other plans, programmes and policies that are most relevant to Blackburn with Darwen. It also includes those that may not seem directly relevant but help to ensure that SEA requirements are covered.
Stage 2: Collect baseline information	Summarises or expands on some of the data from Stage 1 and considers any other relevant data available to ascertain what the current social, economic and environmental conditions are within Blackburn with Darwen.
Stage 3: Identify sustainability issues and problems	Sets out the key issues and problems that Blackburn with Darwen faces, based on the findings of stages 1 and 2.
Stage 4: Develop the sustainability appraisal framework	Places the issues into relevant themes. It then turns these themes into objectives and questions that can be used to assess the emerging Plan to ensure it considers Blackburn with Darwen's sustainability issues.
Stage 5: Consult on the scope of the SA report	The three statutory consultees Historic England, the Environment Agency and Natural England are consulted and their feedback is used to refine the SA process.

Table 2: Stages of SA Scoping

4.2 A report setting out this process was produced by Capita for Blackburn with Darwen Borough Council and consulted upon for five weeks, concluding on 13 November 2018.

4.3 From this 2018 scoping exercise, 13 IA objectives were derived that were deemed appropriate indicators to test new Local Plan proposals against to ensure they were addressing the issues that Blackburn with Darwen faces. They cover social,

1.1

[6] National Planning Practice Guidance, MHCLG https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

environmental and economic elements. Readers are directed to the Scoping Report for more information on the process. To assist in the IA assessment, each IA Objective has a set of decision-aiding questions, as set out in Table 3.

IA Objective	**Assessment Criteria: *Will the Local Plan…***
1. Create a diversified, high quality and forward looking urban and rural economy with a sustainable tourism sector, high and stable levels of employment where everyone is afforded the skills and opportunities to share and contribute to greater, sustainable prosperity.	• Protect and enhance the vitality and viability of existing employment areas? • Support economic development in areas that are easily accessible by sustainable transport? • Provide a variety of employment land and mixed-use development sites to support a varied and robust economy? • Provide and/or support a range of employment opportunities over the plan period? • Help to add to the economic prosperity and potential of the local area? • Contribute to sustainable growth in tourist facilities and jobs? • Ensure and maintain a sufficient labour force (in terms of volume and skills)? • Provide for training opportunities and skills development in the local community? • Provide and support high quality education facilities? • Allow for access to existing educational facilities?
2. Support vibrant town centres.	• Protect and enhance the vitality and viability of town centres? • Support appropriate retail, leisure and/or employment opportunities in town centre locations to aid urban regeneration?
3. Reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure and develop strategic transport and communications infrastructure.	• Promotes public transport, walking and cycling? • Encourage development within accessible distances of services and facilities? • Ensure that transport infrastructure is sufficient to accommodate existing needs and potential growth? • Promotes strategic links within the wider area? • Ensure that communications infrastructure can enable and support future growth?
4. Promote equality of opportunity and reduce levels of deprivation and disparity	• Ensure equality of opportunity and equal access to facilities / infrastructure for all? • Avoid negative impacts based on 'protected characteristics', as defined in the Equality Act 2010? • Ensure that the needs of different places in the borough are equally addressed? • Reduce fear of crime, the incidence of crime and anti-social behaviour? • Encourage the involvement of local people in

IA Objective	Assessment Criteria: *Will the Local Plan…*
	community activities? • Reduce the proportion of people living in deprivation by improving conditions relating to all domains of the Indices of Multiple Deprivation? • Enable investment in areas suffering from high levels of deprivation? • Foster good relations between different people?
5. Promote and support healthy living environments and lifestyles for all residents, and access to health services while targeting action to reduce health inequalities.	• Support healthier lifestyles and improvements in determinants of health? • Ensure there is sufficient capacity in healthcare facilities to accommodate the population? • Avoid loss of existing healthcare facilities? • Support a living environment with opportunities for outdoor leisure?
6. Afford everyone in the Borough with equality of access to the range of open space, sport facilities and community services and facilities they require in meeting their needs.	• Ensure everyone can access sports facilities and open space? • Avoid loss of existing open space? • Ensure a range of facilities and services to support the existing and future population?
7. Enable all people to have a choice of decent homes, in a range of tenures, sizes and types, to meet their needs, including affordable homes.	• Ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected housing needs? • Contribute towards an adequate supply of affordable housing? • Help to improve the quality of the existing housing stock?
8. Conserve, enhance and promote Blackburn with Darwen's townscape character, high quality natural landscape, and cultural and historic environment, maintaining and strengthening local distinctiveness and sense of place.	• Create a high-quality environment in which to live and/or work? • Promote high quality design? • Conserve, enhance or promote heritage assets? • Conserve, enhance or promote townscape character? • Conserve, enhance or promote natural landscapes?
9. Maintain and enhance areas and networks of multifunctional green infrastructure and ecological networks and geodiversity, including designated wildlife sites, protected species and irreplaceable habitats, as a resource to support wildlife,	• Avoid unacceptable harm to designated wildlife sites, protected species and irreplaceable habitats? • Avoid fragmentation of habitats and/or landscapes? • Avoid the loss of green infrastructure? • Support an increase in the amount and quality of the green infrastructure network? • Conserve and protect geodiversity?

IA Objective	Assessment Criteria: *Will the Local Plan…*
amenity and recreation.	
10. Avoid and reduce all forms of pollution.	• Bring contaminated land back into beneficial use? • Avoid potential increase to levels of contamination? • Promote an improvement in air quality? • Avoid the creation and risk of noise pollution?
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	• Ensure capacity in waste management facilities to deal with existing and future development? • Help to minimise waste generation? • Promote movement up the waste hierarchy?
12. Limit and adapt to climate change through sustainable use of energy reduction of greenhouse gases, and avoiding needless loss of, and making best use of, natural resources.	• Minimise and has resilience to the impacts of climate change? • Minimise emissions of greenhouse gases? • Promote sustainable construction? • Promote energy efficiency? • Support low carbon and renewable energy schemes? • Promotes public transport, walking and cycling? • Support the development of previously developed land and other sustainable locations? • Avoid the loss of the best and most versatile agricultural land? • Avoid the needless sterilisation of minerals? • Avoid consuming greater volumes of water resources than are available?
13. Reduce flood risk to people and property, and maintain and improve the quality of ground and surface waters.	• Avoid development in areas with known flooding or drainage constraints? • Avoid an increase in flood risk? • Avoid risk to the quality of any watercourse or water body? • Promote means to avoid, mitigate or adapt to flood risk? • Ensure sufficient capacity in the drainage and foul water network? • Protect water features from pollution and, where possible, create a net benefit by improving water quality?

Table 3: IA Objectives and decision-aiding questions

5. Approach to Integrated Appraisal

5.1 The suite of 13 IA Objectives are proposed to be used to assess the emerging Local Plan using a matrix where the Local Plan proposal would be "pitched" against the IA Objectives and an outcome noted using the colours and symbols in Table 4.

Symbol	Definition
++	Major positive effect
+	Positive effect
n	Neutral effect
-	Minor negative effect
--	Major negative effect
u	Unknown at this stage

Table 4: Assessment scoring system

5.2 During the assessment, a number of factors will have to be considered to determine whether a predicted effect has the potential to be significant. These factors are listed in Table 5 below.

Issues for consideration	Details
Type of Effect	• Positive or Negative • Direct or Indirect • Cumulative, secondary, synergistic • Temporary or Permanent
Magnitude and Spatial Extent	• Where will it impact? Will it be within the Borough boundary or outside it? • Will it cause trans-boundary issues and impact on adjacent areas or regionally (GM) or nationally? • What is the geographical area and size of population likely to be affected?
Who it will affect, key groups or communities to be considered include:	• Old and young people • Socio economic groups (variable) • Women and men • Asylum seekers and refugees • Black and ethnic minority people (including Gypsy and Traveller communities) • Disabled people • Faith communities • Lesbian, gay, bisexual and transgender people
Vulnerability of Receptor	• Sensitivity of receptors • Special natural characteristics/areas or cultural heritage

Issues for consideration	Details
	• Protected areas • Relative importance of the site, whether it is a nationally or internationally important feature or of local significance
Timing and Duration of the Effect	• Short-term: 0-4 years • Medium-term: 5-9 years • Long-term: 10+ years

Table 5: Factors to consider in assessment

5.4 The matrix would allow for consideration of the above factors, and clearly set out assessment outcomes. Suggested mitigation or enhancements would also be noted with the matrix. The proposed matrix is illustrated below.

Local Plan Policy / Proposal					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
1	+	+	+		
2.. **Etc...**	-	-	--		

5.5 As noted within this Report, HIA and EqIA can be integrated within an IA. To aid this, specific IA Objectives have been prepared that would allow for assessment of Local Plan proposals upon health and equality.

5.6 Separate EqIA and HIA will also be published in due course based upon Blackburn with Darwen Borough Council's established templates for assessing authority proposals.

6. Assessing Objectives

6.1 The Core Strategy set out strategic objectives for the Borough up to 2026. With the roll forward of the Local Plan to an end date of 2036, it is appropriate to consider through the Issues and Options consultation whether the previous strategic objectives expressed in the Core Strategy remain relevant and appropriate to meet the overarching vision of the Plan.

6.2 The 11 strategic objectives are:

A. Create conditions allowing a change in emphasis to a higher-wage, higher skill economy, while continuing to support traditional industries
B. Retain and attract skilled and qualified people to live in the Borough
C. Ensure that local people benefit from economic growth and have sustainable access to services and facilities
D. Improve the quality of the local environment and the Borough's physical setting
E. Increase levels of demand both for existing housing stock and for new development in inner urban areas
F. Minimise the Borough's environmental footprint
G. Be ready for the effects of climate change
H. Consolidate the roles of the main settlements in the Borough: Blackburn as a sub-regional centre; Darwen as a market town with a distinct identity
I. Widen the range of activities taking place in the Borough's town centres
J. Ensure that the Borough's rural areas and villages have a sustainable future
K. Promote the development of mixed communities

6.3 Whilst these Strategic Objectives are high level aims that will be expressed in more detail through the Plan's policies, it is beneficial to assess them at this stage to understand any potential significant adverse effects that could arise from their implementation.

6.4 Strategic Objectives tend to be overarching thematic aims and given their high-level nature, it is neither effective nor realistic to subject them to a full, detailed IA assessment. The Strategic Objectives have therefore been tested against each of the IA Objectives in the matrix below, using the colour scoring system set out under Table 4 above.

	Strategic Objective										
IA Objective	**A**	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**
1	++	++	++	n	n	u	u	n	+	+	n
2	+	+	+	+	+	+	+	++	++	n	n
3	+	n	+	n	u	+	+	+	+	-	n
4	+	+	+	+	n	n	n	n	n	+	+
5	n	n	n	+	n	n	n	n	n	n	n
6	n	n	n	n	u	n	n	n	n	n	n
7	n	++	+	n	++	u	u	n	n	+	+
8	n	+	n	++	n	u	n	n	n	n	n
9	n	n	n	u	u	+	+	n	n	n	n
10	-	n	n	n	-	++	+	+	+	-	n
11	-	n	n	n	-	+	+	n	n	n	n
12	-	n	n	+	-	++	++	+	+	-	n
13	u	n	n	n	u	++	++	n	n	u	n

6.5 The matrix did identify some potential for conflict between some IA Objectives and Strategic Objectives. These tend to be those objectives related to housing and economic growth. In order to deliver growth to meet Blackburn and Darwen's needs, development would be required and this could have negative impacts with regards to generation of waste and pollution, and use of natural resources. There are also some identified conflicts with regards to the sustainability of the Borough's rural areas (Strategic Objective J). In this respect, the matrix above serves as a useful tool in identifying where there are cases where mitigation may be required in the Local Plan policies to minimise adverse effects.

6.6 There are several occasions where the relationship between objectives is uncertain. In those cases there is the potential for negative, positive or neutral impacts, or a combination. Again, this highlights that the emerging Local Plan must contain sufficient policy coverage so that when applied as a whole, negative impacts can be avoided or mitigated, and positive impacts can be enhanced.

CAPITA

7. Assessing Growth Options

7.1 Blackburn with Darwen Borough Council in conjunction with Hyndburn Borough Council commissioned a Housing and Economic Needs Assessment Study (HENAS) that considered the potential housing and employment land requirements for the two Boroughs. The study set out the housing figure generated by the Government's standard housing methodology derived from the 2016 based household projections, which for Blackburn with Darwen is 99 dwellings per annum. The recent consultation by the Government on the Standard Housing Methodology generates an alternative figure of 157 dwellings per annum.

7.2 The study also looked at additional scenarios to consider alternative approaches to deriving a potential level of housing growth:

- Two alternative approaches based on demographic projections that utilised the 2016 based population projections but applied two sensitivity tests (applying mid-year estimates population data; and considering a longer time scale for migration trends over a ten-year period); and
- Two economic forecasts (baseline and an alternative growth based approach) with consideration given to the 2016 household projections and an approach that considers the 2014 household projections; and a mix of 2014/2008 household projections.

7.3 Table 6 below sets out the range of potential growth options with respect to housing requirements based on the standard housing methodology and the economic growth scenarios described above. Given the current national advice with respect to the 2016 household projections, the two potential growth options that used this projection have not been included as potential options at present.

Scenario	Annual Housing Need	Job Growth (2018-2036)
Standard Housing Methodology (Option 1)	99 (157)	Low Growth
Economic Growth Forecast (2014 household projections adjusted) (Option 2)	360	High Growth
Economic Growth Forecast (2014/2008 household projections adjusted) (Option 3)	410	High Growth

Table 6: Housing Growth Options

7.4 In terms of employment land, the HENAS report considered the level of employment land likely to be required as a result of labour demand estimates derived from the growth based economic forecast. The study also considered the potential demand for new employment land if growth continued in a similar trend to the previous levels of employment land completions. This was done to account for the view that completions data provided a better representation of the likely employment needs for B2 and B8 use classes, whereas the labour demand estimates were a better indicator for B1 use class needs. Tables 7 and 8 below set out the potential floorspace requirements that flow from pursuing each of these options.

Employment Use Class	Floorspace (Sq M)[7]
B1	55,800
B2	-15,100
B8	73,900
All B Class	114,600

Table 7: Employment Land Growth Option 1 – Using the Economic Growth Forecast for all B Class uses

Employment Use Class	Floorspace (Sq. M)[8]
B1	55,800
B2	74,600
B8	121,000
All B Class	251,400

Table 8: Employment Land Growth Option 2 – Using a blended approach (Economic Growth Forecast for B1 uses and past completions rates for B2 and B8 uses)

1.1

[7] Figures rounded to nearest 100 square metres
[8] Ibid.

7.5 The alternative options above have been assessed through the IA process, so the potential sustainability impacts of each could be considered. The matrices at Appendix A tests the three housing growth options and the two employment land growth options set out in Tables 6, 7 and 8 against the 13 IA objectives.

7.6 Housing growth option 1, based upon the standard housing method figure, does not perform well when tested against the IA Objectives. This growth option would plan for the minimum number of homes required over the Plan period. This would potentially be contrary to the NPPF and NPPG that advises that a higher figure could be justified where there is a growth strategy in place, particularly where additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals). In the case of Blackburn with Darwen, the current adopted Local Plan sets out a growth strategy to deliver significant amounts of new housing and employment development and the Borough is part of the Pennine Lancashire Housing Zone with sites in South East Blackburn being developed for new housing.

7.7 For this reason, Housing growth option 1 would not be a positive growth strategy within the Borough. This is strongly linked to the demographics of the Borough, which under the option, would continue a trend of an increasing older population and decreasing working age population. There are inherent issues associated with such a trend including fewer job and housing opportunities, less potential to lower deprivation, and an increasing reliance upon services and facilities without sufficient scope to support the existing range or deliver new.

7.8 A secondary effect of this option would be positive economic growth and regeneration in adjacent authorities' areas as people, developers and businesses seek more vibrant places to locate.

7.9 Even a lower level of growth, as put forward through this option, would have environmental impacts such as loss of green infrastructure. In considering IA

Objectives relating to pollution, waste management, climate change, natural resources and flood risk, the effects would be unknown given that development can have the potential to negatively and positively impact upon these factors. The assessment in these cases therefore is useful in guiding towards the preparation of Local Plan policies that would seek positive environmental effects in relation to these matters.

7.10 These environmental unknowns were also assessed under Housing growth options 2 and 3. Relatively speaking, however, there is a greater potential for adverse environmental effects when a higher amount of growth is proposed. Certainly, in the case of options 2 and 3, loss of green infrastructure would be a permanent major negative effect.

7.11 Housing growth options 2 and 3 both put forward a level of growth that would be adjusted for a more positive economic strategy by planning for greater number of jobs that would retain or attract more working age people, which would more sustainably balance the age structure of the Borough. More working age people and more development would be able to support the economy, and the facilities and services in the Borough. Over time, cumulative positive effects would occur as a younger, more prosperous population would be more able to support the town centres, encouraging their vibrancy and vitality, increasing the likelihood of new business and job opportunities. More vibrant town centres would contribute to the regeneration of inner city areas.

7.12 Depending upon the infrastructure that could be delivered alongside development, this could work to deal with existing deficiencies in provision that could be of wider benefit.

7.13 The assessed differences between options 2 and 3 is that option 3 puts forward a higher level of growth that would in particular offer increased housing opportunities over time but would have a more significant loss of green field land.

7.14 Employment land growth options 1 and 2 would both be based upon the same number of initial jobs. In that respect they are both considered to represent positive economic strategies in the shorter to medium term that would cumulatively work to support the local economy, the vibrancy of the town centres, the lowering of deprivation and housing opportunities.

7.15 Employment land growth option 2 has been adjusted based upon past take up trends. To be fully realised, it would require almost twice as much land as option 1. Whilst this is principally related to the land requirement of the proposed B class use, it is considered that over the longer term, it would represent the potential to support more growth and jobs than option 1. For this reason, positive economic impacts have been assessed to continue into the longer term for option 2, whilst for option 1 its potential lack of flexibility and opportunity in employment land allocation could have negative economic implications in the longer term.

7.16 A major implication of pursuing Employment land growth option 2 is that Green Belt land would potentially be required to accommodate the growth. This would have negative effects upon the landscape character of the area and major negative effects with regards to loss of green infrastructure.

8. Assessing Spatial Options

8.1 Three spatial options have been assessed through IA:

- Continuing the spatial approach of the Core Strategy and Local Plan Part 2 that comprises the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns (Spatial Option 1).
- In addition to Option 1, use of the existing safeguarded land to accommodate growth up to 2036 (Spatial Option 2).
- In addition to Options 1 and 2, release of Green Belt land to accommodate Employment land growth option 2 (Spatial Option 3).

8.2 As the three spatial options would not be alternatives to one another, the alternative of not pursuing each option has also been assessed. The assessments are within Appendix B.

8.3 Spatial Option 1 presents a balanced approach to growth that would aid inner urban regeneration whilst acknowledging that some edge of urban sites would also be required to accommodate growth. In doing so, the option would seek to provide sufficient housing growth to accommodate needs and offer a diversified housing offer that would support priorities for seeking to retain and attract resident workforce. This would have cumulative and secondary effects in reducing deprivation, supporting the economy and services and facilities of the Borough. This would align with and support options to increase the viability and vitality of town centres.

8.4 This option promotes a balance of growth within the urban area and to the urban edges. The scope for highly accessible development within the urban area is clear and delivery in such locations would be entirely positive in relation to this objective. The implications of potential development to the edges of the urban area are less clear. The overall expectation would be that development to the edge of the urban area would be relatively less accessible via sustainable transport options. However, such development would still be in close proximity to the urban area with good opportunities to enhance sustainable travel if there are gaps or issues.

8.5 The effects of this spatial option upon environmental objectives are generally unknown. It is considered that more understanding about the specific sites that would be utilised would be needed before a full assessment could be undertaken. The edge of urban area development promoted through this spatial option would see the loss of some green infrastructure, and so a negative effect has been assessed against IA Objective 9.

8.6 The specific impact of the spatial option as a whole would depend upon the final balance struck between directing development to the inner urban areas and to edge of the towns

8.7 The alternative of not implementing this spatial option has been assessed as either having negative or unknown effects. This is because the development that the Borough requires may, at least in part, still come forward. Having no spatial strategy would offer less opportunity to balance growth in a way that would contribute to the desired objective of regenerating the town centres. Without the spatial strategy, there would be less ability to direct housing growth to different areas of the Borough, thus providing a diverse housing mix. Without an understanding of the sites that could come forward, the environmental effects would be unknown.

8.8 Spatial Option 2 would see the allocation of safeguarded land for housing. This has been assessed as assisting the delivery of a level of growth that would support a positive economic strategy. The approach would follow the current adopted Local Plan that sets out a growth strategy to 2026 to deliver significant amounts of new housing and employment development.

8.9 The release of safeguarded land would allow for further housing choice, which would support an increase in working age people within the Borough and therefore a positive economic strategy. This would support a reduction in deprivation and a more mixed community. More working age people would mean the local population would be more able to support new jobs and economic opportunities in the town centres. The existing safeguarded land in the Borough, whilst on the edge of the built-up area, is not located far from the town centres and new residents in these locations would likely use Blackburn and Darwen town centres for their shopping and leisure needs. This would contribute to the regeneration and on-going success of the town centres.

8.10 The areas of existing safeguarded land are not isolated from the built-up area so whilst there would be greater demand upon the transport network, the sites have the potential to successfully connect to the existing network.

8.11 Greater demands would be put upon services and facilities within the Borough. However new development has the potential to deliver new community infrastructure, if appropriate planning policies are put in place to secure this. The spatial option, in pursuing a strategy that would help rebalance the younger and older populations in the Borough, would be particularly helpful in lessening the disproportionate demand upon healthcare facilities created by an aging population.

8.12 This spatial option does not perform well when assessed against environmental objectives. The areas of safeguarded land either contain or are within the near vicinity of listed buildings. Research into the significance of these and any other relevant heritage assets would be required to ensure significance would not be unjustifiably harmed. However, the potential for harm to these heritage assets is high. The areas are not affected by landscape designations but development would significantly alter the existing undeveloped, open character of these areas. Parts of the existing safeguarded land are within the Borough's mineral safeguarding area. Development would sterilise mineral resources unless extracted first or evidenced to not be viable to extract. The permanent loss of green infrastructure that would occur through the development of this safeguarded land would also result in a negative assessment.

8.13 There would be some unknown aspects regarding this spatial option, in particular with regards to waste management and flood risk. These would be reliant upon the site, its design and the infrastructure delivered alongside it.

8.14 As this spatial option would be pursuing a proactively positive economic strategy, it is considered that there would be negative effects with regards to economic and social IA Objectives if the option was not pursued. To not pursue this spatial option would result in no loss or gain with regards to the environment and so a neutral effect has been assessed against the relevant IA Objectives.

8.15 Similar to Spatial Option 2, Spatial Option 3 would allow for the delivery of a proactive positive economic strategy. This would help to secure a higher working age resident population and have secondary and cumulative positive effects upon the local economy, the vitality of the town centres, housing opportunities and the lowering of deprivation. The spatial option is therefore assessed as having positive effect in these regards.

8.16 Given the nature and location of Green Belt land, the spatial option tends to have negative effects when assessed against environmental IA Objectives. The Green Belt is an area of an open character and thus any development here would have an irreversible affect upon this character and in terms of loss of green infrastructure. Further understanding of the sites within the Green Belt that would be proposed to be released would be required to ascertain the potential effect with regards to heritage assets, loss of natural resources, biodiversity, geodiversity and flood risk; nevertheless Green Belt loss represents the potential for adverse effect with regards to these matters.

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9. Overview

9.1 This report is the result of an assessment of the Blackburn with Darwen Local Plan Issues and Options Consultation against the 13 Integrated Appraisal (IA) Objectives developed through a scoping process.

9.2 The Issues and Options IA assessment of the emerging Local Plan considers the sustainability, health and equality implications of:

- 11 strategic objectives that would deliver the overarching vision of the emerging Local Plan.
- Three housing growth options.
- Two employment land growth options.
- Three spatial options and the alternative of not pursuing each.

9.3 The assessment of the 11 strategic objectives has been a useful exercise in identifying potential conflict between meeting these strategic objectives and ensuring the Local Plan would be in line with the aims of sustainable development. The conflict tends to arise between economic and environmental objectives. The assessment has highlighted that the emerging Local Plan must contain sufficient policy coverage so that when applied as a whole, negative impacts can be avoided or mitigated, and positive effects can be enhanced.

9.4 Pursuing Housing growth option 1 has been assessed as not representing a positive strategy in that it would only provide for the minimum assessed local housing need. This would see a continuing unsustainable trend of an increasing population of older people and a reduction in working age people within the Borough.

9.5 Housing growth options 2 and 3 are based upon an uplift to meet economic growth scenarios. Both options result in an uplift in housing need to accommodate the potential workforce required to be resident in the Borough. Growth option 3 results in a higher level of housing need to because of an adjustment to household formation rates that increases the number of homes required to accommodate the resident population. Both options would increase housing opportunities that would help to rebalance the Borough's age profile and support economic growth. This higher level of growth is assessed as having potentially greater environmental implications than growth option 1, including loss of green infrastructure. On the assumption that Growth option 2 secures sufficient additional homes to accommodate the economic growth scenario it would on balance be the option that best meets the Borough's growth requirements whilst minimising loss of green infrastructure.

9.6 Employment land growth options 1 and 2 are both based upon and would provide for the same number of initial jobs identified through an economic growth forecast. In that respect they are both considered to represent positive economic strategies in the shorter to medium term that would cumulatively work to support the local economy, the vibrancy of the town centres, the lowering of deprivation and housing opportunities.

9.7 Employment land growth option 2 has additionally been adjusted to reflect past take up trends. To be fully realised, Employment land growth option 2 would require almost twice as much land as option 1. As there is provision in total for additional floorspace within Employment land growth option 2, this would support a greater number of additional jobs than option 1, provide greater range of choice and flexibility to the employment market and therefore represent a stronger economic option over the longer term. However, pursuing Employment land growth option 2 is identified as potentially requiring development of Green Belt land for the floorspace requirements to be met. This would require the identification of exceptional circumstances.

9.8 Three spatial options have been assessed. Spatial Option 1 would continue the spatial approach of the Core Strategy and Local Plan Part 2. This option is comprised of the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns. Whilst the specific impact of the spatial option as a whole would depend upon the final balance struck in directing development between the urban edge and inner urban areas, the strategy is generally seen as a balanced approach to supporting the inner urban areas whilst delivering additional edge of town development to meet growth needs. To not pursue this strategy could result in unmanaged development within the Borough that would not have the same economic and social benefits and would be at risk of greater environmental harm.

9.9 Spatial Option 2 and Spatial Option 3 represent more proactive strategies focused upon the release of specific areas of safeguarded land and Green Belt land to meet housing and employment needs. At this time it is unclear to what extent the areas of land identified would be required to meet development needs. The option to utilise such sites would clearly result in positive effects against objectives for housing delivery and economic growth but will have potential environmental effects that would require mitigation. Spatial Option 3 would require the release of Green Belt and, as noted above, would require further work to ascertain if exceptional circumstances exist to justify its loss. If the exceptional circumstances can be proven to exist, a Green Belt review should be undertaken to ascertain the most appropriate areas of loss.

9.10 Separate EqIA and HIA will also be published in due course based upon Blackburn with Darwen Borough Council's established templates for assessing authority proposals. However, each of the options considered have specifically been tested against IA Objectives that include IA Objective 4 to Promote equality of opportunity and reduce levels of deprivation and disparity and IA Objective 5 Promote and support healthy living environments and lifestyles for all residents, and access to health services while targeting action to reduce health inequalities.

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Appendix A: Growth Option Assessments

Housing growth option1: Standard Housing Methodology					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
1. Urban and rural economy	n	-	--	Pursuing a level of growth based upon the standard housing method figure would not support a positive economic strategy, due to the projected growth in retired residents and reduction in those of working age. This would worsen over time. The approach would not follow the current adopted Local Plan that sets out a growth strategy to 2026 to deliver significant amounts of new housing and employment development. The negative impacts would be unlikely to spread beyond the Borough boundaries but this approach could over time support economic growth elsewhere as other areas become relatively more attractive to working age people than Blackburn with Darwen. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	None identified.
2. Vibrant town centres	n	-	-	Fewer working age people would mean the local population would be less able to support new jobs and economic opportunities in the town centres. Additionally, if the local area is less prosperous, it could mean the community is less likely to shop in the town centres and use other town centre facilities. The effects would not be felt in the shorter term but could manifest over time. Developers, investors, etc. could seek opportunities in other town centres. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	None identified.
3.Travel, sustainable transport options and communications infrastructure	u	u	u	Smaller growth could mean that the level of development required could be more concentrated in central, easier to access areas. However, the availability of sites and their ability to be delivered does not guarantee that this would necessarily be the case. It is also unknown at this stage what infrastructure would be delivered along with this level of growth. Generally speaking, the lower the level of growth, the more difficult it would be to deliver infrastructure that could offer a strategic solution to growth impacts.	Provision of Plan policies that require delivery of appropriate transport and communications infrastructure.
4.Equality of	n	-	--	Pursuing a level of growth based upon the standard housing method figure	None identified.

Housing growth option1: Standard Housing Methodology					
IA Objective	Short impact	Medium impact	Long impact	Supporting comments	Mitigation
opportunity and reduce levels of deprivation and disparity				would not support a positive economic strategy, due to the projected growth in retired residents and reduction in those of working age. This could worsen deprivation in the Borough. The changing demographics of the Borough would not contribute to a mixed community, as younger and potentially wealthier people would be encouraged to live and work elsewhere. The negative effects wouldn't manifest in the shorter term but would worsen over time. The negative effects could in turn mean positive effects for other Boroughs/Districts, as people choose to live elsewhere due to greater housing and employment opportunities. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	
5. Healthy living environments, health services and reduce in health inequalities.	n	-	--	An area with a growing older population would become more dependent upon healthcare facilities. However, with lower levels of growth and less working age people, there would be less ability to deliver and support such facilities. This is not a sustainable approach that would worsen over time as the population would gradually become older. The negative effects would be felt at a local level and would particularly affect those most in need of healthcare provision.The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	Provision of Plan policies that require delivery of appropriate healthcare alongside development; however this would have a limited effect based upon the level of growth.
6. Open space, sport facilities and community services	n	-	-	Lower levels of growth and less working age people would mean less ability to deliver and support such services and facilities. This is not a sustainable approach that would worsen over time. The negative effects would be felt at a local level and would particularly affect older people and those from deprived areas that are likely to most in need of services and facilities and would be unable to access them if located further away. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	Provision of Plan policies that require delivery of appropriate services and facilities alongside development; however this would have a limited effect based upon the level of growth.
7. Decent homes, in a range of tenures, sizes	n	-	--	The standard housing method should be used to determine the minimum number of homes to be delivered in an area. NPPG notes that there are circumstances where a higher figure could be justified. These circumstances	Provision of Plan policies that require delivery of a range of housing

Housing growth option1: Standard Housing Methodology					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
and types, including affordable homes				are relevant to the Borough; given the current adopted Local Plan clearly sets out a growth strategy to deliver significant amounts of new housing and employment development. Additionally, the Borough is part of the Pennine Lancashire Housing Zone with sites in South East Blackburn being developed for new housing. A growth strategy based upon the minimum number of homes would not be as able to provide a full choice of housing opportunities for the local population, including the delivery of affordable housing. The negative effects would be felt in the medium to longer term and would affect younger people who would require local housing opportunities and those who may have particular housing needs.The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	options; however this would have a limited effect based upon the level of growth.
8.Townscape character, high quality natural landscape, and cultural and historic environment	n	n	n	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. Generally speaking, however, a lower level of growth is least likely to have an impact upon townscape, landscape and the historic environment. Development offers the potential to be harmful to the appearance of an area but can also improve it. On balance, and given the requirements of national planning policy, a neutral effect is envisaged.	Provision of Plan policies ensuring high standards of design and sensitive approach to managing the historic environment.
9.Green infrastructure and ecological networks and geodiversity	-	-	-	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. A lower level of growth would require the least loss of green infrastructure, should any be required. National planning policy requires for a net gain in biodiversity. On balance, given the likelihood that some permanent loss of green infrastructure would occur, even with this lowest growth option, a permanent, local level, negative impact is envisaged.	None identified.
10. Avoid and reduce all forms of pollution	u	u	u	Growth of any scale could create pollution or conversely present the opportunity to reduce it, for example through bringing contaminated land back into use or incorporating green construction techniques. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies that avoid and/or reduce pollution.
11. Avoid and reduce waste and	u	u	u	Growth of any scale is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials.	Provision of proactive Plan policies regarding

Housing growth option1: Standard Housing Methodology					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
improve waste management by encouraging re-use, recycling and composting.				The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	waste generation and management.
12. Climate change and of natural resources including soil and mineral resources.	u	u	u	Growth of any scale could have an impact upon this IA Objective, such as through being developed upon the best agricultural land or in a location that would require dependency upon private vehicles. It could also offer an opportunity for sustainable construction and energy efficiencies in buildings. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding climate change and use of natural resources.
13. Reduce flood risk and improve the quality of ground and surface waters.	u	u	u	Development, in particular on greenfield land, has the potential for increased water run-off and flood risk. Development can also be the opportunity to incorporate water management features that could benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding flood risk and water management.

Housing growth option 2: Economic Growth Forecast (2014 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
1. Urban and rural economy	n	+	+	This level of growth would use the recommended 2014 SNHPs with adjustment for economic growth. The approach would follow the current adopted Local Plan that sets out a growth strategy to 2026 to deliver significant amounts of new housing and employment development. This growth option would allow for an increase in working age people within the Borough, supporting a positive economic strategy. Success tends to support further success, so this would be a positive long term strategy. Impacts are unlikely to be evident in the short term. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.
2. Vibrant town centres	n	+	+	More working age people would mean the local population would be more able to support new jobs and economic opportunities in the town centres.	None identified.

Housing growth option 2: Economic Growth Forecast (2014 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
				This would contribute to the regeneration and on-going success of the town centres Additionally, if the local area is more prosperous, it could mean the community is more likely to shop in the town centres and use other town centre facilities. The effects would not be felt in the shorter term but could manifest over time. The positive impacts would be likely felt locally and would be permanent in their effect.	
3.Travel, sustainable transport options and communications infrastructure	u	u	u	Larger scale growth could mean that the level of development required could be more widespread, and there would be more people needing to move around, creating greater demands upon the transport network. However, much of this would depend upon the availability of sites. It is also unknown at this stage what infrastructure would be delivered along with this level of growth. Generally speaking, the higher the level of growth, the easier it could be to deliver infrastructure that could offer a strategic solution to growth impacts.	Provision of Plan policies that require delivery of appropriate transport and communications infrastructure.
4.Equality of opportunity and reduce levels of deprivation and disparity	n	+	+	This growth option would support a positive economic strategy. With greater number of jobs, this would help prevent deprivation in the Borough. The growth option would contribute to a mixed community, as younger and potentially wealthier people would be encouraged to live and work live in the Borough rather than move away. The positive effects wouldn't manifest in the shorter term but would worsen over time. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.
5. Healthy living environments, health services and reduce in health inequalities.	n	n	n	A larger scale of growth could put greater demands upon healthcare facilities. However, the growth option would see a more balanced local demographic of older and younger people. So whilst there could be more demand, the level of growth and the younger people there would be greater opportunity to deliver and support such facilities. On balance, a neutral effect is envisaged.	Provision of Plan policies that require delivery of appropriate healthcare alongside development.
6. Open space,	n	n	n	Higher levels of growth and more working age people would mean greater	Provision of Plan

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Housing growth option 2: Economic Growth Forecast (2014 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
sport facilities and community services				ability to deliver and support such services and facilities. Equally, a greater population would put increased demands upon such facilities so it would be essential that the required need for such facilities is delivered alongside new development. On balance, a neutral effect is envisaged.	policies that require delivery of appropriate services and facilities alongside development.
7. Decent homes, in a range of tenures, sizes and types, including affordable homes	n	+	+	This growth option uses the recommended 2014 SNHP, adjusted for economic growth. NPPG notes that there are circumstances where a higher housing figure than the standard housing method figure could be justified. These circumstances are relevant to the Borough; given the current adopted Local Plan clearly sets out a growth strategy to deliver significant amounts of new housing and employment development. Additionally, the Borough is part of the Pennine Lancashire Housing Zone with sites in South East Blackburn being developed for new housing. This growth option would be able to provide a larger choice of housing opportunities for the local population, including the delivery of affordable housing. As development takes some time to be delivered, the positive effects would be felt in the medium to longer term and would affect younger people who would require local housing opportunities and those who may have particular housing needs. The positive impacts would be likely felt locally and would be permanent in their effect.	Provision of Plan policies that require delivery of a range of housing options.
8.Townscape character, high quality natural landscape, and cultural and historic environment	n	n	-	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. Generally speaking, however, a higher level of growth is more likely to have an impact upon townscape, landscape and the historic environment. Development offers the potential to be harmful to the appearance of an area but can also improve it. On balance, and given the requirements of national planning policy, a neutral effect is envisaged in the short and medium term but this could become negative in the longer term should all growth be delivered, as there could be some significant changes to the character of the area.	Provision of Plan policies ensuring high standards of design and sensitive approach to managing the historic environment.
9.Green	-	-	--	This assessment would be heavily dependent upon the sites that would be	None identified.

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Housing growth option 2: Economic Growth Forecast (2014 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
infrastructure and ecological networks and geodiversity				delivered and so it is unknown at this stage what the impact would be. A higher level of growth would require loss of green infrastructure. National planning policy requires for a net gain in biodiversity. Despite this, given the permanent loss of green infrastructure that would occur, a permanent, local level, negative impact is envisaged. As new development is delivered, this effect would increase to a major negative effect.	
10. Avoid and reduce all forms of pollution	u	u	u	Growth of any scale could create pollution or conversely present the opportunity to reduce it, for example through bringing contaminated land back into use or incorporating green construction techniques. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies that avoid and/or reduce pollution.
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	u	u	u	Growth of any scale is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding waste generation and management.
12. Climate change and of natural resources including soil and mineral resources.	u	u	u	Growth of any scale could have an impact upon this IA Objective, such as through being developed upon the best agricultural land or in a location that would require dependency upon private vehicles. It could also offer an opportunity for sustainable construction and energy efficiencies in buildings. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding climate change and use of natural resources.
13. Reduce flood risk and improve the quality of ground and surface waters.	u	u	u	Development, in particular on greenfield land, has the potential for increased water run-off and flood risk. Development can also be the opportunity to incorporate water management features that could benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding flood risk and water management.

Housing growth option 3: Economic Growth Forecast (2014/2008 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
1. Urban and rural economy	n	+	+	This level of growth would use a household formation rate between the 2014 and 2008 household projections. The approach would follow the current adopted Local Plan that sets out a growth strategy to 2026 to deliver significant amounts of new housing and employment development. This growth option would allow for an increase in working age people within the Borough, supporting a positive economic strategy. Success tends to support further success, so this would be a positive long term strategy. Impacts are unlikely to be evident in the short term. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.
2. Vibrant town centres	n	+	+	More working age people would mean the local population would be more able to support new jobs and economic opportunities in the town centres. This would contribute to the regeneration and on-going success of the town centres Additionally, if the local area is more prosperous, it could mean the community is more likely to shop in the town centres and use other town centre facilities. The effects would not be felt in the shorter term but could manifest over time. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.
3.Travel, sustainable transport options and communications infrastructure	u	u	u	Larger scale growth could mean that the level of development required could be more widespread, and there would be more people needing to move around, creating greater demands upon the transport network. However, much of this would depend upon the availability of sites. It is also unknown at this stage what infrastructure would be delivered along with this level of growth. Generally speaking, the higher the level of growth, the easier it could be to deliver infrastructure that could offer a strategic solution to growth impacts.	Provision of Plan policies that require delivery of appropriate transport and communications infrastructure.
4.Equality of opportunity and reduce levels of deprivation and disparity	n	+	+	This growth option would support a positive economic strategy. With greater number of jobs, this would help prevent deprivation in the Borough. The growth option would contribute to a mixed community, as younger and potentially wealthier people would be encouraged to live and work live in the Borough rather than move away. The effects wouldn't manifest in the shorter term but would become positive over time.	None identified.

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Housing growth option 2: Economic Growth Forecast (2014 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
				The positive impacts would be likely felt locally and would be permanent in their effect.	
5. Healthy living environments, health services and reduce in health inequalities.	n	n	n	A larger scale of growth could put greater demands upon healthcare facilities. However, the growth option would see a more balanced local demographic of older and younger people. So whilst there could be more demand, the level of growth and the younger people there would be greater opportunity to deliver and support such facilities. On balance, a neutral effect is envisaged.	Provision of Plan policies that require delivery of appropriate healthcare alongside development.
6. Open space, sport facilities and community services	n	n	n	Higher levels of growth and more working age people would mean greater ability to deliver and support such services and facilities. Equally, a greater population would put increased demands upon such facilities so it would be essential that the required need for such facilities is delivered alongside new development. On balance, a neutral effect is envisaged.	Provision of Plan policies that require delivery of appropriate services and facilities alongside development.
7. Decent homes, in a range of tenures, sizes and types, including affordable homes	n	+	++	This growth option uses a household formation rate between the 2014 and 2008 household projections. NPPG notes that there are circumstances where a higher housing figure than the standard housing method figure could be justified. These circumstances are relevant to the Borough; given the current adopted Local Plan clearly sets out a growth strategy to deliver significant amounts of new housing and employment development. Additionally, the Borough is part of the Pennine Lancashire Housing Zone with sites in South East Blackburn being developed for new housing. This growth option would allow for the allocation of housing numbers that would be based upon a larger housing formation rate. This would offer the opportunity to provide a particularly large choice of housing opportunities for the local population, including the delivery of affordable housing. As development takes some time to be delivered, the positive effects would be felt in the medium to longer term and would affect younger people who would require local housing opportunities and those who may have particular housing needs. The positive impacts would be likely felt locally and would be permanent in their	Provision of Plan policies that require delivery of a range of housing options.

Housing growth option 2: Economic Growth Forecast (2014 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
				effect.	
8.Townscape character, high quality natural landscape, and cultural and historic environment	n	n	-	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. Generally speaking, however, a higher level of growth is more likely to have an impact upon townscape, landscape and the historic environment. Development offers the potential to be harmful to the appearance of an area but can also improve it. On balance, and given the requirements of national planning policy, a neutral effect is envisaged in the short and medium term but this could become negative in the longer term should all growth be delivered, as there could be some significant changes to the character of the area.	Provision of Plan policies ensuring high standards of design and sensitive approach to managing the historic environment.
9.Green infrastructure and ecological networks and geodiversity	-	--	--	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. A higher level of growth would require loss of green infrastructure. This growth option puts forward a particularly high level of growth and so loss of green infrastructure would be of a high scale. National planning policy requires for a net gain in biodiversity. Despite this, given the permanent loss of green infrastructure that would occur, a permanent, local level, negative impact is envisaged. As new development is delivered, this effect would increase to a major negative effect.	None identified.
10. Avoid and reduce all forms of pollution	u	u	u	Growth of any scale could create pollution or conversely present the opportunity to reduce it, for example through bringing contaminated land back into use or incorporating green construction techniques. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies that avoid and/or reduce pollution.
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	u	u	u	Growth of any scale is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding waste generation and management.
12. Climate	u	u	u	Growth of any scale could have an impact upon this IA Objective, such as	Provision of

Housing growth option 2: Economic Growth Forecast (2014 household projections adjusted) High Job Growth					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
change and of natural resources including soil and mineral resources.				through being developed upon the best agricultural land or in a location that would require dependency upon private vehicles. It could also offer an opportunity for sustainable construction and energy efficiencies in buildings. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	proactive Plan policies regarding climate change and use of natural resources.
13. Reduce flood risk and improve the quality of ground and surface waters.	u	u	u	Development, in particular on greenfield land, has the potential for increased water run-off and flood risk. Development can also be the opportunity to incorporate water management features that could benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding flood risk and water management.

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Employment land growth option 1: Using the Economic Growth Forecast for all B Class uses					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
1. Urban and rural economy	n	+	-	This option would plan for positive job growth. However, pursuing this level of growth does not reflect previous delivery and may not support a positive economic strategy over the longer term. This would worsen over time when available land reduces. The approach would not follow the current adopted Local Plan that sets out a growth strategy to 2026 to deliver significant amounts of new housing and employment development. The negative impacts would be unlikely to spread beyond the Borough. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	None identified.
2. Vibrant town centres	n	+	-	This option would plan for positive job growth. However, using this growth forecast could result in fewer jobs over the longer time and therefore fewer working age people. This could result in reducing economic opportunities in the town centres. Additionally, if the local area is less prosperous, it could mean the community is less likely to shop in the town centres and use other town centre facilities. The effects would not be felt in the shorter term but could manifest over time. Developers, investors, etc. could seek opportunities in other town	None identified.

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Employment land growth option 1: Using the Economic Growth Forecast for all B Class uses					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
				centres. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	
3.Travel, sustainable transport options and communications infrastructure	u	u	u	The effect is unknown due to the availability of sites and their ability to be delivered. It is also unknown at this stage what infrastructure would be delivered along with this level of growth. Generally speaking, the lower the level of growth, the more difficult it would be to deliver infrastructure that could offer a strategic solution to growth impacts.	Provision of Plan policies that require delivery of appropriate transport and communications infrastructure.
4.Equality of opportunity and reduce levels of deprivation and disparity	n	+	-	This option would plan for positive job growth. However, using this growth forecast could over the longer term worsen deprivation in the Borough as people of working age could leave, seeking employment elsewhere. The changing demographics of the Borough would not contribute to a mixed community, as younger and potentially wealthier people would be encouraged to live and work elsewhere. The negative effects wouldn't manifest in the shorter term but would worsen over time. The negative effects could in turn mean positive effects for other Boroughs/Districts, as people choose to live elsewhere due to greater opportunities. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	None identified.
5. Healthy living environments, health services and reduce in health inequalities.	n	n	-	A growth strategy that does not follow past trends could result in fewer job opportunities for younger people who would locate elsewhere, reinforcing the aging population within the Borough. An area with a growing older population would become more dependent upon healthcare facilities. This is not a sustainable approach that would worsen over time as the population would gradually become older. The negative effects would be felt at a local level and would particularly affect those most in need of healthcare provision. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	Provision of Plan policies that require delivery of appropriate healthcare alongside development.
6. Open space, sport facilities	n	n	-	Should this level of growth result in fewer working age people, it could mean less ability to deliver and support such services and facilities. This is not a	Provision of Plan policies that

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Employment land growth option 1: Using the Economic Growth Forecast for all B Class uses					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
and community services				sustainable approach that would worsen over time. The negative effects would be felt at a local level and would particularly affect older people and those from deprived areas that are likely to most in need of services and facilities and would be unable to access them if located further away. However, this option would lead to a lower likelihood that areas of Green Belt would be needed for employment growth. Whilst the Green Belt is not always accessible or high quality open space, it does offer potential for future recreation and enhances the openness of the Borough. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	require delivery of appropriate services and facilities alongside development.
7. Decent homes, in a range of tenures, sizes and types, including affordable homes	n	n	-	This level of economic growth would support a positive housing growth strategy but by not following past trends, over the longer term there could be less opportunity for younger and more prosperous residents within the Borough and this could result in a less competitive and buoyant housing market. The negative effects would be felt in the longer term and would affect younger people who would require local housing opportunities and those who may have particular housing needs. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.	Provision of Plan policies that require delivery of a range of housing options.
8.Townscape character, high quality natural landscape, and cultural and historic environment	n	n	n	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. This level of level of economic growth would require less land take up and would lead to a lower likelihood of the loss of Green Belt. Development offers the potential to be harmful to the appearance of an area but can also improve it. On balance, and given the requirements of national planning policy, a neutral effect is envisaged.	Provision of Plan policies ensuring high standards of design and sensitive approach to managing the historic environment.
9.Green infrastructure and ecological networks and geodiversity	-	-	-	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. National planning policy requires for a net gain in biodiversity. On balance, given the likelihood that some permanent loss of green infrastructure could occur, even with this lower growth option, a negative impact is envisaged.	None identified.
10. Avoid and	u	u	u	Growth of any scale could create pollution or conversely present the opportunity	Provision of

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Employment land growth option 1: Using the Economic Growth Forecast for all B Class uses					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
reduce all forms of pollution				to reduce it, for example through bringing contaminated land back into use or incorporating green construction techniques. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	proactive Plan policies that avoid and/or reduce pollution.
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	u	u	u	Growth of any scale is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding waste generation and management.
12. Climate change and of natural resources including soil and mineral resources.	u	u	u	Growth of any scale could have an impact upon this IA Objective, such as through being developed upon the best agricultural land or in a location that would require dependency upon private vehicles. It could also offer an opportunity for sustainable construction and energy efficiencies in buildings. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding climate change and use of natural resources.
13. Reduce flood risk and improve the quality of ground and surface waters.	u	u	u	Development, in particular on greenfield land, has the potential for increased water run-off and flood risk. Development can also be the opportunity to incorporate water management features that could benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding flood risk and water management.

Employment land growth option 2: Using a blended approach (Economic Growth Forecast for B1 uses and past completions rates for B2 and B8 uses)					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
1. Urban and rural economy	n	+	+	This option has blended economic growth forecasts with previous levels of completions to form a higher level of economic growth. This growth option would allow for an increase in jobs and housing and therefore an increase in working age people within the Borough. Success	None identified.

