

Hyndburn Local Plan: Core Strategy Review

Growth Option and Spatial Option Justification Paper

January 2019

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1. Introduction

- 1.1. The Council is reviewing its Core Strategy, adopted in 2012. Part of the review is considering the overall strategy for development in the Borough to 2036. This involves consideration of suitable 'Growth Options' for the Borough (for both housing and employment), as well as 'Spatial Options' for the distribution of the selected level of growth.
- 1.2. In February 2018 the Council consulted on a number of different options through a public consultation undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The options presented were:

Housing Growth Options:

- Option 1: CLG Consultation method (60 dwellings per annum);
- Option 2: Low housing growth (175 dwellings per annum);
- Option 3: Medium housing growth (246 dwellings per annum);
- Option 4: High housing growth (317 dwellings per annum).

Employment Growth Options:

- Option 1: Low employment growth (0.2ha of land per annum);
- Option 2: Medium employment growth (1.0ha of land per annum);
- Option 3: High employment growth (3.1ha of land per annum).

Spatial Options:

- Option 1: Core Strategy led growth – continue the growth strategy set in the adopted Core Strategy via Policy H1 and strategic allocations;
- Option 2: Garden Village led growth – concentration of more significant growth in the Huncoat area, taking full advantage of the recent designation of the area as a Housing Zone by the Government;
- Option 3: Transport Corridor led growth – focus the distribution of growth around key strategic transport routes such as the East Lancashire railway line, the M65, A56 and Pennine Reach (Quality Bus Route) transport corridors;
- Option 4: Market Focus led growth – focus development in the areas most desirable to developers and landowners (higher value market areas); and
- Option 5: Land Availability led growth – focus development in areas where land is already known to be available for housing and employment development.

- 1.3. This paper provides a summary of each of the Housing Growth Options, Employment Growth Options, and Spatial Options. It then considers five key matters in justifying selection of the preferred option for each being taken forward in the Core Strategy Review Regulation 18(2) consultation (planned for February 2019):

1. How the proposed options perform against Sustainability Appraisal and Strategic Environmental Assessment (a separate report was published alongside the Regulation 18 consultation material in 2018 providing the detailed assessment of this);
2. How the proposed options accord with relevant strategies (local, regional and national) and Council ambitions;
3. How the proposed options fit with relevant aspects of the Local Plan evidence base;
4. Consultation responses received during the Regulation 18 consultation in 2018; and
5. Whether the options are flexible enough to deal with changing circumstances over the Plan period, and can be implemented.

2. Housing Growth Options

Summary of Housing Growth Options considered

2.1. Table 1 provides a summary of the four Housing Growth Options that were the subject of the Regulation 18(1) consultation process and Sustainability Appraisal in 2018. Table 1 also provides some key positives and negatives of each option.

Table 1: Summary of the Housing Growth Options published in the Regulation 18(1) consultation February – April 2018

Housing Growth Option	1. CLG consultation method	2. Low housing growth	3. Medium housing growth	4. High housing growth
Approx. level of growth	 ~1,200 dwellings (60dpa)	 ~3,500 dwellings (175dpa)	 ~4,920 dwellings (246dpa)	 ~6,340 dwellings (317dpa)
Impact on population of Hyndburn	<ul style="list-style-type: none"> • Projections which show a likely decrease in population of around 1,600 by 2033¹ 	<ul style="list-style-type: none"> • Projected population growth of around 3,000 by 2033 	<ul style="list-style-type: none"> • Projected population growth of around 7,500 by 2033 	<ul style="list-style-type: none"> • Projected population growth of around 9,000 by 2033
Positives (+) Negatives (-)	<ul style="list-style-type: none"> + Growth could be met within existing commitments + No further significant land releases sought - Minimum level of provision - Only allows for recent trends to continue - Net out migration continues - Virtually no opportunity for economic growth - Virtually no opportunity to re-balance housing stock 	<ul style="list-style-type: none"> + Growth could largely be contained within the urban area (minimal Green Belt implications) - Net migration continues (i.e. population growth is 'natural change' only) - Low levels of affordable housing provision - Opportunity to re-balance the housing stock is limited 	<ul style="list-style-type: none"> + Net migration into the Borough + Opportunity to re-balance the housing stock within the Borough - Some sites outside of the urban area (including Green Belt) are likely to be required 	<ul style="list-style-type: none"> + Significant net migration into Hyndburn; + Greater levels of affordable housing to be provided + Opportunity for transformational growth - Potential significant impact on some parts of the Green Belt - Impacts on infrastructure (highways / schools) to be mitigated

