

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

1. Introduction

- 1.1 Blackburn with Darwen Council currently has an adopted Core Strategy (2011) and Local Plan Part 2: Site Allocations and Development Management Policies (2015). These two plans set out the land use planning strategy for the Borough up to 2026.
- 1.2 New planning regulations¹ were published by Government in late 2017 that required local authorities to review Local Plans at least every five years from the date of their adoption. Local Authorities will need to carry out an assessment of whether a Local Plan remains relevant and effectively addresses the needs of the local community, or whether policies need updating. Having carried out this assessment authorities must decide:
- that one or more policies do need updating, and update their Local Development Scheme to set out the timetable for updating their plan, and then update their plan; or
 - that their policies do not need updating, and publish their reasons for this decision.
- 1.3 In response to the new regulations, an assessment of the two adopted local plans was undertaken. Key factors that needed to be considered with respect to the current local plans were:
- Progress on the delivery of development set out in the Core Strategy and the Local Plan Part 2 and an evaluation of the strategy set out in the plans;
 - The publication of the Housing White Paper by the Government in February 2017² which proposed various changes that would directly impact on Local Plans. The key changes proposed through the White Paper included a new standardised housing methodology for local authorities to follow; and legislative proposals to make local plans a statutory requirement for local authorities and require reviews of plans at least every five years.
 - A subsequent consultation on the standardised housing methodology in September 2017³ by the Government that set out draft figures for housing need for each local authority in England.

¹ The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 (<http://www.legislation.gov.uk/uksi/2017/1244/contents/made>)

² Housing White Paper (2017) (<https://www.gov.uk/government/collections/housing-white-paper>)

³ Further details - <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

- Consequential changes that flowed from the Housing White Paper including the publication of a revised National Planning Policy Framework (NPPF)⁴ in July 2018 and updated Planning Practice Guidance (PPG)⁵ in September 2018.
- Further consultation on the standard housing methodology that took place from October to December 2018⁶.

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

The Current Strategy

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

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

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

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

⁴ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵ <https://www.gov.uk/government/collections/planning-practice-guidance>

⁶ <https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>

- 1.8 The two plans collectively seek to deliver 9,365 homes⁷ (in three phases consisting of 2,650 from 2011-16; 3,125 from 2016-21; and 3,600 from 2021-2026); and 66 Hectares of employment land, including land at Frontier Park in Hyndburn Borough Council's area. Allocations in the Local Plan Part 2 set out the detail of where housing and employment land will be delivered.

Developing the new Local Plan

- 1.9 The Council approved a new Local Development Scheme in February 2018⁸ that set out the intention to develop a single Local Plan to replace the Core Strategy and Local Plan Part 2. This consultation on Issues and Options marks the first stage towards the development of a new local plan.
- 1.10 The plan is then scheduled to be consulted on at Publication stage (Regulation 19) in summer 2020 with a view to submitting the plan for examination towards the end of 2020. It is anticipated that the plan will be adopted in 2021 and will therefore look forward to 2036 to meet the expectation set out in paragraph 22 of the NPPF that strategic policies should look ahead over a minimum 15 year period from adoption.

⁷ Includes an allowance for bringing empty homes back into use.

⁸ <https://www.blackburn.gov.uk/Pages/Local-Development-Scheme.aspx>

2. Vision/ Strategic Objectives

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

2.2 The vision in the Core Strategy states:

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

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

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

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

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

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

2.3 The Core Strategy set out 11 strategic objectives:

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

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

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

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

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

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

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

3. Growth Options

National Policy

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

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

Housing

- 3.2 Section 5 of the NPPF deals with delivering a sufficient supply of homes. Paragraph 60 of the NPPF confirms the Government’s expectation that local plans are based on a standard method for calculating how many new homes are required (standard housing methodology). It is recognised that exceptional circumstances may justify an alternative approach but any alternative approach needs to reflect current and future demographic trends and market signals.
- 3.3 Further guidance on how the standard housing methodology will be applied is provided in the updated PPG⁹. The PPG states:

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

- 3.4 The standard housing methodology is based on two pieces of information from national data sources. The first is the household projections, which are published by the Office for National Statistics (ONS). The second aspect is the latest housing affordability data again published by ONS. Full details of the calculation that is applied can be obtained in the PPG¹⁰.