Employment land growth option 2: Using a blended approach (Economic Growth Forecast for B1 uses and past completions rates for B2 and B8 uses)					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
				tends to support further success, so this would be a positive long term strategy. Impacts are unlikely to be evident in the short term. The positive impacts would be likely felt locally and would be permanent in their effect.	
2. Vibrant town centres	n	+	+	This is a proactive economic strategy that over time could result in more working age people, which would mean the local population would be more able to support opportunities in the town centres. This would contribute to the regeneration and on-going success of the town centres Additionally, if the local area is more prosperous, it could mean the community is more likely to shop in the town centres and use other town centre facilities. The effects would not be felt in the shorter term but could manifest over time. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.
3.Travel, sustainable transport options and communications infrastructure	u	u	u	Larger scale growth could mean that the level of development required could be more widespread, and there would be more people needing to move around, creating greater demands upon the transport network. However, much of this would depend upon the availability of sites. It is also unknown at this stage what infrastructure would be delivered along with this level of growth. Generally speaking, the higher the level of growth, the easier it could be to deliver infrastructure that could offer a strategic solution to growth impacts.	Provision of Plan policies that require delivery of appropriate transport and communications infrastructure.
4.Equality of opportunity and reduce levels of deprivation and disparity	n	+	+	A positive economic approach would contribute to lowering deprivation in the Borough. The growth option would contribute to a mixed community, as younger and potentially wealthier people would be encouraged to live and work live in the Borough rather than move away. The positive effects wouldn't manifest in the shorter term but would worsen over time. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.
5. Healthy living environments,	n	n	n	This growth option could attract more people to live in the Borough, who would put greater demands upon healthcare facilities. However, the growth	Provision of Plan policies that

Employment land growth option 2: Using a blended approach (Economic Growth Forecast for B1 uses and past completions rates for B2 and B8 uses)					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
health services and reduce in health inequalities.				option would contribute to a more balanced local demographic of older and younger people. So whilst there could be more demand, the level of growth and the younger people there would be greater opportunity to deliver and support such facilities. On balance, a neutral effect is envisaged.	require delivery of appropriate healthcare alongside development.
6. Open space, sport facilities and community services	n	n	n	Higher levels of growth and more working age people would mean greater ability to deliver and support such services and facilities. Equally, a greater population would put increased demands upon such facilities so it would be essential that the required need for such facilities is delivered alongside new development. The higher growth option will result in some areas of greenbelt development. The greenbelt is not always accessible open space, so the impact remains unknown at present. On balance, a neutral effect is envisaged.	Provision of Plan policies that require delivery of appropriate services and facilities alongside development.
7. Decent homes, in a range of tenures, sizes and types, including affordable homes	n	n	+	A more positive economic growth option will support a higher level of housing growth offering the opportunity to provide a particularly larger choice of housing opportunities for the local population, including the delivery of affordable housing. As growth takes time and development takes some time to be delivered, the positive effects would be felt in the longer term and would affect younger people who would require local housing opportunities and those who may have particular housing needs. The positive impacts would be likely felt locally and would be permanent in their effect.	Provision of Plan policies that require delivery of a range of housing options.
8.Townscape character, high quality natural landscape, and cultural and historic environment	n	-	-	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. However, it is possible that this level of economic growth may lead to a loss of Green Belt. On balance, and given the requirements of national planning policy, a neutral effect is envisaged in the short term but this could become negative in the medium and longer term should all growth be delivered, as there could be some significant changes to the character of the area.	Provision of Plan policies ensuring high standards of design and sensitive approach to managing the historic environment. A Green Belt review

Employment land growth option 2: Using a blended approach (Economic Growth Forecast for B1 uses and past completions rates for B2 and B8 uses)					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
					would be required to ensure the least valuable locations would be lost to development.
9.Green infrastructure and ecological networks and geodiversity	-	--	--	This assessment would be heavily dependent upon the sites that would be delivered and so it is unknown at this stage what the impact would be. However, it is possible that this level of economic growth may lead to a loss of Green Belt. National planning policy requires for a net gain in biodiversity. Despite this, given the permanent loss of green infrastructure that would occur, a permanent, local level, negative impact is envisaged. As new development is delivered, this effect would increase to a major negative effect.	None identified. A Green Belt review would be required to ensure the least valuable locations would be lost to development.
10. Avoid and reduce all forms of pollution	u	u	u	Growth of any scale could create pollution or conversely present the opportunity to reduce it, for example through bringing contaminated land back into use or incorporating green construction techniques. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies that avoid and/or reduce pollution.
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	u	u	u	Growth of any scale is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding waste generation and management.
12. Climate change and of natural resources including soil and mineral	u	u	u	Growth of any scale could have an impact upon this IA Objective, such as through being developed upon the best agricultural land or in a location that would require dependency upon private vehicles. It could also offer an opportunity for sustainable construction and energy efficiencies in buildings. The impact would be dependent upon the site, the development's design and	Provision of proactive Plan policies regarding climate change and use of natural

Employment land growth option 2: Using a blended approach (Economic Growth Forecast for B1 uses and past completions rates for B2 and B8 uses)					
IA Objective	**Short impact**	**Medium impact**	**Long impact**	**Supporting comments**	**Mitigation**
resources.				other factors. The effect is therefore unknown.	resources.
13. Reduce flood risk and improve the quality of ground and surface waters.	u	u	u	Development, in particular on greenfield land, has the potential for increased water run-off and flood risk. Development can also be the opportunity to incorporate water management features that could benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding flood risk and water management.

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Appendix B: Spatial Option Assessments

Spatial Option 1: the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns						**Alternative option - do not implement proposed spatial option**	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
1. Urban and rural economy	n	+	+	A balanced spatial strategy that secures regeneration and delivers upon the housing growth required would offer positive effects for this objective. As this approach reflects the current strategy, the effect of the strategy against the baseline is expected to be neutral in the short term and strengthen over time as a result of continued implementation. The option would support investment and economic growth in areas accessible to public transport and could be considered to provide a range of opportunities for diversification of the employment offer over the plan period. The option explicitly seeks to provide sufficient housing growth to accommodate needs and offer a diversified housing offer that would support priorities for seeking to retain and attract resident workforce. No specific reference is made through the option to support education, training or skills but the option would not lead to negative effects upon this consideration. For rural areas, this option suggests that there might be relatively limited opportunity for sustainable growth. However, the specific impact of the strategy as a whole would depend upon the final balance struck	Application of this strategy with specific regard given to the needs of small communities outside the urban areas and associated safeguards to bring about accompanying improvements to infrastructure where required would enable very positive effects for this objective.	-	It is surmised that overall, opting not to implement this option, which is a continuation of the current policy approach, would lead to negative effects against the objective. It is assumed such an approach would no longer support inner urban areas in particular, whilst pro-active support for housing development elsewhere would reduce. This would have a harmful impact upon both the urban and rural economy and reduce opportunities to secure sustainable growth.

Spatial Option 1: the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
				between directing most development to the inner urban areas and edge of the towns, and elsewhere to meet specific needs. The effect would be felt over the longer term at a local level.			
2. Vibrant town centres	n	+	+	This spatial option specifically seeks to bring about regeneration and facilitates housing growth to provide a more diversified housing offer. The implications of this would align with and support options to increase the viability and vitality of town centres and is expected to also accord with increased provision of retail and employment opportunities in town centres.As this approach reflects the current strategy, the effect of the strategy against the baseline is expected to be neutral in the short term and strengthen over time as a result of continued implementation.		--	Creation of vibrant town centres would be particularly reliant upon a supported spatial strategy that seeks to encourage and facilitate regeneration. To adopt a strategic that would not support inner urban regeneration and support a diversified housing offer would have a substantial negative impact upon this objective.
3.Travel, sustainable transport options and communicati ons infrastructure	n	+	+	This option promotes a balance of growth within the urban area and to the urban edges. The scope for highly accessible development within the urban area is clear and delivery in such locations would be entirely positive in relation to this objective. The implications of potential development to the edges of the urban area are less clear. The overall expectation would be that development to the edge of the urban area would be relatively less accessible via sustainable transport options. However, such development would still be in close	Additional application of clear site selection criteria to ensure that sites to the edge of the urban area are accessible to sustainable transport modes.	u	The specific impact of not applying this spatial strategy is unknown. Whilst the implications of failing to encourage development within the inner urban area are likely to be negative for this objective as development would not be promoted in accessible locations, overall the distribution of development, if this option were not pursued, is unknown at this time.

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Spatial Option 1: the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
				proximity to the urban area with good opportunities to enhance sustainable travel if there are gaps or issues.			
4.Equality of opportunity and reduce levels of deprivation and disparity	n	+	+	This option promotes regeneration within the inner urban areas and development to support a diversified housing mix. The outcomes of this should include provision of housing capable of supporting the needs of everyone, and support delivery of affordable housing. This would bring about opportunities to address income and health inequality and support investment in locations currently experiencing deprivation.In relation to protected characteristics the option will bring about opportunities for investment and development that would benefit all and bring about regeneration that would support specific groups concentrated in deprived communities.	The likely positive effects upon this objective would be strengthened through application of specific policy objectives to enable increased community cohesion and involvement.	u	The specific impact of not applying this spatial strategy is unknown. Whilst the implications of failing to encourage development within the inner urban area are likely to be negative for this objective as development would not be promoted in potentially more deprived areas and would be less likely to support regeneration in areas that experience deprivation and reduced opportunities at the current time.
5. Healthy living environments , health services and reduce in health inequalities.	n	+	+	The support for investment in regeneration in the urban area would bring about development in attractive locations where opportunities for walking and cycling would be high. Meanwhile, development to the edge of the urban area would have an unknown or potentially negative effect if access to services and facilities and design quality is not maintained to bring about the creation of healthy environments.An option that supports new housing delivery and potential increases in prosperity would	Provision of policy to support the quality and range of housing stock delivered to meet the needs of all - particularly specialist housing provision and accommodation for a growing elderly population would enhance the effects upon this objective.	u	The specific impact of not applying this spatial strategy is unknown. However, the implications of failing to encourage development within the inner urban area are likely to be negative for this objective as development would not be promoted in potentially more accessible locations where walking and cycling and creation of healthy living environments can be supported and areas of existing health inequalities -

Spatial Option 1: the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
				generally support healthy living environment through creation of good quality, affordable housing stock.More broadly the option's impact upon access to health services is neutral to negative. The option would bring about growth that can be assumed to create some additional pressure on existing health service facilities that would require mitigation. In supporting development in and around the urban area, these pressures would be located in the best locations to be addressed through enhancement to these services.	Additionally, identification of the improvements required to health service provision, and application of strong policy to promote walking and cycling in all locations and especially urban edge development would be key.		linked to deprivation would be less likely to experience the benefits of a diversified housing offer and provision of high quality and affordable new housing stock.
6. Open space, sport facilities and community services	u	u	u	At this time it is considered that the potential effects of this option upon this objective are unknown. The spatial option would distribute new housing throughout the Borough so should allow for a good level of access to existing facilities. This includes a proportion of new development to be within town centres where many services and facilities are located. Provision of new services and facilities alongside new development will be dependent upon each site.	To ensure positive effects against this objective, Plan policies should be proactive in securing sufficient amounts and range of services and facilities to meet residents' needs.	-	Whilst it is unknown whether implementing this option would have a positive or negative effect, a failure to positively promote inner urban regeneration would fail to support the many services and facilities that are located there. This could lead to their decline and inability to serve the existing communities within those areas. This would be a negative impact felt at local level that would worsen over time as the town centres become less vibrant.
7. Decent homes, in a range of tenures, sizes and types, including	n	+	+	This option promotes housing delivery and development to support a diversified housing mix. The option supports regeneration within the inner urban areas, which is an approach that would be consistent with the objective of improving	Provision of policy to support the quality and range of housing stock delivered to meet the needs of all - particularly specialist	-	A failure to deliver and distribute housing as proposed in this spatial option would likely result in a negative effect. The housing mix would not be as diverse and it would be less able to meet the differing

Spatial Option 1: the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
affordable homes				existing housing stock. The outcomes of this should include provision of housing capable of supporting the needs of everyone, and support delivery of affordable housing.A local, permanent positive effect would manifest over time.	housing provision and accommodation for a growing elderly population would enhance the effects upon this objective.		needs of the community.
8.Townscape character, high quality natural landscape, and cultural and historic environment	u	u	u	At this time it is considered that the potential effects of this option upon this objective are unknown. Whilst there are potential positive effects as a result of delivering inner urban regeneration the manner in which those improvements are carried out is entirely dependent upon the nature and quality of regeneration and the nature of the inner urban areas involved. Meanwhile, development to the edges of the urban area will have the potential to minimise harmful impacts upon natural landscapes but proximity to or incursion into the countryside could be potentially harmful.	To ensure positive effects against this objective, appropriate quality controls upon the design of new development and impact upon heritage assets would also need to be considered.	-	Whilst it is unknown whether implementing this option would have a positive or negative effect, a failure to positively promote inner urban regeneration would lead to decline, and associated issues of vacancy and dereliction that would be harmful to townscape character. Meanwhile, the distribution of development elsewhere would be unknown but potentially present greater risk to natural landscapes.
9.Green infrastructure and ecological networks and geodiversity	-	-	-	This policy directs development to the inner urban area and to the urban edge. Such development is anticipated to require the allocation of greenfield land that would consequently bring about increased risk of loss and harm to biodiversity, green infrastructure and ecological networks.Whilst the balance between development in the inner urban area and urban edge is unknown, it is considered that this policy has a potentially negative effect upon this objective. The negative effect	Maximising development of least environmental value and a supportive policy regime would be necessary to ensure the plan as a whole results in positive effects for this objective. This would include protection of the most valuable	-	Whilst it is unknown whether implementing this option would have a positive or negative effect; a failure to positively promote inner urban regeneration would lead to decline, and associated issues of vacancy and dereliction that would be harmful to townscape character. Meanwhile, the distribution of development elsewhere would be unknown but potentially present greater risk to natural landscapes.

Spatial Option 1: the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
				would be permanent.	habitats and features and mechanisms to bring about biodiversity net gain.		
10. Avoid and reduce all forms of pollution	u	u	u	Development in edge of town locations could increase air pollution as more people use the local road network. Equally, directing homes to the inner urban areas would prevent this. The presence of contaminated land in these locations is unknown but is likely to be lower in the green land edge of town locations and higher in the inner urban area. There could be the opportunity to reduce pollution through, for example, green construction techniques and provision of sustainable transport opportunities. The impact would be dependent upon the site, the development's design and other factors. Based on the available information the effect is unknown.	Provision of proactive Plan policies that avoid and/or reduce pollution.	u	The specific impact of not applying this spatial strategy is unknown. Development would need to be delivered somewhere in the Borough and without knowing the nature of and distribution of the sites; the effect upon this IA Objective cannot be fully assessed.
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	u	u	u	Growth and development in any location is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding waste generation and management.	u	The specific impact of not applying this spatial strategy is unknown. Development would need to be delivered somewhere in the Borough and without knowing the nature of and distribution of the sites; the effect upon this IA Objective cannot be fully assessed.

Spatial Option 1: the regeneration of the inner urban areas of Blackburn and Darwen, whilst developing a more diversified housing offer through allocations in the urban edges of the two towns						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
12. Climate change and of natural resources including soil and mineral resources.	n	n	n	As the specific sites required to deliver this spatial option are unknown, it is unknown if they would be within the Borough's mineral safeguarding area and if their delivery could sterilise mineral resources unless extracted first or evidenced to not be viable to extract. Development at the edge of the urban area could see the loss of grade 3, 4 or 5 agricultural land, whereas inner urban development would avoid this. Development in edge of urban area locations will likely increase air pollution through more people using the local road network. There could be the opportunity to reduce pollution through, for example, green construction techniques and provision of sustainable transport opportunities. The impact would be dependent upon the site, the development's design and other factors. Based on the lack of available information about these sites, the effect is unknown.	Provision of proactive Plan policies regarding climate change and use of natural resources.	u	The specific impact of not applying this spatial strategy is unknown. Development would need to be delivered somewhere in the Borough and without knowing the nature of and distribution of the sites; the effect upon this IA Objective cannot be fully assessed.
13. Reduce flood risk and improve the quality of ground and surface waters.	u	u	u	Development, in particular on greenfield land, has the potential for increased water run-off and flood risk. Flood risk zones and surface water flood risk areas can be found throughout the Borough. Development can offer the opportunity to incorporate water management features that could mitigate flood risk and benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding flood risk and water management.	u	The specific impact of not applying this spatial strategy is unknown. Development would need to be delivered somewhere in the Borough and without knowing the nature of and distribution of the sites; the effect upon this IA Objective cannot be fully assessed.

Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
1. Urban and rural economy	n	+	+	The allocation of safeguarded land for housing would assist the delivery of a level of growth that would support a positive economic strategy. The approach would follow the current adopted Local Plan that sets out a growth strategy to 2026 to deliver significant amounts of new housing and employment development. This growth option would allow for an increase in working age people within the Borough, supporting a positive economic strategy. Success tends to support further success, so this would be a positive long term strategy. Impacts are unlikely to be evident in the short term. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.	-	To not implement this spatial option could mean that insufficient homes would be delivered to support a positive economic strategy. A good range of housing opportunities are required to encourage younger people to stay in or move to the Borough. Otherwise the demographics of the area would see a projected growth in retired residents and reduction in those of working age. This could worsen over time. The negative effects would be local but temporary with the expectation that a different growth strategy would be pursued in the future that could improve conditions in the Borough.
2. Vibrant town centres	n	+	+	More working age people would mean the local population would be more able to support new jobs and economic opportunities in the town centres. The existing safeguarded land in the Borough, whilst on the edge of the built-up area, is not located far from the town centres and new residents in these locations would likely use Blackburn and Darwen town centres for their shopping and leisure needs. This would contribute to the regeneration and on-going	None identified.	-	To not implement this spatial option could mean that insufficient homes would be delivered to support a positive economic strategy. There would be less people in the Borough to support the town centres, and likely to be less prosperous local residents too. This could worsen over time. The negative effects would be local but temporary with the expectation

Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
				success of the town centres Additionally, if the local area is more prosperous, it could mean the community is more likely to shop in the town centres and use other town centre facilities. The effects would not be felt in the shorter term but could manifest over time. The positive impacts would be likely felt locally and would be permanent in their effect.			that a different growth strategy would be pursued in the future that could improve conditions in the Borough.
3.Travel, sustainable transport options and comms. infrastructure	n	n	n	Should a strategy that uses safeguarded land for housing development be pursued, this would be linked to a greater population in the area, meaning greater demands upon the transport network. The areas of existing safeguarded land are not isolated from the built up area so have the potential to successfully connect to the existing transport and communications networks. It is essential that the necessary infrastructure is delivered along with development at these locations. Generally speaking, the higher the level of growth, the easier it could be to deliver infrastructure that could offer a strategic solution to growth impacts. A neutral impact is envisaged.	Provision of Plan policies that require delivery of appropriate transport and comms. infrastructure	n	Not pursuing this spatial option would be linked to a smaller local population, so there would be less demand placed upon the existing transport network. Equally, less development offers lower opportunity to secure more strategically beneficial infrastructure. Overall, a neutral impact is envisaged.
4.Equality of opportunity and reduce levels of	n	+	+	The need to allocate safeguarded land for housing use would be linked to a positive economic strategy. With greater number of jobs, this would help prevent deprivation in	None identified.	-	To not implement this spatial option could mean that insufficient homes would be delivered to support a positive economic strategy, due to

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Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
deprivation and disparity				the Borough. Use of this land would contribute to a mixed community, as younger and potentially wealthier people would be encouraged, through greater housing choice and job opportunities, to live and work live in the Borough rather than move away. The positive effects would manifest over time. The positive impacts would be likely felt locally and would be permanent in their effect.			the projected growth in retired residents and reduction in those of working age. This could worsen deprivation in the Borough. This would not support a mixed community, as younger and potentially wealthier people would be encouraged to live and work elsewhere. The negative effects wouldn't manifest in the shorter term but would worsen over time. The negative effects would be felt locally. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.
5. Healthy living environments, health services and reduce in health inequalities.	n	n	n	Use of safeguarded land for housing use would be linked to a larger scale of growth that could put greater demands upon healthcare facilities. However, the growth option would see a more balanced local demographic of older and younger people. So whilst there could be more demand, the level of growth and increased amount of younger people would offer greater opportunity to deliver and support such facilities. Directed growth to existing safeguarded land would not have any particular impact upon this.	Provision of Plan policies that require delivery of appropriate healthcare alongside development.	-	Growth that requires development within safeguarded land would support a more balanced demographic, rather that the otherwise projected growth in older people. An area with a growing older population would become more dependent upon healthcare facilities. With lower levels of growth and less working age people, there would be less ability to deliver and support such facilities. This is not a sustainable approach that would worsen over time as the population

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Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
				On balance, a neutral effect is envisaged.			would gradually become older. The negative effects would be felt at a local level and would particularly affect those most in need of healthcare provision. The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.
6. Open space, sport facilities and community services	n	n	n	The development of existing safeguarded land for housing use would not significantly affect the amount of publically accessible open space within the Borough. The development of these locations could offer the opportunity open up existing private land for public use. Higher levels of growth and more working age people would mean greater ability to deliver and support such services and facilities. Equally, a greater population would put increased demands upon such facilities so it would be essential that the required need for such facilities is delivered alongside new development. On balance, a neutral effect is envisaged.	Provision of Plan policies that require delivery of appropriate services and facilities alongside development.	n	The areas of existing safeguarded land are not publically accessible so to not pursue this option would not have a significant effect in this regard. Not pursuing the spatial option would mean less local population and so less demand, but also less opportunity to see community infrastructure delivered alongside development that would be of wider benefit. On balance, a neutral effect is envisaged.
7. Decent homes, in a range of tenures, sizes and types, including affordable	n	+	+	Releasing safeguarded land for housing use would allow for a larger choice of housing opportunities for the local population, including the delivery of affordable housing. As development takes some time to be delivered, the positive effects would be felt in the medium to longer term and would affect younger people who would require local	Provision of Plan policies that require delivery of a range of housing options.	-	To not pursue this spatial option would mean less choice of homes, affecting local affordability and opportunity. This would be a long term negative effect that would be temporary on the expectation that a different option would be pursued in the future to overcome the negative

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Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
homes				housing opportunities and those who may have particular housing needs. The positive impacts would be likely felt locally and would be permanent in their effect.			effects.
8.Townscape character, high quality natural landscape, and cultural and historic environment	-	-	-	The two areas of safeguarded land to the north of Blackburn town centre both either contain or are within the near vicinity of listed buildings. Research into the significance of these heritage assets and a design response that sensitively responds to that significance to ensure it is not unjustifiably harmed is essential. Generally speaking, however, the potential for harm to these heritage assets is high and so a negative effect is assessed with regards to the historic environment. The areas are not affected by landscape designations. Development offers the potential to be harmful to the appearance of an area but can also bring forward attractive new development that positively contributes to the appearance of the area. However, given the change in the character of the area that development here would bring, and the risk to the historic environment, a long term, permanent negative effect is envisaged overall.	Provision of Plan policies ensuring high standards of design and sensitive approach to managing the historic environment.	n	A strategy based upon no development within safeguarded areas would not have a significant effect upon the character of those areas.
9.Green infrastructure and ecological	-	-	-	The areas of existing safeguarded land are not affected by biodiversity or geodiversity designations. As National planning policy requires for a net gain in biodiversity, this	None identified.	n	No development within safeguarded areas would avoid the loss of green infrastructure in those locations. No green infrastructure would be

Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
networks and geodiversity				could have a positive effect. Despite this, given the permanent loss of green infrastructure that would occur through the development of this safeguarded land, a permanent, local level, negative impact is envisaged.			created and there would be no net gain of biodiversity. As there would be no loss or gain, the effect would be neutral.
10. Avoid and reduce all forms of pollution	-	-	-	Development in these locations will likely increase air pollution through more people using the local road network. The presence of contaminated land in these locations is unknown but is likely to be low given its generally undeveloped nature. There could be the opportunity to reduce pollution through, for example, green construction techniques and provision of sustainable transport opportunities. The impact would be dependent upon the site, the development's design and other factors. However, based on the available information about these sites, a negative effect is envisaged. Given the national targets to reduce pollution and climate change, the effect is relevant at the national level. The permanence of the effect is unknown on the basis that future technologies could help overcome negative effects.	Provision of proactive Plan policies that avoid and/or reduce pollution.	n	No development in safeguarded land would mean less growth and less potential for the generation of pollution. As no significant effect is envisaged, the outcome would be neutral.
11. Avoid and reduce waste and improve waste management	u	u	u	Growth and development in any location is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials. The impact would be dependent upon the site, the development's design and other	Provision of proactive Plan policies regarding waste generation	n	No development in safeguarded land would mean there would be no waste implications arising in these locations. As no significant effect is envisaged, the outcome would be neutral.

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Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
by encouraging re-use, recycling and composting.				factors. The effect is therefore unknown.	and management .		
12. Climate change and of natural resources including soil and mineral resources.	-	-	-	Parts of the existing safeguarded land are within the Borough's mineral safeguarding area. Development would sterilise mineral resources unless extracted first or evidenced to not be viable to extract. Development at these sites would see the loss of grade 3 and grade 4 agricultural land Development in these locations will likely increase air pollution through more people using the local road network. There could be the opportunity to reduce pollution through, for example, green construction techniques and provision of sustainable transport opportunities. The impact would be dependent upon the site, the development's design and other factors. However, based on the available information about these sites, a negative effect is envisaged. Given the national targets to reduce pollution and climate change, and the contribution local authorities should make to wider aggregate needs, the effect is relevant at the national level. The permanence of the effect is unknown on the basis that future technologies could help overcome negative effects.	Provision of proactive Plan policies regarding climate change and use of natural resources.	n	No development within safeguarded areas would avoid the potential for loss of natural resources in those locations. There would be no positive or negative implications with regards to climate change. As there would be no loss or gain, the effect would be neutral.
13. Reduce	u	u	u	Development, in particular on greenfield land	Provision of	n	No development in safeguarded land

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Spatial Option 2: Consider in addition (to deliver Option 1) allocation of safeguarded land to help meet development needs to 2036.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
flood risk and improve the quality of ground and surface waters.				such as this, has the potential for increased water run-off and flood risk. A small area of the existing safeguarded land is within flood risk zones and suffers from surface water flood risk. Development at these locations can offer the opportunity to incorporate water management features that could mitigate flood risk and benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	proactive Plan policies regarding flood risk and water management .		would mean there would be no flood and water quality implications arising in these locations. As no significant effect is envisaged, the outcome would be neutral.

Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
1. Urban and rural economy	n	+	+	The deletion of Green Belt land, particularly around the M65, would allow the Borough to achieve higher levels of economic growth. Success tends to support further success, so this would be a positive long term strategy. Impacts are unlikely to be evident in the short term. The positive impacts would be likely felt locally and would be permanent in their effect.	None identified.	-	Not developing areas of Green Belt would constrain the amount of available land for economic development. This would not support a positive economic strategy. The negative effects would be local but temporary with the expectation that a different growth strategy would be pursued in the future that could improve conditions in the Borough.
2. Vibrant town	n	+	+	Meeting the full land requirements for	None identified.	-	Not developing areas of Green

Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
centres				employment need will result in more jobs, a greater working age people and support for more opportunities in the town centres. Additionally, if the local area is more prosperous, it could mean the community is more likely to shop in the town centres and use other town centre facilities. The effects would not be felt in the shorter term but could manifest over time. The positive impacts would be likely felt locally and would be permanent in their effect.			Belt would constrain the amount of available land for economic development. This would reduce prosperity in the Borough and the ability to support vibrant town centres. The negative effects would be local but temporary with the expectation that a different growth strategy would be pursued in the future that could improve conditions in the Borough.
3.Travel, sustainable transport options and communications infrastructure	-	-	n	Large areas of Green Belt run alongside the M65. This land has excellent road access and offers opportunities to improve existing and add new connections. However, due to the nature of Green Belt these areas are on the edge of the built up area and not always accessible by other more sustainable transport options. In the short term this development would lead to a great reliance upon private vehicle. However, improvements to the network could reduce this impact over time.	Provision of Plan policies that require delivery of appropriate transport and communications infrastructure.	u	Not developing areas of Green Belt may prevent economic growth in the Borough and lower levels of commuting. It could push economic development into the existing built up area rather than on Green Belt. These areas have greater access to sustainable transport options; however, existing congestion could be worsened. It could also lead to increasing levels of commuting out of the Borough if businesses cannot find suitable sites within the Borough. Overall the effect is unknown.
4.Equality of opportunity and reduce levels of	n	+	+	Meeting the full requirements for employment land would lead to a greater number of jobs, helping to prevent	None identified.	-	Not developing areas of Green Belt would constrain the amount of available land for economic

Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
deprivation and disparity				deprivation in the Borough. Use of this land would contribute to a mixed community, as younger and potentially wealthier people would be encouraged, through greater housing choice and job opportunities, to live and work live in the Borough rather than move away. The positive effects would manifest over time. The positive impacts would be likely felt locally and would be permanent in their effect.			development. The negative effects would be local but temporary with the expectation that a different growth strategy would be pursued in the future that could improve conditions in the Borough.
5. Healthy living environments, health services and reduce in health inequalities.	n	n	n	Use of Green Belt for employment allocations would be linked to a larger scale of economic and housing growth which could put greater demands upon healthcare facilities. However, the growth option would see a more balanced local demographic of older and younger people. So whilst there could be more demand, the level of growth and the increased number of younger people there would offer greater opportunity to deliver and support such facilities. Directing employment growth to Green Belt would not have any particular impact upon this. On balance, a neutral effect is envisaged.	Provision of Plan policies that require delivery of appropriate healthcare alongside development.	n	Not developing areas of Green Belt would constrain the amount of available land for economic development. Whilst development may occur elsewhere in the long term this could negatively impact the Borough's economy. This could impact on the percentage of working age population, as younger people would likely migrate out of the Borough for work. However, the demand for services would decrease along with population decrease. On balance, a neutral effect is envisaged.
6. Open space, sport facilities and community	n	n	n	Depending on the exact location the development of Green Belt for employment could affect the amount of publically	Provision of Plan policies that require	n	To not pursue this spatial option would mean no extra demand, loss or gain of open space and

Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
services				accessible open space within the Borough. However, development of these locations could also offer the opportunity open up existing private land for public use. Higher levels of growth and more working age people would mean greater ability to deliver and support such services and facilities. Equally, a greater population would put increased demands upon such facilities so it would be essential that the required need for such facilities is delivered alongside new development. On balance, a neutral effect is envisaged.	delivery of appropriate services and facilities alongside development.		other facilities. A neutral effect is envisaged.
7. Decent homes, in a range of tenures, sizes and types, including affordable homes	n	n	+	Releasing some Green Belt land for employment would meet the potential full employment need and help achieve further economic growth. This would support housing growth to allow for a larger choice of housing opportunities for the local population, including the delivery of affordable housing. As development takes some time to be delivered, the positive effects would be felt in the medium to longer term and would affect younger people who would require local housing opportunities and those who may have particular housing needs. The positive impacts would be likely felt locally and would be permanent in their effect.	Provision of Plan policies that require delivery of a range of housing options.	-	To not pursue this spatial option would mean less choice of homes, affecting local affordability and opportunity. This would be a long term negative effect that would be temporary on the expectation that a different option would be pursued in the future to overcome the negative effects.
8.Townscape character, high	-	-	-	There will be number of heritage assets within the Green Belt. Research into the	Provision of Plan policies	n	A strategy based upon no development within the Green

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Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
quality natural landscape, and cultural and historic environment				significance of these heritage assets and a design response that sensitively responds to that significance to ensure it is not unjustifiably harmed is essential. Generally speaking, however, there is the potential for harm to these heritage assets and so a negative effect is assessed with regards to the historic environment. The Green Belt is of a rural character and features several areas of particular landscape attraction. Development offers the potential to be harmful to the appearance of an area but can also bring forward attractive new development that positively contributes to the appearance of the area. However, given the change in the character of the area that development here would bring, and the risk to the historic environment, a long term, permanent negative effect is envisaged overall.	ensuring high standards of design and sensitive approach to managing the historic environment.		Belt would have not have a significant effect upon the character of that area.
9.Green infrastructure and ecological networks and geodiversity	-	-	-	There are areas of the Green belt that are affected by biodiversity or geodiversity designations. Development would need to avoid these areas. As National planning policy requires for a net gain in biodiversity, this could have a positive effect. Despite this, given the permanent loss of green infrastructure that would occur through the development of Green Belt, a permanent, local level, negative impact is envisaged.	None identified.	n	No development within the Green Belt would avoid the loss of green infrastructure in those locations. No green infrastructure would be created. There would be no net loss or gain of biodiversity. As there would be no loss or gain, the effect would be neutral.
10. Avoid and	-	-	-	Development in these locations will likely	Provision of	n	No development in the Green Belt

Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
reduce all forms of pollution				increase air pollution through more people using the local road network. The presence of contaminated land in these locations is unknown but is likely to be low given its generally undeveloped nature. There could be the opportunity to reduce pollution through, for example, green construction techniques and provision of sustainable transport opportunities. The impact would be dependent upon the site, the development's design and other factors. However, based on the available information about these sites, a negative effect is envisaged. Given the national targets to reduce pollution and climate change, the effect is relevant at the national level. The permanence of the effect is unknown on the basis that future technologies could help overcome negative effects.	proactive Plan policies that avoid and/or reduce pollution.		would mean less growth and less potential for the generation of pollution. As no significant effect is envisaged, the outcome would be neutral.
11. Avoid and reduce waste and improve waste management by encouraging re-use, recycling and composting.	u	u	u	Growth and development in any location is likely to create waste. However, new development also offers an opportunity to incorporate re-use and recycling of materials. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.	Provision of proactive Plan policies regarding waste generation and management.	n	No development in the Green Belt would mean there would be no waste implications arising in these locations. As no significant effect is envisaged, the outcome would be neutral.
12. Climate change and of natural	-	-	-	Parts of the Green Belt are within the Borough's mineral safeguarding area. Development would sterilise mineral	Provision of proactive Plan policies	n	No development within the Green Belt would avoid the potential for loss of natural resources in those

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Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
resources including soil and mineral resources.				resources unless extracted first or evidenced to not be viable to extract. Development at these sites could see the loss of grade 3, 4 and 5 agricultural land. Development in these locations will likely increase air pollution through more people using the local road network. There could be the opportunity to reduce pollution through, for example, green construction techniques and provision of sustainable transport opportunities. The impact would be dependent upon the site, the development's design and other factors. However, based on the available information about these sites, a negative effect is envisaged. Given the national targets to reduce pollution and climate change, and the contribution local authorities should make to wider aggregate needs, the effect is relevant at the national level. The permanence of the effect is unknown on the basis that future technologies could help overcome negative effects.	regarding climate change and use of natural resources.		locations. There would be no positive or negative implications with regards to climate change. As there would be no loss or gain, the effect would be neutral.
13. Reduce flood risk and improve the quality of ground and surface waters.	u	u	u	Development, in particular on greenfield land such as this, has the potential for increased water run-off and flood risk. Some areas of Green Belt land is within flood risk zones and suffers from surface water flood risk. Development at these locations can offer the opportunity to incorporate water	Provision of proactive Plan policies regarding flood risk and water management.	n	No development in the Green Belt would mean there would be no flood and water quality implications arising in these locations. As no significant effect is envisaged, the outcome would be neutral.

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Spatial Option 3: The deletion of Green Belt land should be considered to provide sufficient land to meet floorspace needs arising through Employment Growth Option 2.						Alternative option - do not implement proposed spatial option	
IA Objective	**S impact**	**M impact**	**L impact**	**Supporting comments**	**Mitigation**	**Impact**	**Supporting Comments**
				management features that could mitigate flood risk and benefit the wider area. The impact would be dependent upon the site, the development's design and other factors. The effect is therefore unknown.			

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Housing and Economic Need Assessment

Blackburn with Darwen and Hyndburn Councils

December 2018

Prepared by

GL Hearn
280 High Holborn
London WC1V 7EE

T +44 (0)20 7851 4900
glhearn.com

Contents

Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it is has been signed by the Originators and approved by a Business or Associate Director.

DATE	ORIGINATORS	APPROVED
December 2018	Nena Pavlidou, Senior Planner	Paul McColgan Associate Director

Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 EXECUTIVE SUMMARY

1.1 The purpose of the Housing and Economic Need Assessment Study is to assess future development needs for housing (both market and affordable) and employment across the Blackburn with Darwen (BwD) and Hyndburn joint Housing Market Area. The Study considers housing and employment need to inform the preparation of the emerging Local Plans.

1.2 This study forms part of the evidence base which Councils will use in preparing their development planning policy. The document does not set the housing target for local authorities but provides the evidence to inform its starting position.

Housing Need

1.3 Planning Practice Guidance (PPG) on Housing Need Assessment sets out a standard method to be used in calculating the housing need. According to this **there is a need of 130 dwellings per annum across the HMA relating to 99 dpa in BwD and 31 dpa in Hyndburn.**

1.4 The standard methodology is however subject to change which if the proposed changes are accepted could increase the housing need to 217 dwellings per annum across the HMA relating to 157 dpa in BwD and 60 dpa in Hyndburn.

1.5 This however is the minimum housing need for the local authorities and Councils are encouraged to exceed this. Decisions taken with regard to the level of growth will be based on appropriate evidence and will be justified for example in relation to meet planned economic growth or to ensure delivery of more affordable homes.

1.6 This however is a policy choice and to inform this choice we have calculated the housing need based on these scenarios. One such scenario includes examining the need for additional housing to support the Local Economy.

Economic Led Housing Need

1.7 Using Oxford Economics (OE) data as a baseline GL Hearn has amended a set of forecast based on the review of the local economic strategies, past completions trends, together with our local knowledge for the market in order to provide a realistic "economic growth scenario". This shows a potential growth of just over 7,500 jobs over the 2018-36 period.

Table 1: Forecast job growth in BwD (2018-36)

	Jobs (2018)	Jobs (2036)	Change in jobs	% change
BwD	71,458	76,654	5,196	7.3%
Hyndburn	31,120	33,450	2,330	7.5%
HMA	102,578	110,104	7,526	7.3%

Source: OE & GL Hearn 2018

1.8 The table below estimates the corresponding housing need for the economic growth scenario. In translating jobs to housing growth we have considered a number of factors including changes to the economically active population, including an adjustment to Household Formation Rates. The analysis shows that to support the economic growth scenario there would need to be provision of around 411 homes each year in BwD and 216 in Hyndburn as an average over the period. This is a total of 627 dwellings per annum.

Table 2: Projected housing need – job-led scenarios and 2016-based HRRs – BwD

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
BwD	58,282	66,258	7,976	399	411
Hyndburn	34,585	38,786	4,201	210	216
HMA	**92,867**	**105,044**	**12,177**	**609**	**627**

Source: Demographic projections

1.9 As demonstrated the economic-led housing need is higher than the standard methodology even when taking account of the proposed changes currently out for consultation. This means that in order to ensure that the area's economic potential is met then 627 dwellings per annum across the HMA would need to be delivered.

1.10 There is potentially a slight element of back loading associated with slower jobs growth in the 2016-2018 period however this has occurred. For the remainder of the period jobs growth and thus housing growth is fairly constant.

1.11 As an alternative housing delivery could be linked with the delivery of major sites in each borough to ensure there are no short terms gaps if labour supply. Either way this level of housing delivery would require a step change in housing delivery with delivery since 2003 averaging only around 270 dpa.

Affordable Housing Need

1.12 To assess affordable housing need a methodology is set out in the PPG which has been followed. The analysis calculates an overall surplus of affordable housing of 100 units per annum in BwD and a shortfall of 79 per annum in Hyndburn. The findings above are based on clearing the current need over the 20-years from 2016.

Housing Need and The Housing Requirement

1.13 The study has assessed housing need and potential housing requirements through a variety of factors as presented above.

Table 3: Housing Need and Housing Requirement Options

	BwD	Hyndburn
Standard Method Current	99	31
Standard Method Consultation	157	60
Economic-Led Housing Need – Economic Growth Scenario	411	216
Historic Housing Delivery Trends	151	108

Source: GL Hearn based on OE forecasts

1.14 The Housing Need based on the Standard Housing Methdology (Current) for Blackburn with Darwen is 99 dpa and in Hyndburn it is 31 dpa. However should the local authorities decide to adopt a higher housing requirement to meet economic growth then these housing requirement should be 411 and 216 dpa respectively. However this is a choice for the local authorities to make.

1.15 Similarly, the local authorities could decide to increase the delivery of affordable housing to clear the backlog sooner and as a result could consider a sensible increase above the standard methodology, noting that the economic led growth would achieve this.

Housing Mix

1.16 The extended definition of affordable housing includes households who are able to access the private rented sector but who cannot afford to buy. In both BwD and Hyndburn there is limited evidence for a need for this type of housing; put simply, the typical cost of housing to buy in the area (in the second-hand market) is sufficiently affordable such that there is no need for a discounted new build product.

1.17 The mix identified below should inform strategic policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.

Table 4: Appropriate Mix of Homes by Size and Tenure

Blackburn with Darwen	1-bed	2-bed	3-bed	4+ bed
Market	0-5%	35-40%	40-45%	15-20%
Affordable home ownership	20-25%	45-50%	25-30%	0-5%
Affordable housing (rented)	30-35%	30-35%	25-30%	5-10%
Hyndburn	1-bed	2-bed	3-bed	4+ bed
Market	0-5%	40-45%	35-40%	15-20%
Affordable home ownership	15-20%	55-60%	20-25%	0-5%
Affordable housing (rented)	35-40%	30-35%	20-25%	5-10%

Older Persons Need

1.18 The data shows that in general, BwD and Hyndburn have a higher level of disability when compared with the national position, and that an ageing population means that the number of people with disabilities could be expected to increase in the future. Key findings include:

- Over 30% increase in the population aged 65+ (accounting for over 100% of total population growth);
- A total need for around 1,700 units of housing for older people (sheltered, enhanced sheltered and extra-care)
- concentrations of long-term health problems and disabilities in the social rented sector; and
- a need for around 400 dwellings to be for wheelchair users (M4(3)) in the period to 2036

Employment Land Need

1.19 We considered demand for employment land and floorspace over the period from 2016 to 2036. The analysis considers future employment land needs using the labour demand scenarios set out above and compares these against past completions trend data.

1.20 Taking into account recent commercial completions the following table presents the residual floorspace requirement up to 2036. A total of 443,000 sq. m is expected to be required across the HMA between 2018/19 and 2036 (residual).

Table 5: Residual Employment Floorspace Requirements (sqm) 2018-2036

	Blackburn with Darwen	Hyndburn	FEMA
B1	34,847	5,872	40,719
B2	72,507	86,359	158,866
B8	120,826	122,596	243,422
B-Class Total	**228,181**	**214,827**	**443,008**

1.21 The tables below translate the residual floorspace requirements to Employment land requirements by applying plot ratios similar to those of the existing stock across the area. This shows a residual need for 107.4 Ha of employment land

Table 6: Residual Employment Land Requirements (hectares) 2018-36

	Blackburn with Darwen	Hyndburn	FEMA
B1	5.8	1.0	6.8
B2	18.1	21.6	39.7
B8	30.2	30.6	60.9
B-Class Total	**54.1**	**53.2**	**107.4**

2 INTRODUCTION

2.1 GL Hearn has been commissioned by Blackburn with Darwen and Hyndburn Councils ('the Councils') to prepare a Housing and Economic Need Assessment Study (HENAS) to identify the housing need and mix together with the employment land requirements for the 2016-2036 period.

2.2 The purpose of the HENAS is to assess future development needs for housing (both market and affordable) and employment across the Blackburn Housing Market Area (the HMA) which incorporates both councils. This area has strong housing and economic links as acknowledged through the adopted Local Plans of the Councils.

2.3 The HENAS is intended to inform the preparation of the emerging Local Plans for both local authorities. However it should be noted that the HENAS does not in itself set housing and employment targets.

2.4 The HENAS provides an assessment of the need for housing and employment land requirements, making no judgements regarding future policy decisions which the Councils may take. While this study provides important inputs into setting targets for housing and employment provision, wider plan-making will also take into account factors such as the supply of land for new development, Green Belt, local infrastructure capacity and environmental constraints as well as policies to promote further development.

2.5 The National Planning Policy Framework[1] was published in July 2018 (NPPF2) alongside new planning practice guidance[2] (PPG) relating to assessing housing need. This included for the first time a standard methodology for assessing housing need[3]. This Study responds to and is compliant with these documents.

Structure

2.6 The remainder of this report is structured as below:

- Chapter 3: Demographic Growth and Housing Need
- Chapter 4: Market Signals
- Chapter 5: Economic Baseline
- Chapter 6: Jobs Forecast
- Chapter 7: Future Employment and the link to Housing
- Chapter 8: Affordable Housing Need
- Chapter 9: Private Rented Sector

[1] Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf
[2] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf
[3] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

- Chapter 10: Housing Technical Standards and Older persons needs
- Chapter 11: Housing Mix
- Chapter 12: Employment Land Requirements
- Chapter 13: Conclusions and Recommendations

3 DEMOGRAPHIC GROWTH AND HOUSING NEED

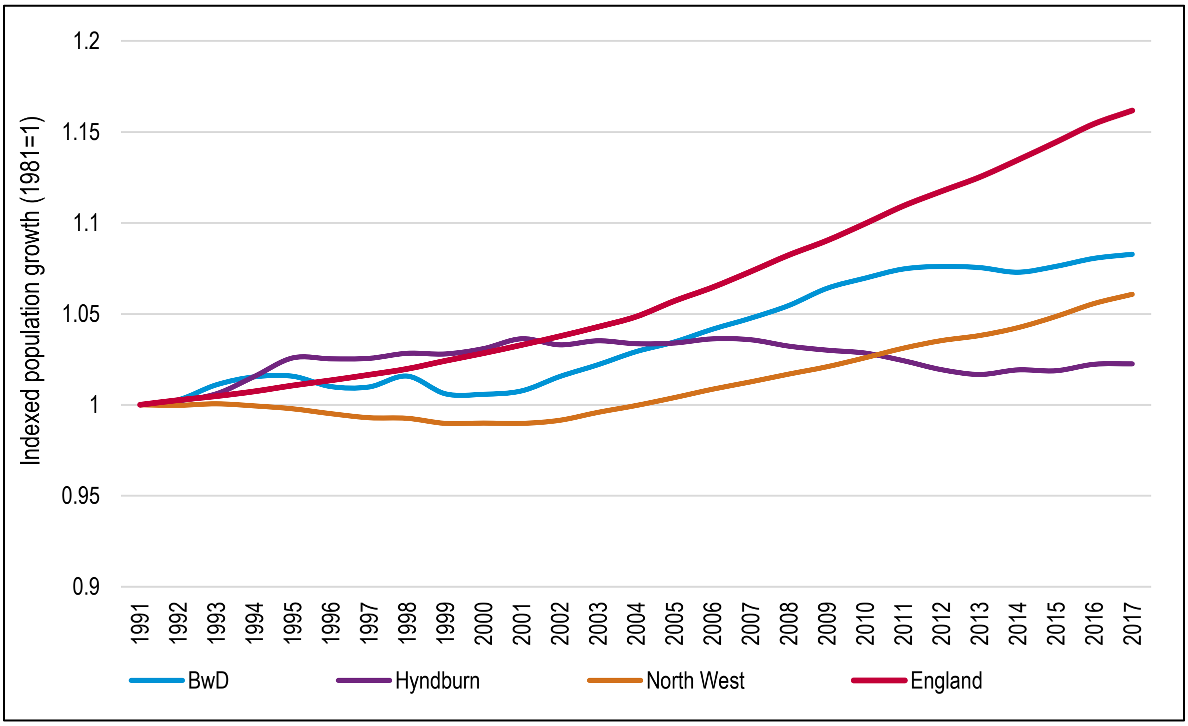
Introduction

3.1 This section of the report considers the demographic drivers of housing need, in particular looking at past trends in population growth and future projections. The analysis draws on the 2016-based sub-national population projections (SNPP) and the 2016-based household projections (SNHP) – both ONS data releases. The analysis also looks at the most recent population estimates (again from ONS) which updates to mid-2017.

Past Population Growth

3.2 Figure 1 considers historic population growth in the period from 1991 to 2017. Both Blackburn with Darwen (BwD) and Hyndburn show population growth that is some way below the national average, although in BwD the growth has been above that seen regionally. Over the past 10-years (indeed going back to 2001) the data shows fairly modest growth in BwD and a decline in population in Hyndburn.

Figure 1: Indexed population growth (1991-2017)



Source: ONS (mid-year population estimates)

Components of Population Change

3.3 Tables 1 and 2 overleaf consider the drivers of population change between 2001 and 2017. The main components of change include natural change (births minus deaths), net migration (internal/domestic and international) and other changes. There is also an Unattributable Population Change (UPC) which is a correction made by ONS upon the publication of Census data if population has been under- or over-estimated.

3.4 In BwD the data shows a positive level of natural change throughout the period, reflecting a relatively young age structure as well as positive levels of international migration. For every year there is a substantial net out-migration of people to other parts of the United Kingdom.

3.5 The data also shows a positive level of UPC, suggesting that between 2001 and 2011, ONS may have underestimated population growth within population estimates (and this was corrected once Census data were published).

Table 7: Components of population change, mid-2001 to mid-2017 – BwD

Year	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	743	-873	734	-3	484	1,085
2002/3	688	-707	434	-7	483	891
2003/4	791	-407	106	11	488	989
2004/5	900	-707	53	4	477	727
2005/6	983	-941	445	-13	491	965
2006/7	998	-1,217	567	-17	501	832
2007/8	1,071	-1,199	593	5	490	960
2008/9	1,092	-709	442	-11	481	1,295
2009/10	978	-1,084	400	-15	490	769
2010/11	1,070	-1,081	271	15	416	691
2011/12	1,161	-1,129	159	6	0	197
2012/13	1,043	-1,272	126	12	0	-91
2013/14	1,018	-1,535	157	13	0	-347
2014/15	882	-877	443	-8	0	440
2015/16	928	-1,036	692	22	0	606
2016/17	746	-833	409	-12	0	310

Source: ONS

3.6 Similar patterns can be seen in Hyndburn (Table 8), with a positive level of natural change and net out-migration to other parts of the country. The analysis also shows a net internal in-migration, although the scale of this is somewhat lower than in Blackburn. The UPC in Hyndburn is negative, suggesting ONS may have over-estimated population growth in the period to 2011.

Table 8: Components of population change, mid-2001 to mid-2017 – Hyndburn

Year	Natural change	Net internal migration	Net international migration	Other changes	Other (Unattributable)	Total change
2001/2	47	-159	-34	-17	-99	-262
2002/3	186	58	27	5	-101	175
2003/4	284	-263	-39	0	-110	-128
2004/5	272	-92	-39	-10	-100	31
2005/6	267	-151	189	-3	-122	180
2006/7	256	-308	130	-7	-109	-38
2007/8	207	-460	105	1	-130	-277
2008/9	388	-414	12	-9	-150	-173
2009/10	385	-357	14	-9	-160	-127
2010/11	313	-566	91	19	-184	-327
2011/12	342	-788	41	16	0	-389
2012/13	313	-528	0	8	0	-207
2013/14	316	-236	102	15	0	197
2014/15	228	-343	77	1	0	-37
2015/16	243	-48	80	4	0	279
2016/17	241	-286	67	-4	0	18

Source: ONS

3.7 In both Blackburn with Darwen and Hyndburn there has been a notable reducition in the last few years in net internal out migration. This could be linked to increasing housing delivery post recession.

2016-based Sub-national Population Projections (SNPP)

3.8 Table 9 shows projected population growth from 2016 to 2036 in BwD, Hyndburn and the wider comparator areas. The data shows that the population of both Boroughs is projected to fall whilst both the North West region (6%) and England (10%) are projected to see an increase in the population.

Table 9: Projected population growth (2016-2036) – 2016-based SNPP

	Population 2016	Population 2036	Change in population	% change
BwD	148,462	146,501	-1,961	-1.3%
Hyndburn	80,392	77,845	-2,547	-3.2%
North West	7,223,961	7,627,017	403,056	5.6%
England	55,268,067	60,905,483	5,637,416	10.2%

Source: ONS

Alternative Demographic Scenarios

3.9 The SNPP is the latest official population projection and is based on looking at migration trends over the past 5 to 6 years. However, given that levels of migration and population growth have been variable over time it is reasonable to consider alternative (sensitivity) scenarios.

3.10 These sensitivities are trend based and do not for example take into account future political changes. The most notable of which is Brexit. However, it is impossible to accurately predict the impact this will have on population and economic change. .

3.11 That said the official population projections do reflect the expert panels view on future changes to international migration. That view will reflect their view on the likely changes to migration as a result of Brexit, but it is just a view rather than based on any knowledge of the final deal.

3.12 The sensitivity scenarios take account of longer-term migration trends and also data from the ONS 2017 mid-year population estimates (MYE). The analysis below considers two potential sensitivities to the SNPP figures. These can be described as:

- Implications 2017 mid-year population data – 2016-based SNPP (+MYE); and
- Implications of 10-year migration trends – 10-year migration

2016-based SNPP (+MYE)

3.13 This projection takes assumptions from the 2016-based SNPP, but overwrites the population projection figures for 2017 by those in the ONS MYE (by age and sex). Moving forward from 2017, this sensitivity uses the same birth and death rates as contained in the 2016-based SNPP and the actual projected migration figures (by age and sex).

10-year migration

3.14 This projection uses information about migration levels in the 10-year period (2007-17); the scenario therefore also includes the most up-to-date MYE figures (for 2017). The projection does not just look at the migration figures and roll these forward but recognises that migration can be variable over time as the age structure changes.