¹ Based on ONS SNPP forecast of decline of 800 between 2014-2024

SHMA Scenario²	• Not considered in SHMA	• Scenario G (Constant Jobs)	• Scenario E (Baseline Experian Jobs Growth)	• Scenario F (Adjusted Experian Jobs Growth)
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Sustainability Appraisal findings

- 2.2. A detailed Sustainability Appraisal (SA) of the four Housing Growth Options was undertaken by Land Use Consultants (LUC). The final SA report was published alongside the Local Plan Regulation 18 consultation material in February 2018. Table 4.1 of the report (on p36) summarized the findings of the SA process against each of the Housing Growth Options, identifying the positive and negative effects anticipated against each of the 20 different SA objectives.
- 2.3. Table 2 below 'scores' the SA findings: where positive effects are identified in Table 4.1 of the SA final report a positive score is given in Table 2 below (with relatively higher scores being given to more significant positive effects). Where negative effects are identified in Table 4.1 of the SA final report a negative score is given in Table 2 below (again with relatively lower scores being given where more significant negative effects are identified).
- 2.4. Table 2 therefore provides an overall relative sustainability assessment of each of the four Housing Growth Options when considered equally against all 20 SA objectives.
- 2.5. However, it is important to consider that sustainable development is about finding a balance of economic, social and environmental benefits of development. Of the 20 SA objectives set out in Table 2, half of them (10) primarily relate to the environment, around a third (6) relate to social objectives, with the remaining few (4) relating to economic objectives.
- 2.6. If we consider weighting the scores so that equal weight is given to each of the three components of sustainability, we find a different outcome in terms of the overall scores. This is summarized by the 'Overall Weighted Total' at the bottom of Table 2.
- 2.7. When considering the SA findings in balance between economic, social and environmental benefits, Option 3 (Medium Growth) appears to be the most beneficial to fulfil the full remit of SA objectives. Option 1 (CLG Consultation Method) is second best, followed equally by Options 2 and 4 (Low Growth and High Growth respectively).

² The SHMA modelled a number of different scenarios of housing growth for Hyndburn. For more detailed information refer to the relevant scenario in the latest SHMA report. The CLG consultation method is not considered in the SHMA as it was issued after the publication of the SHMA.

Table 2: Sustainability Appraisal 'score' taken from Table 4.1 of the SA Final Report

SA OBJECTIVE	GROWTH OPTIONS: HOUSING			
	1: CLG consultation method	2: Low growth	3: Medium growth	4: High growth
1: Employment	0	0	0	0
2: Economy	-1	0	1	5
3: Education	1	1	5	5
4: Health	0	0	0	0
5: Crime	0	0	0	0
6: Poverty	1	1	5	5
7: Access to facilities	0	0	0	0
8: Transport	1	0	0	0
9: Housing	1	1	5	5
10: Centre Vitality & Viability	1	1	0	0
11: Historic Environment	0	0	-3	-3
12: Waste	1	-1	1	-5
13: Resources	0	-1	1	-5
14: Climate Change	5	3	0	0
15: Flooding	0	-1	1	-5
16: Biodiversity & Geodiversity	0	0	-3	-3
17: Landscape	5	0	-3	-3
18: Water	0	-1	1	1
19: Pollution	5	3	0	0
20: Soil	5	1	1	-5
Total	1.3	0.4	0.6	-0.4
Overall Weighted Total (‘Economic’ objectives 1, 2, 8 and 10 left as is) (‘Social’ objectives 3-7 and 9 multiplied by 0.66) (Environmental objectives 11-20 multiplied by 0.4)	0.6	0.3	0.7	0.3

2.8. Of course, scoring the SA is only one way of attempting to differentiate at a strategic level between the development options, and specific qualitative matters highlighted in the SA under each are particularly relevant. These are discussed further in the Conclusion on Preferred Housing Growth Option. For specific details and commentary on the specific findings set out in Table 2, the [SA report](#) itself produced by LUC should be consulted.