⁹ The guidance can be accessed at the following website address -

<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

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

3.5 The PPG provides guidance¹¹ on where circumstances may justify a higher housing figure to be set out in a local plan including:

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

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

3.7 An important caveat to bear in mind is that the Government set out an intention in the Planning Practice Guidance to consult further on the standard housing methodology. The Government subsequently undertook a consultation that ran from 26th October to 7th December 2018¹². The consultation proposed three changes to the guidance set out in the PPG update of September 2018:

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

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

¹¹ PPG - Housing need assessment (Paragraph: 010 Reference ID: 2a-010-20180913)

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf

Economic Development

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

“Planning policies should:

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

Growth Options

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

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

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

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

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

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

Table 1 – Household Growth (2018-2036)

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

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

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

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

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

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

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

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

3.18 Table 2 below sets out the range of potential growth options with respect to housing requirements based on the standard housing methodology and the economic growth scenarios described above. Given the current advice with respect to the 2016 household projections (see paragraph 3.14 above) the

potential growth options of 110 dwellings per annum and 285 dwellings per annum do not feature in the table below.

Table 2 – Housing Growth Options

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

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

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

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

- 3.21 In terms of employment land, the HENAS report considered the level of employment land likely to be required as a result of labour demand estimates derived from the growth based economic forecast. The study also considered the potential demand for new employment land if growth continued in a similar trend to the previous levels of employment land completions. This was done to

account for the view that completions data provided a better representation of the likely employment needs for B2 and B8 use classes, whereas the labour demand estimates were a better indicator for B1 use class needs.

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

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

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

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

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

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

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

¹³ Figures rounded to nearest 100 square metres

4. Spatial Options

National/Local Policy Framework

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

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

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

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

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

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

- 4.5 The preparation of the Local Plan Part 2 was informed by a review of the Green Belt within the Borough. As a result of the review a number of sites were allocated for housing development within the plan period (up to 2026) and three areas were allocated for development beyond the plan period (safeguarded sites). The intention is that the three safeguarded sites will only be considered for release for development as a result of a local plan review.
- 4.6 The key issues to consider in developing the spatial strategy for the new local plan include assessing:
- The balance of housing development in terms of the split between the delivery of sites within urban areas and any potential need for development beyond the urban area either as extensions to the existing urban area or for development in rural areas primarily within the villages of the Borough.
 - The delivery of small sites as a result of the expectation set out in the NPPF.
 - The need to review the three areas of safeguarded land given the timescale of the new plan to 2036 and whether any safeguarded land will be required for release for development.
 - The need for additional employment land allocations that address the quantum and quality of existing employment stock.

Balance of Housing Development and Small Sites

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

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

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

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

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

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

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

- 4.10 It has been noted above that the NPPF sets out an expectation for the inclusion of small sites either within the local plan or via the brownfield register that each local authority must maintain. The Council’s latest brownfield register¹⁴ lists 33 sites within the Borough that have been identified as suitable for housing development with 18 of the sites (55%) under one hectare in size. The current housing allocations in the Local Plan Part 2 are all larger than one hectare which is a function of the fact that the plan only allocated sites that could accommodate 50 or more dwellings.

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

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

¹⁴ <http://www.blackburn.gov.uk/Pages/Brownfield-register.aspx>

Safeguarded Land

- 4.12 Three areas of land are currently identified for development beyond the plan period (post 2026) in the Local Plan Part 2 (Policy 4). The policy in the plan seeks to ensure these areas of safeguarded land are protected from piecemeal change or development prior to any further consideration of the need for planned development. The appropriate time for this consideration is at the point of the review of the local plan and it is therefore timely to consider whether any changes should be proposed in the new local plan.
- 4.13 The new plan will include allocations for housing and employment needs up to 2036. Based on the current understanding of future supply and potential growth set out in the new local plan it is anticipated that there may be a need to consider allocations on safeguarded land before 2036. No specific decisions have been made on the amount of safeguarded land that will need to be allocated. Moreover, there is no specific view on the location of any new allocation within the safeguarded land areas. The Council will need to undertake a full appraisal of any area identified as suitable for release in the safeguarded areas in line with the requirement set out in Policy 4 of the Local Plan Part 2.

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

Employment Land Allocations

- 4.14 The current Local Plan Part 2 identifies a total of 43.5 hectares of employment land allocations. Land is also provided at Frontier Park on the edge of Blackburn (in Hyndburn) to meet additional employment needs for the Borough. Monitoring by the Council suggests around an annual average of 5.7 hectares (gross) of employment land has been delivered in the Borough over the past 12 years.
- 4.15 The Council has commissioned additional evidence to assess the current portfolio of employment land (existing key sites and allocations in Local Plan Part 2). The output from this study will assist in determining the potential scale of need that may be delivered through new allocations in the emerging local plan. Previous work undertaken on behalf of the Council¹⁵ highlighted the key trends and requirements for each of the three main B class use sectors (Table 5).