3.15 With international migration, this projection also takes account of the fact that ONS are projecting for international net migration to decrease in the longer-term both nationally and for most local authorities.

3.16 To overcome the issue of variable migration, the methodology employed looks at the share of migration in each Borough compared to the share in the period feeding into the 2016-based SNPP (which is 2011-16 for internal migration and 2010-16 for international migration). Where the share of migration is higher in the 10-year period, the projection applies an upward adjustment to migration, and vice versa.

Outputs from different demographic projections

3.17 Tables 4 and 5 show the estimated level of population growth in the SNPP and the alternative projections developed. In BwD the key finding is that using 10-year trends shows a small positive population growth whereas in Hyndburn the projected population growth is negative in all scenarios.

Table 10: Projected population growth (2016-2036) – alternative scenarios – BwD

	Population 2016	Population 2036	Change in population	% change
2016-based SNPP	148,462	146,501	-1,961	-1.3%
2016-based SNPP (+MYE)	148,462	146,900	-1,562	-1.1%
10-year migration	148,462	150,307	1,845	1.2%

Source: Demographic projections

Table 11: Projected population growth (2016-2036) – alternative scenarios – Hyndburn

	Population 2016	Population 2036	Change in population	% change
2016-based SNPP	80,392	77,845	-2,547	-3.2%
2016-based SNPP (+MYE)	80,392	78,137	-2,255	-2.8%
10-year migration	80,392	77,675	-2,717	-3.4%

Source: Demographic projections

Household Growth and Housing Need

3.18 Having studied the population size and how it is likely to change, the next step in the process is to convert this information into estimates of the number of households in the area. To do this the concept of household representative rates (HRR) is used.

3.19 HRRs can be described in their most simple terms as the number of people who are counted as heads of households (or in this case the more widely used Household Reference Person (HRP)). The analysis in this report draws on data from the 2016-based SNHP.

3.20 To convert households into dwellings the analysis includes an uplift to take account of vacant homes. For the purposes of analysis it has been assumed that the number of vacant homes in new stock would be 3% higher than the number of occupied homes (which is taken as a proxy for households) and hence household growth figures are uplifted by 3% to provide an estimate of housing need.

3.21 It is assumed that such a level of vacant homes will allow for movement within the housing stock and includes an allowance for second homes. We note that in both areas this is likely to be high but it is an industry standard figure to allow for churn in the property.

3.22 The analysis shows an overall housing need for 96 dwellings per annum (dpa) across BwD when using the 2016-based SNPP as the underlying population projection. This figure increases to 162 dpa with longer-term (10-year) migration assumptions.

Table 12: Projected housing need – range of demographic based scenarios and 2016-based HRRs – BwD

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
2016-based SNPP	57,074	58,947	1,873	94	96
2016-based SNPP (+MYE)	57,074	59,025	1,951	98	100
10-year migration	57,074	60,228	3,154	158	162

Source: Demographic projections

3.23 In Hyndburn, the three projections show a need in the range of 25-35 dpa depending on the scenario. The highest of these scenarios is based on the 2016-SNPP with updates to include the latest mid-year population estimate.

Table 13: Projected housing need – range of demographic based scenarios and 2016-based HRRs – Hyndburn

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
2016-based SNPP	34,550	35,120	570	28	29
2016-based SNPP (+MYE)	34,550	35,225	675	34	35
10-year migration	34,550	35,043	493	25	25

Source: Demographic projections

Housing Need and the Standard Methodology

3.24 The latest version of the Planning Practice Guidance (PPG) on Housing Need Assessment (September 2018) sets out a standard method to be used in calculating a housing need. The PPG sets out a three-step process.

Step 1

3.25 The first step is to establish a demographic baseline of household growth; this is to be taken directly from published household projections and should be the annual average household growth over a 10-year period.

3.26 The 10-year period is the 10 years starting from the date being examined so for this document it is the 2018-2028 period. While the need is established over this period the need can then be used for longer periods such as over a plan period.

Step 2

3.27 The second step of the proposed methodology seeks to adjust the demographic baseline on the basis of market signals. The adjustment increases the housing need where house prices are high relative to workplace incomes. This uses the published median affordability ratios from ONS based on workplace-based median house prices to median earnings ratio for the most recent year for which data is available. This was 2017 affordability ratio at the time of writing.

3.28 Specifically, the PPG says that 'for each 1% increase in the ratio of house prices to earnings, where the ratio is above 4, the average household growth should be increased by a quarter of a (one) percent'. The equation to work out the adjustment factor is as follows:

$$\textbf{Adjustment factor} = \left(\frac{\textbf{Local affordability ratio} - \textbf{4}}{\textbf{4}}\right) \times \textbf{0.25}$$

3.29 As an example, if the workplace affordability ratio in an area was 8.00; i.e. median house prices were eight times the median earnings of those working in the area, then the adjustment would be 0.25 or 25%. This is calculated as follows: (((8 - 4) / 4) × 0.25).

Step 3

3.30 The final step in the proposed standard method is to possibly cap the market signals uplift. There are two situations where a cap is applied. The first is where an authority has reviewed their plan (including developing an assessment of housing need), or adopted a plan within the last five years.

3.31 In this instance the need may be capped at 40% above the requirement figure set out in the plan. The second situation is where plans and evidence is more than five years old. In such circumstances a cap may be applied at 40% of the higher of the projected household growth or the housing requirement in the most recent plan (where this exists).

3.32 Table 14 sets out a calculation of the need under the Standard Method. This shows a need for 99 dwellings per annum in BwD and 31 dpa in Hyndburn. For plan making where the plan is submitted after the 24th of January 2019 these figures are to be used as the OAN. However this is a minimum need and local authorities are free and indeed encouraged to exceed these figures.

Table 14: MHCLG Standard Method Housing Need Calculations

	Blackburn with Darwen	Hyndburn
Households 2018	57,183	34,675
Households 2028	58,149	34,986
Change in households	966	311
Per annum change	97	31
Affordability ratio (2017)	4.46	4.14
Uplift to household growth	3%	1%
Total need	99	31
Capped	**99**	**31**

Source: Derived from ONS data

Revisions to the Standard Methodology

3.33 Despite only being recently adopted the Standard Methodology is subject to an on-going consultation on potential changes to it. The consultation is to ensure that the government target of 300,000 additional homes per annum is reached by the mid 2020s. This is in light of the revised national population projections which substantially reduced demographic growth.

3.34 The only major change being proposed is to set the baseline in reference to the 2014-based household projections rather than the 2016-based projections. As shown in the table below this substantially increases the housing need across the HMA to 217 dpa.

Table 15: MHCLG Consultation Standard Method Housing Need Calculations

	Blackburn with Darwen	Hyndburn
Households 2018	57,806	34,587
Households 2028	59,332	35,186
Change in households	1,526	599
Per annum change	153	60
Affordability ratio (2017)	4.46	4.14
Uplift to household growth	3%	1%
Total need	157	60
Capped	**157**	**60**

Source: Derived from ONS data

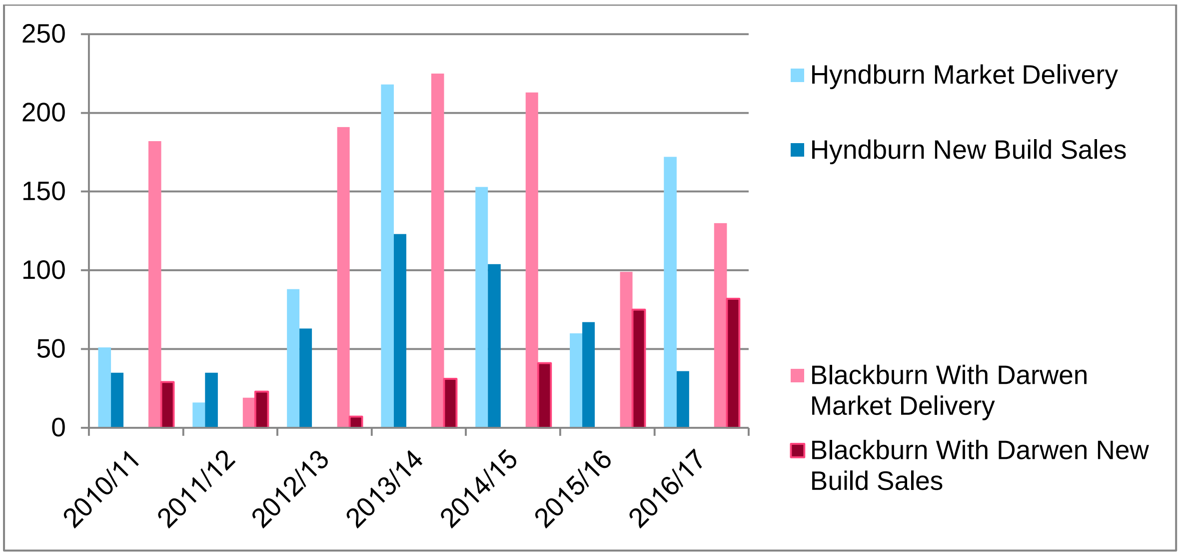
3.35 However it should be noted that at the present time these numbers hold little to no weight but may do so in the fullness of time. It is also likely that the revised methodology will only be adopted in 2019 at which time the period examined would be the 2019-29 period. Adopting that time period would reduce the housing need to 155 in Blackburn with Darwen and 58 in Hyndburn.

Completion Trends

3.36 We have also sought to run a sensitivity scenario looking at completion trends of new build market homes and new-build sales. The latter data is taken from the HM Land Register's price paid database and published by ONS whilst the former is from the local Authority Monitoring Reports (AMRs).

3.37 This analysis should come with a few caveats. Firstly the AMR data for completions, particularly by tenure is incomplete. It should therefore only be viewed indicatively. Furthermore some of the completions data will include sub-division while the new-build sales data will not. If properties are purchased through companies then these will also not be recorded as sales.

Figure 2: Newly built sales and net completions across the HMA, 2003-2017



Source: AMRs and Land Registry 2018

3.38 Figure 2 shows that market completions substantially outstrip sales of new build property in Blackburn with Darwen in particular. Since 2010/11 there has been on average a delivery of 151 new market homes. However in contrast only 41 new build sales have been achieved.

3.39 In Hyndburn since 2010/11 there has been on average a delivery of 108 new market homes. However in contrast only 66 new build sales have been achieved.

3.40 As mentioned above this could be because of the types of homes being delivered i.e. sub-division not counting as new build sales. Alternatively they are in build to rent schemes or self-build and were never intended to sell.

3.41 The agents did suggest that it was not typically investors who bought these properties but that part-exchange deals are popular. It is possible that such sales are not recorded by the Land Registry.

3.42 Even including consideration of these it would appear that the sales market is slow to catch up with delivery. This might in the longer term result in the slowing delivery until excess new-build stock can be sold.

3.43 We have however spoken to new-build sales agents in Accrington who suggested that the new-build properties are quick to sell. It was suggested that on average new-build properties are sold within one to three months of going on sale. It was noted that this had increased of late as a result of help-to buy.

3.44 By comparison there is not a substantive difference between to two factors in Hyndburn. Market completions number on average 108 with new build sales at an average of 66. Indeed in one year sales exceeded delivery suggesting that there is no significant surplus stock.

3.45 There has also been a notable trend in increasing delivery and new-build sales in Blackburn with Darwen since 2013/14. Again agents have suggested this is linked to help to buy. The agents noted that in Blackburn new build sales are very popular with one development of twelve units being sold off plan within two months. One agent said there is a demand for larger properties while the market has been delivering two and three bedroom properties.

3.46 The delivery and sales numbers in Hyndburn are in excess of the standard methodology, even when including the revised numbers this is not obviously the case in Blackburn with Darwen. This would suggest that the market could comfortably absorb additional homes above the standard methodology in Hyndburn.

Key Points

- In BwD population change has been driven by a positive level of natural change while in Hyndburn net out-migration to other parts of the country has been equally strong.
- The latest 2016-based population projection show a population growth over 2016 to 2036 in both BwD and to a greater degree Hyndburn to be negative (i.e. population decline). This contrasts with both the North West region (6%) and England (10%) equivalents.
- We have sought to examine alternative period from which to draw demographic data. Only one of these show a positive growth for Blackburn while none of them result in a positive growth for Hyndburn.
- Because of the way the population is occupying homes in smaller household sizes despite falling population growth housing need can still be positive.
- The analysis shows an overall housing need for 96 dwellings per annum (dpa) across BwD when using the 2016-based SNPP. This figure increases to 162 dpa with longer-term (10-year) migration assumptions.
- In Hyndburn, the three projections show a need in the range of 25-35 dpa depending on the scenario. The highest of these scenarios is based on the 2016-SNPP with updates to include the latest mid-year population estimate.
- The latest version of the Planning Practice Guidance (PPG) on Housing Need Assessment (September 2018) sets out a standard method to be used in calculating a housing need. Using this method shows a need for 99 dwellings per annum in BwD and 31 dpa in Hyndburn.
- However the Standard Methodology is also subject to an on-going consultation on potential changes to it. Using this potential standard method shows a need for 157 dwellings per annum in BwD and 60 dpa in Hyndburn.
- Since 2010/11 there has been on average a delivery of 151 new market homes in BwD and 108 in Hyndburn

4 MARKET SIGNALS

4.1 In this section we assess certain market signals in HMA authorities, namely Blackburn with Darwen (BwD) and Hyndburn, benchmarked against the regional (North West) and national comparators. Those taken from the census (over-crowding, tenure) have not been updated since the 2014 Strategic Housing Market Assessment (SHMA) report[4].

4.2 The previous report set out a range of market signals in the housing market area, including:

- Median house prices across the HMA authorities were below the national and Lancashire averages. House Prices in 2013 were £97,000 in Blackburn and £87,000 in Hyndburn. The national equivalent was £190,000 and Lancashire's £130,000. In 2013 median house prices in BwD were 48% lower than the national average and in Hyndburn 54% lower.
- The median house price for Blackburn with Darwen and Hyndburn had changed at a similar rate and displayed similar trends to Lancashire between 1996 and 2013. However, since 2006 prices in BwD had increased at a higher rate than those in Hyndburn and Lancashire.
- Median rents in 2013 were £450 per month in BwD and £400 in Hyndburn. Those were 23% and 32% lower than the national average respectively. The VOA data demonstrated that median rents in BwD had stayed static since 2011, whilst rents in Hyndburn had decreased by 4.8% over the same period. This was in contrast to both county and national figures, where there had been a growth in rents of 2.6% nationally and 3.0% in Lancashire since 2011.
- The ratio between lower quartile house prices and lower quartile earnings showed that since 2003 there was an increase consistently to 2007 and then the ratios began to fall as the recession hit. In 2012, the lower quartile house price to earnings ratio was 4.2 in BwD and 4.1 in Hyndburn. These were below both the national and county's equivalents.
- In terms of development rates, there had been an under delivery of 1,500 homes in BwD and 420 homes in Hyndburn between 2003/04 and 2012/13 compared with the RSS figures which assumed a higher economic growth scenario, consequently tempered by the recession.
- Overcrowding against the occupancy rating in Hyndburn (2011 data) is not considered to be severe, with just 4.57% of households living in a dwelling that is too small for their household size and composition. Overcrowding in BwD is at a higher level of 6.88%, although still below the national average of 8.74% nationally. Overcrowding within Lancashire as a whole is at a similar level to Hyndburn with just 4.58%.

4.3 The 2014 Study concluded that the scale of adjustment to housing supply over and above demographic-led projections at that time would not need to be substantial in line with the Practice Guidance most particularly due to the absolute median house prices and rental costs being very low in both Boroughs.

4.4 In the following sections we have sought to update some of this market signals compared to the county, regional and national comparators.

[4] Available at https://www.blackburn.gov.uk/New%20local%20plan%202/5.08%20Blackburn with Darwen%20Strategic%20Housing%20Market%20Assessment%20and%20Housing%20Needs%20Study%20July%202014.pdf

House Price

4.5 The median price of homes sold in the HMA in 2017 was £100,625[5] which is some of the lowest nationally. BwD median housing value was £106,000 in 2017 relating to an increase of 9% compared to 2014 study (data for 2013). Similarly Hyndburn's house prices have increased by 9% since 2013 reaching £95,000 in 2017. The HMA median figure is 55% below the national average (£222,000) and 49% below North West equivalent.

4.6 Table 16 shows the house values across the HMA authorities together with the wider comparators. We have sought to present also the lower quartile and mean equivalents. The housing values in HMA are below all the wider comparators. Within the HMA BwD has higher prices than Hyndburn across the different periods.

Table 16: House Prices 2017

	Median	Mean	Lower Quartile
Blackburn with Darwen	£106,000	£150,744	£72,000
Hyndburn	£95,250	£135,289	£60,000
HMA (Av.)	**£100,625**	**£143,016**	**£66,000**
Lancashire	£142,000	£185,507	£95,000
North West	£149,995	£210,823	£100,000
England & Wales	£222,000	£338,621	£140,000

Source: Land Registry 2017

4.7 Table 17 presents house price changes over the last 1, 5, 10, 15 and 20 years. Over the last year, the HMA has seen a change of 1.5%. All the wider comparators have seen an increase of 5%. On individual authority basis, BwD has seen an increase of 3.0% but Hyndburn has seen no change since last year.

Table 17: House Price Growth 1998-2017

		1 year	5years		10 years		15 years		20 years	
Name	2017	Change %	Change %	annual change %	Change %	annual change %	Change %	annual change %	Change %	annual change %
BwD	£107,000	3.0%	10.3%	2.0%	2.9%	0.3%	114.2%	5.2%	206.2%	5.8%
Hyndburn	£100,000	0.0%	14.9%	2.8%	5.8%	0.6%	156.7%	6.5%	207.7%	5.8%
HMA (Av)	**£103,500**	**1.5%**	**12.5%**	**2.4%**	**4.3%**	**0.4%**	**132.8%**	**5.8%**	**206.9%**	**5.8%**
Lancashire	£148,000	2.1%	13.8%	2.6%	13.9%	1.3%	97.3%	4.6%	196.0%	5.6%
North West	£154,950	4.7%	19.2%	3.6%	16.9%	1.6%	93.7%	4.5%	209.9%	5.8%
England	£230,000	4.5%	24.3%	4.5%	29.6%	2.6%	81.1%	4.0%	253.8%	6.5%

Source: ONS Median house price by local authority district

4.8 Over the last 5 years, the HMA has seen an increase of 12.5% (2.4% per annum (pa)) compared to 24% (4.5% pa) nationally; 19% (3.6% pa) regionally and 13.8% (2.6% pa) in Lancashire. During the

[5] Average figure

last 10 years house price values in the HMA have grown by just 4.3% (0.4% pa). This is significantly below the national (30%) and regional (17%) equivalents.

4.9 Over the longer term, house prices have been increased by 133% over the last 15 years and 207% over the last 20 years. These are compared to 81% and 254% in national level respectively. For the same periods North West has seen an increase of 94% and 210% while Lancashire's equivalents are 97% and 196%.

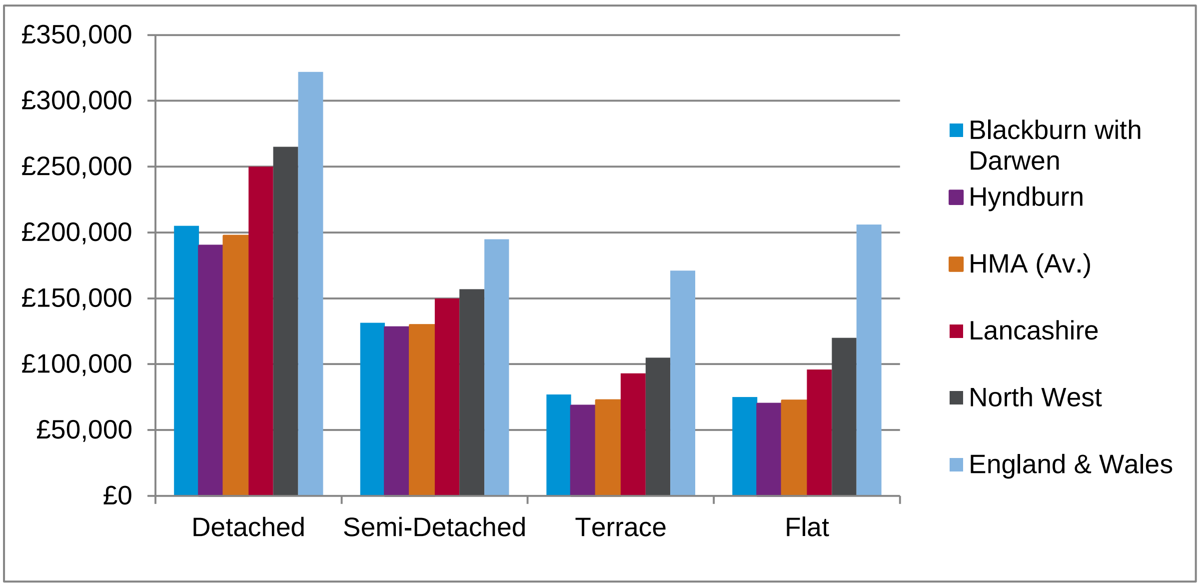
4.10 This illustrates that over the longer period house price growth has been behind the wider comparators but has some what slowed on comparison to national and regional trend particularly over the last 4 years.

Prices by Type

4.11 Figure 3 shows median house prices by type of property across the HMA and the wider comparators. Across all typologies, house prices in the HMA are below all the wider comparators and significantly below the national equivalents.

4.12 The median house price for detached properties in the HMA is £197,000; for semi-detached £129,750, for Terraced properties £72,750 and for flats £72,500. These are relevant also to the size of properties.

Figure 3: Median House Price by type 2017



Source: Land Registry 2017

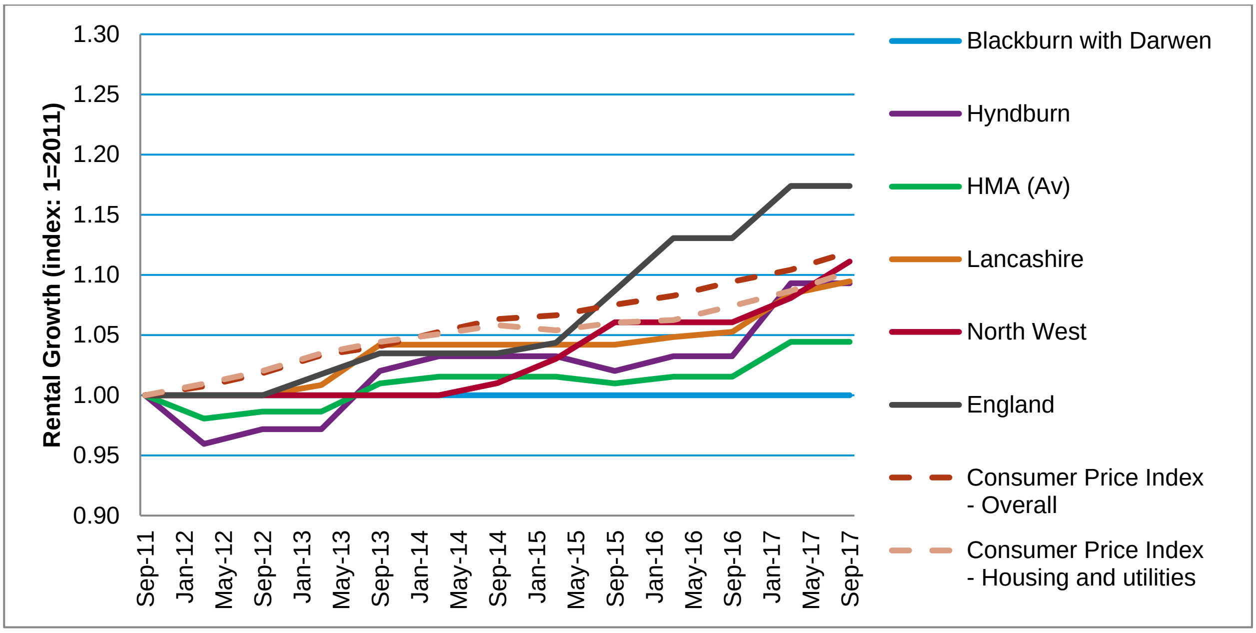
4.13 In all cases the house prices in Blackburn with Darwen exceed those in Hyndburn. This is particularly the case for detached and to a lesser extent terraced properties.

Rental Values

4.14 Median rental values have been recorded at £431[6] per calendar month (pcm) in the year ending to September 2017 through 2,460 transactions recorded in Valuation Office Agency. Median rents have increased just by 4% since 2011.

4.15 The median rental price growth in the HMA are significantly below all the comparators including the general Consumer Price Index (CPI) and the Housing CPI. This means that in real terms rental costs have decreased.

Figure 4: Rental Growth (indexed to 2011)



Source: VOA 2017

4.16 Across the HMA authorities BwD has seen no change in its rental values since 2011 and Hyndburn has seen an increase of 9%. More detailed analysis on rental costs is provided in paragraphs 8.19-8.21.

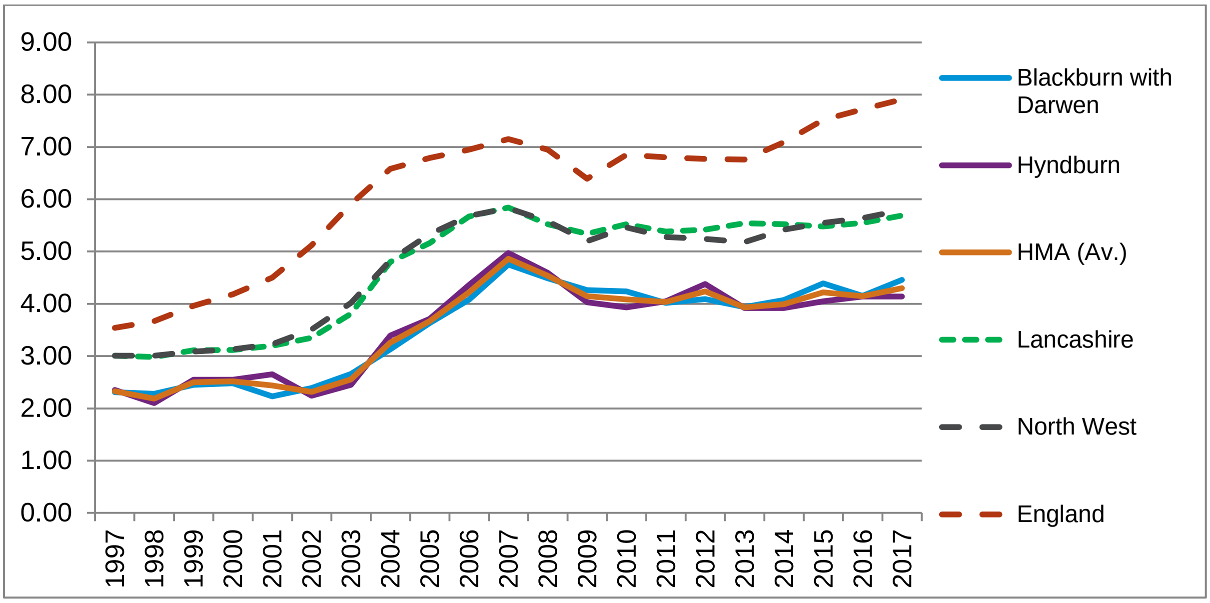
Affordability Ratio

4.17 The average ratio of median house price to median gross annual workplace-based earnings for the HMA was 4.3[7] in 2017. Over the last 20 years this has been increased by 96%, compared to national equivalent growth of 116%, regional of 92% and Lancashire's 91%.

[6] average of the HMA authorities
[7] average of the HMA authorities

4.18 Figure 5 shows the deteriorating affordability since 1997. There was an increase between 2003 and 2007 reaching the peak of 4.86. This was then followed by a recessionary decrease and since 2009 the trend has been comparably flat.

Figure 5: Affordability ratio – median house price to median gross annual workplace-based earnings,1997-2017



Source: ONS 2018

4.19 We sought also to assess the lower quartile affordability ratio which is the ratio of lower quartile house price to lower quartile gross annual workplace-based earnings. In 2017 the average ratio across the HMA was 3.89. This equates to an increase of 98% over the last 20 years. However England's equivalent at 7.26 has increased by 103%.

4.20 In terms of the residence based affordability ratio a similar conclusion can be drawn. In particular, the ratio of median house price to median gross annual residence-based earnings across the HMA is 4.30. This is below the national equivalent of 7.91 and North West's equivalent of 5.81.

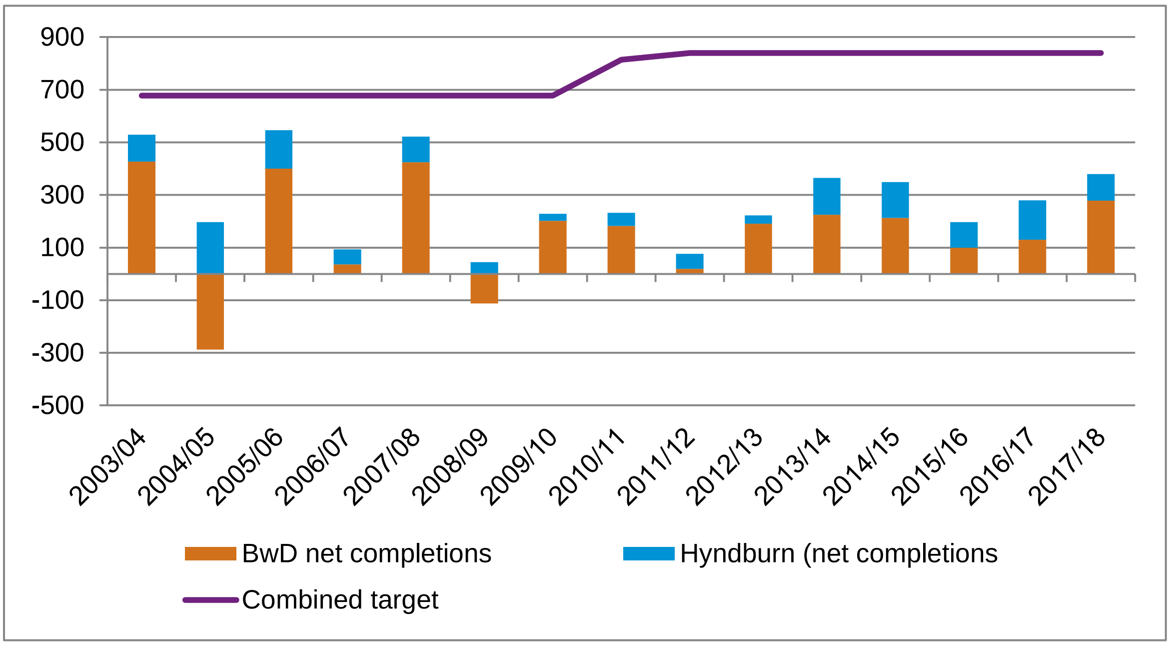
4.21 This evidence does not support the existence of particular affordability pressures in market housing across the HMA. However, there will still be households who will not be able to afford any market property this is examined in Chapter 8.

Completions

4.22 Data has been drawn from the Councils' most recent Annual Monitoring Reports and Five Year Housing Land Supply publications. This information is combined to the previous SHMA Study dated in 2014. It is evident that since the recession the house building market has not recovered within the HMA.

4.23 When compared to the combined housing targets housing delivery has only approached the target once since 2003. This occurred in 2005/6 when 546 homes were delivered but was still below target of that year.

Figure 6: Net Completions 2003-18



Source: Council Monitoring Data

4.24 Cumulatively since 2003 a total of just over 3,800 new homes have been built in the HMA at an average of 270 per annum. This level of delivery is above the proposed standardised OAN of 130 dwellings per annum across the HMA which suggests that a higher rate of development would be feasible.

Qualitative Commentary

4.25 A primary research exercise was carried out in September 2018 by way of consulting with various local estate and lettings agents with a view to provide commentary in establishing the market housing demand in the area.

4.26 We managed to collect responses from six local estate agents who provided their views on the local market dynamics. Three of the agents were located in Blackburn and three were located in Accrington. The following agents provided their views:

- Your Move Darwen (Market Street, Blackburn);
- Curtis Law Estate Agents (Limbrick, Blackburn);
- Property Shop (Blackburn Road, Accrington)
- Eafield & Maple (Blackburn Road, Accrington);

- Mortimers Estate Agents (Queen Street, Blackburn); and
- Thompson & Partners (Blackburn Road, Accrington).

Sales

4.27 There was a consensus that the housing market has remained slow but stable across the HMA for the past 4 years. Most agents stated that market conditions had improved recently in Hoddlesden in the South of the study area.

4.28 There was agreement that buyers are unwilling to pay the high-end prices asked by vendors in the current market, with the lower-end properties selling a lot quicker due to the better availability of mortgages for properties below and in the region of £150,000. This was the case across all sub-markets.

4.29 It was noted that terrace properties are in high demand across the area and would be sold relatively quickly. The agents generally reported that the most popular property type is the more affordable (i.e. entry price level) type, 2-3 bedroom terrace properties within the region of £100,000 - £125,000.

4.30 These properties are highly in demand particularly from first time buyers and young families who are noted by many estate agents as dominating the current market. In particular, Darwen sub-area is popular to families, while Blackburn and Darwen Towns are more popular for singles and couples.

4.31 The agents noted that although there are a high number of first time buyers in the market there is not a specific profile of buyers that would particularly stand out as the area gets diverse interests from first time buyers to retired people.

4.32 It was however noted that central areas close to the town centres have a high proportion of council owned properties which limits the availability of properties on the market in these areas. The suburbs, attract more investors and first time buyers due to the good public transport links and accessibility. These areas are seen also as the most desirable in terms of both sales and lettings.

4.33 Whereas rural areas, tend to have more of the detached housing stock and attract families generally. In particular, Ribble Valley and Hoddlesden were mentioned by estate agents as being popular with local clients already living in the area, inclusive of first time buyers and those retiring from more urban areas locally. These areas are attractive due to their rural location and quiet village environment.

4.34 The profile of buyers also included a high proportion of Buy-to-Let landlords and investors recently, with a number of investors choosing to purchase lower quality properties that after refurbishment are put on either rental or sales market.

4.35 The yield in Blackburn and Darwen were seen as very attractive for investment as there is generally a good supply of stock and improved rail links to Manchester every thirty minutes. There is an increase in demand from commuters looking to buy or rent cheaper properties. The agents also noted that the opening of new businesses/bars/restaurants in this area had encouraged the investment in the market.

4.36 Agents stated that Lower Darwen and Whitehall, together with areas south of the town centre are more desirable to live in compared to central Blackburn and inner city areas. These are affluent areas with a good offer of schools and nurseries drawing families into the area.

4.37 It was also noted that Accrington is popular to first time buyers, where affordability is seen to be good in relation to access to services and the quality of properties on the market.

4.38 The agents in Blackburn generally reported the asking prices of approximately:

- £60,000 for 1-bed properties
- £90,000 for 2-bed properties
- £140,000 for 3-bed houses
- £210,000 for 4-bed houses
- £250,000+ for 5-bed houses

4.39 The agents in Accrington generally reported the asking prices of

- £75,000 for 1-bed properties
- £100,000 for 2-bed properties
- £160,000 for 3-bed houses
- £260,000 for 4-bed houses
- £390,000+ for 5-bed houses

4.40 Darwen market to the south is strong with sales above £200,000 for any property. The agents reported that most properties in Darwen are within the price range of £400,000 and £500,000 however this varies as following:

- £215,000 for 2-bed semi-detached properties on outskirts of town;
- £300,000 to £350,000 for 3-bed properties;
- £500,000 for 4-bed detached properties; and
- £750,000+ ranging up to millions for the larger executive properties.

4.41 All agents believed that the recent stamp duty changes will help first time buyers but none were able to provide any substantial evidence. The general consensus was that, whilst the stamp duty changes will help, the certainty of the market over the next 12 months is heavily dependent upon the outcome of Brexit negotiations influencing the willingness of buyers and investors to engage with the market.

4.42 The agents thought that the market will continue to be as buoyant if not busier over the next year. Whilst the prices may have been stable in recent years, they expect a slight increase in values and are expecting to be busy in terms of transactions particularly given the ongoing interest from investors and first time buyers in the area.

4.43 The agents reported an under-supply of smaller properties (i.e. 1-2 beds) and bungalows on the market, including both houses and apartments as well as at the opposite end of the spectrum an undersupply of the larger 3-4 bed detached properties. Some agents reported an oversupply of terraced houses.

4.44 Finally, agents noted the potential of new builds to sell well on the market although none of the agents were currently handling any new build properties.

Lettings

4.45 There was a consensus that the letting market is a buoyant market, busier than the sales market across the study area. The agents reported very strong demand for all types of rental properties in terms of cost and size, and expected to see greater supply across the area due to ongoing interest from buy-to-let investors.

4.46 It was noted that all types of properties are in demand and would be let relatively quickly. But the agents generally reported that the most popular property type is, similarly to the sales, the more affordable 2-3 bed terrace properties. It was noted that there is generally a shortage of 4-bed family properties particularly around areas where there are good schools nearby in Hyndburn Borough.

4.47 The profile of renters is diverse with a number of first time buyers and young families in their 20s and 30s who cannot afford to buy as yet. These are typically looking for the 1-2 bed properties. It was also noted that more established families also look for rental properties in more rural areas, which remain well connected, particularly in Darwen.

4.48 One estate agent noted that demand is particularly high from unemployed people/families in Accrington and more widely across Hyndburn, where clients are typically looking for 2-3 bed terraced properties.

4.49 Demand is high across the area from buy to let investors looking to buy poor quality terraced housing and carry out refurbishment in order to rent out for higher values. One estate agent noted that investors are using terraced housing as an opportunity to refurbish in order to create more profitable flats in Hyndburn.

4.50 The rental demand was seen as strong across the whole area and agents noted that there were no clear stand out sub-market in the rental market except broadly speaking those areas with good access to vehicular transport network (e.g. Motorway network to Manchester and Preston) and railway links to Manchester.

4.51 The agents in Blackburn generally reported typical asking prices for rents of approximately:

- £440-480pcm for 1-bed properties
- £500pcm for 2 bed properties
- £525pcm for 3 bed houses
- £650pcm for 4 bed houses

4.52 The Darwen and southern sub-market generally reported lower rents at typically around:

- £325-420pcm for 1-bed properties
- £380-410pcm for 2-bed properties
- £510+pcm for 3-bed houses

4.53 The Accrington market generally reported similar rents at typically around:

- £325-420pcm for 1-bed properties
- £440pcm for 2-bed properties
- £520pcm for 3-bed houses
- £840pcm for 4-bed houses

4.54 The agents all reported that the rents have either been stable or steadily increased in recent years. Most agents were positive that the rents will continue to increase but perhaps in a slower rate due to static wages and the potential impact of Brexit on the market.

4.55 The agents noted that many investors were looking for properties under £50,000, with a mix of small investors and those with pre-existing portfolios. Agents stated that terrace properties in the £500 - £700 pcm range were popular with investors alongside those with a more restricted supply such as four bed properties and bungalows within the £850 - £1,000 pcm range.

4.56 Most rental properties currently come from re-let stock and there are not that many new build properties that come on to the rental market across either Hyndburn or the BwD areas.

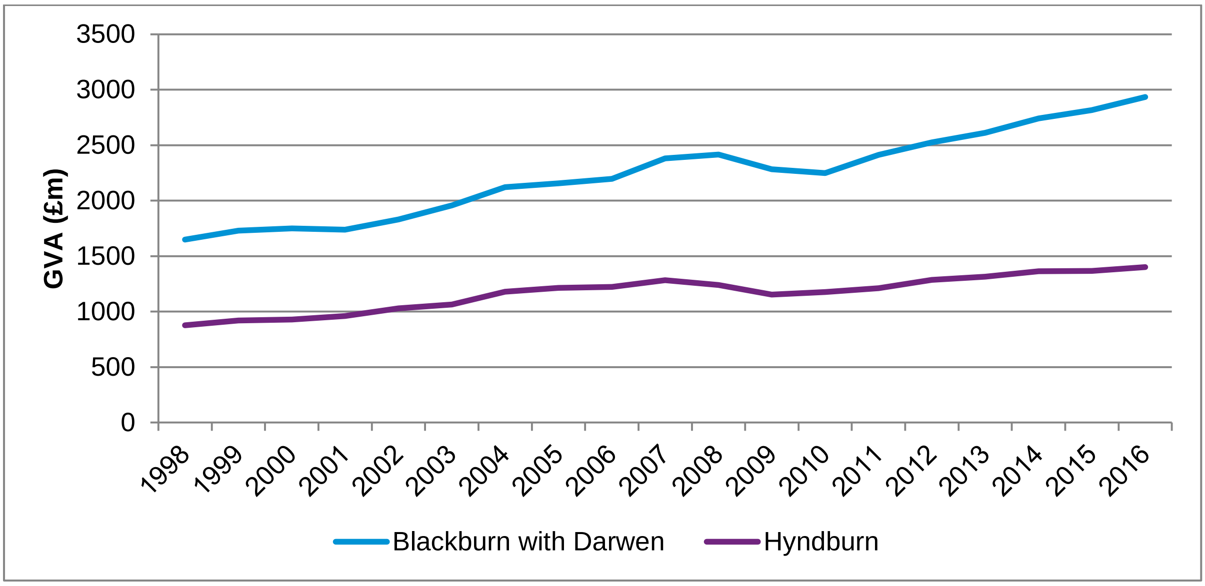
Key Points

- Median house prices across the HMA authorities were below the national and Lancashire averages at £100,625. House Prices in 2017 was £106,000 in Blackburn and £95,250 in Hyndburn.
- Median rents in 2017 were £430 across the HMA having increased by 4% since 2011 which is below the rate of inflation.
- The ratio of median house price to median gross annual workplace-based earnings for the HMA was 4.3 in 2017. Over the last 20 years this has been increased by 96%, compared to 116% nationally.
- Since 2003 a total of 3,800 new homes have been built in the HMA at an average of 270 per annum. This is above the 130dpa standard methodology need.
- Overall, the evidence does not support a further uplift on the demographic needs as a result of market signals.

5 ECONOMIC BASELINE

5.1 Blackburn with Darwen (BwD) local economy produced goods and services valued at just over £2.9 billion per annum Gross Value Added (GVA) in 2016, and Hyndburn's economy was worth just over of £1.4 billion in 2016.

Figure 7: GVA Trend (2005-2016)



Source: ONS

5.2 While both Local Authorities have seen growth since 1998 (excluding the recessionary years) there has been considerable growth in the Blackburn economy, particularly since 2010.

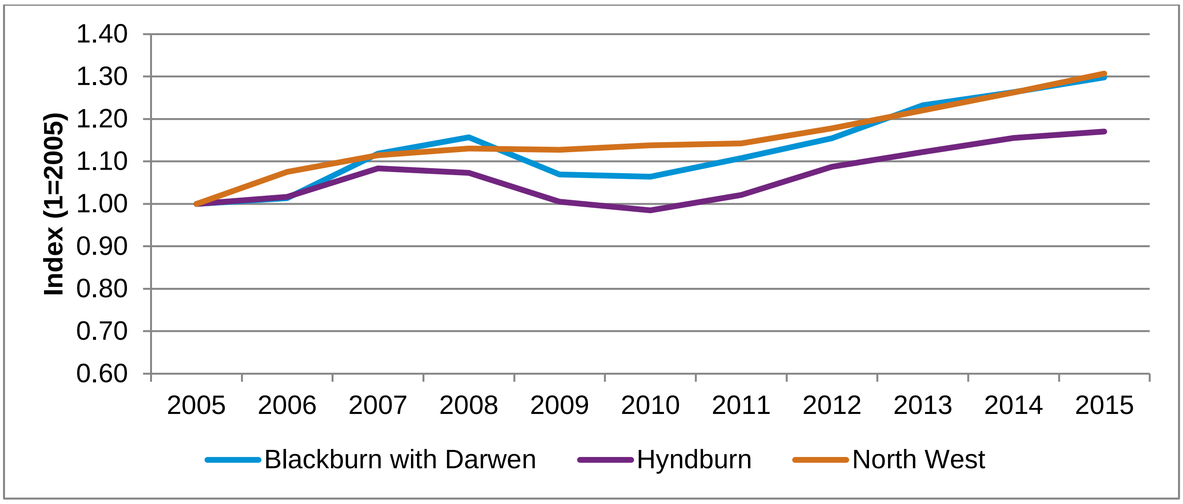
5.3 The Business Register and Employment Survey suggests that Blackburn and Darwen economy supports 68,000 jobs in 2017 while the Hyndburn equivalent was 29,000. In both cases this was around 1,000 jobs higher than two years previous.

Employment and Economic Growth

5.4 Figure 8 shows the GVA growth trends compared to the trend for the North West region. This illustrates that BwD's GVA growth was broadly similar to the regional growth rate whereas Hyndburn's GVA growth was weaker than the regional levels.

5.5 However, both boroughs did see substantial contractions in GVA during the recession following the 2007/08 financial crash whereas the regional GVA was relatively steady during this period. BwD's recovery from this downturn to 2015 outpaced that of the regional growth while a similar recovery rate to the regional trend was seen in Hyndburn.

Figure 8: Indexed GVA Growth (2005-2015)

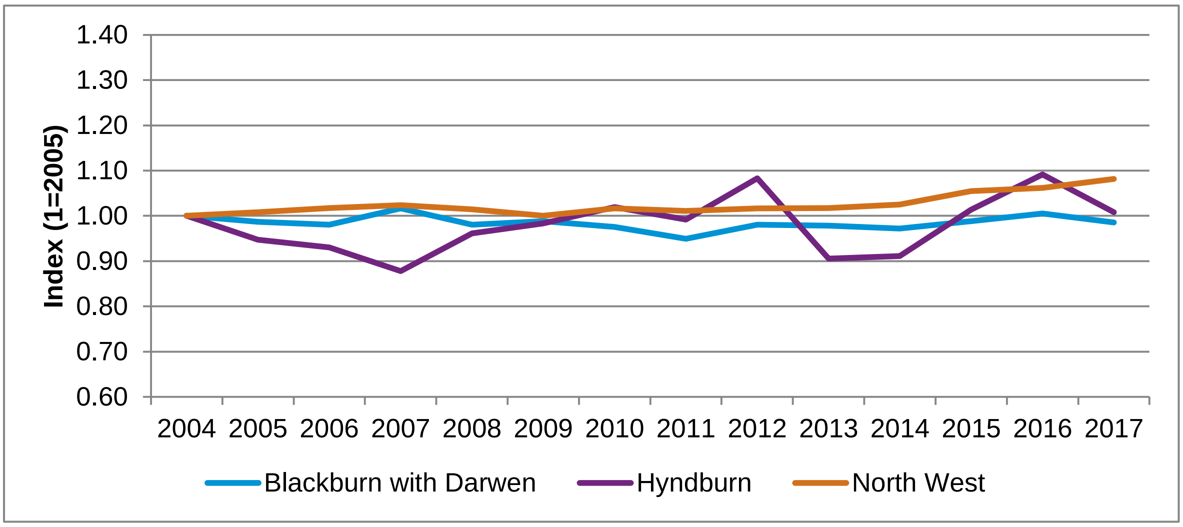


Source: Lancashire Enterprise Partnership

5.6 Since 2004, employment in BwD has stayed relatively steady at approximately 60,000 jobs although a slight dip during the recession including 2011 (57,800 jobs) can be noted. Hyndburn saw a more turbulent trend with jobs as low as 31,600 in 2011 and 32,600 in 2013, and as high as 39,000 in 2012 and 39,300 in 2016.

5.7 These trends are different to that seen at the North West regional level which had a relatively steady increase in employment. Growth in employment has not been as strong as the GVA growth in both boroughs, indicating productivity improvements within the local economy.

Figure 9: Indexed Employment Growth (2004-2017)

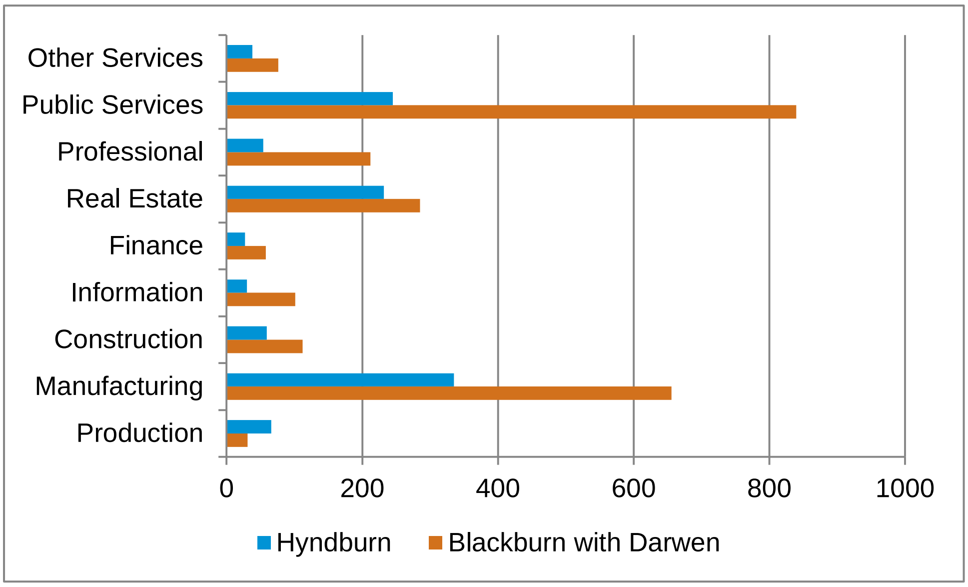


Source: ONS Annual Population Survey

GVA Growth by Sector

5.8 Figure 10 shows the breakdown of the two boroughs' GVA by sector in 2016. The strongest contributors to GVA in the two boroughs are the Manufacturing, Public Sector and Real Estate sectors.

Figure 10: GVA by Sector (2015)



Source: ONS, 2018

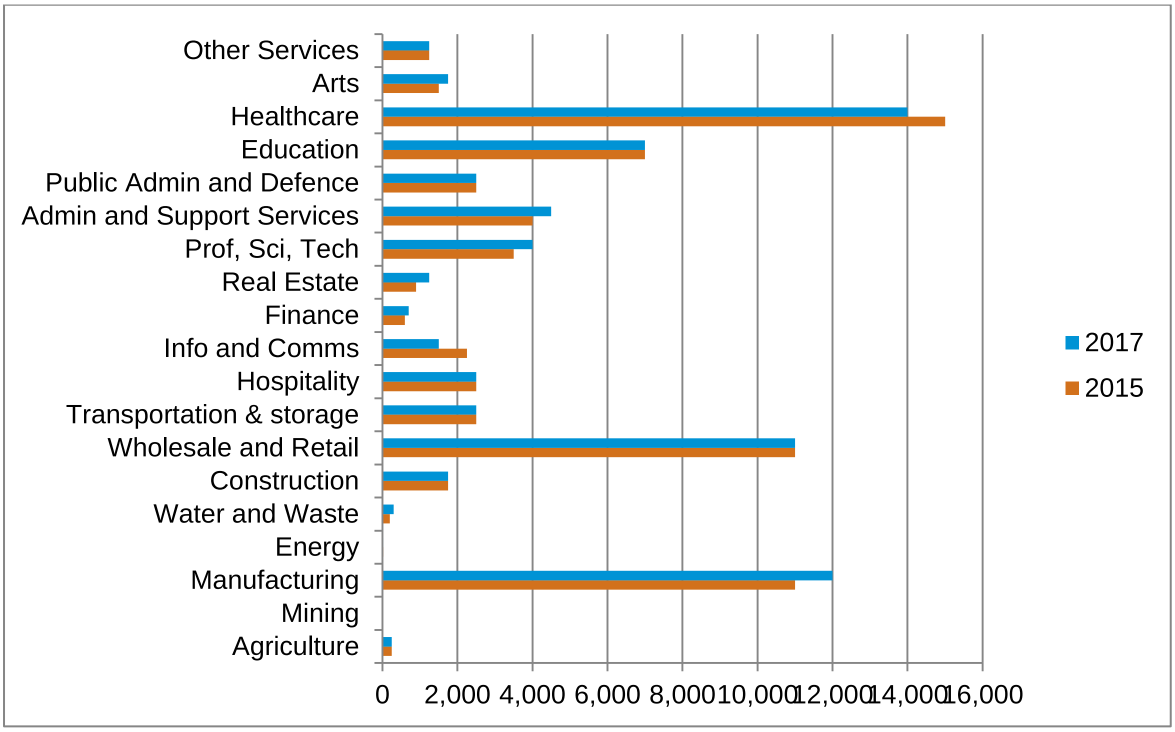
5.9 For all sectors with the exception of production the GVA in Blackburn with Darwen exceeds that in Hyndburn. The production sector includes farming, forestry and mining and quarrying.

