



EXECUTIVE BOARD DECISION

REPORT OF: Executive Member for Regeneration

LEAD OFFICERS: Deputy Chief Executive

DATE: 10 January 2019

**PORTFOLIO/S
AFFECTED:** ALL

WARD/S AFFECTED: All

KEY DECISION: YES NO

SUBJECT: Local Plan - Issues and Options Public Consultation

1. EXECUTIVE SUMMARY

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

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

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

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

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

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

2. RECOMMENDATIONS

That the Executive Board:

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

3. BACKGROUND

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

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

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

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

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

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

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

Vision and Strategic Objectives

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

the Vision and Strategic Objectives should be amended in the new local plan.

Growth Options

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

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

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

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

Table 1 - Housing Growth Options

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

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

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

“Regarding the use of the 2016-based SNHP(Sub National Household Projections), it should be noted that the data (at least at a national level) has been subject to some criticism for potentially building in some degree of 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."

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

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

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

Spatial Options

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

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

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

Thematic Issues

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

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

3.18 The housing theme asks questions about:

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

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

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

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

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

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

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

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

4. KEY ISSUES & RISKS

4.1 Inevitably the focus will fall on the growth options. The key point to note with respect to the Standard Housing Methodology and Economic Baseline Scenario options is that neither approach will support a positive economic future for the Borough. The key reason for this can be found in an analysis of the projected change in types of households within the Borough between 2018 and 2036 associated with these scenarios. The bulk of household growth is expected to be in those households

headed by people aged 65 years or more (4,650 additional households). In contrast, there is expected to be a decline in households headed by people aged 16 to 64 (2,900 households). This will inevitably have an impact on the size of the working age population in the Borough and hence the ability of employers to grow their businesses within the area. The population projections that have informed the latest household projections suggest a reduction in the working age population (16 to 64 years old) of about 4,800 people. The growth in older persons (aged 65 years or more) is projected to rise by 7,000 people over the period 2018 to 2036.

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

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

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

5. POLICY IMPLICATIONS

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

6. FINANCIAL IMPLICATIONS

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

7. LEGAL IMPLICATIONS

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

8. RESOURCE IMPLICATIONS

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

9. EQUALITY AND HEALTH IMPLICATIONS

Please select one of the options below. Where appropriate please include the hyperlink to the EIA.

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

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

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

10. CONSULTATIONS

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

11. STATEMENT OF COMPLIANCE

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

12. DECLARATION OF INTEREST

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

VERSION:	1
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CONTACT OFFICER:	Helen Holland, Planning Strategy & Development Manager
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DATE:	3 rd December 2018
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BACKGROUND PAPER:	1. Issues and Options Document (for consultation)
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| | <ol style="list-style-type: none">2. Sustainability Appraisal of the Issues and Options Document3. Housing and Economic Needs Assessment |
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