¹⁵ BE Group (2015) Commercial Market Property Study

Table 5: Business Needs identified by BE Group Research

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

4.16 Section 3 set out the two options for future employment needs and resultant allocations. If option 2¹⁶ is pursued there may be implications for where allocations are located given the likelihood that additional land may need to be considered in the vicinity of the M65. The vast majority of the land adjacent to the M65 is currently designated as Green Belt. Any proposals for allocations

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

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

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

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

5. Thematic Issues

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

Employment

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

Protection of Employment Land

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

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

Housing

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

Housing Need Assessment section. Gypsy and Traveller needs are dealt primarily in a separate Government guidance note published in 2015¹⁷.

Housing Mix

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

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

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

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

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

Houses in Multiple Occupation (HMO)

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

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

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

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

Gypsy and Traveller, and Travelling Showpeople Needs

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

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

Affordable Housing

5.9 The NPPF identifies in paragraph 62 that planning policies should specify the type of affordable housing required, and expect it to be met on-site. Off-site provision or financial contributions can be acceptable but would require robust justification. The definition of what constitutes affordable housing has been widened in the updated NPPF¹⁸ covering four main categories:

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

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

¹⁸ See Annex 2: Glossary of the NPPF

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

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

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

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

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

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

Technical Standards

- 5.13 The Government has in recent years produced a national set of technical standards and the PPG provides guidance on the various standards¹⁹. The PPG states:

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

¹⁹ <https://www.gov.uk/guidance/housing-optional-technical-standards>

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

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

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

Public Facilities

Blackburn & Darwen town centres

- 5.15 The NPPF identifies in paragraph 85 that planning policies and decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation.
- 5.16 Local Plan Part 2 Policy 26 sets out the current framework for developing the Borough's town centres which focuses on:
- Strengthening and focusing the shopping offer;
 - Expanding the role of the town centres;
 - Protecting and enhancing the leisure offer and developing an evening economy; and
 - Establishing a vibrant town centre residential population.
- 5.17 The overall aim for Blackburn and Darwen town centres within the new local plan will be to continue to encourage a positive and flexible approach to planning for their future. This will ensure that the Borough's town centres can respond to rapid changes in the retail and leisure industries, as required by NPPF paragraph 85(a).
- 5.18 A Supplementary Planning Document (SPD) for Blackburn Town Centre has been prepared which provides additional details on the town centre framework and identifies a number of investment areas within Blackburn town centre which have development potential for specific uses.

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

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

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

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

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

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

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

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

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

District centres

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

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

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

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

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

Primary & secondary shopping frontages

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

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

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

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

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

Retail impact assessments

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

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

Table 7: Local Retail Floorspace Thresholds

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

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

Health

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

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

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

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

Environment

Renewable energy & energy efficiency of new development

- 5.31 The Government has identified the role of renewable and low carbon energy sources in working towards national targets to reduce greenhouse gas emissions, which contribute towards a changing climate.
- 5.32 Paragraph 151 of the NPPF states that local plans should consider identifying suitable areas for renewable and low carbon energy development in addition to supporting community-led initiatives for renewable and low carbon energy (paragraph 152, NPPF).
- 5.33 Government has also stated that wind farm developments should only be granted planning permission if the site is identified as a 'suitable area' in a Local Plan or a Neighbourhood Plan and the proposal has the backing of the affected local community²⁰.

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

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

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

- 5.34 The Government has indicated that sustainable construction standards and the energy performance of buildings are likely to be best dealt with via Building Regulations and not planning.
- 5.35 To assist in reducing greenhouse gas emissions from new development in the Borough, Policy 11 of Local Plan Part 2 requires development to take advantage of opportunities to maximise environmental sustainability. This includes optimising energy and other resource use and performance through building shape, orientation, servicing, detailing and materials in addition to minimising the need to travel and minimise car use through attention to the design, layout and permeability of development.

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

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

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

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

Quality of Place

Design

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

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

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

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

Green infrastructure

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

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

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

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

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

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

- 5.42 NPPF paragraph 99 gives Local and Neighbourhood Plans the ability to designate areas of open spaces of particular value to a community as 'Local Green Space' subject to meeting a number of criteria²¹.

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

Biodiversity

- 5.43 The environmental test of sustainable development requires planning policy and planning decisions to help to improve biodiversity. NPPF paragraph 174(b) suggests that it will be up to local planning authorities to prepare their own policies on how to identify and pursue opportunities for securing measurable net gains²².

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

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

QUESTION 44: How should we measure net gain?

Access to Jobs and Services

Parking standards

²¹ NPPF para.100

²² NPPF para.174

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

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

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

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

Assessment of Core Strategy and Local Plan Part 2 Policies

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

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

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

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

6. Next Steps

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