Employment Structure

5.10 BwD's largest sector in terms of total employment numbers is the Human Health and Social Work Activities sector with 14,000 jobs in 2017. There are also large numbers employed in the Wholesale and Retail sector (11,000 jobs), Manufacturing sector (12,000) and the Education sector (7,000).

5.11 Over the last two years the fastest growing sector was the manufacturing sector, which added 1,000 jobs. In contrast the largest reduction was in the healthcare sector which contracted by the same amount.

Figure 11: Employment by Broad Sector – Blackburn with Darwen (2015 - 2017)



Source: Business Register and Employment Survey, 2018

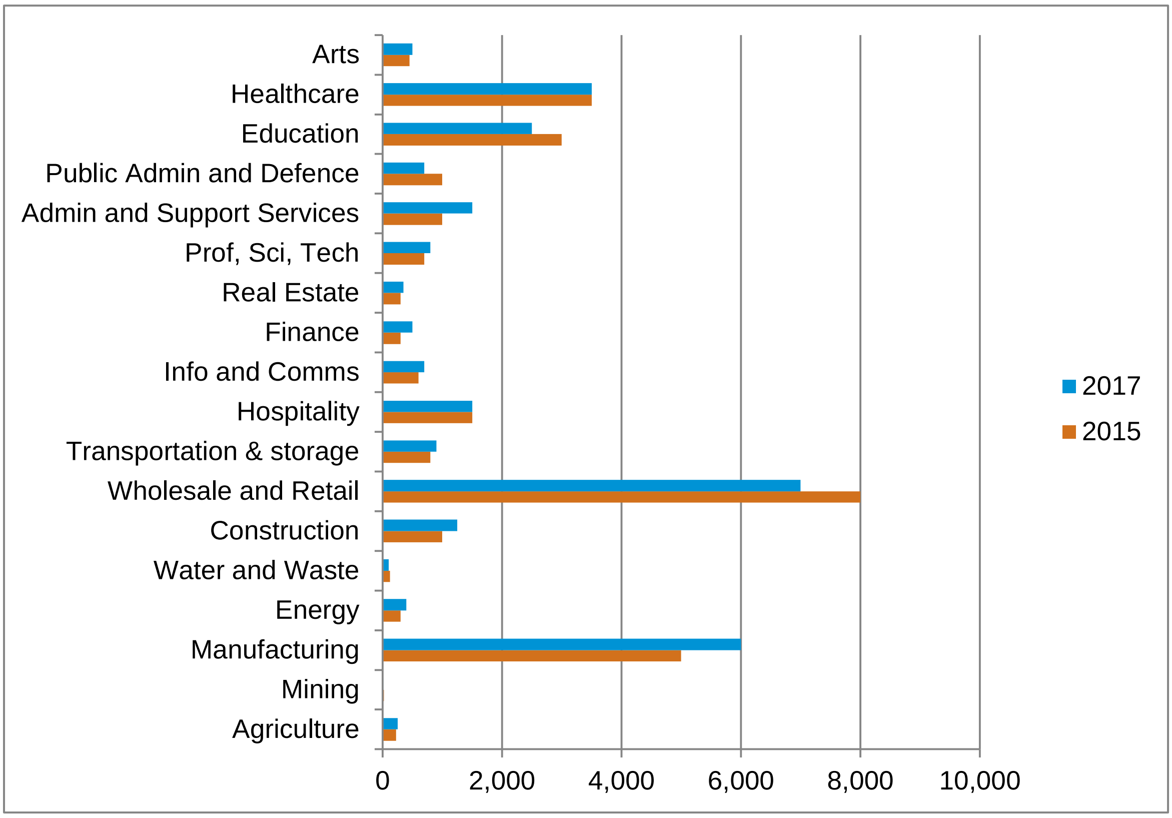
5.12 Other sectors which have seen large growth in the Borough over this period are Professional, Scientific and Technical and Admin and Support Services (+500 jobs), and Real Estate (350 jobs). In percentage terms the largest growth was in the Water and Waste sector (50%) followed by the Real Estate (33%) and Arts and Finance and Insurance (both 18%).

5.13 The public sectors of Public Administration and Defence; Compulsory Social Security and the semi-public sector and the semi-public Arts, Entertainment and Recreation sectors have seen a loss of 1,000 jobs in since 2015 (all healthcare). Other sectors which have seen reductions in total jobs include Energy (-10) and Information and Communications (-750 jobs).

5.14 Hyndburn's largest sector in terms of total employment numbers is the Wholesale and Retail Trades which includes the repair and sale of motor vehicles with 7,000 jobs in 2017. There are also large numbers employed in the Manufacturing sector (6,000 jobs), Human Health and Social Work Activities sector (3,500) and the Education sector (2,500).

5.15 In Hyndburn, the manufacturing sector has seen the largest jobs growth since 2015, with a growth of 1,000 jobs. Other sectors which have seen growth in the District over this period are Administration and Support services (+500 jobs) and Construction (+250 jobs).

Figure 12: Employment by Broad Sector – Hyndburn (2015 - 2017)



Source: Business Register and Employment Survey, 2018

5.16 In percentage terms the largest growth was in the Finance and Insurance (67%) followed by the Admin and support services sector (50%) and Energy sector (33%).

5.17 The above figures do not explicitly identify jobs in the tourism sector, but these are divided across the accommodation and food service and Arts, entertainment and recreation sectors. In combination, these totalled just below 4,000 jobs in 2017 in BwD and have seen an increase of 250 jobs since. Hyndburn's tourism sector totalled 2,000 jobs in 201 and have seen a growth of 50 jobs since 2015.

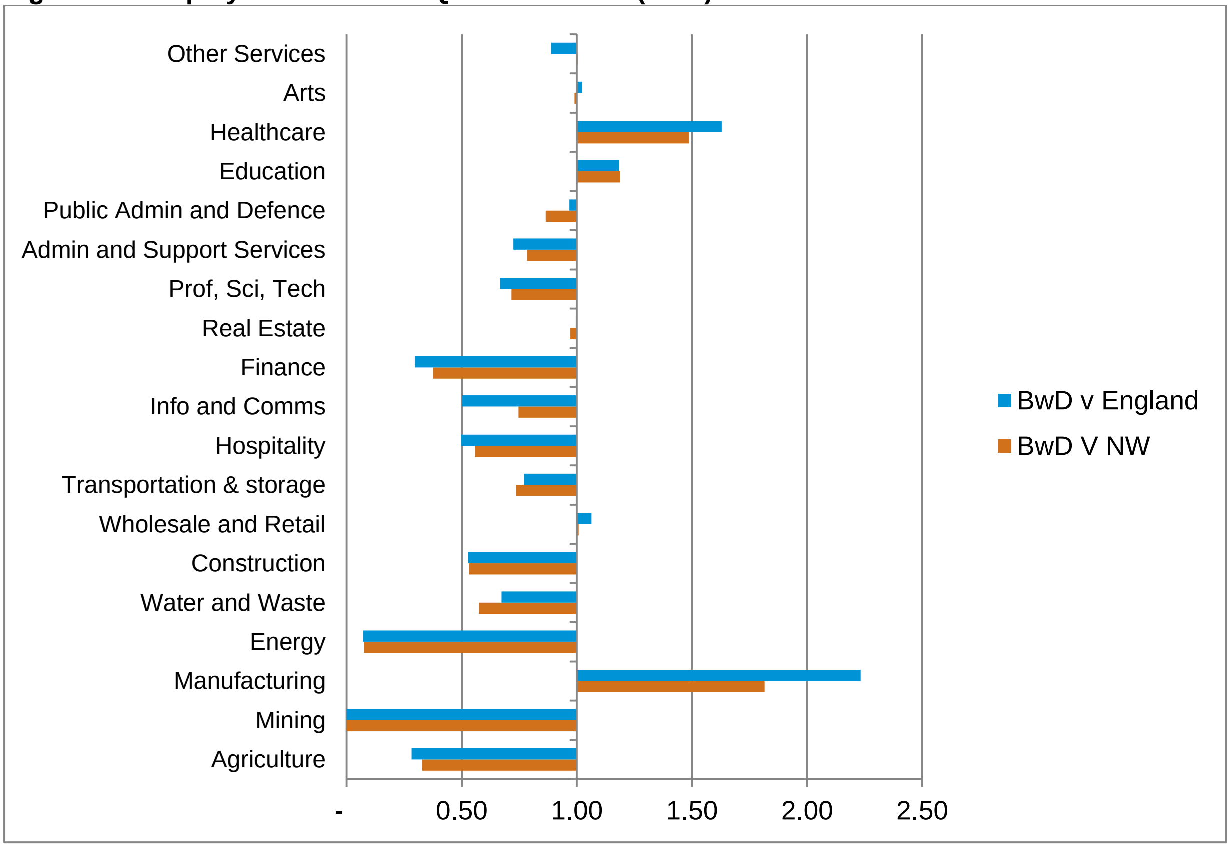
Location Quotient

5.18 Figures 13 and 14 overleaf show the location quotient analysis of BwD and Hyndburn's employment structures compared to the structures at regional and national levels. In relative terms, sectors with the largest comparative over-representation in BwD are Manufacturing, Human Health and Social Work Activities, Education and Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles sectors all of which are stronger than the national and regional trends.

5.19 In Hyndburn, the sectors with the largest overrepresentation are the Utilities, Manufacturing, Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles and Education sectors which are stronger than the national and regional trends.

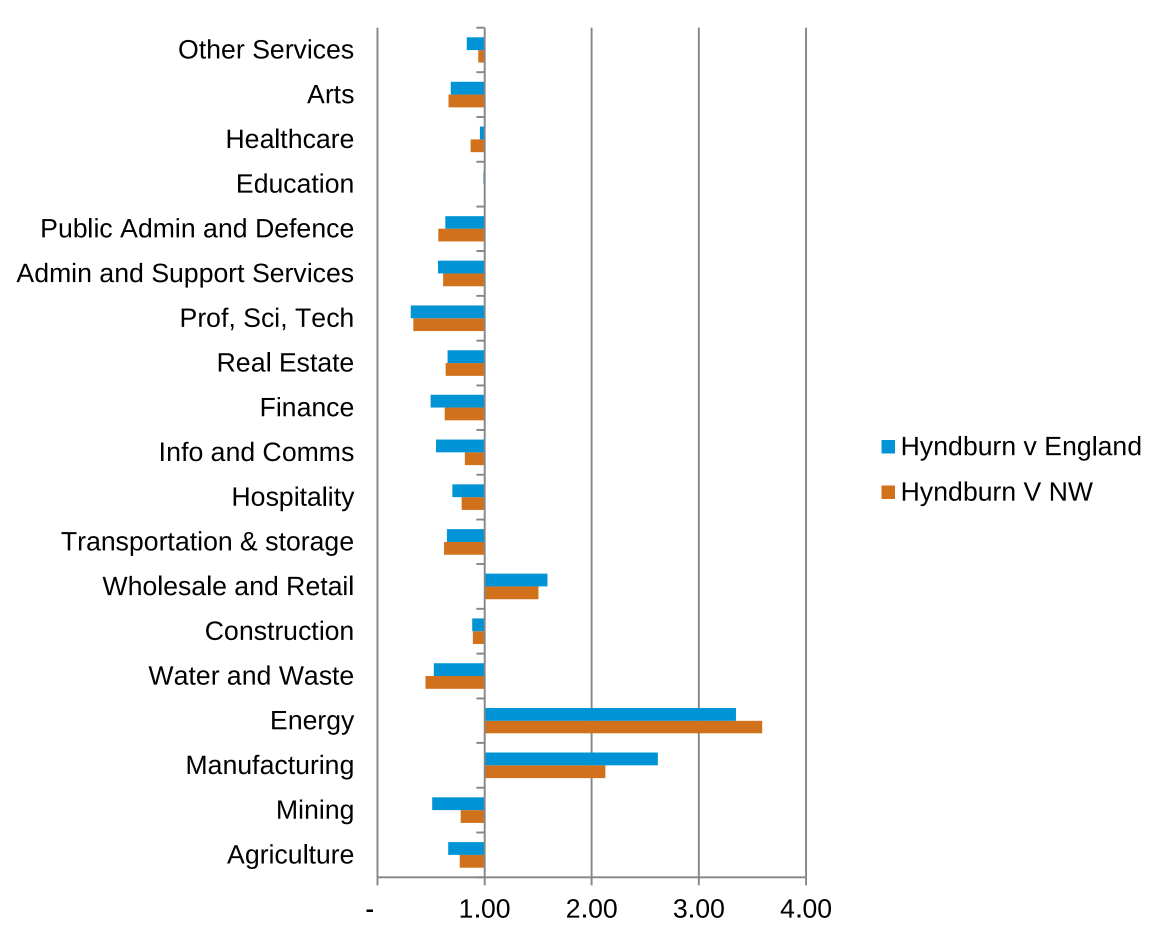
5.20 Against the regional representation BwD also has a strong Information and Communication sector while Hyndburn has strong a Energy and Manufacturing sector.

Figure 13: Employment Location Quotient – BwD (2017)



Source: BRES

Figure 14: Employment Location Quotient – Hyndburn (2017)



Source: BRES

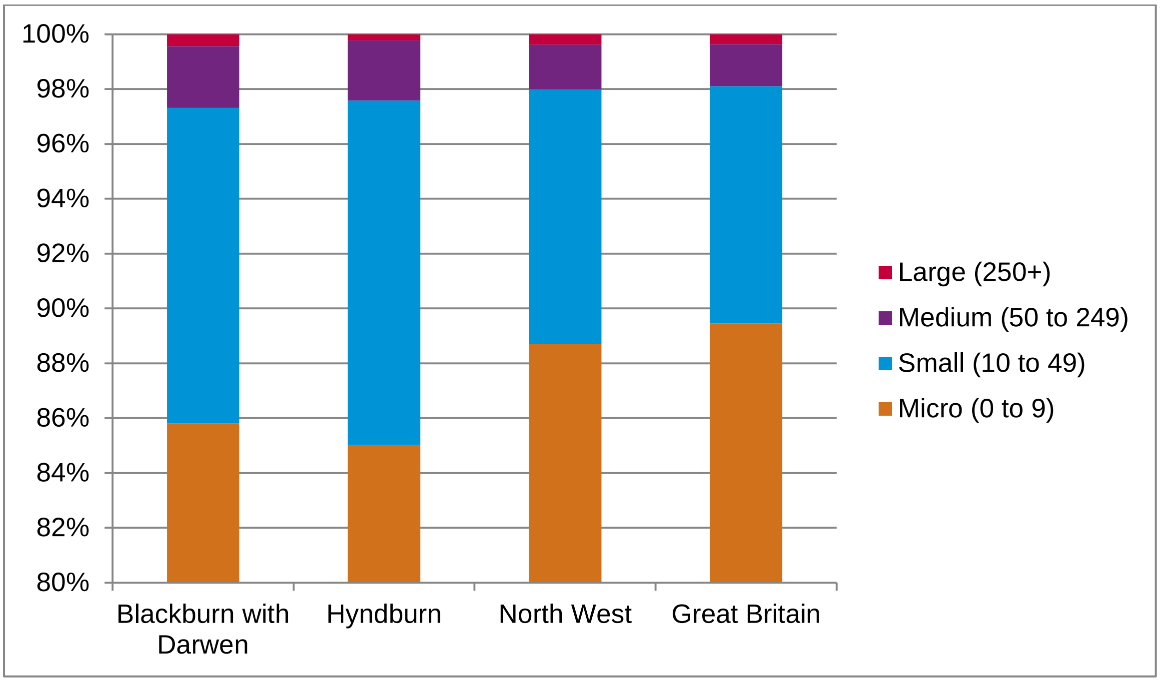
5.21 There are a number of sectors in the Boroughs which are relatively under-represented in comparison to the regional and national representations. In BwD, of particular note are Agriculture, Forestry and Fishing, Mining and Quarrying, Electricity, Gas, Steam and Air Conditioning Supply, Water Supply; Sewerage, Waste Management and Remediation Activities, Accommodation and Food Service Activities and Financial and Insurance Activities sectors.

5.22 In Hyndburn, of particular note is the under-representation of Agriculture, Forestry and Fishing, and high values sectors such as Financial and Insurance Activities, Professional, Scientific and Technical Activities and Administrative and Support Service Activities.

Business Base

5.23 There are 4,650 business located in BwD and 2,270 businesses locating in Hyndburn. The vast majority of the enterprises based in BwD (85.8%) and Hyndburn (85%) being micro businesses which employ fewer than 10 people. This group includes a high percentage of self-employed and sole-traders in general. This is slightly lower than the regional (88.7%) and national (89.5%) equivalents.

Figure 15: Enterprises by Size, 2017



Source: UK Business Counts, NOMIS 2017

5.24 There are 20 businesses in BwD and 5 businesses in Hyndburn that have over 250 employees. As with the regional and national picture employment within BwD and Hyndburn are not overly reliant on a small number of major employers. This provides the districts with a level of resilience to a major downturn affecting a single business or sector. Although downturns across a single sector could impact the areas resilience.

5.25 The statistics do not allow us to break down these by sector but it is known that the largest employers in Blackburn are the NHS, the Council, Eurogarages, Crown Paints, and Graham and Brown Wallpaper Manufacturers. In Hyndburn, they include Accrington and Rossendale College, Bensons Beds, Coach House Antiques, Carboard Box Company, Express Gifts, RLC Calendar, Senator International, Simon Jersey, and Whatmore.

Labour Market

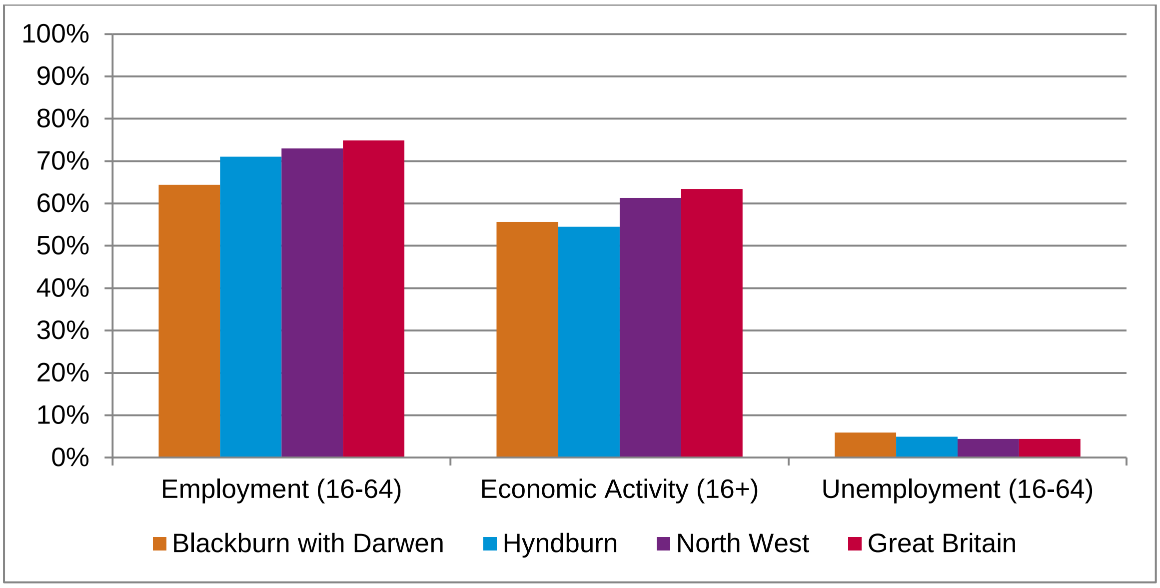
Economic Participation

5.26 Figure 16 shows employment and unemployment as a percentage of the working age population (defined by ONS to be the population aged 16-64 years). The figure also shows economic activity as a percentage of those aged over 16. The latter is inevitably lower as it includes a large number of retired people.

5.27 The figures show that the employment rate of 16-64 year olds in BwD is 64.4% and 71% in Hyndburn. These are lower than the regional rate (73%) which itself is below the national rate (74.9%).

5.28 In BwD the employment rate for males is 69.5%, which is significantly lower than the regional rate (77.3%) and the national rate (79.6%). For females the employment rate in BwD is 59.3% - significantly lower than both the regional (68.8%) and national (70.3%) averages.

Figure 16: Economic Activity Rates (2017) [8]



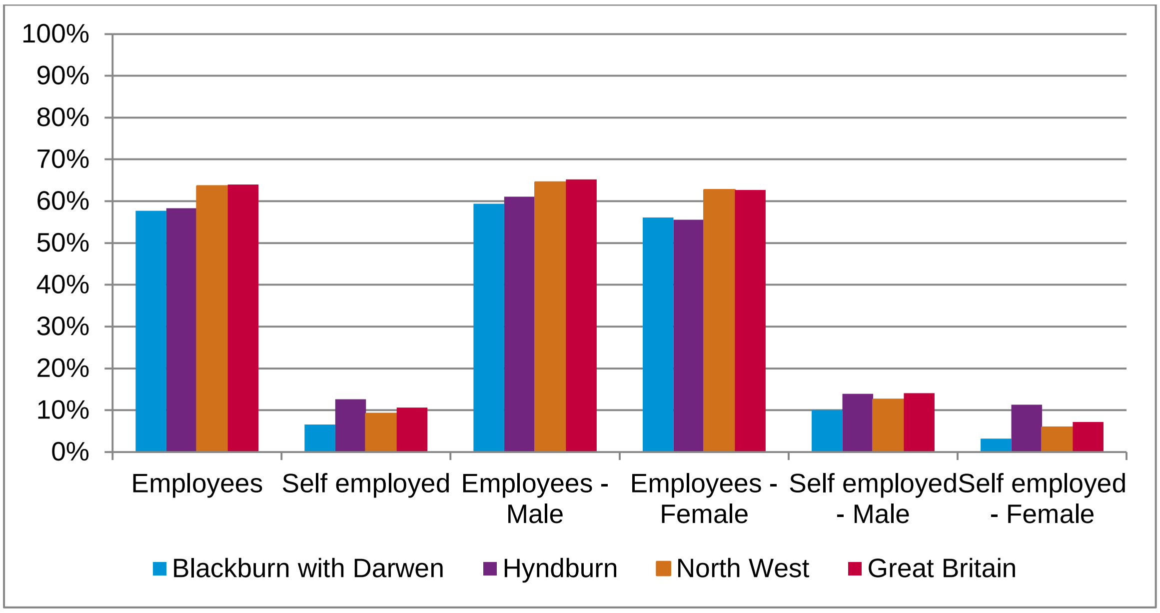
Source: ONS Annual Employment Survey

5.29 In Hyndburn the employment rate for males is 75%, which is lower than the regional rate (77.3%) and the national rate (79.6%). For females the employment rate in Hyndburn is 66.9% - lower than both the regional (68.8%) and national (70.3%) averages.

5.30 The Economic Activity Rate describes the percentage of working-age adults (16+) who are working or looking for work. Note this is a slightly different denominator. The Economic Activity Rates in both BwD (55.6%) and Hyndburn (54.5%) are lower than the other comparators.

[8] Employment as % of people aged 16 -64 who did some paid work in the reference week (whether as an employee or self-employed); those who had a job that they were temporarily away from (e.g. on holiday); those on government supported training and employment programmes; and those doing unpaid family work (i.e. working in a family business).; Economic Active people, who are economically active, expressed as a percentage of all people; Unemployment as % is a proportion of economically active population.

Figure 17: Employment by Type (2016)



Source: ONS Annual Employment Survey

5.31 Unemployment within BwD (5.9%) and Hyndburn (4.9%) are higher than that seen in the North West region and the national figure (both 4.4%). Although the level of self-employment in Hyndburn (12.6%) exceeds the regional figure (9.2%) and national trends (10.6%). This is driven by a particularly high level of self-employed females.

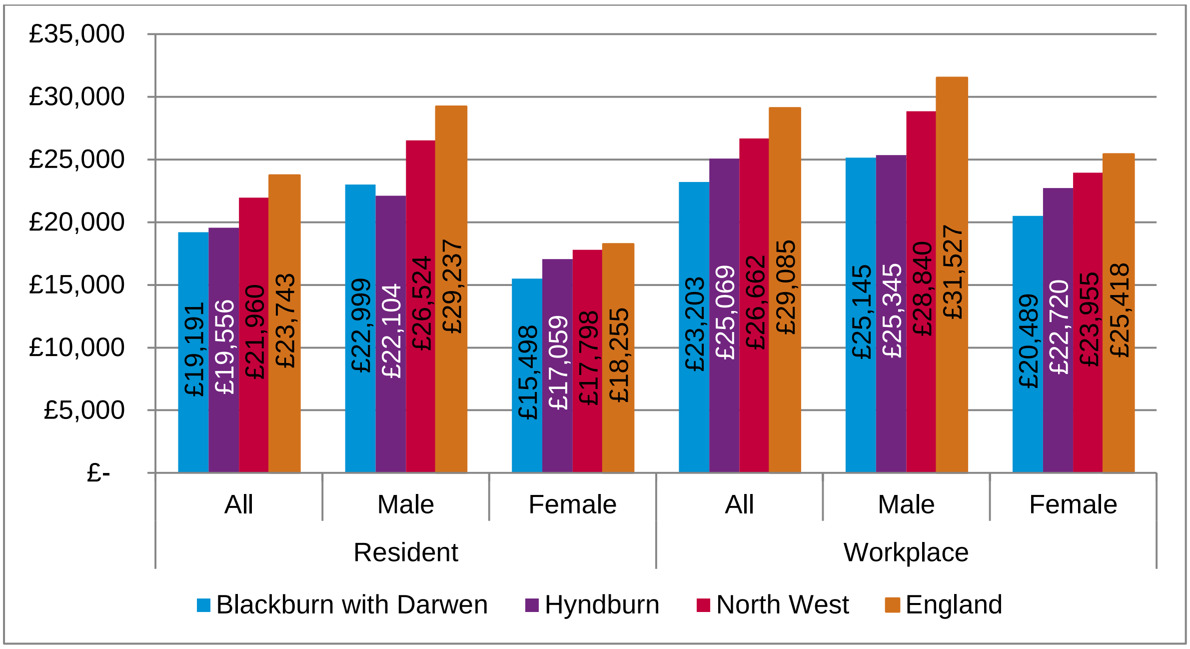
Earnings

5.32 BwD residents in employment earn a median gross annual pay of £19,191 and Hyndburn residents earn a slightly higher median gross annual pay of £19,556. However, these are lower than the median for North West (£21,960) and England as a whole (£23,743).

5.33 GL Hearn use median values in preference to mean values for earnings data. This is because median values are less influenced by extreme values and because of the skewed distribution of earnings data.

5.34 The median gross annual pay of people working full-time in BwD (£23,303) is higher than the figure for residents' median gross pay. The same pattern occurs in Hyndburn where the median gross annual pay for people working full-time in the Borough is£25,069. These are however still lower than the North West median of £26,662 and the England median of £29,085.

Figure 18: Earnings – Annual Median Pay of Full-Time Workers (2017)



Source: ONS Annual Survey of Hours and Earnings, 2017

5.35 Those working full-time in BwD typically earn around £4,000 more and Hyndburn around £5,000 more than those who reside in the districts. This indicates that the higher paid jobs in the districts are occupied by people that do not live in the districts.

Key Points

- BwD's economy produces goods and services valued at £2.7 billion per annum (GVA) and supports around 60,000 jobs.
- Hyndburn's economy produces goods and services valued at £1.3 billion per annum (GVA) and supports around 36,000 jobs.
- BwD's largest sector in terms of total employment numbers is the human health and social work activities sector. In relative terms, key sectors of strength in BwD are manufacturing, human health and social work activities, education and wholesale and retail trade
- Hyndburn's largest sector in terms of total employment numbers is the wholesale and retail trade. In relative terms, key sectors of strength in Hyndburn are the utilities, manufacturing (textiles and furniture), wholesale and retail trade and education sectors.
- The vast majority of the enterprises based in the two districts are micro businesses which includes self-employed and sole-traders
- The two districts' employment and economic activity rates are relatively low in comparison to the regional and national trends. While the unemployment rates in BwD (5.9%) and Hyndburn (4.9%) are both higher than the reginal and national levels (both 4.4%).
- BwD residents in employment earn a median gross annual pay of £19,191 with those working in the district earning £23,203. This indicates that the higher paid jobs in the district are occupied by people that do not live in the district.
- Hyndburn residents in employment earn a median gross annual pay of £19,556 with those working in the district earning £25,069. This indicates that the higher paid jobs in the district are occupied by people that do not live in the district.

6 EMPLOYMENT FORECASTING

6.1 This section considers future employment growth in BwD and Hyndburn as forecasted by Oxford Economics in 2018. This forecast is the trend based forecast used as a baseline to assess the future employment land requirements across the area.

6.2 In addition to the forecasts we have also developed an economic growth scenario which moves away from a purely trend based forecast to take into account local strategies for growth and recent and planned investment.

6.3 This is informed by a review of the relevant economic strategies including those of the two Boroughs together with Lancashire Local Enterprise Partnership (LEP) in order to better understand the strengths and opportunities within the local economies and amend the forecasts accordingly.

Review of Economic Strategies

6.4 Herein we summarise the relevant economic strategies and the competitive strengths and weaknesses of the local economy.

Lancashire Enterprise Partnership Strategic Economic Plan (SEP) 2015-2025

6.5 The SEP identifies key priorities and programmes, which command local support and funding commitments. All programmes have the ability to deliver and benefit from Growth Deal and European Structural & Investment Fund support from 2015/16 onwards.

6.6 These priorities include:

- A sector development programme seeking £11m in competitive Growth Deal funding to improve the capability and capacity of Lancashire's competitive strengths in advanced manufacturing, particulalry in aerospace, automotive and energy.
- A skills for growth programme seeking £47m in competitive Growth Deal funding, underpinned by a capital investment strategy consistent with agreed economic priorities, including a new Apprenticeship Hub to increase SME engagement and apprenticeships.
- An enhanced business growth hub requiring £12.8m in competitive Growth Deal funding to strengthen the support Boost can deliver to high growth SMEs.
- An enhanced Growing Places investment fund seeking £30m in competitive Growth Deals funding to enable the LEP to continue unblocking stalled development opportunities critical to the economic regeneration of Lancashire.

6.7 The Partnership’s priority sectors are:

- Advanced Manufacturing (aerospace, automotive, food & drink, textiles, chemicals);
- Creative and Digital (IT, advertising, music & performance, publishing);
- Energy and Environmental Technologies;
- Health and Social Care;
- Finance and Professional Services;
- Visitor Economy; and
- Construction.

Growth Deal Implementation Plan

6.8 The Lancashire Growth Deal aims to release the growth potential of the whole of Lancashire, building on key local economic assets including the universities and colleges, the Enterprise Zone, the Preston and Lancashire City Deals and high-value business clusters across the county.

6.9 The key priorities include:

- Releasing Growth Potential – through essential transport improvements to motorway junctions and railway lines as well as building new roads which support job creation and enable the release of more land for homes and businesses
- Growing the local skills and business base - with a £10m 2015/16 skills allocation, which includes £400k revenue to support Lancashire's Business Growth Hub.
- Innovation and Manufacturing Excellence - Maximise the economic value of Lancashire's centres of research and innovation excellence and globally competitive business clusters.

6.10 The key projects included in the Growth Deal and related to the study area are:

- Bolton Rail Corridor: Track enhancement and station improvements to allow additional train frequency/reliability between East Lancashire and Greater Manchester to increase usage/performance and support development activity.
- Blackburn Town Centre Improvements: Orbital completion and public realm improvements.
- Hyndburn-Burnley Pendle Growth Corridor: Transport and highways junction improvements to improve journey times and support employment and residential development activity
- Making Rooms - Lancashire First Fab Lab: The Making Rooms scheme will see the conversion of a currently vacant site in Blackburn town centre into a new centre for creativity and innovation. The finished development will consist of; A Fabrication Laboratory (Fab Lab), Office space, Event Space & Catering facilities
- Pennine Gateways: The proposal will deliver key transport infrastructure improvements at 3 main gateways into Blackburn from the M65 at Junctions 4, 5 and 6 to unlock new housing and employment growth in one of England's most deprived areas. The proposal also supports the growth plans of the Royal Blackburn Hospital and its intention to become a university teaching centre. The proposal complements existing Growth Deal investment in Darwen and supports the LEP's strategic priority of enhancing the economic M65, as east Lancashire's primary growth corridor. The scheme, which delivers significant levels of private sector investment, also complements and supports the case for Highway England to upgrade M65 between JCTS 2-6 and enables the delivery of walking and cycling infrastructure to support economic growth.

Pennine Lancashire Growth and Prosperity Plan 2016-2032[9]

6.11 The Pennine Lancashire Growth and Prosperity Plan has been produced by Pennine Lancashire leaders and chief executives and covers the five local authority areas of BwD (BwD), Burnley, Hyndburn, Pendle and Rossendale, and includes Lancashire County Council.

[9] Available at https://www.burnley.gov.uk/sites/default/files/RPP_Pennine%20Lancashire%20Growth%20%20Prosperity%202016-32.pdf

6.12 The Plan sets the ambition to accelerate economic growth and housing development in Pennine Lancashire, closing the productivity gap and ensuring that Pennine Lancashire builds on its position as a major contributor to the Lancashire economy and the Northern Powerhouse.

6.13 The plan is intended to inform and support the delivery of the Lancashire Strategic Economic Plan, the Lancashire Plan, the Northern Powerhouse and a Lancashire-wide devolution deal.

6.14 The Plan makes particular reference to the following four employment sites in Blackburn:

- Blackburn Knowledge Zone in Blackburn's Town Centre: The Knowledge Zone concept seeks to attract investment and new higher value jobs to Blackburn and to develop higher value knowledge-based industries which build on the strong foundation provided by local aerospace and advanced manufacturing industries. This is also supported by the Blackburn Town Centre Strategy[10].
- Pennine Gateway in North Blackburn: A new project investing £2.6m to improve a key gateway to the Borough at Brownhill Roundabout and nearby junctions. The package of improvements is being developed as part of the wider £13m Growth Deal 3 Pennine Gateways project which will deliver key transport improvements at main gateways into BwD between 2019 and 2021. The project is funded from Central Government's Local Growth Deal via the Lancashire Enterprise Partnership. The package of improvements is focussed on the following:
    - Brownhill roundabout –this forms a key intersection between the Ribble Valley, Blackburn Town Centre and Blackburn's major employment zones at Whitebirk, bringing wider connectivity to the M6/M65/M66 motorways. A number of designated housing sites are close to the junction, hence the need to upgrade this and adjacent junctions on the highway network.
    - Pleckgate Road / Ramsgreave Drive (Knowles Arms) junction improvement, including new traffic signal equipment.
    - Whalley Old Road / Whitebirk Drive junction capacity upgrade, increases to the northbound "stacking" lane on Whitebirk Drive and new traffic signal equipment.
- Furthergate Business Park located close to Blackburn town centre and J6 (Whitebirk) of the M65 Motorway is a key employment site which is expanded at east. The site hosts office, industrial and warehouse businesses offering a huge range of employment space;
- FabLab Blackburn - Making Rooms: This is a place where creativity, technology and advanced manufacturing come together in a community facility for use by businesses and the public to design and make anything from high-tech products and gadgets to toys, artworks, home decorations and t-shirts. The Fab Lab contains an impressive range of modern fabrication equipment combining advanced manufacturing with traditional craft processes

6.15 Similarly, the Plan refers to the following key site in Hyndburn:

- Whitebirk, Hyndburn: this lies on the eastern edge of Blackburn however is part of Hyndburn administrative area. It mainly concentrates key retail activity of big wholesale units.

6.16 The Plan also refers to two more Strategic Business Parks in Hyndburn including:

- Huncoat where an emerging masterplan aims to provide up to 2,000 new homes and employment land development of up to 17 Ha of employment land; and

[10] Available at
https://www.blackburn.gov.uk/New%20local%20plan%202/4.06a%20Blackburn%20Town%20Centre%20Strategy%202010-2025.pdf

- J7 Business Park: The 50-acre business park at Clayton-le-Moors was acquired by the Blackburn-based Adhan group of companies in 2016. As well as refurbishing the existing one million sq ft of premises on the site, it plans to construct an additional 500,000 sq ft of modern purpose-built industrial and commercial units on vacant land.

Blackburn with Darwen Plan for Prosperity 2014-2020

6.17 The Plan for Prosperity sets out how Blackburn with Darwen's Local Strategic Partnership Board (LSP) intends to secure greater prospects for the Borough over the next six years. It brings together the policies and strategies for growth into one place.

6.18 Key economic opportunities identified through the study include:

- Improve M65 capacity
- Further retail development in the Former Market Hall site
- Improved bus connections – including a new rapid bus transport scheme which is aimed at improving public transport along the Accrington – Blackburn – Darwen corridors linking in with the strategic east-west and north-south railway lines.
- Strengthen education offer: The Infrastructure Delivery Plan (2014) has identified that there will be a need for additional primary school capacity in Blackburn and Darwen to serve the housing growth areas.
- Relevant difference - play to strengths rather than competing with other towns
- Delivery of Whitebirk Strategic Employment Site
- Adopt flexible planning framework policies which allow developers to adapt and respond to prevailing market conditions
- Property market to tap into entrepreneurs
- Improving the retail offer

Hyndburn Borough Council Corporate Strategy 2018 to 2023

6.19 This strategy defines Hyndburn Council's priorities over the next 5 years which will work towards delivering the Council's long term vision for the borough. Housing and employment growth are central to Hyndburn Council's strategic vision for the Borough.

6.20 Achieving economic prosperity is in part about having access to good quality, well paid jobs and is central to this corporate strategy including a commitment to increase and improve access to good quality employment opportunities.

6.21 The Council will plan and deliver major regeneration projects across the borough working in partnership with the private sector. They will work with businesses and other private and public sector partners to deliver job creation, business growth, and inward investment.

6.22 Site specific investment includes Frontier Park at Whitebirk which will create and host up to 2000 jobs including new businesses. Business growth is to be stimulated through the development of a network of enterprise havens. These include Accrington Market Hall refurbishment the former Town Hall at Great Harwood which will include incubator suites and 15 modern business suites.

6.23 Creative businesses have also been catered for at the Stables and Motor House Artist Studios at Haworth Art Gallery.

6.24 In addition, Huncoat has been granted Housing Zone status by the government and a masterplan, which is currently being developed, aims to unlock housing and employment land for development and at the same time provide a planning framework and spatial plan that maximises the place-making potential for Huncoat This is located close to Altham Business Park which has grown significantly over recent years and the Council now sees as a key strategic employment location in the Borough.

6.25 Huncoat could make a major contribution towards the future housing growth in Hyndburn with the potential for up to 2,000 new homes in the long term. In terms of employment, the former Power Station site is also identified as a potential area for new employment opportunities. The masterplan process will investigate the optimal mix of housing and employment in the area and recommend a preferred option to take forward in the Local Plan.

Economic Forecasting

6.26 Economic data has been provided by Oxford Economics to support and inform the Lancashire Enterprise Partnership Plans and Strategies. The LEP have commissioned a range of studies to create the comprehensive evidence base and have drawn together key priorities and objectives from the studies and identified common themes and issues. This has formed the basis of the Lancashire Skills and Employment Strategic Framework.

6.27 OE has modelled the forecast with 2018 being the base year and projected it to 2028. GL Hearn has analysed the forecasts and projected it to 2036 in order to align with two Councils' emerging plan periods. This comprises the baseline forecast for this Study.

6.28 In addition, we have amended the forecast based on the review of the local economic strategies (as presented above), past completions trends, together with our local knowledge for the market in order to provide an "economic *growth scenario*". This scenario focuses on the area's priority sectors and local strengths.

6.29 We have also considered the Hyndburn Business Survey 2018 findings. This was conducted earlier this year and reveals the need of some businesses to expand over the next 5 years. Its findings have been modelled within the Economic Growth Scenario. Table 18 shows the level of employment growth within the two forecasts for the period up to 2036.

6.30 According to the baseline forecast a reduction of 284 jobs is estimated to occur between 2018 and 2036 across the HMA/FEMA area. In particular, the baseline forecast expects jobs in Blackburn to grow by 74 jobs, while Hyndburn's economy is expected to shrink by 358 jobs.

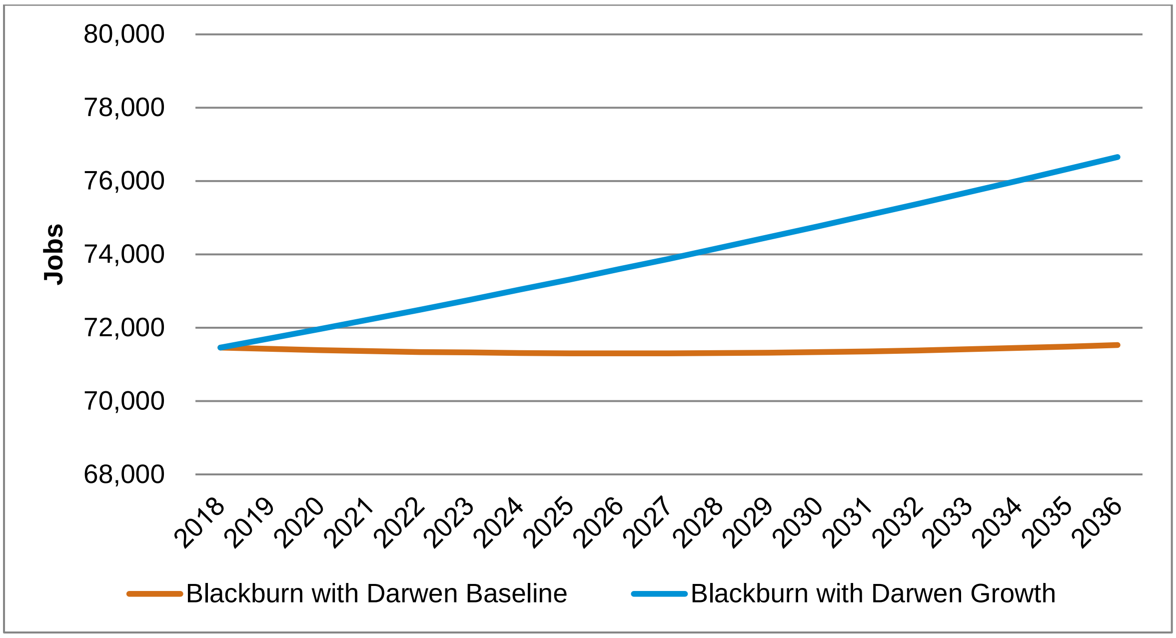
Table 18: Jobs Forecasts 2018-36

	2018	2036 Baseline	Baseline Growth (18-36)	2036 Growth Scenario	Economic Growth Scenario (18-36)
BwD	71,458	71,532	74	76,654	5,196
Hyndburn	31,113	30,755	-358	33,444	2,331
Total	**102,571**	**102,287**	**-284**	**110,098**	**7,527**

Source: OE & GL Hearn 2018

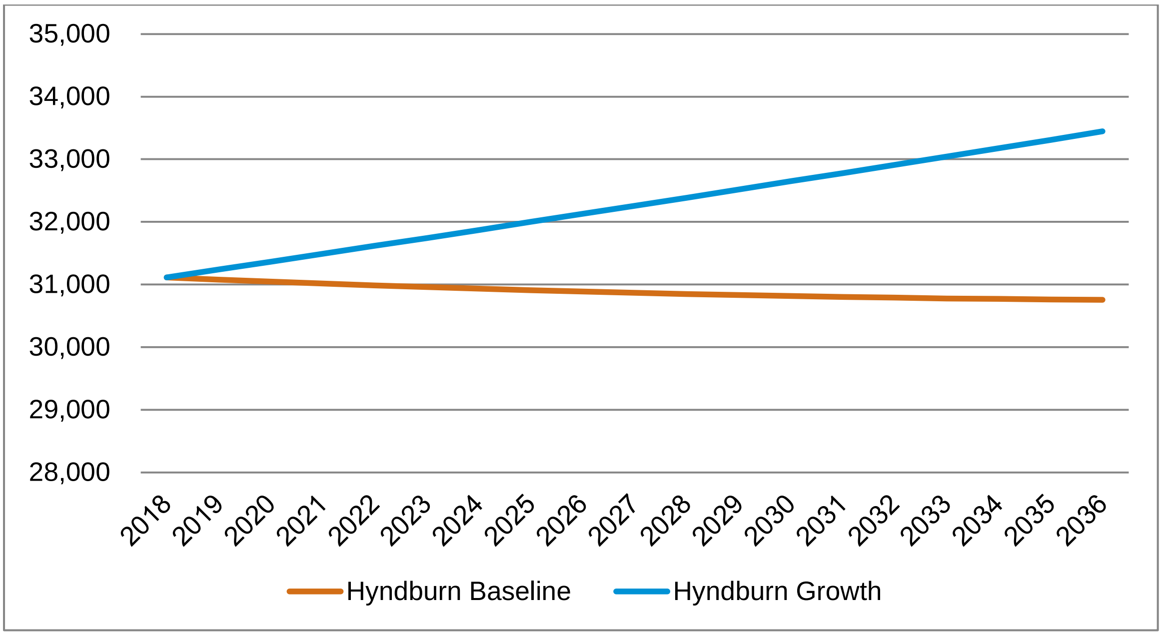
6.31 The Economic Growth Scenario expects a more positive outcome relating to a total potential jobs growth of around 7,527 across the HMA/FEMA. This can be disaggregated to 5,196 jobs growth in Blackburn with Darwen and 2,331 jobs growth in Hyndburn for the period to 2036. The graphs below show the expected trends per local authority.

Figure 19: Forecasted Jobs Growth 2018-36, BwD



Source: OE & GL Hearn 2018

Figure 20: Forecasted Jobs Growth 2018-36, Hyndburn



Source: OE & GL Hearn 2018

6.32 Although the model was run for the detailed 2 digit sectors (a total of 90 sectors), for presentation purposes we have sought to use the broad sectoral anticipated change as presented in Figures 21 and 22 below. Note that the charts use 2018 base-date although this is a projected figure not a known figure as such there may be variations from the data set out previously.

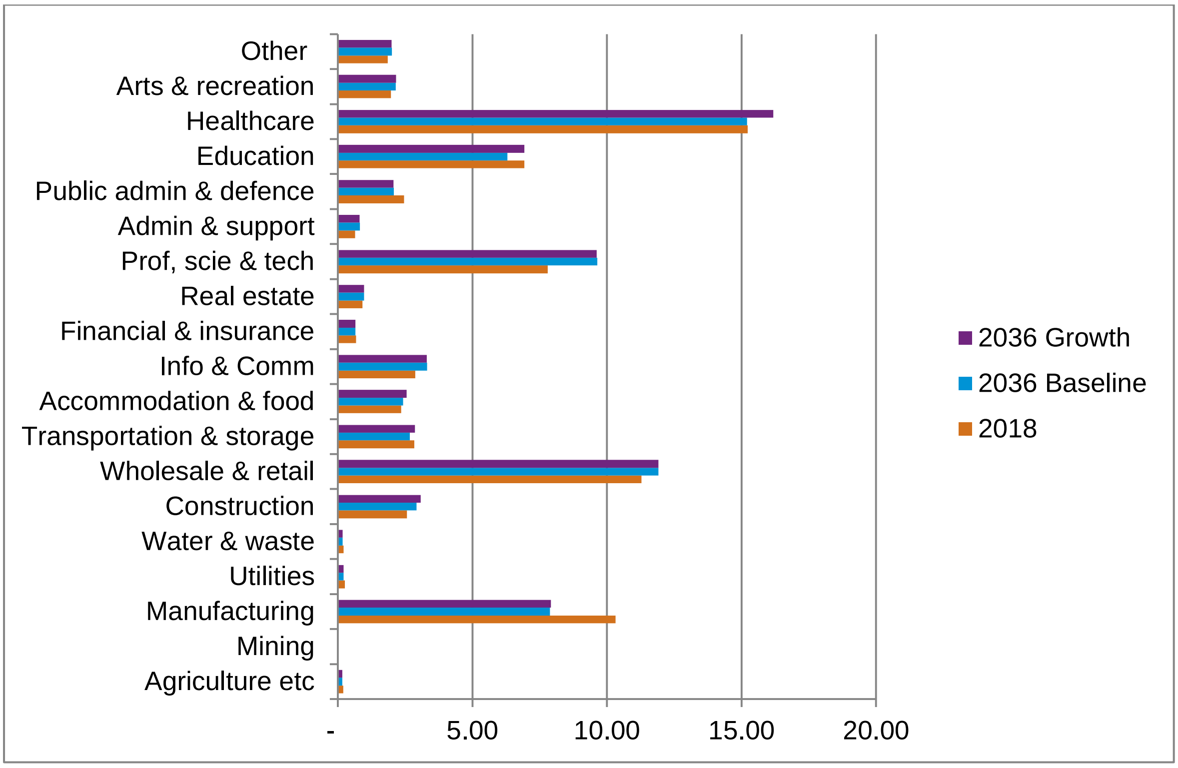
6.33 Across the study area the Wholesale & Retail together with Health & social care are the two main sectors in terms of employment across the study area. These sectors will continue to grow and to comprise the key sectors of the local economy.

6.34 The Professional, Scientific and Technical sector is also a key sector in the local economy. In both forecasts this sector is expected to grow significantly over the next 18 years. Construction is also a sector expected to grow significantly compared to the rest of the area's sectoral growth.

6.35 The manufacturing sector the baseline forecast expects a higher decrease for the period to 2036 reflecting longer term national trends on this sector. However, this is a key sector for the area and according to evidence we do not expect a decrease on the same rate as the baseline. This was particularly the case for Hyndburn.

6.36 In Blackburn we have amended the forecasts for Healthcare and Education to reflect investment in both. We have also made more modest adjustments to the Construction, Transport and Storage to reflect a higher rate of growth than previous and known investment respectively.

