

Blackburn with Darwen Borough Council

Integrated Appraisal of Local Plan Issues and Options

December 2018

Quality Management

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Prepared by	Laura Craddock	
Checked by	Martin Craddock	
Authorised by	Jackie Palmer	

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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.	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Protect and enhance the vitality and viability of town

IA Objective	Assessment Criteria: Will the Local Plan...
centres.	<p>centres?</p> <ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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...
	<p>body?</p> <ul style="list-style-type: none"> • 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.

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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 development⁴. The NPPF⁵ 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

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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”. NPPG⁶ 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,

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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: <i>Will the Local Plan...</i>
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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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: <i>Will the Local Plan...</i>
	<p>community activities?</p> <ul style="list-style-type: none"> • 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?
<p>5. Promote and support healthy living environments and lifestyles for all residents, and access to health services while targeting action to reduce health inequalities.</p>	<ul style="list-style-type: none"> • 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?
<p>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.</p>	<ul style="list-style-type: none"> • 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?
<p>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.</p>	<ul style="list-style-type: none"> • 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?
<p>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.</p>	<ul style="list-style-type: none"> • 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?
<p>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,</p>	<ul style="list-style-type: none"> • 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: <i>Will the Local Plan...</i>
amenity and recreation.	
10. Avoid and reduce all forms of pollution.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Positive or Negative • Direct or Indirect • Cumulative, secondary, synergistic • Temporary or Permanent
Magnitude and Spatial Extent	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Sensitivity of receptors • Special natural characteristics/areas or cultural heritage

Issues for consideration	Details
	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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.

IA Objective	Strategic 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.

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.

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	-	--	<p>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.</p> <p>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.</p> <p>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.</p> <p>The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.</p>	None identified.
2. Vibrant town centres	n	-	-	<p>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.</p> <p>The effects would not be felt in the shorter term but could manifest over time.</p> <p>Developers, investors, etc. could seek opportunities in other town centres.</p> <p>The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.</p>	None identified.
3.Travel, sustainable transport options and communications infrastructure	u	u	u	<p>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.</p>	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.

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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				<p>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.</p> <p>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.</p> <p>The negative effects wouldn't manifest in the shorter term but would worsen over time.</p> <p>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.</p> <p>The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.</p>	
5. Healthy living environments, health services and reduce in health inequalities.	n	-	--	<p>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.</p>	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	-	-	<p>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.</p> <p>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.</p> <p>The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.</p>	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	-	--	<p>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</p>	Provision of Plan policies that require delivery of a range of housing

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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

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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.

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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
				<p>This would contribute to the regeneration and on-going success of the town centres</p> <p>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.</p> <p>The effects would not be felt in the shorter term but could manifest over time.</p> <p>The positive impacts would be likely felt locally and would be permanent in their effect.</p>	
3.Travel, sustainable transport options and communications infrastructure	u	u	u	<p>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.</p> <p>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.</p>	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	+	+	<p>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.</p> <p>The positive effects wouldn't manifest in the shorter term but would worsen over time.</p> <p>The positive impacts would be likely felt locally and would be permanent in their effect.</p>	None identified.
5. Healthy living environments, health services and reduce in health inequalities.	n	n	n	<p>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.</p> <p>On balance, a neutral effect is envisaged.</p>	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.

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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	+	+	<p>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.</p> <p>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.</p> <p>The positive impacts would be likely felt locally and would be permanent in their effect.</p>	None identified.
2. Vibrant town centres	n	+	+	<p>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</p> <p>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.</p> <p>The effects would not be felt in the shorter term but could manifest over time.</p> <p>The positive impacts would be likely felt locally and would be permanent in their effect.</p>	None identified.
3. Travel, sustainable transport options and communications infrastructure	u	u	u	<p>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.</p> <p>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.</p>	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	+	+	<p>This growth option would support a positive economic strategy. With greater number of jobs, this would help prevent deprivation in the Borough.</p> <p>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.</p> <p>The effects wouldn't manifest in the shorter term but would become positive over time.</p>	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.

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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
				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

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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
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.

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	+	-	<p>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.</p> <p>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.</p> <p>The negative impacts would be unlikely to spread beyond the Borough.</p> <p>The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.</p>	None identified.
2. Vibrant town centres	n	+	-	<p>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</p>	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				<p>sustainable approach that would worsen over time.</p> <p>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.</p> <p>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.</p> <p>The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.</p>	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	-	<p>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.</p> <p>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.</p>	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	<p>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.</p> <p>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.</p>	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	-	-	-	<p>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.</p>	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.

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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

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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

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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

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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.

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	+	+	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	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.

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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
				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 communications 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 -

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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
				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

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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
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.

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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
				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.

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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
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	+	+	<p>The allocation of safeguarded land for housing would assist the delivery of a level of growth that would support a positive economic strategy.</p> <p>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.</p> <p>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.</p> <p>The positive impacts would be likely felt locally and would be permanent in their effect.</p>	None identified.	-	<p>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.</p> <p>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.</p>
2. Vibrant town centres	n	+	+	<p>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</p>	None identified.	-	<p>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.</p> <p>The negative effects would be local but temporary with the expectation</p>

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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
				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				<p>the Borough.</p> <p>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.</p> <p>The positive effects would manifest over time.</p> <p>The positive impacts would be likely felt locally and would be permanent in their effect.</p>			<p>the projected growth in retired residents and reduction in those of working age. This could worsen deprivation in the Borough.</p> <p>This would not support a mixed community, as younger and potentially wealthier people would be encouraged to live and work elsewhere.</p> <p>The negative effects wouldn't manifest in the shorter term but would worsen over time.</p> <p>The negative effects would be felt locally.</p> <p>The negative effects would be temporary as a different future growth strategy could improve conditions in the Borough.</p>
5. Healthy living environments , health services and reduce in health inequalities.	n	n	n	<p>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.</p> <p>Directed growth to existing safeguarded land would not have any particular impact upon this.</p>	Provision of Plan policies that require delivery of appropriate healthcare alongside development.	-	<p>Growth that requires development within safeguarded land would support a more balanced demographic, rather than 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</p>

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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

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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
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

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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
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

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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
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

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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
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

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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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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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				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.			