Relevant housing strategies / Council policy ambitions

2.9. Appendix 1 of the SA report provides a full list of plans, strategies and programmes relevant to plan making in Hyndburn. The strategies of

specific relevance to considering the issue of housing growth in Hyndburn, and the key points, are summarized below:

Pennine Lancs. Housing Strategy 2009-2029 (Pennine Lancs. Local Housing Authorities, 2009)

2.10. The strategy presents the long-term vision for the future of the housing market in the sub-region, including Hyndburn. Its three key objectives are:

- To ensure a sufficient quantity, high quality, and appropriate type of housing to meet the economic aspirations and social needs of Pennine Lancashire;
- To develop sustainable neighborhoods that can retain successful households and offer opportunities to inward movers and investors; and
- To meet the housing, health and support needs of residents and vulnerable people, promoting better services, more choice, accessible and integrated fully into local communities

2.11. The key implications for the Hyndburn Local Plan are therefore to improve the supply and quality of housing, and to ensure that this is balanced with appropriate economic growth (the strategy refers to a 'Market Progression Model' in particular in this regard to ensure that balanced growth takes place).

Hyndburn Corporate Strategy 2018-2023 (Hyndburn Borough Council, 2018)

2.12. The Council published its new Corporate Strategy in 2018 (a strategy for Growth, Efficiency and Quality). It sets out a clear vision for driving growth and prosperity in Hyndburn over the next 5 years. In relation to housing ambitions specifically, the strategy seeks to:

- Delivery strong housing growth and improved housing choice across the Borough;
- Deliver a year on year increase in the number of housing completions; and
- To work with the Homes and Communities Agency, Lancashire County Council, Infrastructure providers, local residents and other stakeholders to complete the Masterplan for the Huncoat Housing Zone

2.13. The key implications for the Hyndburn Local Plan are therefore to ensure that adequate growth is planned for (to improve housing choice, and deliver increased completions), and to ensure that the outputs of the Huncoat Masterplan work are properly reflected in the development plan for the Borough.

Relevant evidence base findings

- 2.14. Since publication of the Regulation 18(1) consultation material in early 2018, some significant changes to assessing housing need in plan making have taken place. The revised NPPF, published July 2018, confirms that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance'* (NPPF, para. 60).
- 2.15. In July 2018 the Council jointly commissioned (alongside Blackburn with Darwen Council) GL Hearn to undertake a Housing and Economic Needs Assessment (HENA) for the joint housing market area in accordance with the revised NPPF and associated Planning Practice Guidance. The HENA study was completed in November 2018 and, in terms of housing, looked at the following key matters:
- Demographic Growth and Housing Need
 - Housing Market Signals
 - Future employment and the link to housing
 - Affordable housing need
 - Private Rented Sector
 - Housing technical standards and older persons needs
 - Housing mix
- 2.16. The key findings of the HENA relevant to determining an appropriate quantum of housing development to plan for in Hyndburn are as follows:
- The projected housing need under the various demographic based scenarios (based on population and household projections only) range from 25-35 dwellings per annum;
 - The projected housing need under the Governments standard method for calculating housing need, which includes adjustments for affordability, is 31 dwellings per annum. This may rise to 60 dwellings per annum following the current Government consultation on changes to the standard method;
 - Evidence on housing market signals in the area does not support a further uplift on the demographic needs;
 - Projected housing need under the 'economic baseline' scenario is 85 dwellings per annum;
 - Projected housing need under the 'economic growth' scenario is 216 dwellings per annum; and
 - Since 2010/11, average net delivery of new market homes has been 108 dwellings per annum.
- 2.17. The HENA also considered the housing needs of specific parts of the community (types of housing). Key findings include:
- The estimated annual level of affordable housing need in Hyndburn is 79 dwellings per annum if the existing backlog is to be cleared over a 20 year period;