Figure 21: Jobs Growth Sectoral Distribution, Blackburn with Darwen

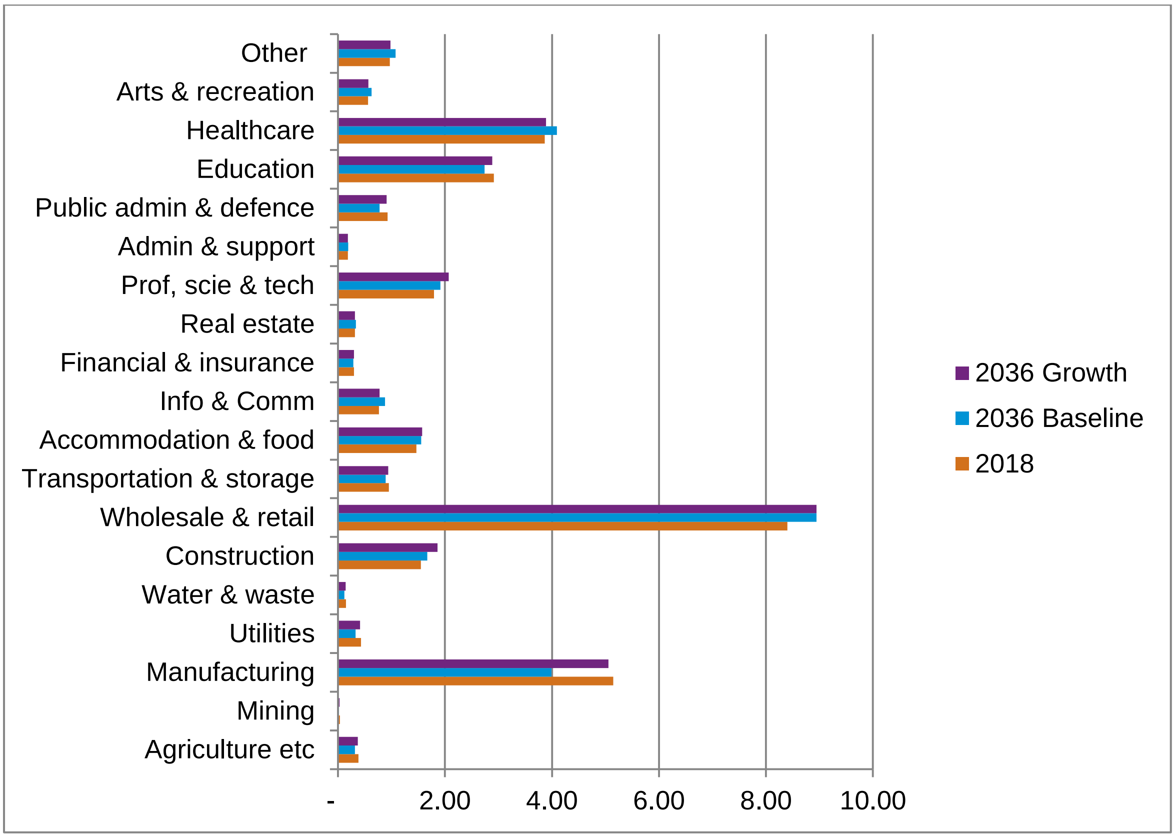


Source: OE & GL Hearn 2018

6.37 Reflecting improvements to the Town Centre and increases in the night-time economy we have also increased employment in the hospitality sector. Other notable improvements in Hyndburn were in the Professional Scientific and technical and construction.

6.38 We have also made a substantial adjustment to Hyndburn's growth in transportation and storage reflecting the planned growth at Frontier Park and Altham.

Figure 22: Jobs Growth Sectoral Distribution, Hyndburn



Source: OE & GL Hearn 2018

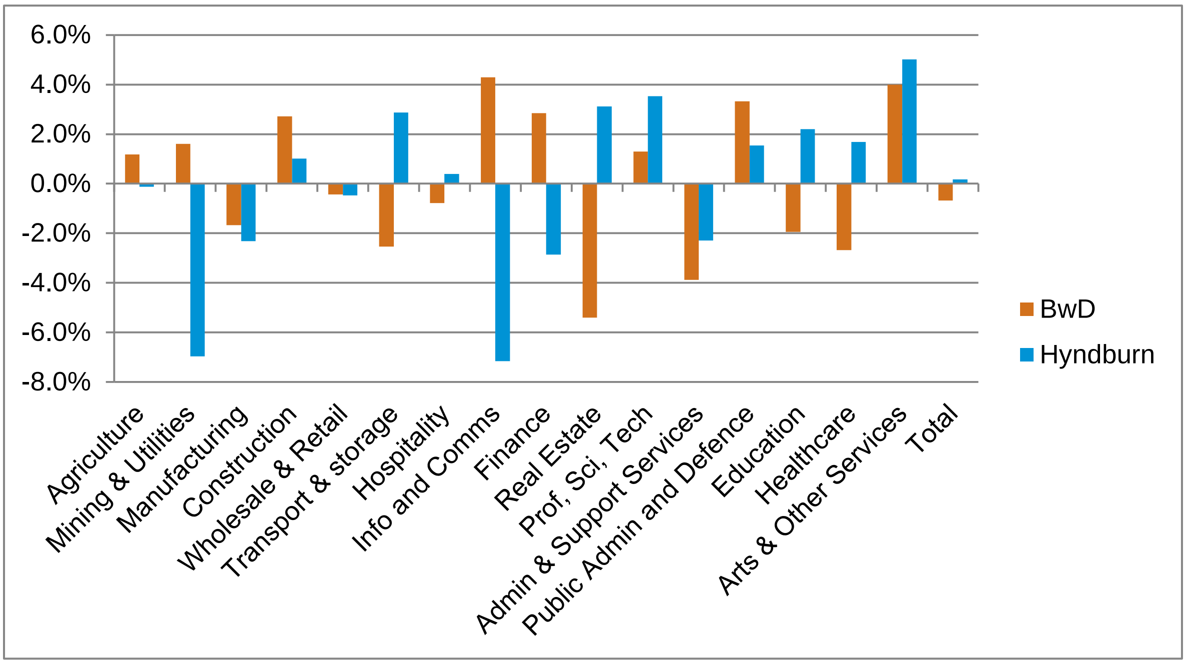
6.39 We have also provided examined how the growth scenario compares to historic trends. This draws on BRES data from 2009 to 2017. Because of a misalignment between sources some sectors have been aggregated. It should also be kept in mind that while the 2009 to 2017 time period is the longest available it is somewhat effected by the recession.

6.40 This shows that in Blackburn with Darwen there will be an overall slowing of jobs growth (from 1.1% per annum to 0.4% per annum) while in Hyndburn the growth will be accelerated from 0.2% per annum to 0.4% per annum.

6.41 In Blackburn with Darwen there is expected to be a significant increase in the rate of jobs within the information and communication, arts and other services sectors. There is also expected to a a slowing rate of decline in the finance and public administration and defence sectors.

6.42 In contrast there is expected to a a significant slowing in the administration and support services, healthcare, real estate and transportation and storage sectors. Although all are still expected to grow.

Figure 23: Change from Historic to Future Compound Annual Growth Rate



Source: OE & GL Hearn 2018

6.43 In Hyndburn there is expected to be a significant increase in the rate of jobs within the arts and other services, professional scientific and technical and transportation and storage sectors in com[parison to the 2009 to 2017 period. There is also expected to a a slowing rate of decline in the real estate sector.

6.44 In contrast there is expected to a a significant slowing in the information and communications, mining and utilities, finance and manufacturing sectors.

6.45 In order to achieve the levels of growth identified herein each of the local authorities will be required to provide appropriate commercial accomodation to house this growth and the labour force to service it. It also assumes that the identified investment earlier in this chapter continues and/or comes to fruition.

6.46 We translated the potential jobs growth into land requirements implementing GL Hearn's Employment Forecast Model as presented in detail in Chapter 11.

Key Points

- OE produced the baseline forecast for 2018-28 and GL Hearn has extrapolated the jobs forecast to 2036 to cover the plan period.
    - According to the baseline forecast a total loss of 285 jobs was estimated across the HMA/FEMA area for the 2018-36 period
- GL Hearn also modelled the economic growth scenario based on:
    - Local and regional strategies;
    - Past completions;
    - Business survey;
    - Our local knowledge
- The Economic Growth Scenario expects a more positive outcome relating to a total potential jobs growth of 7,527 across the HMA/FEMA. This is disaggregated to:
    - 5,196 jobs growth in Blackburn with Darwen and;
    - 2,331 jobs growth in Hyndburn for the period to 2036.
- The sectors expected to grow the most include:
    - Wholesale & retail;
    - Professional, scientific and technical;
    - Construction;
    - Information & communication and;
    - Healthcare

7 FUTURE EMPLOYMENT AND THE LINK TO HOUSING

Introduction

7.1 This section considers future economic performance in drawing conclusions on the overall need for housing. Essentially the analysis takes the job growth forecasts as presented in Chapter 5 above and seeks to test what level of population growth might be needed so that the resident labour-supply increases sufficiently for the job figures to be met.

7.2 The job forecasts used look at the period from 2018 to 2036 although when showing housing need, the period from 2016-36 is used (to be consistent with other analysis). Tables 13 and 14 summarise the forecasts.

Table 19: Forecast job growth in BwD (2018-36)

	Jobs (2018)	Jobs (2036)	Change in jobs	% change
Baseline	71,458	71,532	74	0.10%
Economic Growth Scenario	71,458	76,654	5,196	7.27%

Source: OE & GL Hearn 2018

Table 20: Forecast job growth in Hyndburn (2018-36)

	Jobs (2018)	Jobs (2036)	Change in jobs	% change
Baseline	31,113	30,755	-358	-1.20%
Economic Growth Scenario	31,113	33,444	2,331	7.49%

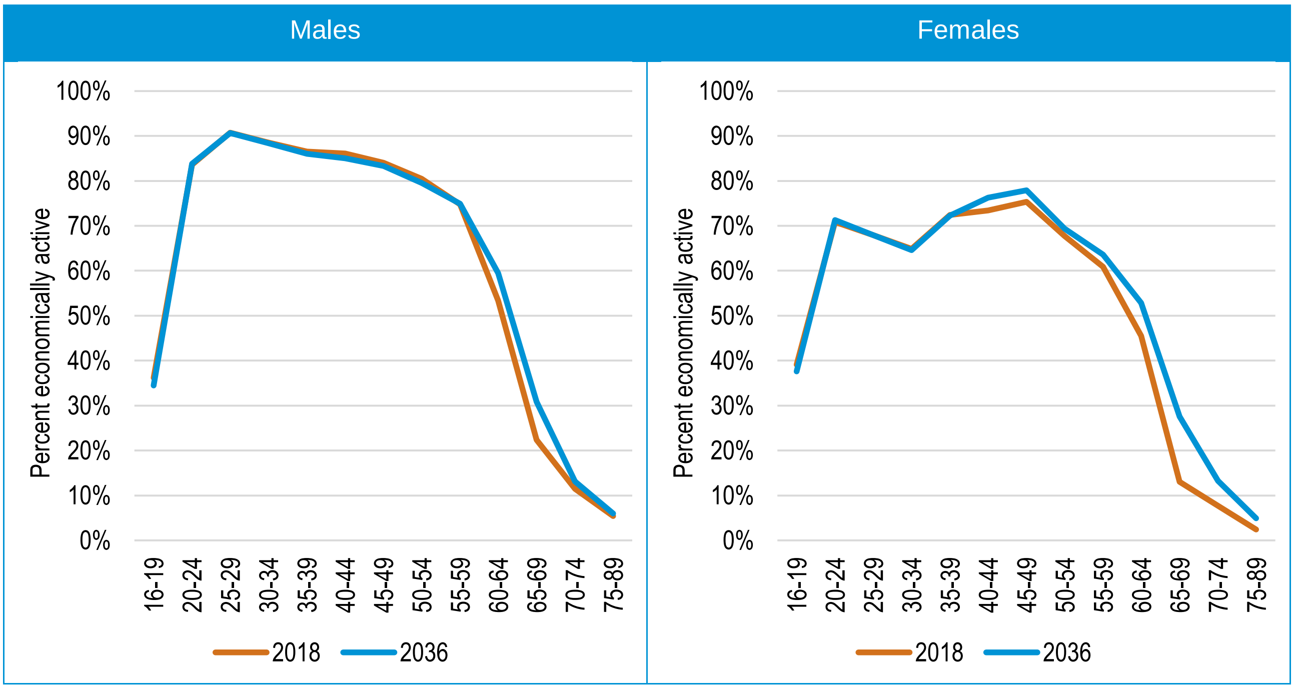
Source: OE & GL Hearn 2018

Growth in Resident Labour Force

7.3 Having studied the likely level of job growth, the next stage is to estimate the change in the resident labour supply (to allow for a comparison between jobs and workforce growth). The approach taken in this report is to derive a series of age and sex specific economic activity rates and use these to estimate how many people in the population will be economically active as projections develop. This is a fairly typical approach with data being drawn in this instance from the Office for Budget Responsibility (OBR) – July 2018 (Fiscal Sustainability Report).

7.4 The figures and tables below show the assumptions made. The analysis shows that the main changes to economic activity rates are projected to be in the 60-69 age groups – this will to a considerable degree link to changes to pensionable age, as well as general trends in the number of older people working for longer (which in itself is linked to general reductions in pension provision).

Figure 24: Projected changes to economic activity rates (2018 and 2036) – BwD



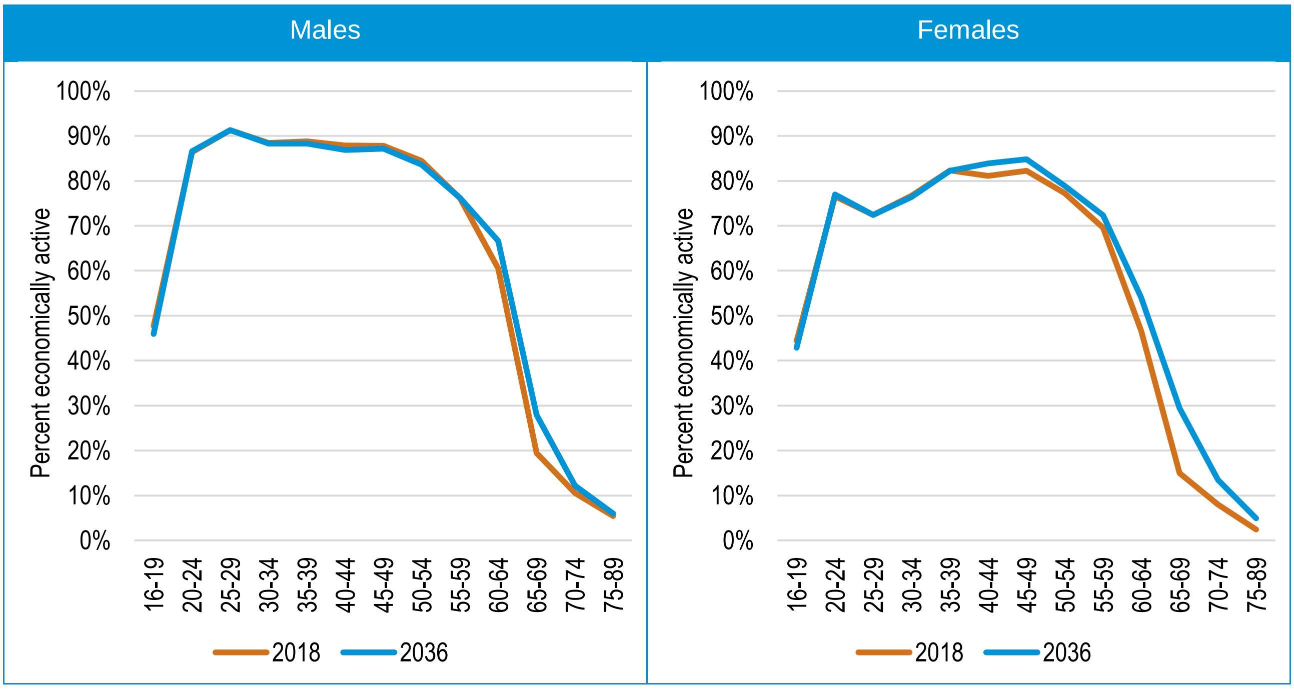
Source: Based on OBR and Census (2011) data

Table 21: Projected changes to economic activity rates (2018 and 2036) – BwD

	Males			Females		
	2018	2036	Change	2018	2036	Change
16-19	36.2%	34.4%	-1.7%	39.1%	37.6%	-1.4%
20-24	80.8%	84.4%	3.6%	71.0%	72.8%	1.8%
25-29	91.5%	91.4%	0.0%	72.2%	72.3%	0.0%
30-34	88.8%	88.4%	-0.4%	65.7%	67.4%	1.7%
35-39	87.1%	86.2%	-1.0%	72.3%	74.7%	2.4%
40-44	86.1%	85.2%	-0.9%	74.1%	78.3%	4.2%
45-49	84.9%	83.9%	-1.0%	75.4%	79.4%	4.0%
50-54	81.5%	80.3%	-1.2%	68.4%	70.2%	1.8%
55-59	74.8%	75.7%	0.8%	60.5%	62.8%	2.3%
60-64	53.0%	59.9%	6.9%	43.9%	54.2%	10.2%
65-69	22.4%	32.9%	10.5%	12.2%	29.2%	17.0%
70-74	11.5%	13.4%	1.9%	7.4%	13.4%	6.1%
75-89	4.8%	6.2%	1.5%	1.8%	4.9%	3.1%

Source: Based on OBR and Census (2011) data

Figure 25: Projected changes to economic activity rates (2018 and 2036) – Hyndburn



Source: Based on OBR and Census (2011) data

Table 22: Projected changes to economic activity rates (2018 and 2036) – Hyndburn

	Males			Females		
	2018	2036	Change	2018	2036	Change
16-19	47.7%	45.9%	-1.7%	44.3%	42.9%	-1.4%
20-24	83.6%	87.2%	3.6%	76.7%	78.5%	1.8%
25-29	92.1%	92.0%	0.0%	76.8%	76.8%	0.0%
30-34	88.8%	88.4%	-0.4%	77.5%	79.3%	1.7%
35-39	89.4%	88.4%	-1.0%	82.2%	84.6%	2.4%
40-44	87.9%	87.0%	-0.9%	81.7%	85.9%	4.2%
45-49	88.7%	87.7%	-1.0%	82.3%	86.3%	4.0%
50-54	85.5%	84.3%	-1.2%	78.0%	79.8%	1.8%
55-59	76.2%	77.0%	0.8%	69.2%	71.5%	2.3%
60-64	60.2%	67.1%	6.9%	45.1%	55.4%	10.2%
65-69	19.5%	30.0%	10.5%	14.1%	31.1%	17.0%
70-74	10.6%	12.4%	1.9%	7.6%	13.7%	6.1%
75-89	4.8%	6.2%	1.5%	1.8%	4.9%	3.1%

Source: Based on OBR and Census (2011) data

Change to the Economically-Active Population

7.5 Working through an analysis of age and sex specific economic activity rates it is possible to estimate the overall change in the number of economically active people in each Borough – this is set out in the tables below. The analysis shows that there would be a decrease in the economically active population for all of the demographic scenarios in both areas other than with 10-year trends in BwD (which shows a small increase).

Table 23: Estimated change to the economically active population (2018-36) – BwD

	Economically active (2018)	Economically active (2036)	Total change in economically active
2016-based SNPP	68,365	68,025	-340
2016-based SNPP (+MYE)	68,401	68,215	-186
10-year migration	68,495	69,988	1,493

Source: Derived from demographic projections

Table 24: Estimated change to the economically active population (2018-36) – Hyndburn

	Economically active (2018)	Economically active (2036)	Total change in economically active
2016-based SNPP	38,613	36,951	-1,662
2016-based SNPP (+MYE)	38,759	37,095	-1,664
10-year migration	38,747	36,850	-1,896

Source: Derived from demographic projections

Linking Job Growth and Changes to Resident Labour Force

7.6 The analysis above has set out potential scenarios for the change in the number of jobs in the Boroughs. However, for the purposes of analysis linked to demographic data it is necessary to convert this into estimates of the required change to the economically active population. The number of jobs and resident workers required to support these jobs will differ depending on three main factors:

- Commuting patterns – where an area sees more people out-commute for work than in-commute it may be the case that a higher level of increase in the economically active population would be required to provide a sufficient workforce for a given number of jobs (and vice versa where there is net in-commuting);
- Double jobbing – some people hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs;
- Unemployment – if unemployment were to fall then the growth in the economically active population would not need to be as large as the growth in jobs (and vice versa).

Commuting Patterns

7.7 The table below shows summary data about commuting to and from BwD and Hyndburn from the 2011 Census. Overall the data shows that BwD sees a small level of net in-commuting for work with the number of people resident in the area who are working being about 6% lower than the total number who work in the area. This number is shown as the commuting ratio in the final row of the table and is calculated as the number of people living in an area (and working) divided by the number of people working in the area (regardless of where they live). In Hyndburn the opposite pattern is seen, with a level of net out-commuting.

Table 25: Commuting patterns in BwD and Hyndburn (2011)

	BwD	Hyndburn
Live and work in Local Authority (LA)	31,801	13,194
Home workers	4,986	2,898
No fixed workplace	4,028	2,525
In-commute	19,911	17,521
Out-commute	24,014	12,718
Total working in LA	64,829	31,335
Total living in LA (and working)	60,726	36,138
Commuting ratio	0.937	1.153

Source: 2011 Census

7.8 In translating the commuting pattern data into growth in the labour-force, a core assumption is that the commuting ratio remains at the same level as shown by the 2011 Census. It is arguable that some changes to the commuting ratio could be modelled, particularly where forecast job growth is above a baseline position, as this might attract more people living outside the area to commute in.

7.9 However, the opposite could be true if locations outside BwD/Hyndburn were to see stronger than baseline job growth. Overall, keeping the ratio constant is considered to be a reasonably balanced approach to use.

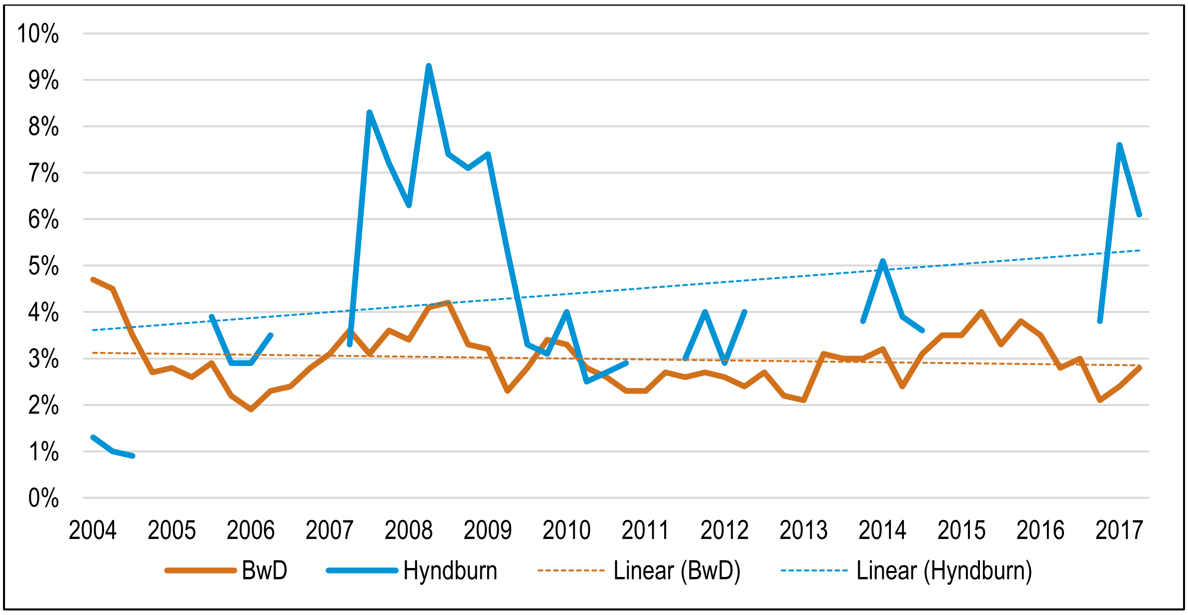
Double Jobbing

7.10 The analysis also considers that a number of people may have more than one job (double jobbing). This can be calculated as the number of people working in the local authority divided by the number of jobs.

7.11 Data from the Annual Population Survey (available on the NOMIS website) suggests across the two Boroughs that typically between about 3-4% of workers have a second job – levels of double jobbing have been variable over time (mainly due to the accuracy of data at a local level).

7.12 For the purposes of this assessment it has been assumed that around 3% of people will have more than one job moving forward in BwD along with a figure of 4% for Hyndburn, this is roughly the average shown for all data points back to 2004.

Figure 26: Percentage of all people in employment who have a second job (2004-2017)



Source: Annual Population Survey (from NOMIS)

7.13 Across the HMA a double jobbing figure of 4% gives rise to a ratio of 0.960 (i.e. the number of jobs supported by the workforce will be 4% higher than workforce growth). It has been assumed in the analysis that the level of double jobbing will remain constant over time. Although we have applied locally specific figures.

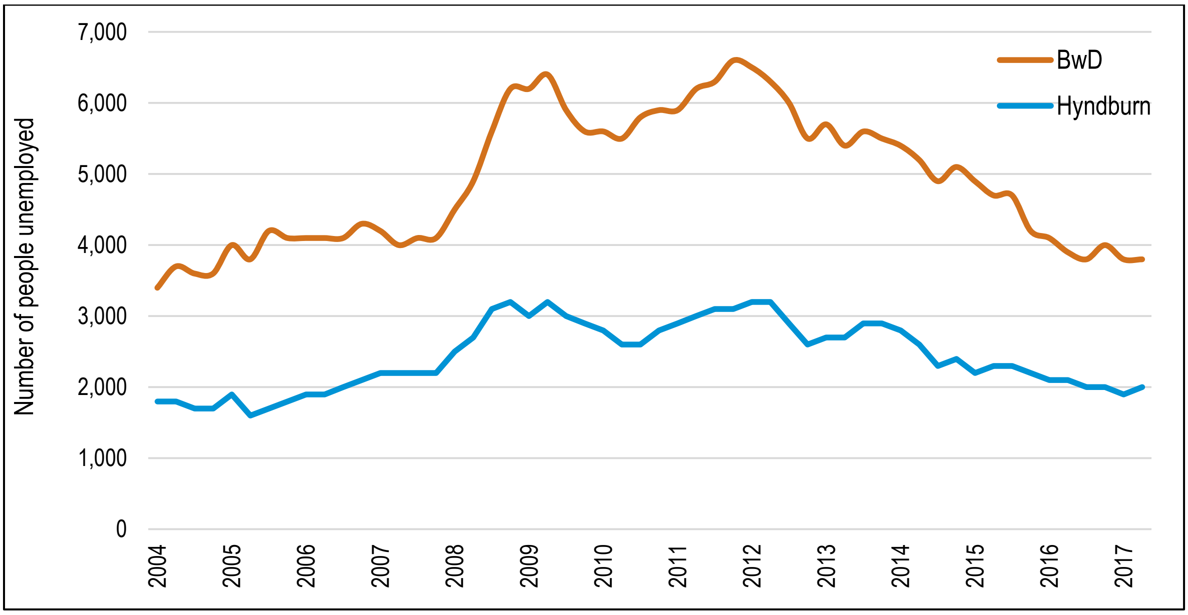
Unemployment

7.14 The last analysis when looking at the link between jobs and resident labour supply is a consideration of unemployment. Essentially, this is considering if there is any latent labour force that could move back into employment to take up new jobs.

7.15 The figure below shows the number of people who are unemployed and how this has changed back to 2004. The analysis shows a clear increase in unemployment from 2004 to 2011/12 and that since 2011/12, the number of people unemployed has dropped notably – by 2017, the number of unemployed people was at roughly the same level as observed in 2004.

7.16 This would indicate that there may be limited scope for further improvements and for the purposes of analysis in this report it has been assumed that there are no changes to the number of people who are unemployed moving forward from 2018 to 2036.

Figure 27: Number of people unemployed (2004-2017)



Source: Annual Population Survey (modelled unemployment data)

Jobs Supported by Growth in the Resident Labour Force

7.17 Tables 20 and 21 show how many additional jobs might be supported by population growth under each of the core demographic scenarios. The figures are all negative other than for 10-year migration trends in BwD (which could support an additional 1,640 jobs). Given the job forecasts shown earlier it is clear (for the scenario forecasts) there would be a mismatch between growth in the labour supply and the growth needed for jobs to be filled.

Table 26: Jobs supported by demographic projections (2018-36) – BwD

	Total change in economically active	Allowance for net out-commuting	Allowance for double jobbing (= jobs supported)
2016-based SNPP	-340	-363	-374
2016-based SNPP (+MYE)	-186	-198	-204
10-year migration	1,493	1,594	1,643

Source: Derived from a range of sources as described

Table 27: Jobs supported by demographic projections (2018-36) – Hyndburn

	Total change in economically active	Allowance for net out-commuting	Allowance for double jobbing (= jobs supported)
2016-based SNPP	-1,662	-1,441	-1,507
2016-based SNPP (+MYE)	-1,664	-1,443	-1,509
10-year migration	-1,896	-1,644	-1,719

Source: Derived from a range of sources as described

Housing Need Linked to Job Growth Forecasts

7.18 As well as looking at the growth in the economically active population linked to a range of demographic projections, it is of use to consider what level of housing might be required for forecasts to be met.

7.19 Within the modelling, migration assumptions have been changed so that across each local authority the increase in the economically active population matches the increase in the resident workforce required. The changes to migration have been applied on a proportionate basis; the methodology assumes that the age/sex profile of both in- and out-migrants is the same as underpins the SNPP with adjustments being consistently applied to both internal (domestic) and international migration. Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%).

7.20 Once the level of economically active population matches the job growth forecast, the population (and its age structure) is modelled against the HRRs in the SNHP to see what level of housing provision that might imply.

7.21 The first part of the analysis is to estimate what level of growth in the labour supply would be needed for the job growth forecast to be met. This is essentially the same as the analysis above, but working in reverse order.

7.22 This calculation is shown below (Tables 22 and 23) and shows that to meet 5,196 jobs (the highest of the forecasts in BwD), there would need to be an increase in the economically active population of about 4,700 (assuming a constant commuting ratio and levels of double jobbing) – this figure, along with other scenarios, is fed through into the modelling which is again set against the economic activity rates discussed previously. For Hyndburn, there would need to be an increase in the economically active population of about 2,600 based on the higher economic growth forecast of 2,331 jobs.

Table 28: Forecast job growth and change in resident workforce with double jobbing and commuting allowance (2018-36) – BwD

	Baseline	Economic Growth Scenario
Number of jobs (2018-36)	74	5,196
Double jobbing allowance	0.970	0.970
Number of workers required	71	5,041
Commuting ratio	0.937	0.937
Change in resident workforce	67	4,722

Source: Derived from a range of sources as described

Table 29: Forecast job growth and change in resident workforce with double jobbing and commuting allowance (2018-36) – Hyndburn

	Baseline	Economic Growth Scenario
Number of jobs (2018-36)	-358	2,331
Double jobbing allowance	0.956	0.956
Number of workers required	-342	2,229
Commuting ratio	1.153	1.153
Change in resident workforce	-395	2,570

Source: Derived from a range of sources as described

7.23 To achieve the economic growth scenario, levels of net migration need to increase notably from the base position shown in the 2016-based SNPP. In BwD, the SNPP shows an average net out-migration of 814 people per annum over the 2016-36 period, with the economic growth scenario reducing this to 370 people per annum (still a level of net out-migration). Hence the economic growth scenario essentially sees the retention of an additional 440 people per annum within the Borough. In Hyndburn, the SNPP shows average net out-migration of 213 people per annum, whereas the economic growth scenario would see a level of net in-migration (averaging 148 people per annum – a difference of around 360 additional people in the Borough).

7.24 Tables 24 and 25 show estimates of housing need set against the economic growth scenarios – this uses data from the 2016-based subnational household projections (SNHP) to convert population into households. The analysis shows that to support the higher of the economic forecasts there would need to be provision of around 285 homes each year in BwD and 201 in Hyndburn.

Table 30: Projected housing need – job-led scenarios and 2016-based HRRs – BwD

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
Baseline	57,074	59,209	2,136	107	110
Economic Growth Scenario	57,074	62,600	5,527	276	285

Source: Demographic projections

Table 31: Projected housing need – job-led scenarios and 2016-based HRRs – Hyndburn

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
Baseline	34,550	36,192	1,642	82	85
Economic Growth Scenario	34,550	38,451	3,901	195	201

Source: Demographic projections

7.25 Regarding the use of the 2016-based SNHP, it should be noted that the data (at least at a national level) has been subject to some criticism for potentially building in some degree of supressed household formation – this is due to ONS only using trends for the 2001-11 period. To some extent this has driven MHCLG to look to revise its Standard Method (as previously discussed).

7.26 Therefore it seems prudent to also run the economic scenarios against the previous (2014-based SNHP). Additionally, a sensitivity test has been developed to look at an alternative approach to HRRs. In this sensitivity, a 'part-return-to-trend' analysis has been developed, where the rate of household formation sits somewhere between figures in the 2014-based projections and those in an older 2008-based version.

7.27 This approach was widely used prior to the 2016-based SNHP being published and was an approach previously suggested by the Local Plans Expert Group (LPEG). Therefore, two additional scenarios have been used as described below:

- Linking directly to 2014-based SNHP – 2014-SNHP; and
- Linking to the 2014-based SNHP but with a part-return to previous trends for the 25-34 and 35-44 age groups – 2014-PRT

7.28 The tables below show estimates of housing need using these additional household formation rate sensitivities (just for the economic growth scenario). From this it can be seen that the need in BwD would range from 358 to 411 dwellings per annum. In Hyndburn, there is less of a range (and indeed less of a difference when compared with using figures from the 2016-based SNHP) – the range of need in Hyndburn is from 206 to 216 dwellings per annum.

Table 32: Projected housing need – job-led scenario (economic growth scenario) and alternative household representative rates – BwD

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
2014-SNHP	58,282	65,242	6,960	348	358
2014-PRT	58,282	66,258	7,976	399	411

Source: Demographic projections

Table 33: Projected housing need – job-led scenario (economic growth scenario) and alternative household representative rates – Hyndburn

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
2014-SNHP	34,585	38,582	3,997	200	206
2014-PRT	34,585	38,786	4,201	210	216

Source: Demographic projections

7.29 In terms of setting the housing need, the highest figures are probably most appropriate, this is because (particularly in the case of BwD) this scenario does remove potential suppression of household formation that may be built into the official projections.

Key Points

- The Growth Scenario expects a more positive outcome relating to a total jobs growth of 7,527 across the HMA/FEMA. This is disaggregated to:
  - 5,196 jobs growth in Blackburn and;
  - 2,331 jobs growth in Hyndburn for the period to 2036

- The analysis herein indicates that if modelled on a policy-off basis, whereby the Census commuting ratio is held, double jobbing is held at long term rates. Key assumptions about how economic activity might change moving forward used the Office of Budget Responsibility (OBR) projections, but with an adjustment so that rates are not projected to fall for any given age group (by sex)

- These resulted in a housing need of 285 and 201 dpa. However this utilises household representation rates from the 2016-based household projections. This could potentially suppress household formation rates within younger age groups.

- In response we have developed a sensitivity where the rate of household formation sits somewhere between figures in the 2014-based projections and those in an older 2008-based version. These resulted in a housing need of 411 dpa for Blackburn with Darwen and 216 dpa for Hyndburn.

- Add in further bullet re: transition point as raised earlier in Section 6

8 AFFORDABLE HOUSING NEED

Introduction

8.1 Affordable housing is defined in Annex 2 of the National Planning Policy Framework (NPPF2). The new NPPF definition is slightly wider than the previous NPPF definition; in particular a series of 'affordable home ownership' options are considered to be affordable housing.

8.2 A methodology is set out in the PPG to look at affordable need, this is largely the same as the previous PPG method and does not really address the additional (affordable home ownership) definition. The analysis below is therefore split between the current definition of affordable need and the additional definition. The first few sub-sections below deal with the existing definition of affordable need.

Methodology and Source Overview

8.3 Table 34 sets out the main aspects of analysis and provides a description of the sources used. Key topics are then discussed in subsequent sections.

Table 34: Affordable Needs Model – core analysis and sources

Aspect of analysis	Sources	Notes
Lower quartile private sector rents	Valuation Office Agency (VOA) data for the year to March 2018	Used to establish the entry level cost of housing. Although in theory entry levels could also be the lower quartile sales price this would be highly unusual
Incomes	ONS small area income estimates, English Housing Survey (EHS), Annual Survey of Hours and Earnings (ASHE)	Used to estimate the average household income in 2017 and the distribution of income. Different distributions are developed for different household groups (e.g. newly forming households)
Affordability ratio	Valuation Office Agency (VOA) data for the year to March 2018	Consideration of the relative cost of housing in the area compared with national benchmarks. In the case of BwD and Hyndburn, the analysis suggests that spending 25% of income on housing is an appropriate affordability threshold
Current need	Housing Register data	Data provided by the Councils. Figures are for those in a reasonable preference category and not currently living in affordable housing
Future need (newly forming households)	Demographic projections – number of newly forming households aged under 45, income and housing cost data	Analysis consistent with 2a-025 of PPG, including affordability testing
Future need (existing households)	Continuous Recording of Sales and Lettings (CoRe), income and housing cost data	Analysis consistent with 2a-025 of PPG, including affordability testing
Supply of affordable housing (through relets)	CoRe	Takes account of newbuild and transfers. Figures are only for social and affordable rented housing and are based on trends in lettings over the 2014-17 period.

Key Analysis

8.4 The subsections below consider some of the key variables and analysis feeding into the assessment of affordable need. Specifically, this assessment considers the following:

- Analysis of the Housing Register;
- Housing costs (private sector rent levels) – drawing on the latest Valuation Office Agency data covering a 12-month period to March 2018;
- Income data – taking account of new data about local incomes (including information from the Annual Survey of Hours and Earnings (2017) and small area income estimates from ONS (published in December 2016);
- Estimates of the number of newly forming households – this is a direct output of the demographic modelling; and
- Estimates of the supply of affordable housing from relets – taken from Continuous Recording of Lettings data (CoRe) up to 2017.

Housing Register

8.5 The Councils provided an anonymised database of the Housing Register mid-2018. The table below shows analysis of the Register to establish a current housing need. The analysis starts with all households registered and then only includes those with a defined need for housing/alternative housing (considered to be those in bands 1 to 3). The analysis then excludes households who are already tenants of affordable housing – this is because such households would release a home for use by another household if they were rehoused and so no additional need arises. A final adjustment has been to remove households in Band 3 only due to Community or Economic Contribution. Overall it is estimated at the time of the assessment that there is a current need from 1,040 households in BwD and 459 in Hyndburn.

Table 35: Current Housing Need from the Housing Register

	BwD	Hyndburn
Total on Register	3,253	1,369
Total in Bands 1-3	2,269	859
% not living in affordable housing	71%	85%
Current need	1,621	730
Current need – with Community/Economic Contribution removed	1,040	459

Source: Housing Register

Rent Levels

8.6 An important part of the study is to establish the entry-level costs of housing. The affordable housing needs assessment compares private sector rents with the incomes of households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an 'affordable housing need'.

8.7 The entry-level costs of housing have been established from Valuation Office Agency (VOA) data. For the purposes of analysis, lower quartile (LQ) rents have been taken to reflect the entry-level point into the market – the data covers a 12-month period to March 2018. Overall, it can be seen that the lower quartile rent (for all sizes) is currently around £400 per month in both areas.

Table 36: Lower quartile private rents by size (year to March 2018) – per month

	BwD	Hyndburn
Room only	£260	£303
Studio	£310	£247
1 bedroom	£350	£235
2 bedrooms	£400	£390
3 bedrooms	£458	£450
4+ bedrooms	£685	£585
All dwellings	£400	£395

Source: Valuation Office Agency

8.8 When looking at affordability, the ability for households to either buy or rent is often considered. Looking at Land Registry data it seems likely that the incomes required to buy are at a similar level (BwD) or below (Hyndburn) those needed to rent.

8.9 However, rental costs are used in this assessment as it seems likely that for many households, it will be access to a deposit that is a barrier to buying. This to some extent can be evidenced by the large increases in the number of households in private rented housing seen over the past 10-15 years.

8.10 A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis, CLG guidance (of 2007) suggested that 25% of income is a reasonable start point but also notes that a different figure could be used.

8.11 Analysis of current letting practice suggests that letting agents typically work on a multiple of 40%. Government policy (through Housing Benefit payment thresholds) would also suggest a figure of 40%+ (depending on household characteristics).

8.12 The threshold of income to be spent on housing should be set by asking the question 'what level of income is expected to be required for a household to be able to access market housing without the need for a subsidy (e.g. through Housing Benefit)?' The choice of an appropriate threshold will to some degree be arbitrary and will be linked to the cost of housing rather than income.

8.13 Income levels are only relevant in determining the number (or proportion) of households who fail to meet the threshold. It would be feasible to find an area with very low incomes and therefore conclude that no households can afford housing, alternatively an area with very high incomes might show the opposite output. The key here is that local income levels are not setting the threshold, but are simply being used to assess how many can or can't afford market housing.

8.14 Rent levels in BwD and Hyndburn are relatively low in comparison to those seen nationally (a lower quartile rent of £520 per month across England). This would suggest that a proportion of income to be spent on housing could be higher than the bottom end of the range and for this reason the standard 25% 'start point' has been used.

Incomes

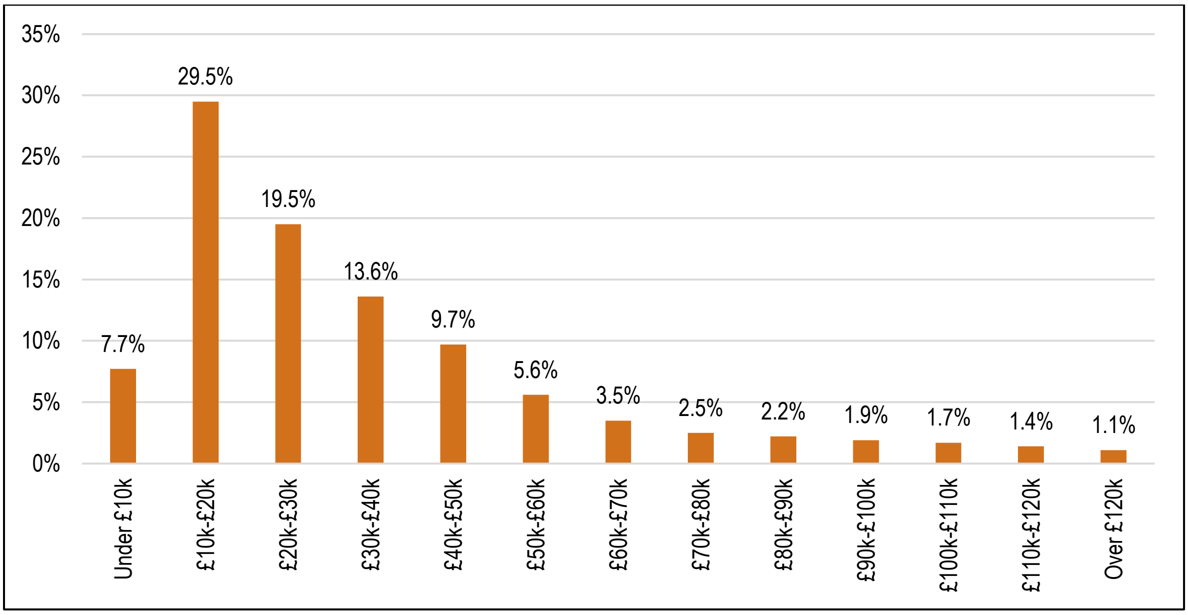
8.15 Following on from the assessment of local housing costs it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability (i.e. the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy); the analysis also provides an indication of the potential for intermediate housing to meet needs.

8.16 Data about total household income has been modelled on the basis of a number of different sources of information to provide both an overall average income and the likely distribution of income. The key sources of data include:

- ONS modelled income estimates (published in December 2016 with a 2013/14 base) – this information is provided for middle layer super output areas (MSOA) and is therefore used to build up to local authority areas;
- English Housing Survey (EHS) – to provide information about the distribution of incomes; and
- Annual Survey of Hours and Earnings (ASHE) – to assist in looking at how incomes have changed since the ONS base date.

8.17 Drawing all of this data together, an income distribution for 2017 has been constructed. The figure below shows the income distribution estimated for both areas combined. Overall the average (mean) income is estimated to be around £34,500, with a median income of £26,200; the lower quartile income of all households is estimated to be £15,200. There is little difference in income levels between the two areas with a median income of £26,600 in BwD and £25,700 for Hyndburn.

Figure 28: Distribution of household income (2017) – BwD and Hyndburn



Source: Derived from a range of data as discussed

8.18 To assess affordability, a household's ability to afford private rented housing without financial support has been studied. The distribution of household incomes is then used to estimate the likely proportion of households who are unable to afford to meet their needs in the private sector without support, on the basis of existing incomes. This analysis brings together the data on household incomes with the estimated incomes required to access private sector housing.

8.19 Different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households (this has consistently been shown to be the case in the English Housing Survey and the Survey of English Housing). Assumptions about income levels for specific elements of the modelling are the same as in previous assessments of affordable need.

Newly forming households

8.20 The number of newly-forming households has been estimated through the demographic modelling with an affordability test also being applied. This has been undertaken by considering the changes in households in specific 5-year age bands relative to numbers in the age band below 5 years previously to provide an estimate of gross household formation (e.g. the analysis considers the number of households aged under 45 in a particular year and subtracts the number aged under 40 five-years previously – this provides an indication of the number of new household (i.e. that didn't exist five years earlier). This differs from numbers presented in the demographic projections which are for net household growth.

8.21 The numbers of newly-forming households are limited to households forming who are aged under 45 – this is consistent with CLG guidance (from 2007 – see Annex B) which notes after age 45 that headship (household formation) rates 'plateau'.

8.22 The PPG does not provide any specific guidance on how to calculate the number of newly forming households. There may be a small number of household formations beyond age 45 (e.g. due to relationship breakdown) although the number is expected to be fairly small when compared with formation of younger households.

8.23 Using the projections in this report, it is estimated that around 1,020 new households are likely to form per annum in the 2016-36 period in BwD, along with 537 households per annum in Hyndburn.

Supply of affordable housing from relets

8.24 The final key area of analysis is around the supply of affordable housing from relets of current stock. For this analysis, information has been taken from CoRe for the 2014-17 period. The table below provides a summary of the calculation carried out, which includes data from both general needs and supported lettings. Overall the table suggests a potential future supply of 1,120 homes per annum in BwD and 405 in Hyndburn.

Table 37: Estimated annual supply of affordable housing – based on data for the 2014-17 period – BwD

	General needs	Supported housing	Total
Total lettings	989	643	1,632
% as non-newbuild	97.1%	99.0%	97.8%
Lettings in existing stock	960	636	1,596
% non-transfers	66.2%	76.0%	70.1%
Total lettings	636	484	1,120

Source: Derived from CoRe data

Table 38: Estimated annual supply of affordable housing – based on data for the 2014-17 period – Hyndburn

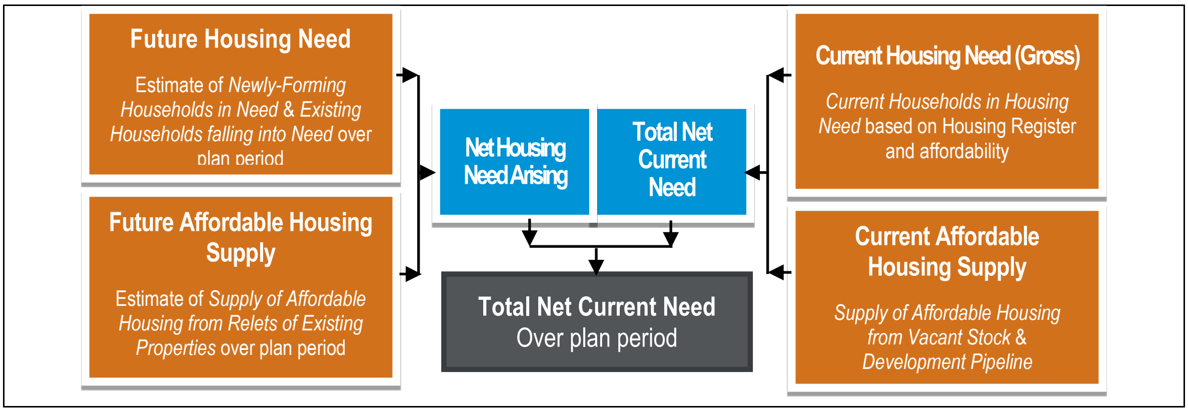
	General needs	Supported housing	Total
Total lettings	366	244	610
% as non-newbuild	97.3%	96.3%	96.9%
Lettings in existing stock	356	235	591
% non-transfers	72.8%	62.2%	68.6%
Total lettings	259	146	405

Source: Derived from CoRe data

Affordable Housing Needs Assessment

8.25 Affordable housing need has been assessed using the methodology set out in the PPG. This model is summarised in the figure below.

Figure 29: Overview of affordable housing needs model



8.26 The table below shows the overall calculation of affordable housing need. This excludes supply arising from sites with planning permission (the ‘development pipeline’) to allow for a comparison with the demographic projections set out in the report. The analysis has been based on meeting affordable housing need over the 20-year period from 2016 to 2036. Whilst most of the data in the model are annual figures the current need has been divided by 20 to make an equivalent annual figure.

8.27 As the table sets out, the analysis calculates an overall surplus of affordable housing of 100 units per annum in BwD and a shortfall of 79 per annum in Hyndburn. The net need is calculated as follows:

Net Need = Current Need + Need from Newly-Forming Households + Existing Households falling into Need – Supply of Affordable Housing

Table 39: Estimated Annual Level of Affordable Housing Need (2016-36)

	BwD	Hyndburn
Current need	52	23
Newly forming households	436	234
Existing households falling into need	532	227
Total Gross Need	1,020	484
Supply	1,120	405
Net Need	-100	79

Source: Housing Register/CoRe/Projection Modelling and affordability analysis

8.28 The analysis above is based on clearing the current need over the 20-years from 2016. In many affordable needs analysis, the current need is considered over a five year period (i.e. the current need is divided by 5 rather than 20) – this was the approach taken in the 2014 SHMA. The table below shows if the current need is cleared over a shorter period of time then both areas shown a need for affordable housing – 108 affordable homes per annum in BwD and 171 per annum in Hyndburn.

Table 40: Estimated Annual Level of Affordable Housing Need (2016-36) – clearing need over a five year period

	BwD	Hyndburn
Current need	260	115
Newly forming households	436	234
Existing households falling into need	532	227
Total Gross Need	1,228	576
Supply	1,120	405
Net Need	108	171

Source: Housing Register/CoRe/Projection Modelling and affordability analysis

Affordable Housing – Expanded NPPF Definition

8.29 Using the traditional method to look at affordable need (i.e. those who cannot afford to rent) it was estimated that there is a need for around 280 units per annum across the study area (if clearing the current need over a five year period) – this is for subsidised housing at a cost below that to access the private rented sector (i.e. for households unable to access any form of market housing without some form of subsidy). It would be expected that this housing would be delivered primarily as social/affordable rented housing.

8.30 The new NPPF introduces a new category of household in affordable housing need, and widens the definition of affordable housing (as found in the NPPF – Annex 2). It is considered that households falling into the definition would be suitable for Starter Homes or Discounted market sales housing, although other forms of affordable home ownership (such as shared ownership) might also be appropriate.

8.31 This section considers the level of need for these types of dwellings in BwD and Hyndburn, as a proportion of overall housing delivery. The NPPF states *"Where major development involving the provision of housing is proposed, planning 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."* (NPPF, para 64).

8.32 The extended definition of affordable housing includes households who are able to access the private rented sector but who cannot afford to buy. In both BwD and Hyndburn there is limited evidence for a need for this type of housing; this is mainly due to the fact that second-hand housing to buy would require a similar or lower level of income as renting an equivalent private sector home.