- The projected need for specialist housing for older people (includes housing with support, housing with care, and care beds) is around 63 dwellings per annum
 - Potential need for registered residential care housing (i.e. institutional population rather than the household population) is 14 bed spaces per annum; and
 - Estimated need for wheelchair user homes is 7 dwellings per annum
- 2.18. In addition to the HENA study, the Council published its latest [Authority Monitoring Report \(AMR\)](#) in September 2018 and [5 Year Housing Land Supply \(5YHLS\) Statement](#) in October 2018. These provide an up to date picture on past delivery of new housing (completions) and planning permissions granted (as at 31st March 2018), important context for the consideration of the future provision of housing in the Borough.
- 2.19. In terms of completions, key findings from the AMR and 5YHLS include:
- Net new housing completions (new build) have averaged 125 dwellings per year over the last 5 years;
 - A comprehensive programme of returning long term vacant (LTV) properties back into use has also created an average of an additional 121 dwellings per year over the last 5 years for occupation;
 - An average of 19 affordable homes per annum have been provided over the last 5 years;
 - Extant planning permissions for a total of 976 dwellings;
 - Extant planning permission for affordable housing totals 58 units on two sites in Great Harwood and Huncoat.
- 2.20. Turning to the development pipeline, the Council has set out in its 5YHLS statement that it has land available for the next five years (2018-2023) totaling 1,147 dwellings, or an average of a potential 229 dwellings per annum. This comprises sites already granted planning permission, allocated sites considered deliverable over this time period, and a small allowance of windfalls.
- 2.21. The findings of the new HENA study (economic growth scenario of 216 per annum), the historical formation of new dwellings over the past 5 years (average of 246 per annum combining net new builds and LTV properties back into use) and the forward looking 5 year supply (average of 229 new dwellings per annum) are all important context for consideration of a suitable preferred Housing Growth Option to take forward in the Core Strategy.

Consultation responses (Regulation 18(1) consultation)

- 2.22. A report on the method and outcomes of the public consultation exercise held in early 2018 was considered at the Council's [Cabinet meeting of 18th July 2018](#).
- 2.23. Whilst the number of individual responses received was low, a summary of the responses to the Housing Growth Options was provided, set out in Table 3 below:

Table 3: Summary of Reg18(1) responses to Housing Growth Options

SA OBJECTIVE	GROWTH OPTIONS: HOUSING			
	1: CLG consultation method	2: Low growth	3: Medium growth	4: High growth
Reponses from drop-in sessions	4	3	9	4
Responses from formal reps	0	0	5	5
Total responses	4	3	14	9

- 2.24. Of those who expressed a preference, the medium housing growth option was the preferred choice with around 50% of the total responses made. The high growth option was second with around 30% of responses.

Flexibility and delivery

- 2.25. In terms of flexibility, paragraph 11a of the revised NPPF states that in general '*plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change*'. Paragraph 81d states that planning policies in particular should '*be flexible enough to accommodate needs not anticipated in the plan*', for example to respond to changing economic circumstances.
- 2.26. In terms of the four housing growth options presented in Table 1, the Council considers that the lower housing figure of 60dpa (the CLG consultation method), as set out in the recently published HENA, would not provide the 'flexibility' required in terms of the NPPF. The method is, to a large degree, based upon past demographic trends which, in Hyndburn, have demonstrated net out-migration, something that the Council is seeking to arrest and reverse.
- 2.27. When viewed in the context of historical completion rates in the Borough, extant planning commitments, and the policy ambitions of the area set out in local and regional strategies (all summarized above) Option 1 is deemed inappropriate to pursue as a preferred growth option. It is not considered to provide any flexibility in terms of attempting to reverse out migration, re-balance the housing market, provide affordable housing, respond to changing economic circumstances or help to significantly boost the supply of new homes.
- 2.28. Furthermore, under Option 1 there are already extant planning commitments in place for new dwellings far in excess of the figure

required for the entire plan period to 2036. The Council would therefore have no need to either allocate any further land, or progress any development in the Government approved Housing Zone at Huncoat. It would therefore not provide sufficient housing of the types that people need (as set out in the HENA).

- 2.29. In terms of deliverability, paragraph 16b) of the revised NPPF states that plans should *'be prepared positively, in a way that is aspirational but deliverable'*.
- 2.30. The Council has set out its growth ambitions clearly in its recently published Corporate Strategy (2018-23). The strategy is considered aspirational for the area, and to contribute to both regional and national growth agendas. Evidence on past completions, which have occurred at a time of relative policy constraint (due to the age of the allocations element of the Local Plan – 1996), and market demand from research and consultation with delivery partners, suggests that delivery rates far higher than those set out under Option 1 are realistic.
- 2.31. Therefore, on the basis of both flexibility and deliverability, Option 1 is ruled out from being taken forward as the Preferred Housing Growth Option. Further discussion on an appropriate growth figure relevant to the remaining options is set out in the Conclusion on Preferred Housing Growth Option below.