8.33 In the year to March 2018, the 'average' lower quartile private rent is shown by VOA to cost around £400 a month, assuming a household spends no more than 25% of income on housing, this would equate to an income requirement of about £19,200.

8.34 For the same period, Land Registry data records a lower quartile price in BwD of £74,300, which (assuming a 10% deposit and 4 times mortgage multiple) would equate to an income requirement of £16,700. In Hyndburn, the lower quartile price is even lower (£61,600 for the same period).

8.35 Given that the income to buy is less than the income to rent, it would be reasonable to conclude that there is no need to provide housing under the new definition of 'affordable home ownership'. However, it does seem that there are some households in BwD and Hyndburn who are being excluded from the owner-occupied sector.

8.36 This can be seen by analysis of tenure change, which saw the number of households living in private rented accommodation more than doubling from 2001 to 2011 (with the likelihood that there have been further increases since). Over the same period, the number of owners with a mortgage dropped slightly.

8.37 It seems likely in BwD and Hyndburn that access to owner-occupation is being restricted by access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially some mortgage restrictions (e.g. where employment is temporary) rather than being due to the actual cost of housing.

8.38 It may therefore be the case that providing some 'affordable home ownership' properties would assist in getting some households out of the private rented sector – this could be achieved by signposting potential purchasers to schemes such as Help-to-Buy, or by encouraging developers to provide some form of equity support. If this could be achieved then it may be reasonable for up to 10% of homes to fall into the affordable home ownership category (10% being the Government expectation moving forward).

8.39 If there are to be properties sold as affordable home ownership, it will also be important to set these at a price point where there is a likelihood that a reasonable number of households will be able to afford (subject to issues around access to capital for example).

8.40 The table below sets out a suggest purchase price for affordable home ownership in the two areas. The figures are based on trying to roughly equate a sale price with an equivalent access point to the private rental market. This shows a one bedroom home 'affordable' price of £69,000 in Hyndburn, rising to £146,000 for homes with 4 or more bedrooms in Blackburn.

Table 41: BwD and Hyndburn affordable home ownership prices (aligned with cost of accessing private rented sector) – data for year to March 2018

Size	BwD	Hyndburn
1-bedroom	£75,000	£69,000
2-bedroom	£85,000	£83,200
3-bedroom	£97,700	£96,000
4+-bedroom	£146,100	£124,800

Source: derived from VOA data

8.41 Overall, this analysis suggests that the additional categories of affordable housing set out in Annex 2 of the NPPF are unlikely to meet any need in BwD and Hyndburn; put simply, the typical cost of housing to buy in the area (in the second-hand market) is sufficiently affordable such that there is no need for a discounted new build product.

8.42 There may be cases where the Council could accept 'affordable home ownership'; for example where this supports viability or to help diversify stock in some areas. However, the analysis is clear that the majority (all) additional affordable homes should be of a rented tenure.

Affordable Housing Need: Key Messages

- Analysis has been undertaken to estimate the need for affordable housing in the 2016-36 period. The analysis is split between a 'traditional' need (which is mainly for social/affordable rented accommodation) and is based on households unable to buy or rent in the market and the 'additional' category of need introduced by the revised NPPF/PPG (which includes housing for those who can afford to rent privately but cannot afford to buy a home).

- The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income. Additionally, when looking at traditional needs consideration is given to household projections and estimates of the supply of social/affordable rented housing.

- Using the traditional method, the analysis suggests a need for 108 affordable homes per annum in BwD and 171 in Hyndburn over the next five years. The Councils are therefore justified in seeking to secure additional affordable housing. The analysis does however identify a potential surplus of affordable housing in BwD in the longer-term.

- Using the additional definition, a key finding is that the cost of housing to buy in the study area is relatively cheap. Additionally, the income levels likely to be required to access owner-occupied housing are often lower than might be needed to rent privately (for smaller homes). This would suggest that a key issue in the area is about access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially some mortgage restrictions (e.g. where employment is temporary).

- Hence, whilst the NPPF2 suggests a clear policy direction to provide 10% of all new housing as affordable home ownership, it is not clear that this is the best solution in the study area. If possible, it would be more appropriate for the Councils to seek for 10% of housing to be made available with some initial upfront capital payment (such as a deposit contribution), rather than as a discount to OMV. Such a payment could cover the deposit and other initial costs, and would potentially need to be protected in some way so that the money is not lost if a household chooses to sell their property (i.e. to ensure that any subsidy is held in perpetuity). Schemes such as Help-to-Buy could form part of such a package. This would still be targeted at the same group of households (likely to mainly be those currently privately renting but who would like to buy).

- In terms of setting housing costs in the affordable home ownership sector, it is recommended that the Council considers setting prices at a level which (in income terms) are equivalent to the levels needed to access private rented housing. This would ensure that households targeted by the new definition could potentially afford housing – this might mean greater than 20% discounts from Open Market Value in some locations.

- Overall, the analysis identifies a notable need for affordable housing in the short-term, and it is clear that provision of new affordable housing is an important and pressing issue in the Boroughs. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise, particularly of affordable housing to rent.

9 PRIVATE RENTED SECTOR

Introduction

9.1 Planning Practice Guidance on housing need assessment highlights the Private Rented Sector (PRS) as one of the specific groups that should be analysed, although there is little advice on the analysis expected and the outputs. Specifically, the PPG says: 'tenure data from the Office for National Statistics can be used to understand the future need for private rented sector housing' and 'market signals reflecting the demand for private rented sector housing could be indicated from the level of changes in rents'.

8.2 This section therefore looks at a range of statistics in relation to the PRS in BwD and Hyndburn. Where reasonable, comparisons are made with other tenures (i.e. owner-occupied and social rented) as well as contrasting data with other areas. The aim is to bring together a range of information to inform the need for additional private rented housing in the study area.

Size of the Private Rented Sector

8.3 The table below shows the tenure split of housing in 2011 in BwD, Hyndburn and a range of other areas. This shows a total of 15,200 households living in private rented housing in the study area – 16.6% of all households. This proportion is slightly higher than the regional average and virtually the same as the national equivalent. The vast majority of households in the PRS are living in housing rented from a landlord or through a letting agency, although 1,300 (1.5% of all households) are recorded as living in 'other' PRS accommodation, this is mainly households living in housing owned by a relative or friend.

Table 42: Tenure (2011)

	BwD	Hyndburn	Study area	North West	England
Owns outright	18,039	11,464	29,503	934,101	6,745,584
Owns with mortgage/loan	19,044	11,858	30,902	1,023,250	7,403,200
Social rented	10,391	4,389	14,780	550,481	3,903,550
Private rented	8,993	6,235	15,228	462,899	3,715,924
Other	886	395	1,281	38,818	295,110
Total	57,353	34,341	91,694	3,009,549	22,063,368
% private rented	15.7%	18.2%	16.6%	15.4%	16.8%

Source: Census (2011)

8.4 As well as looking at the current tenure profile, it is of interest to consider how this has changed over time; the table below shows (for the whole of the study area) data from the 2001 and 2011 Census. From this it is clear that there has been significant growth in the number of households living in privately rented accommodation as well as an increase in outright owners (this will be due to mortgages being paid off, which may have been assisted by a period of low interest rates). There has been a decline in the number of owners with a mortgage and virtually no change in the number of households in social rented housing.

Table 43: Change in tenure (2001-11) – BwD and Hyndburn

	2001 households	2011 households	Change	% change
Owns outright	28,548	29,503	955	3.3%
Owns with mortgage/loan	33,803	30,902	-2,901	-8.6%
Social rented	14,784	14,780	-4	0.0%
Private rented	7,325	15,228	7,903	107.9%
Other	1,923	1,281	-642	-33.4%
Total	86,383	91,694	5,311	6.1%

Source: 2001 and 2011 Census

8.5 The tenure changes in BwD and Hyndburn are broadly similar to that seen in other areas (as shown in the table below) although the proportionate increase in the number of households in the PRS is more notable in the study area than other locations. A reduction in the number of outright owners in Hyndburn is also noteworthy, and is a different pattern to that seen in other locations.

Table 44: Change in tenure (2001-11) – BwD, Hyndburn and other areas

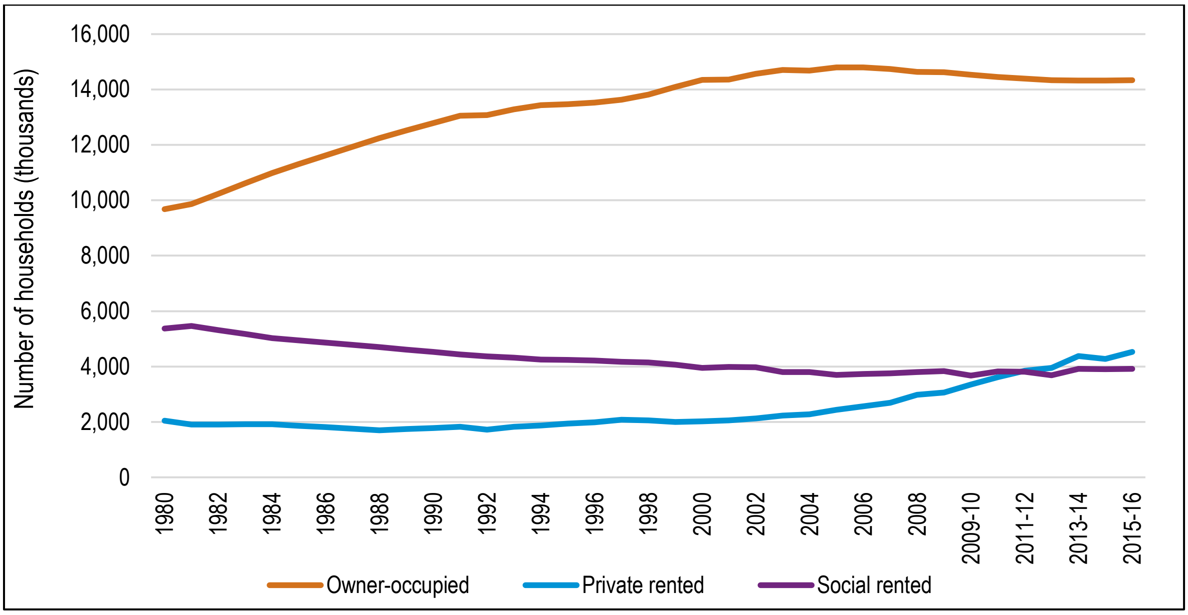
	BwD	Hyndburn	Study area	North West	England
Owns outright	5.6%	-0.1%	3.3%	11.5%	13.0%
Owns with mortgage/loan	-7.5%	-10.3%	-8.6%	-7.8%	-8.4%
Social rented	2.4%	-5.4%	0.0%	-2.5%	-0.9%
Private rented	109.2%	106.0%	107.9%	92.8%	82.4%
Other	-32.1%	-36.2%	-33.4%	-35.5%	-29.6%
Total	7.4%	4.1%	6.1%	7.0%	7.9%

Source: 2001 and 2011 Census

8.6 The PRS has clearly been growing rapidly over time, in BwD and Hyndburn and other locations; it is also worth considering what further changes may have occurred since 2011. Unfortunately, robust local data on this topic is not available; however a national perspective can be drawn from the English Housing Survey (EHS) which has data up to 2016.

8.7 The figure below shows changes in three main tenures back to 1980. This clearly shows the increase in the number of households living in private rented accommodation from about 2001 and also a slight decrease in the number of owners. Since 2011, the EHS data shows that that PRS has risen by a further 25% and if BwD/Hyndburn has seen a similar level of increase then this would imply about 3,800 additional households in the sector.

Figure 30: Trends in tenure, 1980 to 2015-16 – England



Source: English Housing Survey

8.8 The data above shows information for all households and it is of interest to study this information for younger households. Interrogating changes for a full range of age groups is difficult as the two Census (2001 and 2011) use different age bandings. It is however possible to provide an indication of the change in tenure by looking at households aged under 35 and this is shown in the table below.

Table 45: Change in tenure 2001-11 (all households aged Under 35) – BwD and Hyndburn

	2001	2011	Change	% change
Owned	11,366	7,585	-3,781	-33.3%
Social rented	3,572	2,950	-622	-17.4%
Private rented	3,795	7,014	3,219	84.8%
Total	18,733	17,549	-1,184	-6.3%

Source: 2001 and 2011 Census

8.10 Examining the same data at a local authority level reveals a similar pattern across each with owner occupation falling by around one third and being replaced by similar increases in the numbers of younger households privately renting. This is particularly the case in Hyndburn where the PRS sector increased by 174%

Table 46: Change in tenure 2001-11 (all households aged Under 35) – By Local Authority

	BwD				Hyndburn			
	2001	2011	Change	% change	2001	2011	Change	% change
Owned	7,272	4,898	-2,374	-33%	4,094	2,682	-1,412	-34%
Social rented	2,613	2,230	-383	-15%	952	716	-236	-25%
Private rented	2,298	4,215	1,917	83%	1,020	2,794	1,774	174%
Total	12,183	11,343	-840	-7%	6,066	6,192	126	2%

Source: 2001 and 2011 Census

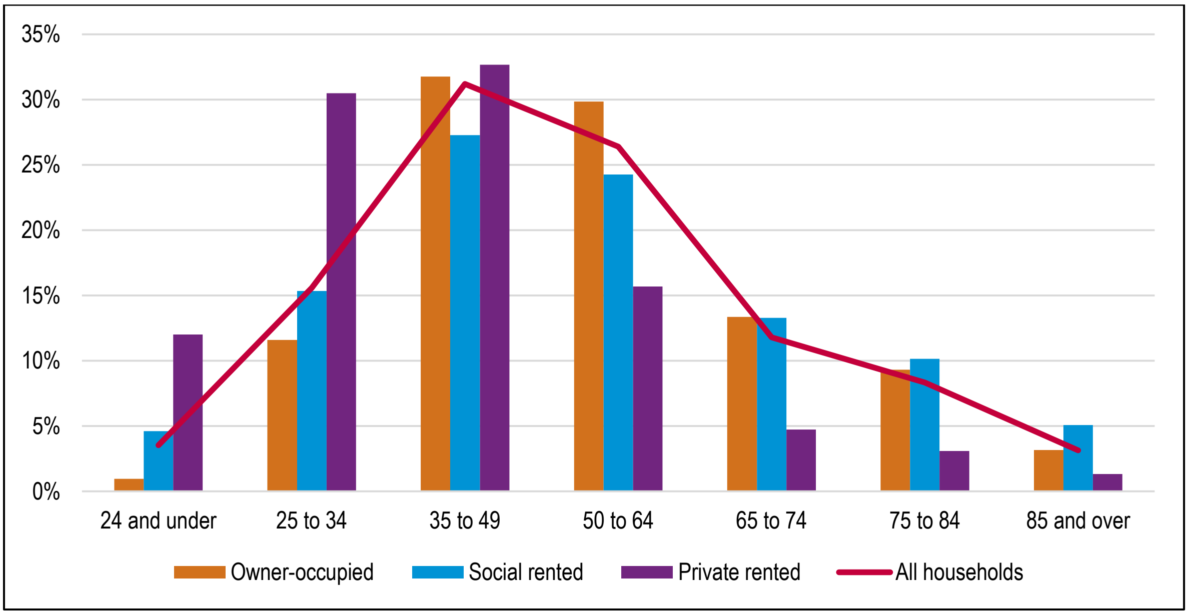
Profile of Private Renters

8.11 This section presents a profile of people/households living in the private rented sector. Whenever possible comparisons are made with those living in other tenures.

Age

8.12 Private renters are younger than social renters and owner occupiers. In 2011, the average age of household reference persons (HRPs) in the private rented sector was 41 years (compared with 53 years for social renters and 54 years for owner occupiers). About three-quarters (75%) of private rented sector HRPs were aged under 50 compared with 47% of social renters and 44% of owner occupiers.

Figure 31: Age of household reference person by tenure (2011) – BwD and Hyndburn



Source: Census (2011)

8.13 At a national level, the EHS notes that the proportion of younger people in the PRS has increased over time. It notes that the proportion of those aged 25 to 34 who lived in the private rented sector increased from 24% in 2005-6 to 46% in 2015-16. Over the same period, there was a corresponding decrease in the proportion of people in this age group in both the owner occupied (from 56% in 2005-6 to 38% in 2015-16) and social rented (from 20% in 2005-6 to 16% in 2015-16) sectors.

Household type

8.14 The table below shows the composition of households living in the private rented sector (and compared with other tenures). This shows a particularly high proportion of households with dependent children, making up 40% of the PRS. The sector also sees a relatively high proportion of households in the 'other' category. Finally almost 32% of those households privately renting are comprised of single people. Many of these households are likely to be multi-adult households living in shared accommodation (i.e. houses in multiple occupation (HMOs)).

8.15 Between 2001 and 2011, Census data shows that the number of households with dependent children in the PRS rose from 3,800 to 6,700 – a 77% increase. The EHS also shows a similar pattern nationally although nationally the proportion of the sector made up of households with dependent children has increased (whereas as the figure in the study area has not particularly changed going from 41% to 40%).

Table 47: Household composition by tenure (2011) – BwD and Hyndburn

	Owner-occupied		Social rented		Private rented		Total	
	Hhs	% of hhs	Hhs	% of hhs	Hhs	% of hhs	Hhs	% of hhs
Single person aged 65+	6,549	10.8%	2,962	20.0%	961	5.8%	10,472	11.4%
Single person aged <65	8,488	14.1%	4,248	28.7%	5,272	31.9%	18,008	19.6%
Couple aged 65+	5,294	8.8%	643	4.4%	230	1.4%	6,167	6.7%
Couple, no children	11,343	18.8%	1,092	7.4%	1,833	11.1%	14,268	15.6%
Couple, dependent children	14,634	24.2%	1,911	12.9%	2,778	16.8%	19,323	21.1%
Couple, all children non-dependent	5,076	8.4%	382	2.6%	271	1.6%	5,729	6.2%
Lone parent, dependent children	2,608	4.3%	2,161	14.6%	3,346	20.3%	8,115	8.9%
Lone parent, all children non-dependent	2,262	3.7%	616	4.2%	453	2.7%	3,331	3.6%
Other households with dependent children	2,281	3.8%	391	2.6%	530	3.2%	3,202	3.5%
Other households	1,870	3.1%	374	2.5%	835	5.1%	3,079	3.4%
Total	**60,405**	**100.0%**	**14,780**	**100.0%**	**16,509**	**100.0%**	**91,694**	**100.0%**
Total dependent children	19,523	32.3%	4,463	30.2%	6,654	40.3%	30,640	33.4%

Source: Census (2011)

Size and type of accommodation

8.16 The tables below show the size and type of accommodation in the PRS compared with other sectors. From this it can be seen that the profile PRS generally sits somewhere between that of owner-occupation and social renting. For example, the PRS has a higher proportion of detached homes than the social rented sector, but fewer than owner-occupiers; the opposite is seen when looking at flatted accommodation. However, the most notable finding is the dominance of terraced housing in the PRS – making up 63% of all housing in the sector.

8.17 When looking at the size of accommodation, it is clear that the PRS is strongly focussed on 2- and 3-bedroom homes (making up 81% of all households in this tenure). The owner-occupied sector in contrast is dominated by 3+-bedroom homes (64% of the total in this tenure) whilst social renting is focussed on 1- and 2-bedroom accommodation (68% of the total).

Table 48: Accommodation type by tenure (households) – BwD and Hyndburn

	Owner-occupied	Social rented	Private rented	Total
Detached	17.7%	3.5%	6.0%	13.3%
Semi-detached	32.5%	25.2%	14.5%	28.1%
Terraced	47.6%	30.4%	62.9%	47.6%
Flat/other	2.2%	40.9%	16.6%	11.0%
Total	100.0%	100.0%	100.0%	100.0%
	60,405	14,780	16,509	91,694

Source: Census (2011)

Table 49: Accommodation size by tenure (households) – BwD and Hyndburn

	Owner-occupied	Social rented	Private rented	Total
1-bedroom	2.0%	34.3%	12.0%	9.0%
2-bedrooms	34.0%	33.3%	51.8%	37.1%
3-bedrooms	46.0%	27.4%	29.6%	40.1%
4+-bedrooms	18.0%	5.0%	6.6%	13.9%
Total	100.0%	100.0%	100.0%	100.0%
	60,405	14,780	16,509	91,694

Source: Census (2011)

Overcrowding and under-occupation

8.18 The analysis below studies levels of overcrowding and under-occupation – this is based on the bedroom standard with data taken from the 2011 Census. The box below shows how the standard is calculated and this is then compared with the number of bedrooms available to the household (with a negative number representing overcrowding and a positive number being under-occupation). Households with an occupancy rating of +2 or more have at least two spare bedrooms.

For the purposes of the bedroom standard a separate bedroom shall be allocated to the following persons –

(a) A person living together with another as husband and wife (whether that other person is of the same sex or the opposite sex)
(b) A person aged 21 years or more
(c) Two persons of the same sex aged 10 years to 20 years
(d) Two persons (whether of the same sex or not) aged less than 10 years
(e) Two persons of the same sex where one person is aged between 10 years and 20 years and the other is aged less than 10 years
(f) Any person aged under 21 years in any case where he or she cannot be paired with another occupier of the dwelling so as to fall within (c), (d) or (e) above.

8.19 The analysis shows that levels of overcrowding in the PRS are slightly higher than other tenures, with 6.6% of households being overcrowded in 2011 (slightly higher than the 6.2% figure in social rented accommodation). Levels of under-occupation are however slightly higher than in the social rented sector, with around 55% of households having at least one spare bedroom.

Table 50: Overcrowding and under-occupation by tenure (households) – BwD and Hyndburn

	Owner-occupied	Social rented	Private rented	Total
+2 or more	33.3%	8.9%	12.7%	25.7%
+1 or more	42.4%	31.3%	42.7%	40.7%
0	19.1%	53.6%	38.0%	28.1%
-1 or less	5.2%	6.2%	6.6%	5.6%
Total	100.0%	100.0%	100.0%	100.0%
	60,405	14,780	16,509	91,694

Source: Census (2011)

Economic activity

8.20 Data from the 2011 Census shows that 59% of private renters in BwD/Hyndburn were working, this is lower than the proportion of owner occupiers (68%) and somewhat higher than the proportion of social renters in work (33%). Smaller proportions of private renters were retired (10%) compared with over 25% in each of the owner-occupied and social rented sectors.

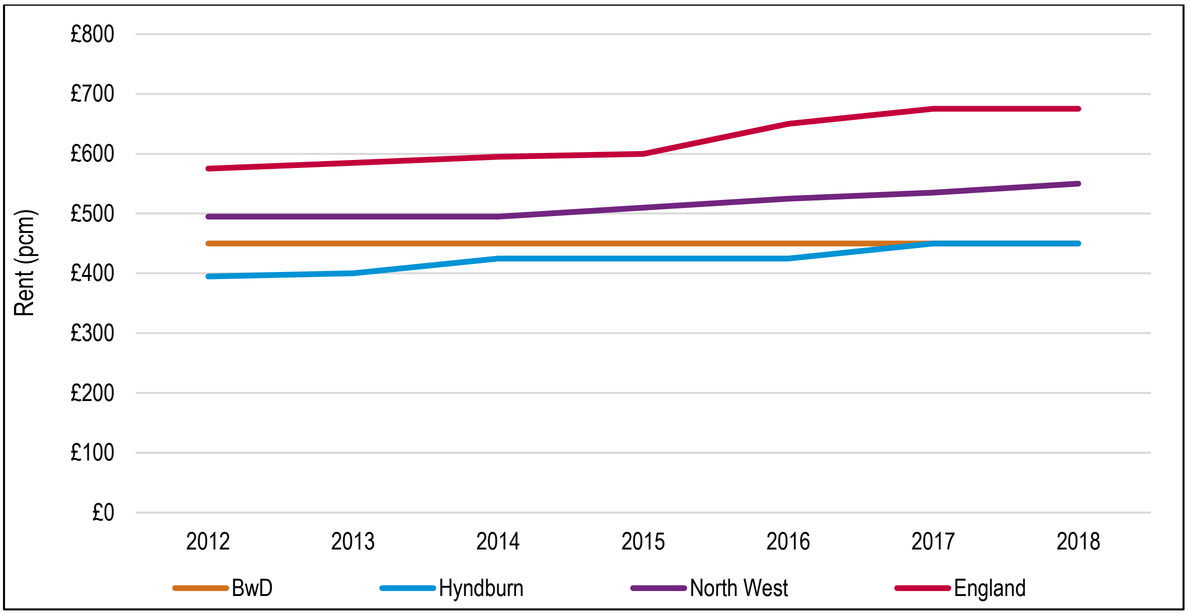
Housing Costs

8.21 Below, analysis is carried out to look at how costs have changed over time for different size of properties. This draws on data from the Valuation Office Agency (VOA) using a time series back to 2011 – the data provided in this section looks at the year to the end of March (for any given year).

8.22 The figure below shows a time-series of average (median) rents from 2012 to 2018; this shows that there really have not been any significant changes to rent levels in the study area and that rent levels are somewhat lower than seen in other locations. This does not indicate any shortage of supply of private rented homes.

8.23 The tables below show that the overall average rent in BwD did not change over the 2012-18 period, whilst rents increased on average by £55 per month in Hyndburn (a 14% increase). In comparison, rents increased by 11% across the North West and 17% nationally.

Figure 32: Average (median) private sector rent (per month) 2012-18



Source: Valuation Office Agency

Table 51: Average (median) private sector rent (per month) 2012 and 2018 – BwD

	2012	2018	Change	% change
1-bedroom	£395	£395	£0	0%
2-bedrooms	£425	£450	£25	6%
3-bedrooms	£500	£525	£25	5%
4+-bedrooms	£725	£750	£25	3%
All dwellings	£450	£450	£0	0%

Source: Valuation Office Agency

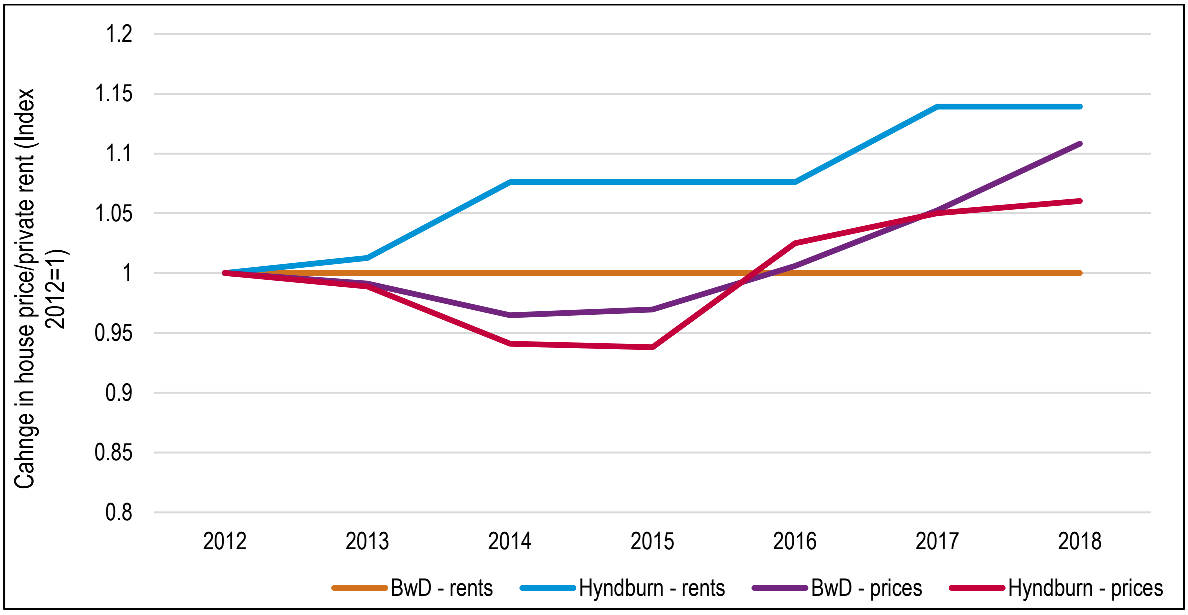
Table 52: Average (median) private sector rent (per month) 2012 and 2018 – Hyndburn

	2012	2018	Change	% change
1-bedroom	£350	£350	£0	0%
2-bedrooms	£390	£425	£35	9%
3-bedrooms	£495	£520	£25	5%
4+-bedrooms	£675	£695	£20	3%
All dwellings	£395	£450	£55	14%

Source: Valuation Office Agency

8.24 The figure below shows a comparison between changes to private sector rents and changes to the average house price in the 2012-18 period. This shows that house prices have increased by around 11% in BwD and 6% in Hyndburn, compared with a 0% and 14% change in rents respectively. This analysis does not really suggest any particular pressures in the different sectors. For context, the equivalent change in prices across England and Wales was 36%.

Figure 33: Change in house prices and private rents (2012-18)



Source: Valuation Office Agency and Land Registry

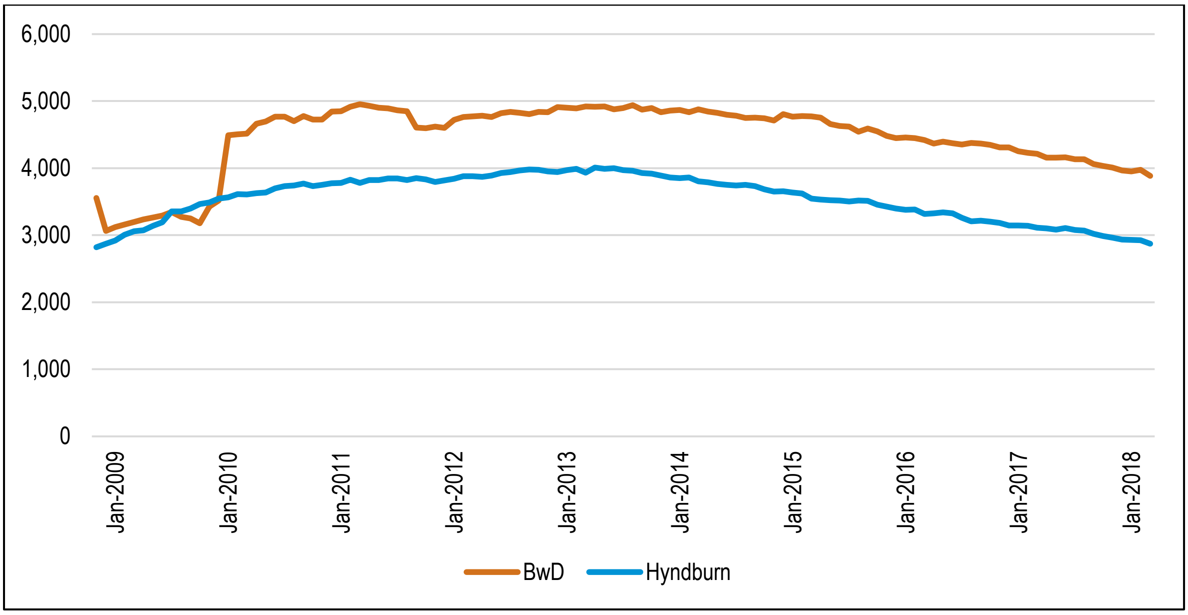
Housing Benefit Claimants

8.25 A further analysis has been carried out to look at the number of housing benefit claimants in the sector. This provides an indication of the number of people who are using the sector as a form of affordable housing, and in many cases will be living in private rented accommodation due to a lack to affordable housing (e.g. in the social rented sector). It should however be noted that some of these households may also be in the sector through choice.

8.26 The analysis shows that from 2008, the number of claimants in the PRS rose steadily to peak at around 8,900 in 2013. Since then the number of claimants has fallen, with the number currently standing at about 6,800. It is clear that the PRS still has a significant role in providing accommodation for those who cannot afford the market, but that this has reduced over time.

8.27 The change is likely to be mainly due to economic improvements (e.g. reducing unemployment), although the relative unaffordability of the sector may also be playing a role – with some households seeking to move into the social rented sector.

Figure 34: Number of Housing Benefit claimants in the private rented sector



Source: Department of Work and Pensions

8.28 We have also examined local rents and how these compare to local housing allowances. The majority of the study area falls within the East Lancashire Broad Rental Market Area although a small southern part of Blackburn with Darwen falls within the Bolton and Bury BRMA.

Table 53: Lower Quartile Rents and Local Housing Allowance Broad Rental Market Area

Area	1 Bed	2 Bed	3 Bed	+4 Bed
BwD	£350	£400	£458	£685
Hyndburn	£235	£390	£450	£585
Bolton and Bury BRMA	£365	£430	£499	£644
East Lancs BRMA	£348	£395	£452	£621

Source: Valuation Office Agency

9.2 As shown in the table above the local housing allowances tend to be around the lower quartile rents for each borough but generally slightly above the Hyndburn costs and below those in Blackburn with Darwen. This may be offset slightly with the slightly higher allowances in the Bolton and Bury BRMA.

Build-to-Rent

8.29 As noted, the size of the PRS has grown substantially since 2011 and this has been the main growth sector in the market. Nationally and regionally there has also been a substantial increase in the size of the PRS.

8.30 Linked in part to this, there is an increased (national) interest from developers in "Build to Rent" housing, which is specifically built not for open market sale but for the Private Rented Sector. Arguably, the sector provides the opportunity for good quality, well-managed rental accommodation which is purpose-built. Additionally, the sector provides the opportunity to boost overall housing delivery, as it does not compete directly with traditional housing development schemes which are built for sale.

8.31 The Government has been promoting Build-to-Rent housing. It has set up a Private Rented Sector Taskforce; and supported delivery though other measures – including a Build to Rent Fund which provides Government-backed loans to support new development. The sector is currently relatively small, but is one with growth potential.

8.32 The Housing White Paper (HWP) notes that local authorities *'should plan proactively for Build to Rent where there is a need, and to make it easier for Build to Rent developers to offer affordable private rental homes instead of other types of affordable housing'*. Following this, the revised NPPF now includes Build to Rent housing in the Glossary and specific advice about affordable housing on Build to Rent schemes. Build to Rent guidance was published by MHCLG on the 13th September 2018.

8.33 In BwD and Hyndburn, there is currently no evidence of a need for Build to Rent or any significant activity in the sector. Indeed nationally, Build to Rent schemes are mainly coming forward in major urban areas (notably London) and are focussed on young professionals in locations close to transport hubs.

8.34 Given private sector rent levels in the study area, it seems unlikely that there would be any notable investment in this sector at present given the level of investment required. However, if schemes were to come forward, the Councils should consider them on merit, including taking account of any affordable housing offer (such as rent levels and the security of tenure).

The Private Rented Sector: Key Messages

- The private rented sector (PRS) accounts for around 17% of all households in BwD and Hyndburn (as of 2011), the same as the national average (17%). The number of households in this sector has however grown substantially (more than doubling in the 2001-11 period).

- The PRS has some distinct characteristics, including a much younger demographic profile, a high proportion of households with dependent children (notably lone parents), a high percentage of single people aged under 65 and levels of overcrowding are relativity high. In terms of the built-form and size of dwellings in the sector, it can be noted that the PRS generally sits somewhere between owner-occupation and the social rented.

- Additional analysis suggests that rent levels have not changed significantly over time (when looking at the 2012-18 period) – this would suggest that despite the large increase in the size of the sector, there is no obvious lack of supply of private rented homes. The increase in the size of the sector could however have a knock-on effect to the cost of owner-occupation, if for example buy-to-let homes reduce the supply available for owner occupation, this could drive-up prices. There is limited evidence that this is occurring.

- There is no evidence of a need for Build to Rent housing (i.e. developments specifically for private rent). However, given the current Government push for such schemes, the Council should consider any proposals on their merit, including taking account of any affordable housing offer (such as rent levels and the security of tenure).

- This study has not attempted to estimate the need for additional private rented housing. It is likely that the decision of households as to whether to buy or rent a home in the open market is dependent on a number of factors which mean that demand can fluctuate over time; this would include mortgage lending practices and the availability of Housing Benefit.

- A general (national and local) shortage of housing is likely to have driven some of the growth in the private rented sector, including increases in the number of younger people in the sector, and increases in shared accommodation. If the supply of housing increases, then this potentially means that more households would be able to buy, but who would otherwise be renting.

10 HOUSING TECHNICAL STANDARDS AND OLDER PERSONS NEEDS

Introduction

10.1 Planning Practice Guidance note 56 (Housing: optional technical standards) sets out how local authorities can gather evidence to set requirements on a range of issues (including accessibility and wheelchair housing standards, water efficiency standards and internal space standards). This section looks at the first two of these (i.e. accessibility and wheelchair housing) as well as considering the specific needs of older people.

10.2 The PPG sets out that the reason for the approach to setting standards is designed to 'rationalise the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes' (56-001) and that 'local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area' (56-002).

10.3 The PPG sets out that local authorities should be using their assessment of housing need (and other sources) to consider the need for M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. It sets out that there are a range of published statistics which can be considered, including:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings);
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);
- the accessibility and adaptability of existing housing stock;
- how needs vary across different housing tenures; and
- the overall impact on viability.

10.4 This section of the report draws on a range of statistics, including those suggested in the PPG (for which the Government has provided a summary data sheet 'Guide to available disability data') – termed the Guide in analysis to follow. The discussion below begins by looking at older persons' needs.

10.5 Additionally, for some analysis it is necessary to project the population forward. Reference for this is made to the 2016-based subnational population projections (SNPP).

Current Population of Older People (2017 base-date)

10.6 Table 54 provides baseline population data about older persons and compares this with other areas. The data has been taken from the published ONS mid-year population estimates and is provided for age groups from 65 and upwards; the data is for 2017 to reflect the latest published data for local authority areas and above. The data shows, when compared with both the region and England, that Hyndburn has a similar proportion of older persons whilst the proportion is low in BwD. In 2017, it is estimated that 14% of the population of BwD was aged 65 or over along with 18% of the population of Hyndburn.

Table 54: Older Person Population (2017)

	BwD	Hyndburn	North West	England
Under 65	127,481	65,741	5,920,919	45,588,919
65-74	12,266	8,406	740,636	5,495,181
75-84	6,637	4,549	428,020	3,183,274
85+	2,388	1,714	169,052	1,352,056
Total	**148,772**	**80,410**	**7,258,627**	**55,619,430**
Total 65+	21,291	14,669	1,337,708	10,030,511
% 65+	14.3%	18.2%	18.4%	18.0%

Source: ONS 2017 Mid-Year Population Estimates

Future Change in the Population of Older Persons

10.7 As well as providing a baseline position for the proportion of older persons in the Borough, population projections can be used to provide an indication of how the numbers might change in the future compared with other areas. The data presented below uses the 2016-based SNPP for consistency across areas and runs from 2016 to 2036 to be consistent with other analysis developed in this report.

10.8 The data shows that the two Boroughs are expected to see a notable increase in the older person population with the total number of people aged 65 and over expected to increase by over 30% over the 20-years from 2016; this compares with a small overall population decline and a notable decrease in the Under 65 population. The proportionate increase in the number of older people in the two areas is however slightly lower than projected for the region and England.

Table 55: Projected Change in Population of Older Persons (2016 to 2036) – 2016-based SNPP

	BwD	Hyndburn	North West	England
Under 65	-7.4%	-10.9%	-1.7%	2.6%
65-74	24.1%	13.5%	23.5%	29.8%
75-84	45.6%	44.5%	44.8%	52.5%
85+	65.2%	89.3%	84.4%	89.5%
Total	-1.3%	-3.2%	5.6%	10.2%
Total 65+	35.5%	32.0%	38.0%	45.1%

Source: ONS subnational population projections (2016-based)

10.9 In total population terms, the projections show an increase in the population aged 65 and over of 12,100 people, this is against a backdrop for the housing market area of an overall population decrease of 4,500 and a decrease in the population aged under 65 of 16,700.

Table 56: Projected Change in Population of Older Persons (2015 to 2037) – 2016-based SNPP – BwD

	2016 population	2036 population	Change in population	% change
Under 65	127,353	117,903	-9,450	-7.4%
65-74	12,135	15,057	2,922	24.1%
75-84	6,542	9,524	2,982	45.6%
85+	2,432	4,017	1,585	65.2%
Total	148,462	146,501	-1,961	-1.3%
Total 65+	21,109	28,598	7,489	35.5%

Source: ONS subnational population projections (2016-based)

Table 57: Projected Change in Population of Older Persons (2015 to 2037) – 2016-based SNPP – Hyndburn

	2016 population	2036 population	Change in population	% change
Under 65	65,826	58,626	-7,200	-10.9%
65-74	8,378	9,512	1,134	13.5%
75-84	4,475	6,466	1,991	44.5%
85+	1,713	3,243	1,530	89.3%
Total	80,392	77,847	-2,545	-3.2%
Total 65+	14,566	19,221	4,655	32.0%

Source: ONS subnational population projections (2016-based)

Older Persons' Housing Needs

10.10 Given the ageing population and higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward. The analysis in this section draws on data from the Housing Learning and Information Network (Housing LIN) along with demographic projections to provide an indication of the potential level of additional specialist housing that might be required for older people in the future.

10.11 The data for need is calculated by applying prevalence rates to the population aged 75+ and as projected forward. The prevalence rates have been taken from a toolkit developed by Housing LIN, in association with the Elderly Accommodation Council and endorsed by the Department of Health. This includes the following categories (discussed in more detail below): sheltered housing, enhanced sheltered housing, extra care, residential care and nursing care. Additionally, the analysis draws on current supply estimates from HOPSR (Housing for Older People Supply

Recommendations) – a database developed by Sheffield Hallam University along with data from the Elderly Accommodation Counsel (EAC) which provides an indication of the current tenure mix of such accommodation.

Definitions of Different Types of Older Persons' Accommodation

Retirement/sheltered housing:
A group of self-contained flats or bungalows typically reserved for people over the age of 55 or 60; some shared facilities lounge, garden, guest suite, laundry; plus on-site supportive management. A regularly visiting scheme manager as long as s/he is available to all residents when on site. An on-call-only service does not qualify a scheme to retirement/sheltered housing. Developments usually built for either owner occupation or renting on secure tenancies.

Enhanced sheltered housing:
Sheltered housing with additional services to enable older people to retain their independence in their own home possible. Typically there may be 24/7 (non-registered) staffing cover, at least one daily meal will be provided additional shared facilities. Also called assisted living and very sheltered housing.

Extra care housing:
Schemes where a service registered to provide personal or nursing care is available on site 24/7. Typically at will be provided and there will be additional shared facilities. Some schemes specialise in dementia care, or may dementia unit.

Care beds:
Care homes: Residential settings where a number of older people live, usually in single rooms, and have access personal care services (such as help with washing and eating).
Care homes with nursing: These homes are similar to those without nursing care but they also have registered provide care for more complex health needs.

Source: HOPSR

10.12 As well as setting out overall prevalence rates for different types of housing, the Housing LIN provides some suggestions for the tenure split between rented and leasehold accommodation, this varies depending on an area's level of depravation. In BwD and Hyndburn, data from the 2015 Index of Multiple Depravation has been used and it is suggested that around 70% of supply should be rented accommodation and 30% leasehold (there is no tenure split for care beds). Consideration has also been given to overall levels of disability in the older person population; given that these are slightly higher than the national average a small upwards adjustment has been made.

10.13 In the table below two categories of accommodation are used (in addition to care beds). These are a) Housing with Support (which covers retirement/sheltered housing) and b) Housing with Care (which includes the enhanced sheltered and extra-care housing. The analysis suggests that there may currently be an oversupply of rented sheltered/retirement housing but a notable shortfall in the leasehold sector. The analysis also suggests a potential need for all tenures of enhanced sheltered and extra-care housing. Finally, using these prevalence rates the analysis identifies a potential need for an additional 1,200 care beds over the 20-years to 2036.

Table 58: Older Persons' Dwelling Requirements 2016 to 2036 – BwD

		Housing demand per 1,000 75+	Current supply	2016 demand	2036 demand	Change to 2036 (demand-supply)
Housing with support	Rented	101	1,347	910	1,373	26
	Leasehold	41	70	370	558	488
Housing with care	Rented	38	245	337	509	264
	Leasehold	14	72	124	187	115
Care beds	-	126	953	1,126	1,700	747

Source: Derived from demographic projections and Housing LIN/HOPSR/EAC

Table 59: Older Persons' Dwelling Requirements 2016 to 2036 – Hyndburn

		Housing demand per 1,000 75+	Current supply	2016 demand	2036 demand	Change to 2036 (demand-supply)
Housing with support	Rented	101	873	624	979	106
	Leasehold	42	0	262	411	411
Housing with care	Rented	37	185	231	363	178
	Leasehold	14	0	88	138	138
Care beds	-	126	789	780	1,224	435

Source: Derived from demographic projections and Housing LIN/HOPSR/EAC

Registered Care Bed spaces (C2 use class)

10.14 As well as the need for specialist housing for older people the analysis needs to consider Registered Care. This need is outside of that set out in the overall housing need as it relates to an institutional population rather than a household population. As with specialist housing it is likely that those entering residential care are likely to vacate their existing accommodation for other to use.

10.15 As with the analysis of potential need for specialist accommodation, the analysis below considers changes to the number of people aged 75 and over who are expected to be living in some form of institutional housing – this is based on Housing LIN assumptions that care bed spaces should be equivalent to around 110 per thousand people aged 75 and over. This analysis shows a need for 27 bed spaces per annum in BwD and a further 14 in Hyndburn.

Table 60: Potential Need for Residential Care Housing

	BwD	Hyndburn
Population aged 75+ (2016)	8,974	6,188
Current housing need (@ 110 units per 1,000)	987	681
Population aged 75+ (2036)	13,542	9,709
Change in population aged 75+	4,568	3,521
Specialist housing need (@ 110 units per 1,000)	503	387
Total need	**1,490**	**1,068**
Estimated supply (HOPSR data)	953	789
Net need (2016-36)	537	279
Per annum net need (2016-36)	27	14

Source: Derived from demographic projections

People with Disabilities

10.16 The CLG Disability data guide provides data about households with a long-term illness or disability from the English Housing Survey. Whilst this provides a national perspective, the source cannot provide more localised data. Hence the analysis below has drawn on the 2011 Census (which has a definition of long-term health problem or disability (LTHPD)).

10.17 Table 61 shows the proportion of people with a long-term health problem or disability (LTHPD) and the proportion of households where at least one person has a LTHPD. The data suggests that across the two areas some 39% of households contain someone with a LTHPD. This figure is higher than seen across the region, and nationally.

10.18 The figures for the population with a LTHPD again show a similar pattern in comparison with other areas (an estimated 20-22% of the population have a LTHPD).

Table 61: Households and people with Long-Term Health Problem or Disability (2011)

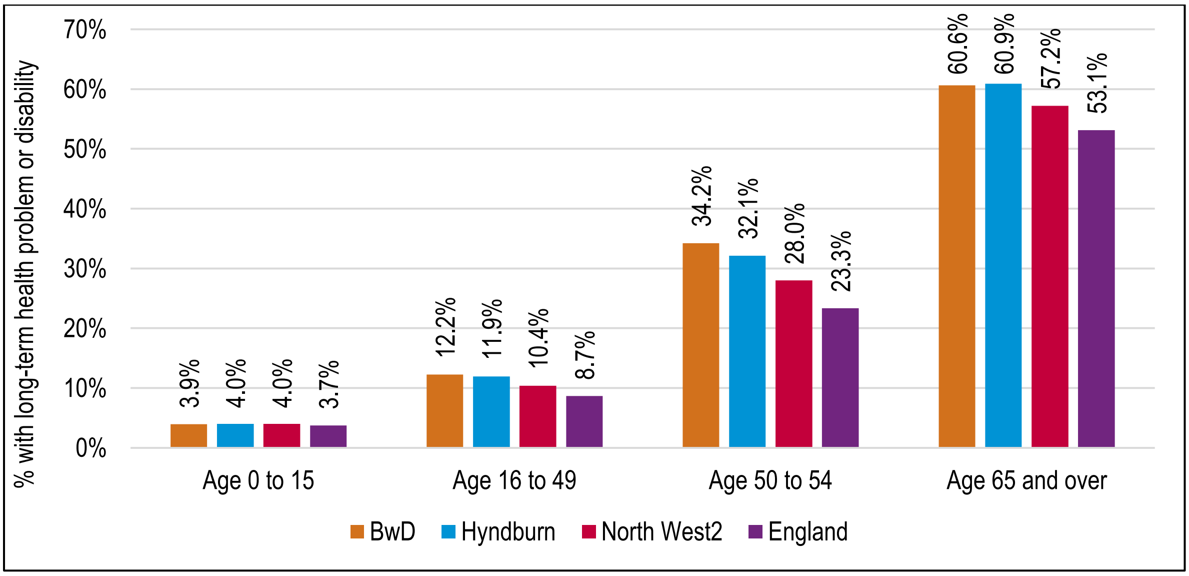
	Households containing someone with health problem		Population with health problem	
	Number	%	Number	%
BwD	22,567	39.3%	29,841	20.2%
Hyndburn	13,472	39.2%	17,553	21.7%
North West	1,100,812	36.6%	1,426,805	20.2%
England	7,217,905	32.7%	9,352,586	17.6%

Source: 2011 Census

10.19 It is likely that the age profile will impact upon the numbers of people with a LTHPD, as older people tend to be more likely to have a LTHPD. Therefore, the figure below shows the age bands of people with a LTHPD.

10.20 It is clear from this analysis that those people in the oldest age bands are more likely to have a LTHPD. The analysis also shows the population being more likely to have a LTHPD than in other areas for all age groups over 15.

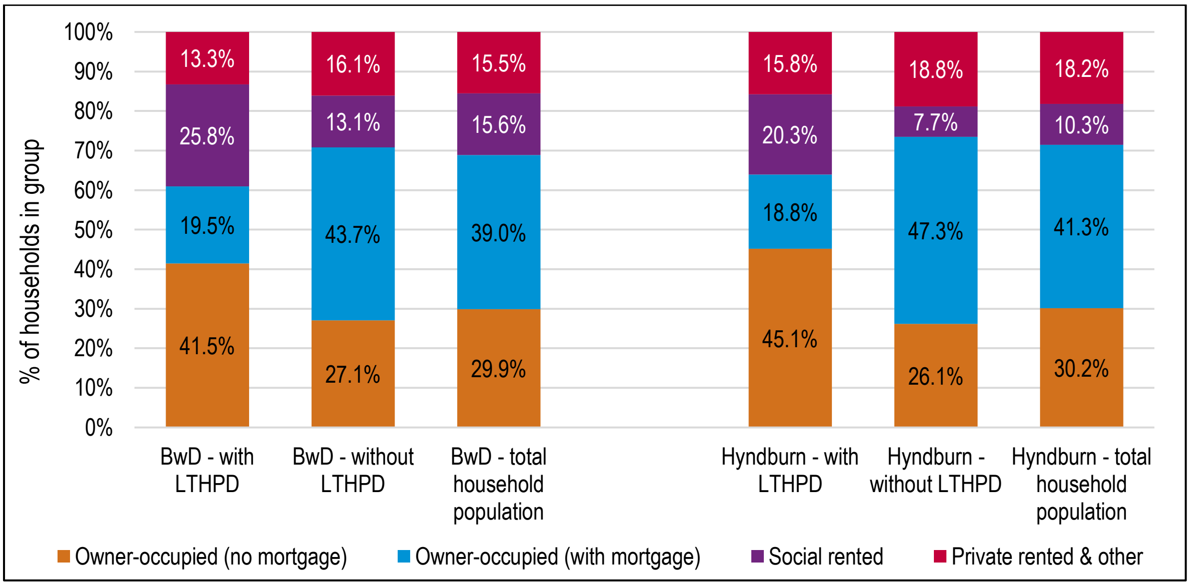
Figure 35: Population with Long-Term Health Problem or Disability in each Age Band



Source: 2011 Census

10.21 Figure 36 shows the tenures of people with a LTHPD – it should be noted that the data is for population living in households rather than households. The analysis clearly shows that people with a LTHPD are more likely to live in social rented housing and are also more likely to be outright owners (this will be linked to the age profile of the population with a disability).