Conclusion on Preferred Housing Growth Option

- 2.32. Paragraph 35 of the NPPF states that, to be 'justified', and therefore pass the Government's test of soundness at Examination in Public, Local Planning Authorities must set out in their Local Plans *'an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence'*. Importantly, it no longer has to be demonstrated that the strategy taken forward is the most appropriate.
- 2.33. For the reasons set out under Flexibility and delivery above, Option 1 is ruled out as a preferred option to take forward for Hyndburn. To assist in selecting and justifying an appropriate option to take forward, Table 4 shows a relative assessment of each of the four housing options against the five key considerations discussed in this report, identifying positive (green), mixed (amber) or negative (red) measures. E.g. under 'strategies/policy ambitions' the color assessment refers to conformity or areas of conflict. Under 'consultation responses' it will relate to the level of support identified.

Table 4: Relative assessment measure of Housing Growth Options

Consideration	Housing Growth Option			
	1: CLG method	2: Low growth	3: Medium growth	4: High growth

SA Findings	Green	Yellow	Green	Yellow
Strategies/policy ambitions	Red	Yellow	Green	Green
Evidence base	Red	Yellow	Green	Green
Consultation responses	Yellow	Yellow	Green	Yellow
Flexibility & deliverability	Red	Yellow	Green	Yellow

2.34. Table 4 clearly identifies Option 3 (Medium Housing Growth) as the most positive overall when taking into account all considerations.

2.35. Whilst the specific figure will have changed since the Regulation 18(1) consultation stage³, the medium growth option was based on the following key principles:

- strong housing growth to help return the demographic position in the Borough to one of net in-migration;
- re-balancing the housing market (including providing more affordable homes); and
- releasing some green belt land where necessary (if insufficient land was available in the urban area).

2.36. In terms of qualitative issues raised in the SA report under Option 3, any potential negative effects are summarized below. In many cases the negative effects are identified in conjunction with positive effects. Importantly none of the SA objectives identify 'significant negative effects' only under Option 3:

- SA Objective 4: Health – population increases will put significant pressure on existing services and facilities;
- SA Objective 7: Access to facilities – likely dispersal of high levels of growth outside the urban areas means that access to services/facilities will likely not be possible other than by private car;
- SA Objective 8: Transport – additional demands will be placed on the existing transport infrastructure;
- SA Objective 10: Centre vitality and viability – population growth may encourage pressure for out-of-town retail development that would not maintain or enhance town centres;
- SA Objective 11: Historic Environment – greater development may have adverse effects on the fabric or setting of heritage assets in urban areas and on buried archaeology in greenfield locations;
- SA Objective 12: Waste – increased population will increase pressures on the Borough's waste collection and waste management systems;

³ in light of revised ONS household projections, NPPF and the recently published HENA

- SA Objective 13: Resources – likely requirement for greenfield sites means that increased risk of potential sterilization of mineral resources;
- SA Objective 14: Climate Change and SA Objective 19: Pollution – increases in noise and light pollution and air pollutants from vehicles is likely
- SA Objective 15: Flooding – new residential development will inevitably lead to a reduction in permeable surfaces;
- SA Objective 16: Biodiversity – potential to affect the biodiversity and geodiversity through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure and other impacts
- SA Objective 17: Landscape – potential to significantly impact upon landscape character through development on greenfield land;
- SA Objective 18: Water – increase in population will exacerbate problems regarding water abstraction and water pollution
- SA Objective 20: Soils – some greenfield sites outside of the urban area are likely to be required

2.37. The Council considers that the issues raised above around impacts on the environment and infrastructure can be addressed and mitigated through a combination of the site selection process (set out in the Site Assessment Methodology for the Site Allocations DPD), the Infrastructure Delivery Plan which will be prepared alongside the Core Strategy, and at a planning application stage through more detailed assessments/studies that are required through the Council's adopted Development Management DPD policies.