Figure 36: Tenure of people with LTHPD



Source: 2011 Census

10.22 Given that typically the lowest incomes are found in the social rented sector and to a lesser extent for outright owners the analysis would suggest that the population/households with a disability are likely to be relatively disadvantaged when compared to the rest of the population.

10.23 Table 62 shows further information about the tenure split of the household population with a LTHPD. This shows that people living in the social rented sector are about twice as likely to have a LTHPD than those in other tenures.

Table 62: Tenure of people with a LTHPD

	% of social rent with LTHPD	% of other tenures with LTHPD
BwD	32.6%	17.4%
Hyndburn	41.5%	18.8%

Source: Derived from demographic modelling and Census (2011)

Wheelchair User Housing

10.24 Information about the need for housing for wheelchair users is difficult to obtain (particularly at a local level) and so some brief analysis has been carried out based on national data within a research report by Habinteg Housing Association and London South Bank University (Supported by the Homes and Communities Agency) - *Mind the Step: An estimation of housing need among wheelchair users in England*.

10.25 This report provides information at a national and regional level although there are some doubts about the validity even of the regional figures; hence the focus is on national data.

10.26 The report identifies that around 84% of homes in England do not allow someone using a wheelchair to get to and through the front door without difficulty and that once inside, it gets even more restrictive. Furthermore, it is estimated (based on English House Condition Survey data) that just 0.5% of homes meet criteria for 'accessible and adaptable', while 3.4% are 'visitable' by someone with mobility problems (data from the CLG Guide to available disability (taken from the English Housing Survey) puts the proportion of 'visitable' properties at a slightly higher 5.3%).

10.27 Overall, the report estimates that there is an unmet need for wheelchair user dwellings equivalent to 3.5 per 1,000 households (this is described in the Habinteg report as the *number of wheelchair user households with unmet housing need*). Moving forward, the report estimates a wheelchair user need from around 3% of households. The table below shows estimates of the need for wheelchair user homes. Across the two local authorities it is estimated that there is a need for around 400 homes over the next 20-years.

Table 63: Estimated need for wheelchair user homes (2016-2036)

	Current need	Projected need (2016-36)	Total	Per annum
BwD	200	56	256	13
Hyndburn	121	17	138	7

Source: Derived from demographic projections and Habinteg prevalence rates

10.28 Information in the CLG Guide to available disability data, also provides some historical national data about wheelchair users by tenure (data from the 2007/8 English Housing Survey). This showed around 7.1% of social tenants to be wheelchair uses, compared with 2.3% of owner-occupiers (there was insufficient data for private renting, suggesting that the number is low).

10.29 This may impact on the proportion of different tenures that should be developed to be for wheelchair users (although it should be noted that the PPG (56-009) states that *'Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling'*).

Housing Technical Standards: Key Messages

- PPG note 56 (Housing: optional technical standards) sets out how local authorities can gather evidence to set requirements on a range of issues (including accessibility and wheelchair housing standards, water efficiency standards and internal space standards). This study considered the first two of these as well as considering the specific needs of older people.

- The data shows that in general, BwD and Hyndburn have a higher level of disability when compared with the national position, and that an ageing population means that the number of people with disabilities could be expected to increase in the future. Key findings include:

  - Over 30% increase in the population aged 65+ (accounting for over 100% of total population growth);
  - A total need for around 1,700 units of housing for older people (sheltered, enhanced sheltered and extra-care)
  - concentrations of long-term health problems and disabilities in the social rented sector; and
  - a need for around 400 dwellings to be for wheelchair users (M4(3)) in the period to 2036

- This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings. The exact proportion of homes in categories M4(2) and M4(3) is for the Councils to consider based on this evidence and also any other relevant information (e.g. about viability). In seeking M4(2) compliant homes the Councils should also be mindful that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

- The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

11 HOUSING MIX

Introduction

11.1 There are a range of factors which influence housing demand. These factors play out at different spatial scales and influence both the level of housing demand (in terms of aggregate household growth) and the nature of demand for different types, tenures and sizes of homes. It is important to understand that the housing market is influenced by macro-economic factors, as well as the housing market conditions at a regional and local level.

11.2 This section assesses the need for different sizes of homes in the future, modelling the implications of demographic drivers on need/demand for different sizes of homes in different tenures. The assessment is intended to provide an understanding of the implications of demographic dynamics on need and demand for different sizes of homes.

Current stock profile

11.3 It should be noted that the current stock of housing (by size) can have a notable impact on the outputs of the modelling. The table below shows a comparison of the size profile of accommodation in a range of areas in three broad tenure groups. This identifies that the profile of housing in BwD and Hyndburn is broadly similar to that seen in other areas.

11.4 Key differences include a lower proportion of 4+-bedroom homes in the owner-occupied sector, a low proportion of 3-bedroom homes in the social rented sector (in Hyndburn) and a high proportion of 2-bedroom private rented homes (in Hyndburn). These observations are taken into account in drawing conclusions.

11.5 Additionally, the role and function of different areas is considered; for example the higher proportion of 1-bedroom private rented homes nationally is influenced by the housing market in London and so differences between that and BwD/Hyndburn are given less weight.

Table 64: Number of bedrooms by tenure and a range of areas

		BwD	Hyndburn	North West	England
Owner-occupied	1 bedroom	2%	2%	2%	4%
	2 bedrooms	30%	40%	24%	23%
	3 bedrooms	48%	44%	52%	48%
	4+ bedrooms	20%	15%	22%	25%
	Total	100%	100%	100%	100%
Social rented	1 bedroom	31%	42%	29%	31%
	2 bedrooms	33%	34%	32%	34%
	3 bedrooms	30%	21%	34%	31%
	4+ bedrooms	6%	3%	4%	4%
	Total	100%	100%	100%	100%
Private rented	1 bedroom	13%	11%	18%	23%
	2 bedrooms	48%	58%	43%	39%
	3 bedrooms	32%	26%	30%	28%
	4+ bedrooms	7%	6%	9%	10%
	Total	100%	100%	100%	100%

Source: Census 2011

Understanding how Households Occupy Homes

11.6 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households in to a suggested profile for additional housing to be provided.

11.7 The main reason for this is that in the market sector households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.

11.8 The size of housing which households occupy relates more to their wealth and age than the number of people which they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a four-bedroom home as long as they can afford it and hence projecting an increase in single person households does not automatically translate in to a need for smaller units.

11.9 This issue is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) although there will still be some level of under-occupation moving forward with regard to older person and working households who may be able to under-occupy housing.

11.10 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups. The data for this analysis has been formed from a commissioned table by ONS

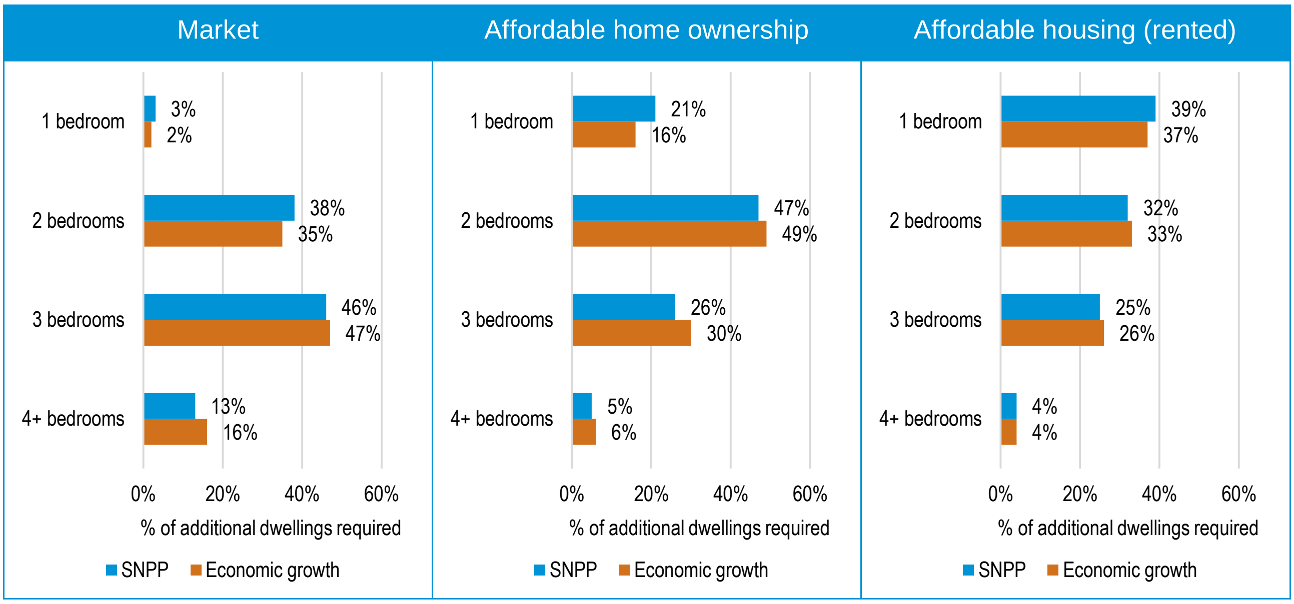
(Table CT0621 which provides relevant data for all local authorities in England and Wales from the 2011 Census).

11.11 In terms of the analysis to follow, the outputs have been segmented into three broad categories. These are market housing, which is taken to follow the occupancy profiles in the owner-occupied sector; affordable home ownership, which is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government's desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting) and affordable (rented) housing, which is taken to follow the occupancy profile in the social rented sector. The affordable sector in the analysis to follow would include affordable rented housing.

Key findings

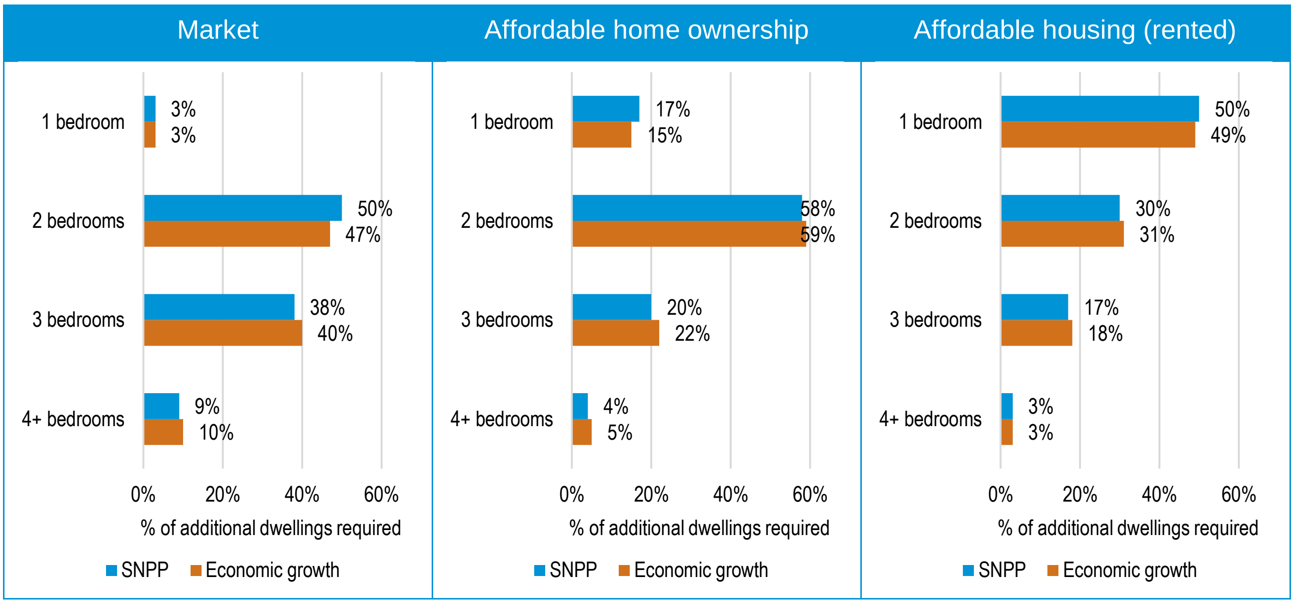
11.12 Figures 36 and 37 summarise analysis in each of the tenures under the modelling exercise – analysis has been carried out linked to both the latest official projections (2016-based SNHP) and also the economic growth scenario (with a part-return to trend uplift to household formation). The analysis clearly shows the different profiles in the three broad tenures with affordable housing being more heavily skewed towards smaller dwellings, and affordable home ownership sitting somewhere in between the market and affordable housing. Generally the analysis also suggests slightly larger dwellings being required in BwD.

Figure 37: Size of housing required – BwD



Source: Housing Market Model

Figure 38: Size of housing required – Hyndburn



Source: Housing Market Model

Indicative Targets by Tenure

11.13 Whilst the output of the modelling provides estimates of the proportion of homes of different sizes that are needed, there are a range of factors which should be taken into account in setting policies for provision. This is particularly the case in the affordable sector where there are typically issues around the demand for and turnover of one-bedroom homes (as well as allocations to older person households) – e.g. one bedroom homes provide limited flexibility for households (e.g. a couple household expecting to start a family) and as a result can see relatively high levels of turnover – therefore, it may not be appropriate to provide as much one-bedroom stock as is suggested by the modelling exercise.

11.14 At the other end of the scale, conclusions also need to consider that the stock of four-bedroom affordable housing is very limited and tends to have a very low turnover. As a result, whilst the number of households coming forward for four or more bedroom homes is typically quite small the ability for these needs to be met is even more limited. There are also localised issues about stock of different sizes of homes which need to be considered in conclusions (e.g. the relative lack of 3-bedroom affordable accommodation in Hyndburn).

11.15 For these reasons, it is suggested in converting the long-term modelled outputs into a profile of housing to be provided (in the affordable sector) that the proportion of one bedroom homes required is reduced slightly from these outputs with a commensurate increase in four or more bedroom homes also being appropriate.

11.16 There are thus a range of factors which are relevant in considering policies for the mix of affordable housing (rented) sought through development schemes. At a Borough-wide level, the analysis would support policies for the mix of affordable housing (rented) of:

Blackburn with Darwen

- 1-bed properties: 30-35%
- 2-bed properties: 30-35%
- 3-bed properties: 25-30%
- 4-bed properties: 5-10%

Hyndburn

- 1-bed properties: 35-40%
- 2-bed properties: 30-35%
- 3-bed properties: 20-25%
- 4-bed properties: 5-10%

11.17 The strategic conclusions recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.

11.18 The need for affordable housing of different sizes will vary by area (at a more localised level) and over time. In considering the mix of homes to be provided within specific development schemes, the information herein should be brought together with details of households currently on the Housing Register in the local area and the stock and turnover of existing properties.

11.19 In the affordable home ownership and market sectors a profile of housing that more closely matches the outputs of the modelling is suggested, although some consideration of the current stock profile is also relevant.

11.20 On the basis of these factors it is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. On this basis the following mix of affordable home ownership is suggested:

Blackburn with Darwen

- 1-bed properties: 20-25%
- 2-bed properties: 45-50%
- 3-bed properties: 25-30%
- 4-bed properties: 0-5%

Hyndburn

- 1-bed properties: 15-20%
- 2-bed properties: 55-60%
- 3-bed properties: 20-25%
- 4-bed properties: 0-5%

11.21 Finally, in the market sector, a balance of dwellings is suggested that takes account of the demand for homes and the changing demographic profile. The conclusions see a slightly larger recommended profile compared with other tenure groups. The following mix of market housing is suggested:

Blackburn with Darwen

- 1-bed properties: 0-5%
- 2-bed properties: 35-40%
- 3-bed properties: 40-45%
- 4-bed properties: 15-20%

Hyndburn

- 1-bed properties: 0-5%
- 2-bed properties: 40-45%
- 3-bed properties: 35-40%
- 4-bed properties: 15-20%

11.22 Although the analysis has quantified this on the basis of the market modelling and an understanding of the current housing market, it does not necessarily follow that such prescriptive figures should be included in the plan making process.

11.23 The 'market' is to some degree a better judge of what is the most appropriate profile of homes to deliver at any point in time, and demand can change over time linked to macro-economic factors and local supply.

11.24 The Council's may also wish to consider providing larger family homes to support or stimulate the local economy. This will allow more experienced personnel to move to the Boroughs to take up jobs particularly higher earning roles.

11.25 The figures can however be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area.

Need/demand for Bungalows

11.26 The sources used for analysis in this report makes it difficult to quantify a need/demand for bungalows in the Borough as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, it is typical (where discussion are undertaken with local estate agents) to find that there is a demand for this type of accommodation.

11.27 Bungalows are often the first choice for older people seeking suitable accommodation in later life and there is generally a high demand for such accommodation when it becomes available. As a new build option it is however the case that bungalow accommodation is often not supported by either house builders or planners (due to potential plot sizes).

11.28 There may however be instances where bungalows are the most suitable house type for a particular site; for example, to overcome objections about dwellings overlooking existing dwellings or preserving sight lines.

11.29 There is also the possibility of a need/demand for retirement accommodation more widely. Retirement apartments can prove very popular if they are well located in terms of access to facilities and services, and environmentally attractive (e.g. have a good view). However, some potential purchasers may find high service charges unacceptable or unaffordable and new build units may not retain their value on re-sale.

11.30 Overall, the Councils should consider the potential role of bungalows as part of the future mix of housing. Such housing may be particularly attractive to older owner-occupiers which may assist in encouraging households to downsize. However, the downside to providing bungalows is that they are relatively land intensive for the amount of floorspace created.

Housing Mix (Size of Homes Needed): Key Messages

- There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. The analysis linked to long-term demographic change concludes that the following represents an appropriate mix of affordable and market homes:

Blackburn with Darwen	**1-bed**	**2-bed**	**3-bed**	**4+ bed**
Market	0-5%	35-40%	40-45%	15-20%
Affordable home ownership	20-25%	45-50%	25-30%	0-5%
Affordable housing (rented)	30-35%	30-35%	25-30%	5-10%

Hyndburn	**1-bed**	**2-bed**	**3-bed**	**4+ bed**
Market	0-5%	40-45%	35-40%	15-20%
Affordable home ownership	15-20%	55-60%	20-25%	0-5%
Affordable housing (rented)	35-40%	30-35%	20-25%	5-10%

- The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing in the study area (by tenure).

- The mix identified above should inform strategic policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.

- Based on the evidence, it is expected that the focus of new market housing provision will be on two- and three-bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to come and stay.

- The Councils should also consider the potential role of bungalows as part of the future mix of housing. Such housing may be particularly attractive to older owner-occupiers which may assist in encouraging households to downsize. However, the downside to providing bungalows is that they are relatively land intensive for the amount of floorspace created.

- The analysis of an appropriate mix of dwellings should also inform the 'portfolio' of sites which are considered by the local authority through its local plan process. Equally it will be of relevance to affordable housing negotiations.

12 EMPLOYMENT LAND REQUIREMENTS

12.1 In this section we consider demand for employment land and floorspace over the period from 2016 to 2036. The section considers requirements for employment land in the B1, B2 and B8 use classes. The analysis considers future employment land needs using the labour demand scenarios set out in Chapter 5 and compares these against past completions trend data.

12.2 There are relative benefits of each approach. Econometric forecasts take account of differences in expected economic performance moving forward relative to the past, overall in regard to the sectoral composition of growth. However a detailed model is required to relate net forecasts to use classes and to estimate gross floorspace and land requirements.

12.3 In contrast, past take-up is based on actual delivery of employment development; but does not take account of the implications of growth in labour supply associated with housing growth nor differences in economic performance relative to the past. It is also potentially influenced by past land supply. The quantitative evidence is supplemented by the wider analysis of market dynamics.

Labour Demand Scenarios

12.4 This section takes forward the econometric forecasting set out in **Chapter 5**, based on the 2018 baseline growth forecast from OE and the "Economic Growth Scenario", which incorporates local and regional strategies together with past completion trends and produced by GL Hearn.

Translating Employment to FTE jobs

12.5 GLH has converted the forecasts for total employment by sector into forecasts for Full-Time Equivalent (FTE) employment by sector through analysis of the proportion of full- and part-time jobs in Blackburn with Darwen and Hyndburn on a sector by sector basis for the 2 digits 90 sectors.

12.6 This is based on the latest data published from the Business Register and Employment Survey (BRES) in 2016[11]. Table 65 shows the difference between the total and FTE jobs across the study area for the 2016-36 period, noting this differs from previous analysis.

Table 65: Total and FTE jobs growth, 2016-2036

	Baseline Jobs Change	Baseline FTE Jobs Change	Economic Growth Scenario Jobs Change	Economic Growth Scenario FTE Jobs Change
BwD	-4	-117	5,119	4,127
Hyndburn	-428	-583	2,260	1,881
Total	**-432**	**-700**	**7,379**	**6,008**

Source: OE & GL Hearn 2018

[11] Data available at: www.nomis.co.uk

Translating Sectors to Use Classes

12.7 GLH has considered the proportion of employment growth in each sector which is likely to take place in office, R&D floorspace (Use Classes B1a and B1b), light industrial floorspace (Use Classes B1c), general industrial floorspace (Use Class B2), and warehouse / distribution floorspace (Use Class B8).

12.8 The model is used to derive the following forecasts of net growth in Full-time Equivalent (FTE) employment by use class over the plan period. Due to the manufacturing shrinkage nationwide (according to OE forecasts) there is a negative net FTE jobs growth for light industrial (B1c Use Class) and Industrial (B2 Use Class) floorspace across both the scenarios in both local authorities.

Table 66: FTE Jobs (000) Growth by B-Class Sector, 2016-36

	Blackburn with Darwen		Hyndburn		HMA/ FEMA	
	Baseline	Growth	Baseline	Growth	Baseline	Growth
B1a/b	1,349	1,828	79	259	1,427	2,087
B1c	- 590	- 174	- 378	3	- 969	-170
B2	- 1,476	- 664	- 735	- 87	- 2,211	-751
B8	65	567	48	1,159	113	1,726
Non-B	536	2,570	403	546	939	3,116
Total	**- 117**	**4,127**	**-583**	**1,881**	**- 700**	**6,008**
B-Class Total	**- 653**	**1,557**	**-986**	**1,335**	**- 1,639**	**2,892**

12.9 The high growth in Hyndburn for B8 jobs reflects the transport and distrubtion growth at major developments at Frontier Park (in part in Blackburn) and Altham which will in part delivery strategic warehousing growth. The Blackburn growth is drven by office based development which includes notable growth across a number of sectors.

12.10 To these figures we have applied employment densities taking account of the *HCA Employment Densities Guide: 3rd Edition* (HCA, 2015) as below:

- Office (B1a and B1b): a range of between 18 sq m GEA per employee based assumes that the gross external area of buildings is on average 20% higher than the net internal area;
- Light Industrial (B1c): an average of 49 sq m GEA per employee, assuming that the gross external area of buildings is on average 5% higher than the net internal area;
- General Industrial (B2): an average of 38 sq m GEA per employee, assuming that the gross external area of buildings is on average 5% higher than the gross internal area;
- Warehouse/ Distribution (B8): an average of 77 sq m GEA per employee. This is within the range of B8 activities reflecting evidence of demand for strategic distribution development.

12.11 Applying these employment densities to the forecasts of net growth in FTE jobs in B-class activities, we can derive forecasts for net changes in employment floorspace. These are presented in the table below.

Table 67: Labour Demand Floorspace Change (sqm), 2016-36

	Blackburn		Hyndburn		HMA/FEMA	
	Baseline	Growth	Baseline	Growth	Baseline	Growth
B1a/b	24,274	32,909	1,419	4,660	25,693	37,569
B1c	-29,140	-8,576	-18,670	171	-47,810	-8,405
B2	-55,796	-25,111	-27,766	-3,282	-83,561	-28,393
B8	5,031	43,624	3,691	89,270	8,723	132,894
B-Class Total	**-55,631**	**42,847**	**-41,325**	**90,819**	**-96,956**	**133,665**

12.12 These are net changes and do not take account of replacement demand, such as from existing companies requiring upgraded floorspace. In considering how much employment land to allocate, it is therefore appropriate to include a margin to provide some flexibility within the supply.

12.13 To calculate an appropriate margin of flexibility we have used post 2012 gross completions in the area which is the longest period available. The past completions data (set out in the section below) shows an annual average delivery of 26,300 sq m of floorspace. Five years' worth of completions is equivalent to c.131,500 sq. m and this has been included as a buffer in the labour demand forecast.

Table 68: Labour Demand Floorspace (sqm) (Inc. 5 years past completions buffer) , 2016-36

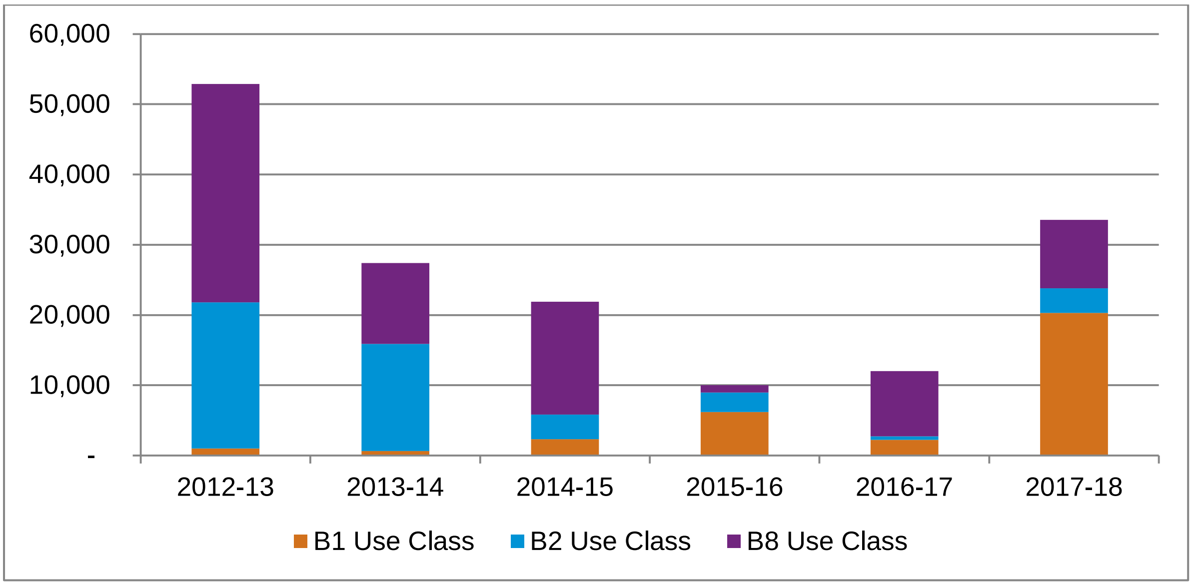
	Blackburn		Hyndburn		HMA/FEMA	
	Baseline	Growth	Baseline	Growth	Baseline	Growth
B1	47,191	55,827	3,485	6,726	50,676	62,553
B2	-66,286	-15,037	-24,186	19,139	-90,472	4,102
B8	35,281	73,874	39,054	124,634	74,336	198,507
B-Class Total	**16,186**	**114,664**	**18,354**	**150,498**	**34,540**	**265,162**

12.14 As presented above, the requirement for Blackburn with Darwen and Hyndburn varies between a total of 34,540 sqm - baseline scenario after including the past completions flexibility buffer - and 265,162 sqm – economic growth scenario incorporating flexibility past completions buffer.

Past Completions

12.15 Next we have considered historic completions of employment floorspace in Blackburn with Darwen and Hyndburn. Different time periods are available on these areas. We have considered data for gross completions of B class floorspace in Blackburn with Darwen over the period from 2000 to 2018 based on the Council's monitoring data. For Hyndburn data (gross completions) is available for the period between 2012 and 2018. Therefore, we have sought to present herein past employment completions since 2012 across the HMA/FEMA area. Net completions data is not available. Figure 39 shows the gross completion trends since 2012.

Figure 39: Past gross completions in HMA/FEMA area 2012-2018



Source: Councils' monitoring data

12.16 Table 69 shows the employment floorspace projections together with the 6 year completion averages by use class[12]. If this is projected for the period 2016-36 a total of 526,000 sq. m of commercial floorspace will be required across both Blackburn with Darwen and Hyndburn Councils. On an individual basis this will be split to 287,000 sq. m of employment floorspace required in Blackburn and 239,000 sq.

Table 69: Employment Projections based on Gross Past Completions

	Blackburn with Darwen		Hyndburn		HMA/FEMA	
	Completions Average 2012-18	Projection 2016-36	Completions Average 2012-18	Projection 2016-36	Completions Average 2012-18	Projection 2016-36
B1	4,697	93,933	769	15,387	5,466	109,320
B2	3,617	72,338	4,094	81,877	7,711	154,215
B8	6,050	120,997	7,073	141,453	13,123	262,450
Total	**14,363**	**287,269**	**11,936**	**238,717**	**26,299**	**525,985**

Source: Councils' monitoring data – edited by GL Hearn

12.17 The gross completions data points to a need for warehouse space (within B8 Use Class) which equals to almost 50% of the total requirement across the two Councils. This trend is even stronger in Hyndburn with 59% of the total requirement for the area relating to warehouse space. The equivalent for Blackburn is 42%. Across the HMA/FEMA, the industrial floorspace requirements (B2 Use Class) represent 29% of the total requirement and office requirements (B1 Use Class) represent 21%.

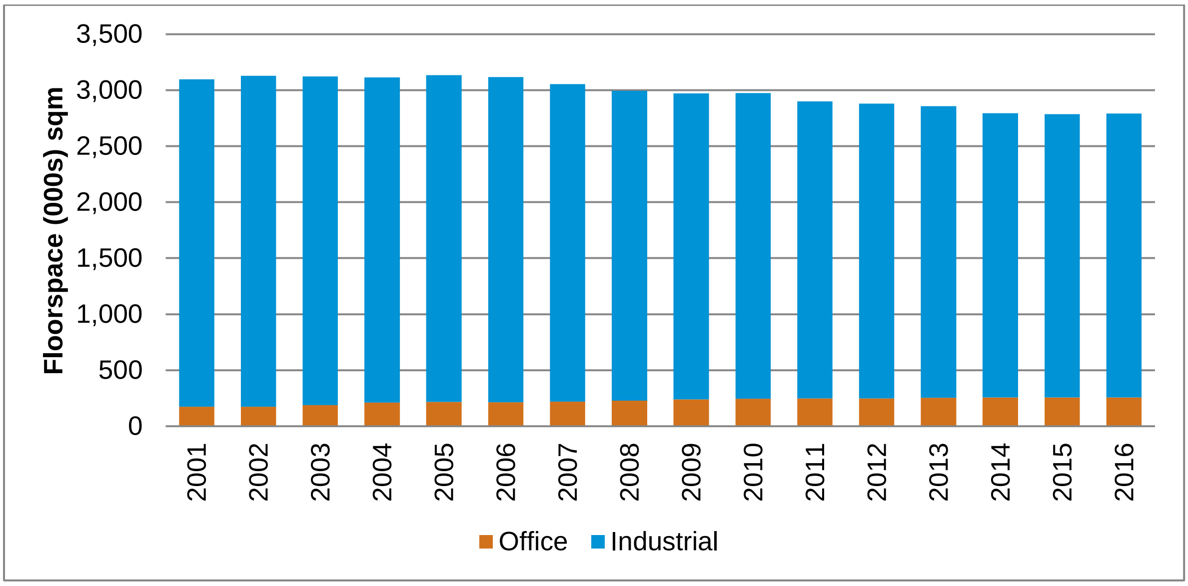
12 The mixed industrial floorspace figures have been disaggregated among the employment uses classes on a pro rata basis.

Floorspace Trends

12.18 In assessing employment completions it is useful to consider the implications on the overall employment floorspace in the area. Set out below is the employment floorspace for office and industrial (including both B2 and B8) floorspace trends from VOA. This shows the total employment floorspace in Blackburn with Darwen and Hyndburn area is around 2.8 million sq m. This relates to 257,000 sq m (9%) of office and 2.5 million sq m (91%) of industrial and warehouse floorspace.

12.19 Figure 40 shows a small decrease in the employment floorspace particularly since 2006. Over the last ten years the employment floorspace has decreased by 11% across Blackburn and Hyndburn Councils. This decrease relates to a 13% decrease of the industrial floorspace. Office floorspace has in contrast increased by 44,000 sqm (21%) over the same period.

Figure 40: Commercial floorspace (sq m)



Source: VOA 2016

12.20 Over the last ten years Blackburn's industrial floorspace has decreased by 11% while the office floorspace has seen an increase from 153,000 sqm to 187,000 sqm (22%). Similarly the industrial floorspace in Hyndburn decreased by 16% while the office space has increased by 21%.

Implications

12.21 This section considers a range of approaches in estimating future employment floorspace need in Blackburn with Darwen and Hyndburn Councils. The outputs of these are summarised in Tables 62-64 below.

Table 70: Comparison of employment floorspace requirements (sqm) – Blackburn with Darwen

	Labour Baseline Scenario	Labour Growth Scenario	Gross Completions Projection
B1	47,191	55,827	91,671
B2	-66,286	-15,037	74,599
B8	35,281	73,874	120,999
B-Class Total	**16,186**	**114,664**	**287,269**

Source: OE & GL Hearn 2018

Table 71: Comparison of employment floorspace requirements (sqm) – Hyndburn

	Labour Baseline Scenario	Labour Growth Scenario	Gross Completions Projection
B1	3,485	6,726	8,263
B2	-24,186	19,139	89,000
B8	39,054	124,634	141,453
B-Class Total	**18,354**	**150,498**	**238,717**

Source: OE & GL Hearn 2018

Table 72: Comparison of employment floorspace requirements (sqm) – HMA/FEMA

	Labour Baseline Scenario	Labour Growth Scenario	Gross Completions Projection
B1	50,676	62,553	99,934
B2	-90,472	4,102	163,599
B8	74,336	198,507	262,452
B-Class Total	**34,540**	**265,162**	**525,985**

Source: OE & GL Hearn 2018

12.22 Across the HMA/FEMA the labour demand baseline and growth forecasts and the gross completions trend projection show a need for around 34,540 sqm; 265,162 sqm and 525,985 sq m of employment floorspace to 2036, respectively. The past completion projections requirements are over 5 times larger than labour force growth scenario requirements.

12.23 Table 73 compares the average annual growth rates of each of the projections to the historic growth rates for office and industrial uses as recorded by VOA. This shows that the labour demand reflects better the historic growth for industrial floorspace and the completions trend reflects better the office growth.

Table 73: Employment Stock Growth Rates Under the Projections - HMA

Use Class	VOA 15 yr Stock Trend	VOA 10 yr Stock Trend	Labour Baseline Scenario 2016-36	Labour Growth Scenario 2016-36	Gross Completions Projection 2016-36
Office	2.70%	1.90%	0.99%	1.22%	1.94%
Industrial	-1.00%	-1.40%	-0.03%	0.40%	0.84%

Overall Conclusions on Employment Land Needs

12.24 The labour demand baseline scenario is based on the economic growth forecast produced by OE (baseline). Based on this GL Hearn take account of a range of locally specific growth drivers and prepare the Economic Growth Scenario. This included consideration of economic demand drivers and past trends, as well as risks which could affect future economic growth.

12.25 This provides an evidenced justification for increasing employment growth above the baseline forecast. The majority of the identified growth sectors will require B Class employment floorspace and particularly office floorspace (within B1 Use Class).

12.26 The past completions scenario expects a higher growth compared to labour scenarios. This reflects better the current and committed growth opportunities particularly in terms of industrial and warehouse space.

12.27 Therefore we expect a growth of office floorspace similar to this in labour growth scenario and an industrial and warehouse growth similar to the past completions trends. These requirements are presented below.

Table 74: Employment Floorspace Requirements (sqm) 2016-2036

	Blackburn with Darwen	Hyndburn	FEMA
B1	55,827	6,726	62,553
B2	74,599	89,000	163,599
B8	120,999	141,453	262,452
B-Class Total	**251,425**	**237,179**	**488,604**

12.28 **A total of almost 489,000 sq. m floorspace is projected to be needed across Blackburn with Darwen and Hyndburn over the plan period**. This is distributed as: 62,500 sq.m of office (B1 Use Class), 164,000 sq. m of industrial floorspace (B2 Use Class) and 262,500 sq. m warehouse space (B8 Use Class).

12.29 Taking into account completions in the 2016-18 period the following table presents the residual floorspace requirement up to 2036. **A total of 443,008 sq. m is expected to be required across the HMA between 2018/19 and 2036 (residual).**

Table 75: Residual Employment Floorspace Requirements (sqm) 2018-2036

	Blackburn with Darwen	Hyndburn	FEMA
B1	34,847	5,872	40,719
B2	72,507	86,359	158,866
B8	120,826	122,596	243,422
B-Class Total	**228,181**	**214,827**	**443,008**

Source: GL Hearn based on OE forecasts

12.30 The tables below translate the floorspace requirements to Employment land requirements by applying plot ratios similar to those of the existing stock across the area. The plot ratios take account of the need for storage, car parking, landscaping and access and circulation. We have assumed the following:

- Office - 60% of the plot is taken up by office floorspace
- Industrial and Warehousing - 40% of the plot is taken up by commercial floorspace

12.31 Applying these plot ratios to the floorspace growth in the study area results in a need for 117 Ha with a fairly even split of around 58 Ha in each local authority.

Table 76: Employment Land Requirements (hectares) 2016-36

	Blackburn with Darwen	Hyndburn	FEMA
B1	9.3	1.1	10.4
B2	18.6	22.3	40.9
B8	30.2	35.4	65.6
B-Class Total	**58.2**	**58.7**	**116.9**

Source: GL Hearn based on OE forecasts

12.32 Once interim completions have been taken into account the residual need of 443,000sq metres translates in to a need for 107.4 Ha of land across the study area.

Table 77: Residual Employment Land Requirements (hectares) 2018-36

	Blackburn with Darwen	Hyndburn	FEMA
B1	5.8	1.0	6.8
B2	18.1	21.6	39.7
B8	30.2	30.6	60.9
B-Class Total	**54.1**	**53.2**	**107.4**

Source: GL Hearn based on OE forecasts

12.33 To conclude, across the plan period there is a requirement of around 480,000 sq. m or 117 ha. This is distributed to 251,000 sq.m or 58.2 ha in Blackburn with Darwen and 237,000 sqm or 58.7 ha in Hyndburn.

12.34 However due to recent completions the residual employment requirement is 443,008 sq. m or 107.4 ha across both councils for the 2018-36 period, which is disaggregated to 228,000 sq.m or 54.1ha employment need in Blackburn with Darwen and 215,000 sq. m or 8.4ha in Hyndburn. This can be delivered through committed and pipeline supply as well as existing allocations.

12.35 The figure for office development is a net figure taking into account that there will be some losses in certain office based sectors and also includes a flexability of margin. However the warehousing and factory munbers are based on gross trends.

12.36 Warehousing floorspace tends to have a limited shelf-life (typically 30 years). The Council should monitor losses to ensure that demand is being replaced rather than resulting an a net loss. Similarly manufacturing floorspace should be monitored to ensure that no fit for purpose losses are occurring although some factory space will need to be replaced due to modern requirements.

Key Points

- This section estimates the quantum of employment floorspace and land area required to support B Class employment development in the study area over the period 2016-36 and 18-36.
- Three scenarios have been developed:
    - A labour demand baseline scenario – based on the OE baseline jobs growth forecast;
    - A labour demand based on the economic growth scenario – based on the growth scenario;
    - Based on past completions trends.
- Overall the labour demand economic growth scenario and the completions trend scenario identify significantly different numbers show a need for around 265,000 and 525,000 square metres.
- The largest differences between the scenarios are the land requirements for industrial (B1c/B2) uses. The labour demand forecasts show a considerably lower requirements reflecting national and regional long term decline in the manufacturing sector. However, since 2012 the area has seen a positive performance of the manufacturing sector and there has been a growth in both jobs and industrial floorspace.
- Considering all factors we consider that the labour demand economic growth scenario provides the most reasonable assessment of employment land needs for offices and the trend based scenario for manufacturing and warehouse space. Combined these show a need for This shows a need for 488,604 sq m of employment floorspace and once completions hin the 2016-18 period are netted off then 443,008 sq m.
- This can be translated into a need for 107.4 ha of employment land in the two Local Plan Areas over the period from 2016-36 (54.1 ha in Blackburn with Darwen; and 53.2 ha in Hyndburn).

13 SUMMARY AND CONCLUSIONS

13.1 The purpose of the Housing and Economic Need Assessment Study is to assess future development needs for housing (both market and affordable) and employment across the Blackburn with Darwen (BwD) and Hyndburn joint Housing Market Area. The Study considers housing and employment need to inform the preparation of the emerging Local Plans.

13.2 This study responds to and is compliant with the requirements of the Revised National Planning Policy Framework (the NPPF2) published in July 2018. It is informed by the Revised Planning Practice Guidance (PPG) published by Government in September 2018 and in particular the Housing need assessment section.

13.3 This study forms part of the evidence base which Councils will use in preparing their development planning policy.

Housing Need

13.4 Planning Practice Guidance (PPG) on Housing Need Assessment sets out a standard method to be used in calculating the housing need. According to this **there is a need of 130 dwellings per annum across the HMA relating to 99 dpa in BwD and 31 dpa in Hyndburn.**

13.5 This however is the minimum housing need for the local authorities and Councils are encouraged to exceed this. This does not need to be justified but the rationale for doing so could be to meet planned economic growth or to ensure delivery of more affordable homes. This however is a policy choice and to inform this choice we have calculated the housing need based on these scenarios.

13.6 The latest NPPF also suggests that historical rates of delivery can be a good barometer of demand. This report has analysed sales of new build accommodation in both local authorities. For Blackburn with Darwen the equivalent figures were 125 over the longer term (2003-17) while Hyndburn the equivalent figures was 61 new build sales per annum.

Economic Led Housing Need

13.7 Using OE data as a baseline GL Hearn has amended a set of forecast based on the review of the local economic strategies, past completions trends, together with our local knowledge for the market in order to provide a "economic growth scenario". These showed a growth of just over 7,500 jobs over the 2018-36 period.

Table 78: Forecast job growth in BwD (2018-36)

	Jobs (2018)	Jobs (2036)	Change in jobs	% change
BwD	71,458	76,654	5,196	7.3%
Hyndburn	31,120	33,450	2,330	7.5%
HMA	102,578	110,104	7,526	7.3%

Source: OE & GL Hearn 2018

13.8 For the purposes of analysis linked to demographic data it is necessary to convert the above forecasts into estimates of the required change to the economically active population, total population and housing need. These require a set of assumptions on:

- Commuting patterns
- Double jobbing;
- Unemployment; and
- Economic Activity Rates

13.9 The tables below estimate the housing need for the economic growth scenarios. This includes a further adjustment to household representation rates recognising suppression in younger age groups. The adjustment ensures that the 2014-based HRR are part returned to those seen in the 2008-based forecasts.

13.10 The analysis shows that to support the higher of the economic forecasts there would need to be provision of around 411 homes each year in BwD and 216 in Hyndburn. This is a total of 627 dwellings per annum. This would support the additional population garnered through a net increase and retention of working age population.

13.11 In BwD the economic growth scenario essentially sees the retention of an additional 440 people per annum within the Borough. In Hyndburn, the economic growth scenario reverses the to see a level of net in-migration averaging 148 people per annum.

Table 79: Projected housing need – job-led scenarios and 2014-PRT HRRs – BwD

	Households 2016	Households 2036	Change in households	Per annum	Dwellings (per annum)
BwD	58,282	66,258	7,976	399	411
Hyndburn	34,585	38,786	4,201	210	216
HMA	**92,867**	**105,044**	**12,177**	**609**	**627**

Source: Demographic projections

13.12 As demonstrated the economic-led housing need is higher than the standard methodology even when taking account of the proposed changes. This means that in order to ensure that the area's economic potential is achieved then 627 dwellings per annum across the HMA would need to be delivered.

Affordable Housing Need

13.13 To assess affordable housing need a methodology is set out in the PPG which has been followed in this report. This is summarised below.

Net Need = Current Need + Need from Newly-Forming Households + Existing Households falling into Need – Supply of Affordable Housing

13.14 The analysis calculates an overall surplus of affordable housing of 100 units per annum in BwD and a shortfall of 79 per annum in Hyndburn. The findings above are based on clearing the current need over the 20-years from 2016.

13.15 Clearing the need over 5 years would result in a need for 108 affordable homes per annum in BwD and 171 in Hyndburn over the next five years. The Councils are therefore justified in seeking to secure additional affordable housing.

Housing Need and The Housing Requirement

13.16 *The study has assessed housing need and potential housing requirements through a variety of factors as presented above. The table below summarises the findings.*

Table 80: Housing Need and Housing Requirement Options

	BwD	Hyndburn
Standard Method Current	99	31
Standard Method Consultation	157	60
Economic-Led Housing Need – Economic Growth Scenario	411	216
Historic Housing Delivery Trends	151	108

Source: GL Hearn based on OE forecasts

13.17 The Housing Need, based on the Government's Standard Method, for Blackburn with Darwen is 99 dpa and in Hyndburn it is 31 dpa. However should the local authorities decide to adopt a higher housing requirement to meet economic growth then these housing requirement should be 411 and 216 dpa respectively. However this is a choice for the local authorities to make.

13.18 Similarly either local authority could decide to increase the delivery of affordable housing to celar the backlog need sooner. This would require a potential increase above the standard methodology. However, the economic growth scenario would also delivery affordable accomodation.

Housing Mix

13.19 The extended definition of affordable housing includes households who are able to access the private rented sector but who cannot afford to buy. In both BwD and Hyndburn there is limited evidence for a need for this type of housing; put simply, the typical cost of housing to buy in the area (in the second-hand market) is sufficiently affordable such that there is no need for a discounted new build product.

13.20 The analysis linked to long-term demographic change concludes that the following represents an appropriate mix of affordable and market homes:

Table 81: Appropriate Mix of Homes by Size and Tenure

Blackburn with Darwen	1-bed	2-bed	3-bed	4+ bed
Market	0-5%	35-40%	40-45%	15-20%
Affordable home ownership	20-25%	45-50%	25-30%	0-5%
Affordable housing (rented)	30-35%	30-35%	25-30%	5-10%
Hyndburn	1-bed	2-bed	3-bed	4+ bed
Market	0-5%	40-45%	35-40%	15-20%
Affordable home ownership	15-20%	55-60%	20-25%	0-5%
Affordable housing (rented)	35-40%	30-35%	20-25%	5-10%

Source: GL Hearn

13.21 The mix identified above should inform strategic policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.

13.22 This study has not attempted to estimate the need for additional private rented housing however there is no evidence of a need for Build to Rent housing (i.e. developments specifically for private rent). That said given the current Government push for such schemes, the Council should consider any proposals on their merit, including taking account of any affordable housing offer (such as rent levels and the security of tenure).

Older Persons Needs

13.23 The data shows that in general, BwD and Hyndburn have a higher level of disability when compared with the national position, and that an ageing population means that the number of people with disabilities could be expected to increase in the future. Key findings include:

- Over 30% increase in the population aged 65+ (accounting for over 100% of total population growth);
- A total need for around 1,700 units of housing for older people (sheltered, enhanced sheltered and extra-care)
- concentrations of long-term health problems and disabilities in the social rented sector; and
- a need for around 400 dwellings to be for wheelchair users (M4(3)) in the period to 2036

Employment Land Need

13.24 We considered demand for employment land and floorspace over the period from 2016 to 2036. The analysis considers future employment land needs using the labour demand scenarios set out above and compares these against past completions trend data.

13.25 We expect a growth of office floorspace similar to that in the labour growth scenario and an industrial and warehouse growth similar to the past completions trends. These requirements are presented overleaf.

Table 82: Employment Floorspace Requirements (sqm) 2016-2036

	Blackburn with Darwen	Hyndburn	FEMA
B1	55,827	6,726	62,553
B2	74,599	89,000	163,599
B8	120,999	141,453	262,452
B-Class Total	**251,425**	**237,179**	**488,604**

Source: GL Hearn based on OE forecasts

13.26 A total of 488,600 sq. m floorspace is projected to be needed across Blackburn with Darwen and Hyndburn over the plan period. This is distributed as: 62,500 sq.m of office (B1 Use Class), 164,000 sq. m of industrial floorspace (B2 Use Class) and 262,500 sq. m warehouse space (B8 Use Class).

13.27 Taking into account recent commercial completions the following table presents the residual floorspace requirement up to 2036. A total of 443,000 sq. m is expected to be required across the HMA between 2018/19 and 2036 (residual).

Table 83: Residual Employment Floorspace Requirements (sqm) 2018-2036

	Blackburn with Darwen	Hyndburn	FEMA
B1	34,847	5,872	40,719
B2	72,507	86,359	158,866
B8	120,826	122,596	243,422
B-Class Total	**228,181**	**214,827**	**443,008**

Source: GL Hearn based on OE forecasts

13.28 The tables below translate the residual floorspace requirements to Employment land requirements by applying plot ratios similar to those of the existing stock across the area. This shows a residual need for 107.4 Ha of employment land

Table 84: Residual Employment Land Requirements (hectares) 2018-36

	Blackburn with Darwen	Hyndburn	FEMA
B1	5.8	1.0	6.8
B2	18.1	21.6	39.7
B8	30.2	30.6	60.9
B-Class Total	**54.1**	**53.2**	**107.4**

Source: GL Hearn based on OE forecasts

General Disclaimer

This report has been prepared by GL Hearn Limited (GL Hearn) in favour of **Blackburn with Darwen and Hyndburn Councils** ("the Client") and is for the sole use and benefit of the Client in accordance with the agreement between the Client and GL Hearn dated **12 July 2018** under which GL Hearn's services were performed. GL Hearn accepts no liability to any other party in respect of the contents of this report. This report is confidential and may not be disclosed by the Client or relied on by any other party without the express prior written consent of GL Hearn.

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Freedom of Information

GL Hearn understands and acknowledges the Authority's legal obligations and responsibilities under the Freedom of Information Act 2000 (the "Act") and fully appreciates that the Authority may be required under the terms of the Act to disclose any information which it holds. GL Hearn maintains that the report contains commercially sensitive information that could be prejudicial to the commercial interests of the parties. On this basis GL Hearn believes that the report should attract exemption from disclosure, at least in the first instance, under Sections 41 and/or 43 of the Act. GL Hearn accepts that the damage which it would suffer in the event of disclosure of certain of the confidential information would, to some extent, reduce with the passage of time and therefore proposes that any disclosure (pursuant to the Act) of the confidential information contained in the report should be restricted until after the expiry of 24 months from the date of the report.

EXECUTIVE BOARD DECISION

REPORT OF:	Executive Member (Resources)
LEAD OFFICERS:	Director of Finance and Customer Services
DATE:	10th January 2019

PORTFOLIO/S AFFECTED:	All
WARD/S AFFECTED:	All

SUBJECT: Approval of the Lancashire Bid to become a 75% Business Rates Retention (BRR) Pilot for 2019/20

1. EXECUTIVE SUMMARY

The purpose of the report is to notify the Executive Board that the Lancashire wide bid to become a 75% Business Rates Retention pilot area for the 2019/20 financial year is one of 15 successful bids announced in the Provisional Local Government Finance Settlement on 13th December 2018.

2. RECOMMENDATIONS

2.1. That the Executive Board notes that:

2.1.1 Blackburn with Darwen Borough Council (BwD), will become a member of the Lancashire Business Rates Pool Member for the 2019/20 financial year following confirmation of the success of the bid to become a 75% Business Rates Retention pilot area, that was submitted in September 2018

2.1.2 Within the bid, the first 5% of any additional growth in Business Rates in Lancashire (i.e. in the move from 50% to 75% BRR), will be used to create a 'resilience reserve' to mitigate against any associated, additional loss for a council as a result of them being a pilot member. If funds are remaining in this reserve at the end of the pilot, this will be used to further compensate individual councils facing a loss.

2.1.3 Within the bid, a further 25% of the additional growth will be set aside to create a Lancashire wide fund to be used to target strategic economic growth and sustainability. This investment fund will be allocated on the basis of unanimous decision by members of the Lancashire Leaders Business Rates Pilot Group.

2.1.4 Within the bid, the remaining retained growth will be apportioned according to the new tier splits i.e. Districts 56% (currently 40%); County Council 17.5% (currently 9%); unitaries 73.5% (currently 49%); fire 1.5% (currently 1%) to promote local economic growth and to enable the financial sustainability of pool members.

2.1.5 That responsibility for finalising the arrangements for the pilot is delegated to the Director of Finance and Customer Services, in consultation with the Executive Member for Resources.

2.1.6 That once further information is released by Government on this, as part of the final Local Government Finance Settlement, this will be included in the 2019/20 Budget Reports presented to Finance Council in February 2019.

3. BACKGROUND

The Executive Member Decision Report of 24th September 2018 outlined the current operation of Business Rates Retention for local authorities across the country, with the exception of those areas that are already part of one of the Business Rates Retention pilots.

The report explained that the majority of the Lancashire District Councils (who pay a 'tariff'), along with Lancashire County Council (who receives a 'top up'), formed a business rate pool across Lancashire in 2016/17, which has been re-approved by central government each year since then. The pool has eliminated the requirement for the District Councils to pay over a levy to the Government on their growth, which in 2017/18 equated to retention of an extra £6.01mill in Lancashire which would otherwise have been paid over to central Government.

Under that pooling arrangement each authority had to bear its own risk should they experience a reduction in business rates, having given up the right to their individual 'safety net 'protection from the Government on joining the pool; each District has retained their own growth, net of a 10% share of their retained levy which has been paid to LCC.

The safety net payment trigger was set at 92.5% of the Baseline Funding Level which meant that the Government would guarantee this minimum level of income across the pool as a whole.

On the 24th July 2018, the Government issued a prospectus for authorities to become 75% Business Rates Retention (BRR) pilot areas for the 2019/20 financial year. All applications had to be received by midnight on Tuesday 25 September 2018.

Both LCC and the current pool's Lead Authority (Ribble Valley BC) undertook separate modelling exercises on the 2018/19 NNDR1 returns from all Lancashire authorities and both identified that if a 75% BRR scheme existed across Lancashire, based on the 2018/19 figures, there was approximately £10.8m of predicted growth that could be retained within the county either as an investment fund and/or to promote financial sustainability.

At the Lancashire Leaders and Chief Executives meeting on the 11th September, it was agreed that the Lancashire Chief Finance Officers Group would prepare a risk report on such a bid and draft an outline application form. Following production and circulation of a draft bid and a report to all Lancashire Authorities on 18th September, Lancaster City Council formally withdrew from the process owing to the significant risk to their Business Rates income presented by the nuclear power station at Heysham.

Without Lancaster City Council in the pool, the extra forecasted growth (based on the figures within the 2018/19 NNDR1), is approximately £7.1m across Lancashire.

4. KEY ISSUES & RISKS

KEY ISSUES

Notification that the bid has been successful came as part of the Provisional Local Government Finance Settlement on 13th December; the Lancashire bid is one of fifteen bids approved.

Provided that no authority within the proposed pool requests the Secretary of State to make a revocation to remove them from the pool (which would be required within 28 days of the notification), the pool will come in to effect on 1st April 2019; this will mean that all of the Lancashire authorities, with the exception of Lancaster City Council, will be covered by the designation and remain in the pool for the full financial year.

If a local authority requests revocation of the designation before the cut-off date, the rest of the pool cannot continue and the Secretary of State will then revoke the designation; as such, the local authorities identified as part of the pool will revert to being considered as individual authorities for the purposes of the business rates retention scheme.

Basic principles for the governance arrangements for the new pool have been agreed between authorities however these must be developed further over the coming few months.

RISKS

The key risks of the 75% BRR pool are:

- The 2019/20 pilots will not benefit from the 'no detriment' clause enjoyed by existing 100% BRR pilots (i.e. the clause through which the Government underwrites all losses within a pilot to ensure pilot members are no worse off by being a member of the pilot than they would otherwise be). Instead, the safety net threshold for the entire pool will be raised from 92.5% to 95% to recognise the increased risk sharing.
- Participating authorities will be exposed to a higher level of business rate risk for the duration of the pilot, i.e. for 2019/20, as they will face a higher share of any losses arising as a result of appeals, bad debts and empty premises; i.e. they will share 75% of the cost of these rather than the 50% shared at present.
- The Safety Net threshold will only be activated by the Government on a pool wide basis however, based on the 2018/19 NNDR1 figures, it is highly unlikely that this will be triggered on the proposed Lancashire pilot. To minimise the risk to the pool, each authority will bear its own risk over and above the 5% resilience fund created from the additional retained growth (see Section 2.1.2 above).
- Authorities selected as pilots will be expected to forgo Revenue Support Grant (£13.3m in 2019/20 for BwD) and Rural Services Delivery Grant (not applicable to BwD). The value of these grants will be taken into account when revised tariffs and top-up's for the pilot authorities are set up but the impact on BwD and other participating authorities is forecast to be revenue neutral.

The new 75% pilot, should allow Lancashire authorities to influence the policy and approach taken by the Government on any future national scheme. Having 2019/20 as essentially a transitional year, should provide an opportunity to test and gather information on the design of the new business rate retention system in preparation for the anticipated national implementation of the new arrangements in 2020/21.

5. POLICY IMPLICATIONS

Participation within a 75% Business Rates Retention pilot across Lancashire for 2019/20 should generate additional income for the borough which can then be utilised to support the Medium Term Financial Strategy of the Council, in securing financial sustainability and economic development.

6. FINANCIAL IMPLICATIONS

Becoming a 75% Business Rates Retention pilot area in 2019/20 will provide the opportunity to retain an additional 25% of business rates growth in Lancashire.

Whilst it is impossible to project with 100% accuracy the 2019/20 financial impact of 75% Business Rates Retention, the modelling undertaken on the 2018/19 Business Rate estimates (NNDR1 information) indicates that there is the potential for £1.26m of additional growth funding to be retained by Blackburn with Darwen Borough Council, from which our contribution to the resilience pot is estimated to be £0.063m, with a further £0.316m to the investment fund for use across Lancashire.

Based on the 2018/19 NNDR1 figures, the Council would therefore retain an additional £0.885m in Business Rates that would otherwise be retained by central government.

Any reduction in business rates income below the authority's baseline funding level must be repaid to the pool.

A contribution from all the participating authorities would be required (at present £2,000 for the current pool) for the costs incurred in administering the scheme by the Lead Authority.

7. LEGAL IMPLICATIONS

The legal framework for the formation of a business rates pool is set out in paragraph 34 of Schedule 7B of the Local Government Finance Act 1988 (as inserted by schedule 1 to the Local Government Finance Act 2012). Each pool has to decide (and get approval from Government) on its governance arrangements. These cover, at the least:

- the rights and obligations of pool members;
- how money is to be disbursed to/between pool members and how payments to central government are to be funded by the lead authority
- the treatment of pool balances and liabilities following the pool's dissolution.

Within the successful bid submission, it was noted that the councils in Lancashire have a well-established Leaders group that meet on a regular basis to discuss strategic issues affecting the whole of Lancashire and that the pilot pool is a natural extension of the work of this group in growing the Lancashire wide economy.

The bid stated that the Pool Pilot Governing body will consist of Leaders of those local authorities who are members of the pool and the Chairman of the Combined Fire Authority, as Lancashire Fire and Rescue Service is also a pool member. This body will receive monitoring reports during the year including forecasts of growth/losses for pilot members, and it will also play a crucial role in deciding how the strategic growth and financial resilience fund will be invested. The bid also confirmed the agreement reached by Leaders group in developing the bid, that all decisions made by the Pool Pilot Governing body must be unanimous.

Any Government conditions attached on becoming 75% Business Rates Retention pilot area will need to be complied with and ensured by the Lead Authority.

8. RESOURCE IMPLICATIONS

The Finance Team will be responsible for the administration and financial monitoring of the Business Rates information that will be required by the Lead Authority, as part of the Council's membership of the pool. This will be resourced within existing establishment.

9. EQUALITY AND HEALTH IMPLICATIONS

Please select one of the options below. Where appropriate please include the hyperlink to the EIA.

Option 1 X Equality Impact Assessment (EIA) not required – the EIA checklist has been completed.

Option 2 ☐ In determining this matter the Executive Member needs to consider the EIA associated with this item in advance of making the decision. *(insert EIA link here)*

Option 3 ☐ In determining this matter the Executive Board Members need to consider the EIA associated with this item in advance of making the decision. *(insert EIA attachment)*

10. CONSULTATIONS

Not applicable

11. STATEMENT OF COMPLIANCE

The recommendations are made further to advice from the Monitoring Officer and the Section 151 Officer has confirmed that they do not incur unlawful expenditure. They are also compliant with equality legislation and an equality analysis and impact assessment has been considered. The recommendations reflect the core principles of good governance set out in the Council's Code of Corporate Governance.

12. DECLARATION OF INTEREST

All Declarations of Interest of any Executive Member consulted and note of any dispensation granted by the Chief Executive will be recorded and published if applicable.

VERSION:	Version 2

CONTACT OFFICER:	Louise Mattinson, Director of Finance and Customer Services, ext 5600
DATE:	10th January 2019
BACKGROUND PAPERS:	None

EXECUTIVE BOARD DECISION

REPORT OF:	Executive Member for Resources
LEAD OFFICERS:	Director of HR, Legal and Corporate Services
DATE:	13 December 2018

PORTFOLIO/S AFFECTED:	ALL
WARD/S AFFECTED:	All
KEY DECISION:	**YES** ☐ **NO** ☒

SUBJECT: CORPORATE COMPLAINTS MONITORING REPORT 1st APRIL 2017 – 31st MARCH 2018

1.1 1. EXECUTIVE SUMMARY

The monitoring information in this report sets out the complaints and compliments received by the Council for the period 1st April 2017 to 31st March 2018. This information has been compared to data collected from previous years to allow reasonable comparison.

2. RECOMMENDATIONS

That the Executive Board notes the report.

3. BACKGROUND

Corporate annual reports will be produced which consist of a brief summary of all feedback received. Detailed analysis of service feedback will also be produced for individual Departments for discussion at departmental management teams.

It can be easy to view complaints in a negative light. However, at the Council, we take the view that effective monitoring of the messages provided through a complaints handling process is an absolutely essential way for a modern organisation to learn and improve the way it works.

It is extremely important for a public service provider like the Council to be mindful, at all times, of the feedback our service users provide. The challenge for us as a Council going forward is to encourage our staff to embrace the positives from effective complaints handling. We must ensure that our monitoring processes examine the reasons behind complaints and, wherever possible, avoid these arising again. We must also seek to understand and share good practice so it can be repeated.

A target to reduce the number of complaints is not necessarily a good thing. A low level of complaints could indicate an invisible, inaccessible or unusable complaints procedure. A drop in complaint numbers could be indicative of a general lack of confidence in the process. The important information is the outcome, and not necessarily the numbers received.

An important part of handling complaints effectively is to take time to develop a better understanding of the information our customers/residents tell us. As a Council we should be committed to:

- Identify service failures and take appropriate action;
- Identify where services need to improve;
- Identify poor complaints handling practice and put it right;
- Examine good practice and understand how we might repeat it in other areas;
- Identify trends in complaints and proactively address any issues.

The Council has a 2 stage formal complaints process;
Stage 1 – departmental investigation, and
Stage 2 – corporate review.

Before a complaint can be investigated by the Ombudsman's office, the investigating officer has to be satisfied that the Council has had the opportunity to resolve the complaint. This is not always possible with all cases and the school appeals complaint is one example. Due to the urgent nature of these complaints, they are not required to follow the Council's formal process and can request an automatic escalation to the Ombudsman, hence why the Council is not able to resolve these sooner.

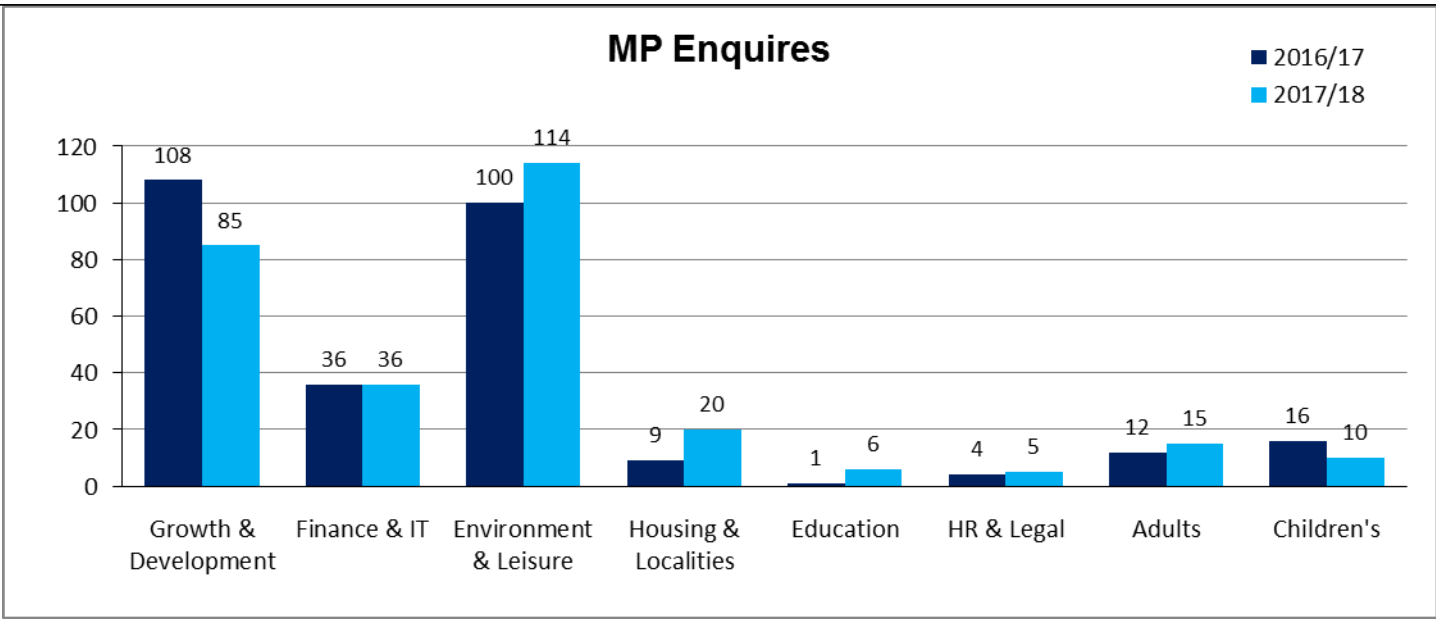
For Adults and Children's complaints we follow a statutory complaints procedure which is a separate jurisdiction to the formal corporate complaints policy. There is a 3 stage process to follow for those complaints that are eligible under the Children's statutory complaints procedure (section 27 of the Children Act 1989) before the complainant can escalate their complaint to the Ombudsman.

The monitoring information is collected by the Corporate Complaints Team using Sharepoint and Respond database for all Adults and Children's complaints.

MP Enquiries

The complaints team have taken over the function of dealing with all MP enquiries centrally since October 2017, which enables the team to monitor the levels and types of enquiries received. This data can be used to inform departments on how we can support MP's offices in finding quicker resolutions/answers to their queries.

During the reported year the Council recorded 291 MP enquiries, which shows only a slight increase from the previous year. Please note that this information has only been recorded accurately since October 2017 so we may well have received more enquiries that have not been previously recorded.



Compliments

The Council recorded 220 compliments in the year from April 2017 to March 2018, this is a decrease of 30% from the previous year. Departments have been encouraged to record compliments about Council services to help share good practice and recognise excellent services provided by our staff.

It is worth noting that compliments have seen an average of 25% reduction year on year. This could be indicative of lack of customer satisfaction given the pressures within most departments.

Complaints

Definition of a complaint
An expression of dissatisfaction with the standard of service provided by the Authority, or with something the Authority or a member of its workforce may or may not have done.

For example:

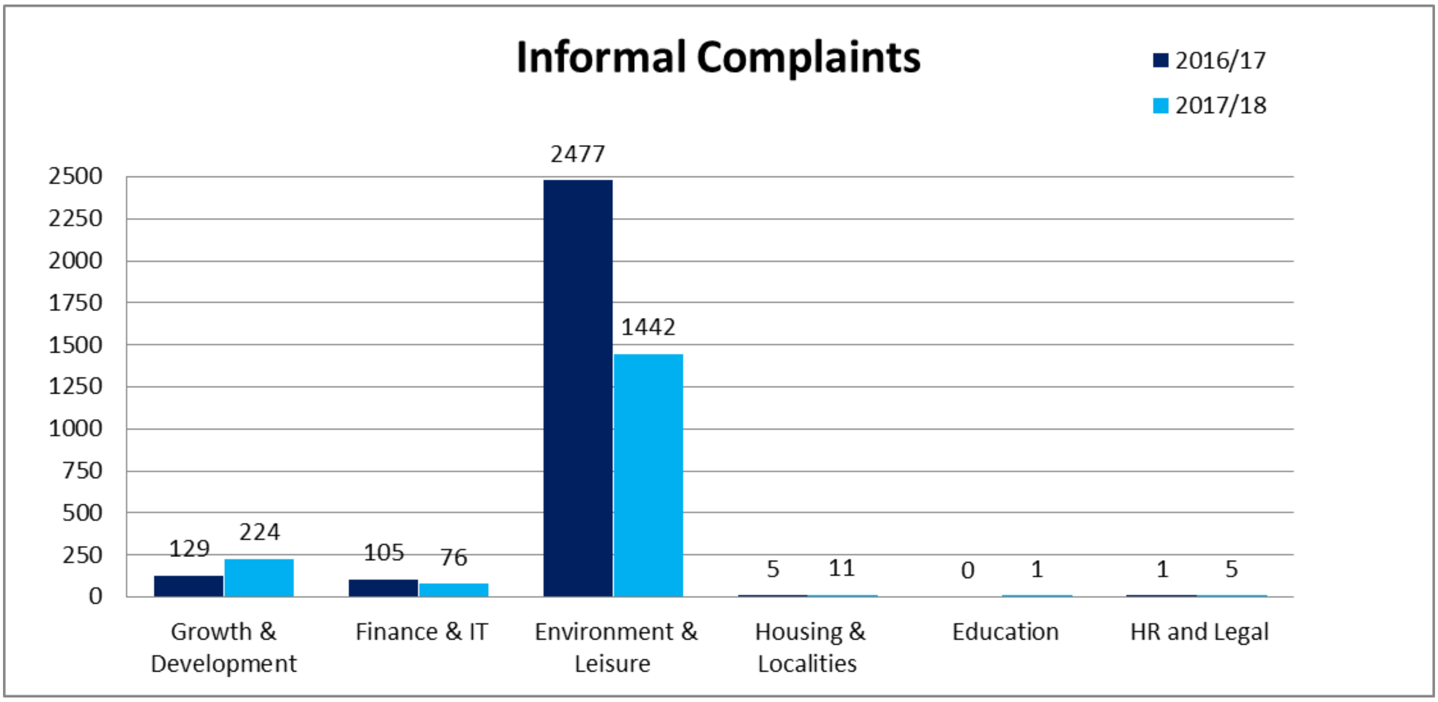
- *We do not deliver a service on time;*
- *We give incorrect information;*
- *We wrongly or inconsistently apply Council policies;*
- *We failed to consult properly with, or listen to people on issues that affect them;*
- *The customer has received a poor quality or inappropriate service; or*
- *The customer is unhappy with the actions or conduct of a member of staff.*

Our aim is to resolve all enquiries at the first point of contact. That means the Council officer who first receives the complaint should make all attempts to resolve the problem to the customer's satisfaction. If this is not possible, the officer should ask the customer if they wish for their complaint to be taken through the formal stages outlined below. The complaint will be dealt with promptly, with courtesy and efficiency, and taken very seriously. The customer can expect to receive a high quality service when they contact any member of staff.

Informal complaints and stage 1 (formal) complaints are investigated and responded by individual departments (Service Managers) and supported by the corporate complaints manager in line with the current policy.

We have recorded 1759 informal complaints for the period 1st April 2017 to 31st March 2018; this is a 35% reduction from the previous year. This is a significant reduction; however it is worth noting that we received a very high volume of complaints in 2016 due to changes in bin collection. Two changes were made around the same time (October 2016). Residents within rural areas of the Borough were allocated a dedicated bin collection point at the end of their lanes, and borough-wide bin collection changed from weekly to fortnightly.

We see a decrease in Housing Benefit complaints since the introduction of Universal Credit, and a reduction in fly tipping complaints for the reported year. We also see a significant reduction in parking services complaints since the introduction of the new parking meters. The old meters had weathered and were causing significant issues for people trying to get a ticket.

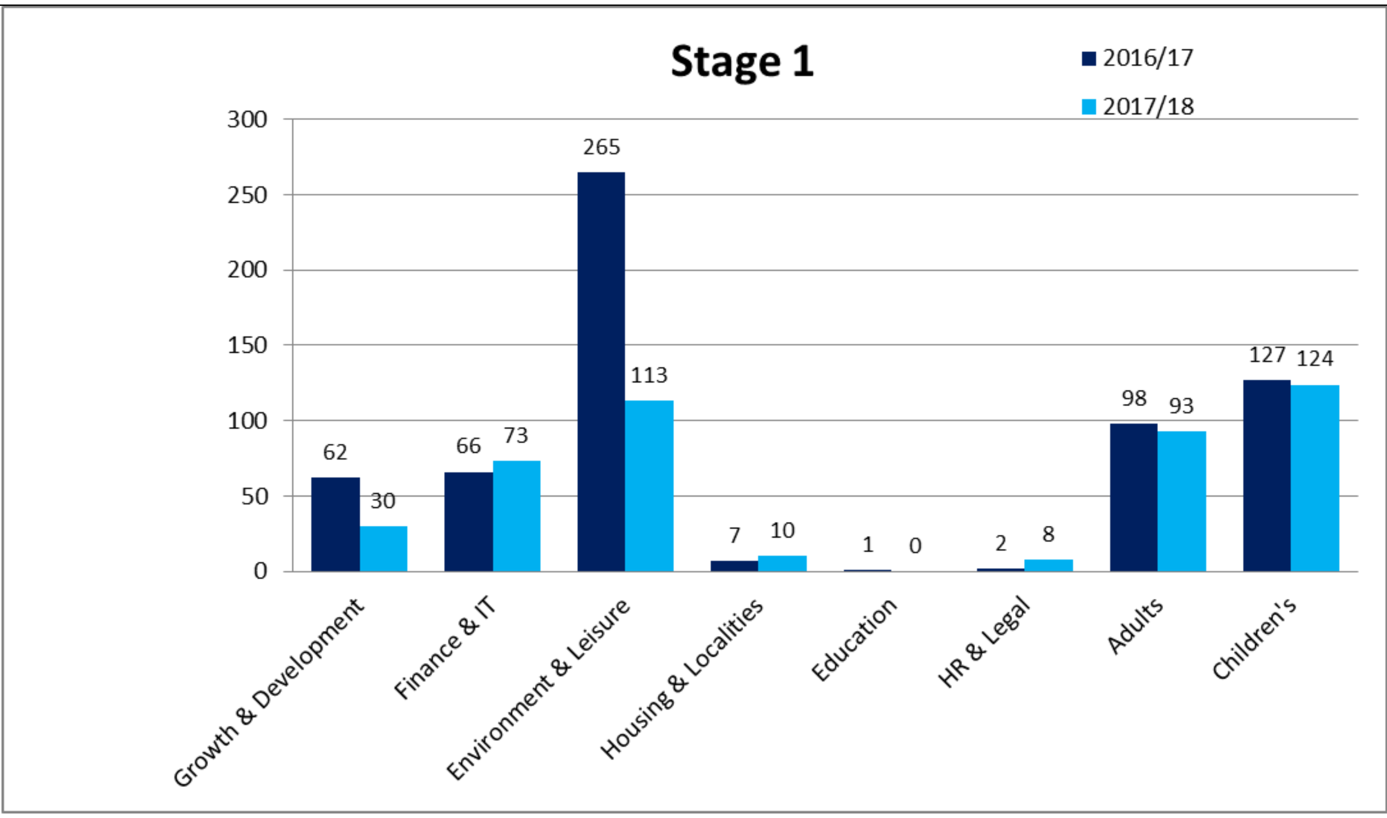


Formal Stage 1 complaints have also seen a 42% reduction for the reported financial year. The Complaints Team have recorded 234 non statutory Stage 1 complaints compared to the 403 received in the previous year. This reduction is attributed to the spike in complaints in 2016 with waste collection changes in Environment.

Another area where we have seen a reduction in formal complaints is within Highways due to pothole repairs around the Borough.

It is worth noting that from the informal complaints recorded; only 13% of these escalated their complaint to the formal process. From the 234 Stage 1 complaints received, only 26 complaints were upheld. For the upheld complaints, further service provisions have been made to correct our errors, apologies provided and service improvement put in place to avoid repetition of similar complaints.

The graph below shows all Stage 1 complaints received by Department during the reported period compared to the previous year.



The quality of the investigations carried out at stage 1 (departmental level) and the action plans developed following an investigation is monitored and improved by random sample checking of 10% of investigations and responses by the Corporate Complaints Team.

The Corporate Complaints Team is working hard to improve access for customers when they wish to complain by:

- Making it easier for customers to complain when they wish to do so;
- Resolving the complaint as well as we possibly can at first contact;
- Using root cause analysis to minimise reasons for complaints; and
- Learning from every complaint.

Statutory Complaints

The Children Act 1989 defines the representations procedure as being for 'representations (including complaints)'.

Our complaints procedure ensures that children and young people who make representations have their concerns resolved swiftly and, wherever possible, by the people who provide the service locally.

The complaints procedure is a useful tool for indicating where services may need improving. It is a positive aid to inform and influence service improvements, not a negative process to apportion blame.

The overall number of complaints recorded for Children's Services (social care) has reduced slightly from 129 (recorded in 2016/17) to 124 recorded for the reported year. The percentage of complaints that are being resolved at stage one remains high at 97% with Managers working with complainants at stage one and reaching an early resolution.

Only 2 complaints escalated to Stage 2 of the Statutory Complaints Procedure (independent investigation) in this monitoring period. This is the same as the previous monitoring period. Both complaints went on to be reviewed at stage 3 of the complaints procedure.

The overall number of complaints recorded for Adult Services has seen a slight reduction in the number of complaints during this monitoring period from 100 in the previous 2 years to 93 in this reported period.

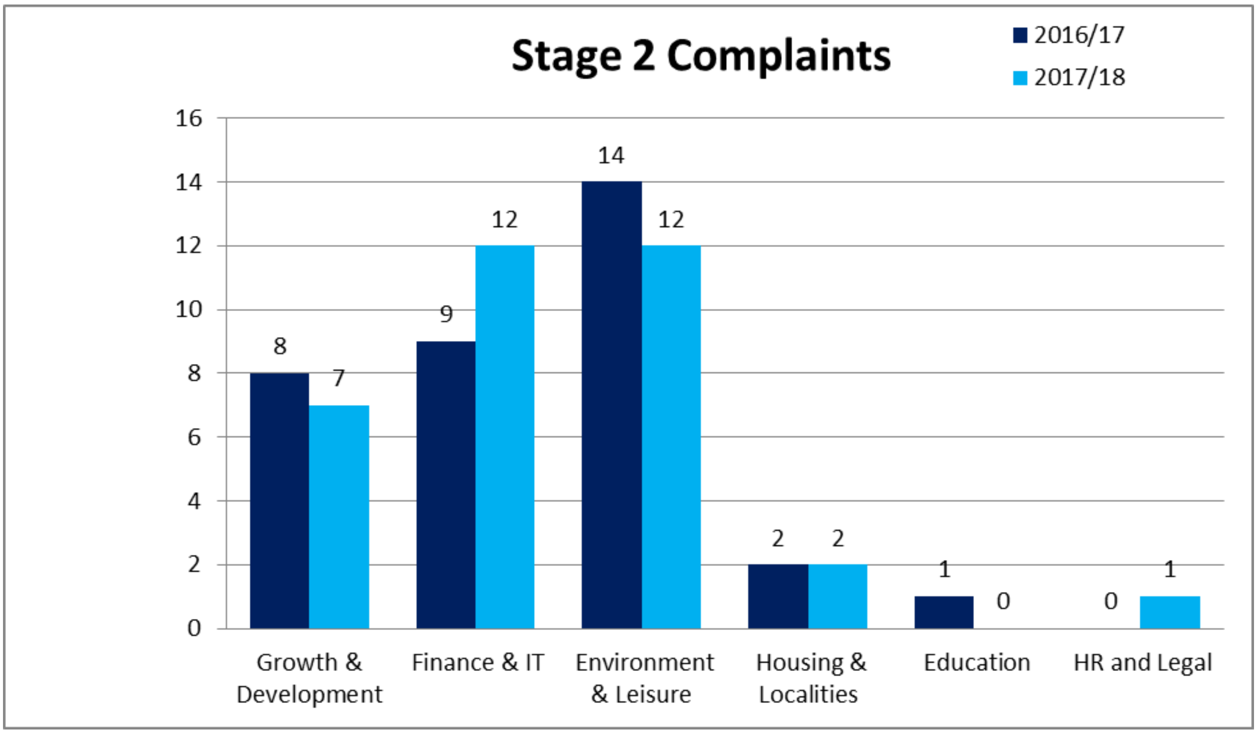
Efforts continue to be made to ensure service users and carers are fully aware of the ways that complaints and representations can be made.

Stage 2 and The Local Government Ombudsman

All stage 2 and Local Government Ombudsman complaints are investigated and concluded by the Corporate Complaints Manager.

The Corporate Complaints Manager received 34 requests for a Stage 2 review for the reporting period, this is a 13% decrease from previous years.

The Corporate Complaints Manager has been working quite closely with Service Managers and Heads of Service to resolve complaints at earlier stages. Managers have also been supported to liaise with complainants at the earliest stage of their complaint to find a local resolution, by meeting them face to face.



For the 34 complaints investigated at stage 2, only 6 complaints were upheld. For the 6 upheld complaints, outcomes included apologies, reimbursement of fees, an offer of time and trouble compensation, and other service provisions. Service improvement mechanisms have also been put in place to ensure that we learn from the complaints and avoid repetition of the same issues.

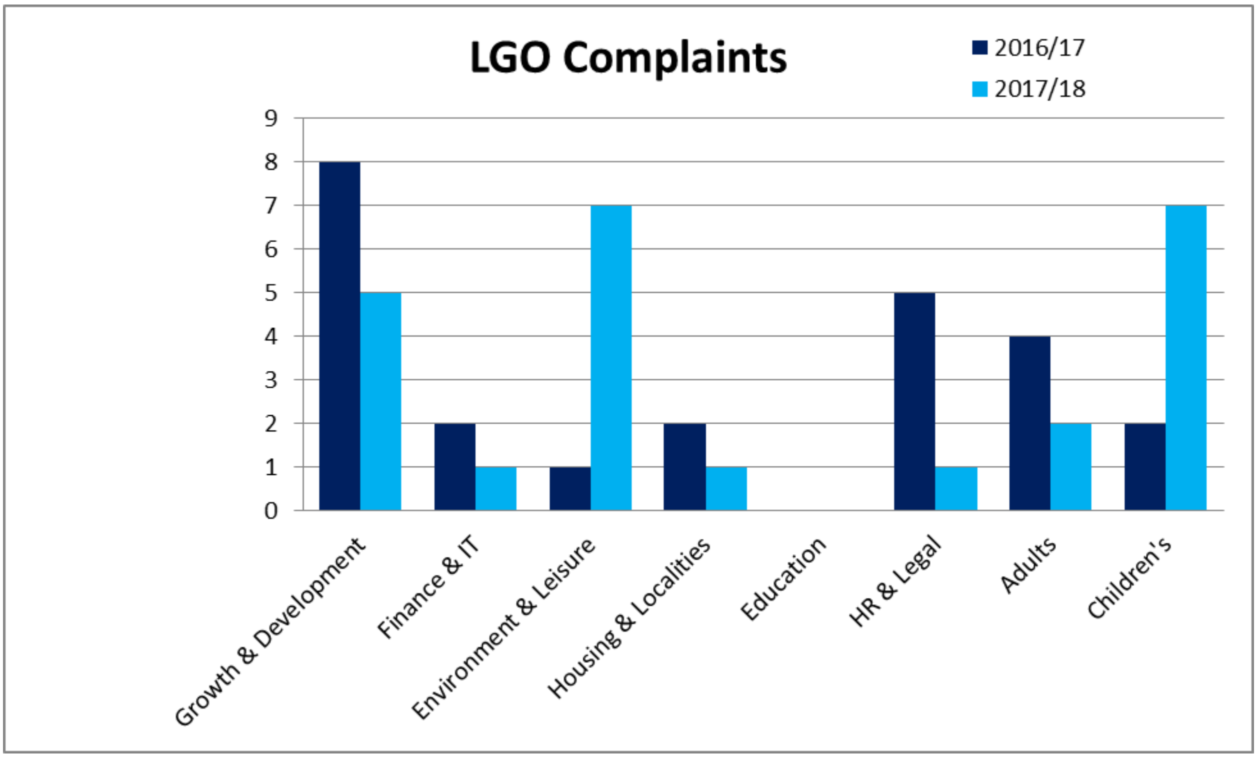
In recent years the Ombudsman's office have started providing information on the number of complaints upheld and not upheld for the first time. In response to council feedback, this year they have provided additional information to focus the statistics more on the outcome from complaints rather than just the amounts received.

They now provide a breakdown of the upheld investigations to show how they were remedied. This includes the number of cases where their recommendations remedied the fault and the number of cases where they decided whether or not the authority had offered a satisfactory remedy during the local complaints process. In these latter cases the LGO provide reassurance that the Council had satisfactorily attempted to resolve the complaint before the complainant approached them. In addition, they provide a compliance rate for implementing their recommendations to remedy a fault.

The tables included in the Ombudsman's review letter presents the number of complaints and enquiries received and the decisions they have made about the authority during the reported period.

The Local Government Ombudsman in his report states that he received 37 complaints for Blackburn with Darwen Council in the reported year. This is a 20% decrease from the previous year 2016-17. The Ombudsman found fault with only two of the cases that they investigated this year compared to the nine from last year.

It is worth noting that given the number of complaints received by the Council, only 1.5% of these complaints have escalated their complaint to the Ombudsman.



From the 37 complaints received by the LGO, only 24 complaints were forwarded to the Council for further investigation, as detailed in the above table.

The two complaints that the LGO found fault with are as follows:

<u>16011488 – Complaint against Planning</u>
Mr Z complained that the Council:
a) Failed to impose a planning condition to limit the use of the car park next to his home in 2009;
b) Failed to ensure the plan the applicant sent to meet the parking condition reflected the number of spaces applied for;
c) Failed to consult affected residents when the applicant sent the parking plan;
d) Acted in a biased way with its own application giving inadequate weight to neighbour amenity.
e) Unfairly failed to enforce the approved parking plan and reduce the number of marked spaces accordingly.

f) Through its councillors, treated him unfairly.

LGO decision:
Mr Z found out Car Park A was bigger than the 2009 permission said. The Planning manager recognised the Council had not investigated this issue in July 2016. Officers investigated the plans and the site history evidence and the planning manager agreed the school had not followed the planning permission. These actions were without fault.

The Council's decision about what enforcement action it could or would take about Car Park A being larger and the steps officers took are unclear and have been delayed since August 2016. The Council had not explained why the school could apply for a lawful development certificate after four years when a condition has been breached. Nor had it set out why it would ask the school to make a section 73 application rather than carry out the landscaping and layout plans the planning committee approved. If the Council had reached a view about expediency already this should have been set out to Mr Z.

The Council should have opened an enforcement record in August 2016 to record its actions and decision and the reasons for them. The Council should hold records of the reports of breaches of planning control it receives, not just record those reports it decides are expedient for it to take action. These were faults.

Mr Z was put to undue time and trouble to contact the Council many times and to complain to the Ombudsman. He continued to suffer uncertainty about what would happen as the Council had delayed decision making and action for 11 months.

Remedy:
a) Seek legal advice about the nature of the breaches and the options for enforcement action. The Council has now sought advice.
b) Reach a decision about whether it is expedient to enforce the breach of planning control and if appropriate the action it intends to take. The Council has done this.
c) Tell Mr Z, the school and the Ombudsman. The Planning Team has done this.
d) Review its process for recording reports of breaches of planning control and how they are progressed and send an update to the Ombudsman. The Council confirmed planning officers now know they must pass all enforcement matters to enforcement officers for a decision and recording.

The Council would, within six weeks of the final decision, apologise to Mr Z and pay him £250 to remedy his distress, frustration and time and trouble as a result of faults by the Council.

Service Improvement measures:
Review our processes for recording reports of breaches of planning control and how they are progressed. Our planning officers are now fully aware that they must pass all enforcement matters to enforcement officers for a decision and recording.

<u>17001881 – Complaint against Children's Services</u>
Mr & Mrs X complained that the Council, when responding to the family's request for funding an extension into their loft space failed to:
• Properly consider the complainants' request for support in creating a loft extension to provide bedroom space for their nephews following a Special Guardianship Order;
• Issue an accurate Regulation 16 Order;
• Follow up on the recommendations made by the independent investigator in the report issued at Stage 2 of the Council's complaints procedure.

The complainants, Mr and Mrs X, said the failings delayed their plans to provide bedrooms for their nephews now living with them under a Special Guardianship Order. Leaving the family living in crowded conditions.

LGO decision:
The Council did not accept that the family needed a fourth bedroom whether that was within the loft or 'extension'. The LGO found fault in its failure to visit the property and properly inspect the available rooms and the adequacy of the extension before putting the proposals in the Regulation 16 Notice.
The LHO agreed with the Stage 2 Investigator's findings and also found fault in the Council's failure to:
• Invite the boys to say what they preferred and why;
• Examine the rooms;
• Examine the extension. This has a single brick external wall and may not have enough insulation and weather proofing for a bedroom;
• Take advice from Building Control and share that advice with the family;
• Consider whether the under 10s as children moving in with a new family (though related) needed separate rooms or could have enough personal space in any shared room;
• Consider the history of Mr and Mrs X's son and his emotional attachment to the room shared with his late brother and the possible negative impact on future relations with the nephews and on their future well-being;
• Share with Mr and Mrs X and the Stage 2 investigation its viability report (after the legal proceedings) showing why the Council could not support a loft room;
• Provide a full explanation about why the Council could not give a loan. And consider offering to put the loan application to councillors or Cabinet member as an exception to normal policy and take their views on whether the family should receive support.

Before proposing using the extension as a habitable room rather than a loft extension a more robust assessment should have been carried out. Before the Stage 2 Report only the independent investigator had seen the extension and nobody had officially assessed its capacity.

The LGO found no fault in the Complaint's Panel's review of the complaint procedure. The Panel had all the relevant information including Mr and Mrs X's views when it decided not to uphold the complaint. However, LGO took a different view of that complaint and believe the faults identified in this investigation led to avoidable distress, inconvenience and doubt for the family. The LGO therefore upheld the complaint.

Remedy:
To remedy the injustice, the Ombudsman recommended that the Council:
• Apologised to Mr & Mrs X;
• Review its decision on a loft room considering only the Fostering Standards and having spoken with the children about the proposals;
• Review whether it could provide a loan, and consider if it should take the loan application to councillors or Cabinet Member for a decision on whether to provide financial support as an exception to usual policy;
• Signpost the family to any charitable institutions who may provide funding as either a grant or loan to enable them to extend into the loft;
• Pay Mr and Mrs X £200 in recognition of the extra time and inconvenience caused by the failings identified in their investigation.

The Council agreed to these recommendations and put to its Lead Member for Children's Services a recommendation for the Council to fund a loft extension for the family. The Lead Member agreed to fund the loft for the family.

The Local Government Ombudsman's office share the issues they find in their investigations to help councils learn from the issues others have experienced and avoid making the same mistakes. They do this through the reports and other resources they publish. Over the last year, they have seen examples of Council's adopting a positive attitude towards complaints and working constructively with them to remedy injustices and take on board the learning from our cases.

Service Improvement

Information on identification and implementation of improvements resulting from complaints is helpful as a means of managing performance and recognising the contribution complaints make to service improvement.

During the reported period the Corporate Complaints Manager has issued guidance notes to record all action taken including service improvements for each upheld complaint. This is to ensure that action is taken to prevent the issue arising again for the individual or anyone other service user. This also ensures that a pattern of service improvements can be developed in order to learn from complaints.

4. KEY ISSUES & RISKS

Public Services are under great strain due to continuing budget reductions although we have achieved significant improvements in efficiency. There is a widening gap between public expectations of public services and the money available to provide them.

For the coming year, complaints to the Council will need to be seen in the context of the impact of these changes to the structures of public services, and the Council will continuously review support for our residents.

5. POLICY IMPLICATIONS

There are none arising from the attached report

6. FINANCIAL IMPLICATIONS

There are none arising from the attached report

7. LEGAL IMPLICATIONS

There are none arising from the attached report

8. RESOURCE IMPLICATIONS

There are none arising from the attached report

9. EQUALITY AND HEALTH IMPLICATIONS
Please select one of the options below. Where appropriate please include the hyperlink to the EIA.

Option 1 ☒ Equality Impact Assessment (EIA) not required – the EIA checklist has been completed.

Option 2 ☐ In determining this matter the Executive Member needs to consider the EIA associated with this item in advance of making the decision. *(insert EIA link here)*

Option 3 ☐ In determining this matter the Executive Board Members need to consider the EIA associated with this item in advance of making the decision. *(insert EIA attachment)*

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10. CONSULTATIONS

Ombudsman's Office
Service Manager's
Directors

11. STATEMENT OF COMPLIANCE

The recommendations are made further to advice from the Monitoring Officer and the Section 151 Officer has confirmed that they do not incur unlawful expenditure. They are also compliant with equality legislation and an equality analysis and impact assessment has been considered. The recommendations reflect the core principles of good governance set out in the Council's Code of Corporate Governance.

12. DECLARATION OF INTEREST

All Declarations of Interest of any Executive Member consulted and note of any dispensation granted by the Chief Executive will be recorded in the Summary of Decisions published on the day following the meeting.

VERSION:	**1**

CONTACT OFFICER:	**Nafisha Master**
DATE:	November 2018
BACKGROUND PAPER:	Corporate Complaints Policy The Local Government Ombudsman Annual Review Sharepoint database – Corporate Complaints Respond CenterPoint – Social Care Complaints

EXECUTIVE BOARD DECISION

REPORT OF:	Executive Member for Resources
LEAD OFFICERS:	Deputy Chief Executive
DATE:	10 January 2019

PORTFOLIO/S AFFECTED:	ALL
WARD/S AFFECTED:	All
KEY DECISION:	**YES** ☐ **NO** ☒

SUBJECT: Council Office Accommodation Strategy Update

1. EXECUTIVE SUMMARY

Further to the report to Executive Board on 8th February 2018, this report updates on the implementation plans for the next stage of the Council's Office Accommodation Strategy.

Since the funding reductions started in 2010 the Council has been making budget cuts each year and downsizing its workforce, and as a consequence of this, has been routinely reviewing its core office accommodation sites to rationalise property and reduce costs.

The refurbishment of the Davyfield Road bungalow site is now complete which will provide staff accommodation and emergency/civil contingency facilities in the event of a town centre buildings failure.

The next phase is outlined below.

2. RECOMMENDATIONS

That the Executive Board notes:
1. Further to the Executive Board report of February 2018, the level of refurbishment planned for Blackburn Town Hall is being scaled back in line with the Council's ongoing budget constraints. .
2. The proposed reduced refurbishment works will be funded from the existing accommodation strategy capital programme fund.
3. A further report will be brought on the future options for the Tower Block.

3. BACKGROUND

The Council's core staff accommodation sites comprise of Blackburn and Darwen Town Halls, the Tower Block and 10 Duke Street.

As reported previously, as the Council's workforce has decreased so has the occupancy of the core accommodation buildings.
There is therefore further scope for building rationalisation to reduce costs and improve services and it has been agreed that all four buildings are no longer required, and that the occupied sites could be rationalised from four buildings to three.

This position takes into account the availability of office accommodation at the Bungalow at Davyfield Road depot. The Bungalow refurbishment has now been completed and will provide out-of-town accommodation for up to 120 staff from appropriate teams, including the existing occupants. The building can also provide touch down space for staff that need to access a Council building without having to travel back into the town centre during peak times. The completed works to the Bungalow will ensure that the building is fit for purpose to provide for future agile working practices. The Bungalow's location on the edge of town also ensures that the building can provide emergency/civil contingency resilience in the event of a town centre building network failure.

Recently internal moves have taken place within Duke Street to create further sections of available space and Adults Services staff, from the Tower Block floors L&M have now relocated to Duke Street which is now fully occupied by Children's Services and Education, Public Health & Adults Services Departments.

The Tower Block will then only be occupied by Resources Departments, Facilities Services and Trades Unions.

The previous Council Office Accommodation Strategy Executive Board Report in February 2018 proposed a full major internal refurbishment of the grade 2 listed Blackburn Town Hall.

This major internal refurbishment included the full replacement of the Mechanical and Electrical systems throughout the building and the removal of internal structural walls.

Due to Council's budget constraints it is proposed to scale back the level and cost of the internal works.

4. KEY ISSUES & RISKS

There is an over-supply of staff office accommodation. The risk of not taking action at this juncture is to continue to carry considerable additional costs of empty staff accommodation.

Modernisation of Blackburn Town Hall, would increase capacity, improve service provision, reduce operational and backlog maintenance costs. The remodelling of the internal cellular spaces into flexible office accommodation will encourage and promote future agile and digital working practices.

Due to the budget constraints of the Council a detailed review has taken place of the existing condition survey reports and a review of the overall available office space within the Town Hall.

This has identified that it would be possible to undertake a scaled back internal refurbishment that would still deliver the desired accommodation strategy outcome, of the Council being able to reduce the number of staff accommodation buildings by vacating the Tower Block.

The proposed works would include the removal of non-load bearing stud partition walls, some limited electrical rewiring works, the creation of staff welfare facilities within each floor, upgraded audio visual systems for the Council Chamber, decoration, floor coverings and new modern flexible office furniture.

This would mean that the previously proposed removal of a number of structural walls, replacement of the heating system and a decant of all staff and services from the Town Hall to other buildings will no longer form part of the proposals thus reducing the costs and disruption significantly.

As part of the works consideration will also be given to future public meeting space provision in the Town Hall to improve public access to the building. All works will be in accordance with the Equality Act 2010.

As the level of works will not create the same disruption and noise in the Town Hall, it will be possible to undertake the work on a floor by floor basis, meaning that although temporary moves will be necessary, most moves will be able to be accommodated within the facility.

The existing customer services & Registrars services delivered from the ground floor of Blackburn Town Hall will continue to be delivered from this space, without disruption.

The works will be costed and undertaken on a floor by basis. The drawings and specifications will be undertaken by the Council's Building Consultancy Team, and the building work will be undertaken by the Council's Corporate Building Team as an in house project.

Once the refurbishment works to Blackburn Town Hall are completed, all staff will be relocated from the Tower Block into Blackburn Town Hall or other core accommodation buildings. As part of this relocation a full review of storage will take place to ensure as much rationalisation as possible takes place in compliance with the Council's document retention and disposal policy.

Once the Tower Block has been vacated it will be deemed surplus to the Council's requirements with two options for consideration. The first option would be to mothball the facility which will still require the buildings heating and ventilation plant to be kept operational and empty business rate charges would apply. The second option would be for the Council to no longer have any responsibility for the building.

This second option requires detailed discussions and negotiations with the Mall, who are the Council's landlord, although the Council is the ultimate freeholder of the site.

A separate Executive Board report will be presented in the future to consider fully the options available to the Council in relation to the Tower Block.

5. POLICY IMPLICATIONS

The Council's established Property & Procurement Policies will be followed.
The Council's existing Agile Working Toolkit will be supported along with the Council's Digital Strategy.

6. FINANCIAL IMPLICATIONS

The Council's existing capital accommodation strategy fund has an allocation of £1,945,000. This fund will be utilised to undertake the works described above.

The savings expected from the Tower Block once it is mothballed after the works above, include part utility savings of approximately £30,000, facilities management savings of approximately £50,000 and part repair, maintenance and statutory compliance savings of £40,000. Total £120,000 p.a.

The savings expected from the Tower Block if the Council no longer had responsibility for the building include Tower Block budget of £220,000 covering facilities management costs, business rates and utility costs and repair, maintenance and statutory compliance savings of £70,000. Total £290,000 p.a.

7. LEGAL IMPLICATIONS

The Council owns the Freehold titles for both Blackburn and Darwen Town Halls.

In relation to the Tower Block, a lease is in place in favour of the Mall, from which there is a 150 year under-lease back to the Council. The under-lease is dated 7th December 1993 expiring 3rd December 2143 with a peppercorn rent.

A future Executive Board report will be brought regarding the Tower Block once further options have been considered and pending discussions with the Mall.

8. RESOURCE IMPLICATIONS

The project will be managed by the Council's Property team, within Growth & Development.

The Council has formed a project team with representatives from all necessary stakeholders including HR, IT, Customer Services, Business Support, PR & Communications & Departmental representatives. The project team will be overseen by the Deputy Chief Executive.

9. EQUALITY AND HEALTH IMPLICATIONS

Please select one of the options below. Where appropriate please include the hyperlink to the EIA.

Option 1 x Equality Impact Assessment (EIA) not required – the EIA checklist has been completed.

Option 2 ☐ In determining this matter the Executive Member needs to consider the EIA associated with this item in advance of making the decision. *(insert EIA link here)*

Option 3 ☐ In determining this matter the Executive Board Members need to consider the EIA associated with this item in advance of making the decision. *(insert EIA attachment)*

10. CONSULTATIONS

Full staff consultation will take place over the coming months to discuss with staff how the Council will move towards agile working practices.

The staff consultation will initially focus on the staff/services located within the Town Hall that will be required to relocate within the building or temporarily relocate to the Tower Block to allow the refurbishment works to take place.

Future detailed conversations will be necessary with the Mall in relation to the future decisions that are made on the Tower Block.

11. STATEMENT OF COMPLIANCE
The recommendations are made further to advice from the Monitoring Officer and the Section 151 Officer has confirmed that they do not incur unlawful expenditure. They are also compliant with equality legislation and an equality analysis and impact assessment has been considered. The recommendations reflect the core principles of good governance set out in the Council's Code of Corporate Governance.

12. DECLARATION OF INTEREST
All Declarations of Interest of any Executive Member consulted and note of any dispensation granted by the Chief Executive will be recorded in the Summary of Decisions published on the day following the meeting.

VERSION:	**1**

CONTACT OFFICER:	**Lee Kinder**
DATE:	22/11/2018
BACKGROUND PAPER:	