2.38. In summary therefore, as there is no clear reason to discount Option 3 (Medium Housing Growth Option) on the basis of the SA process and findings, it is considered to be an appropriate preferred Housing Growth Option principle to be taken forward in the Core Strategy Review.

2.39. Publication of the HENA study provides further clarity on taking forward a specific housing requirement figure in the Core Strategy. The findings of the HENA in relation to economic growth are discussed further in Section 3 of this paper. Essentially however, it concludes that an appropriate level of housing for Hyndburn to support the economic growth scenario equates to **216 dwellings per annum**.

2.40. From the outset, the HENA study is clear that it does not specifically set the housing target for local authorities but provides the evidence to inform its starting position. The HENA provides an assessment of the need for housing and employment land requirements, making no judgements regarding future policy decisions which the Councils may take. Wider plan-making should also take into account factors such as the supply of land for new development, Green Belt, local infrastructure

capacity and environmental constraints as well as policies to promote further development.

- 2.41. Many of these issues will be resolved further through 2019 as more detailed assessments of site availability are completed, infrastructure capacity is investigated through an Infrastructure Delivery Plan, and the final preferred option from the Huncoat Masterplan work emerges. At this stage therefore, 216 dwellings per annum is considered to reflect an appropriately ambitious but pragmatic figure to take forward in the Local Plan.
- 2.42. There remains continuing uncertainty around the precise quantum of development likely at Huncoat, with options being considered under the masterplan work ranging from a total of 1,000 up to 2,000 dwellings. The Council considers that, should the minimum level of development of around 1,000 homes come forward at Huncoat (on the existing strategic housing and employment allocations), this falls broadly in line with the existing Core Strategy. Should the outcome of the Masterplanning exercise recommend a higher quantum of residential development however then the impact of this will need to be considered further at the Regulation 19 Local Plan Publication stage.
- 2.43. As part of the masterplan work, GVA has advised on market and deliverability factors. Maximum anticipated delivery rates of around 75dpa would be expected at Huncoat under its existing 'Housing Zone' status, and up to 100dpa if granted formal Garden Village status. Practically therefore, a higher quantum of overall development at Huncoat would only translate to an additional maximum of around 25dpa delivery during the 15 year plan period. The remaining additional housing anticipated at Huncoat would be delivered beyond the existing plan period. In these circumstances housing provision elsewhere in the Borough (i.e. allocations sought in the other Local Plan areas) would be marginally reduced to maintain an overall requirement of 216 dwellings across the Borough.
- 2.44. The Council will draft policies to this effect in its Regulation 18(2) consultation material as it considers this approach adequately reflects the principles set out under the Medium Housing Growth Option, in the updated economic context.

3. Employment Growth Options

Summary of Employment Growth Options considered

3.1. Table 5 provides a summary of the three Employment Growth Options that were the subject of the Regulation 18(1) consultation process and Sustainability Appraisal in 2018. Table 5 also provides some key positives and negatives of each option.

Table 5: Summary of Employment Growth Options published in the Regulation 18(1) consultation February – April 2018

Employment Growth Option	1. Low growth	2. Medium Growth	3. High Growth
Approx. level of growth⁴:	 ~4.4 hectares (ha) of land (~0.2ha per annum)	 ~19.1 hectares of land (~1.0ha per annum)	 up to 62.0 hectares of land (~3.1ha per annum)
Impact on jobs:	<ul style="list-style-type: none"> No/low job growth – stabilising job losses; 	<ul style="list-style-type: none"> Considerable job growth; 	<ul style="list-style-type: none"> Significant job growth
Positives (+) Negatives (-)	<ul style="list-style-type: none"> + Growth could be contained within the urban area - Zero net jobs growth anticipated - No new inward investment on employment land 	<ul style="list-style-type: none"> + Considerable job growth + Increased opportunities for inward investment and supporting expansion of existing businesses - Sites outside of the urban area may be required 	<ul style="list-style-type: none"> + Significant job growth likely with greater opportunity for transformational growth + Full support for existing businesses (expansion) <u>and</u> inward investment - Sites outside of the urban area would be required (including Green Belt)
ELS Scenario⁵	<ul style="list-style-type: none"> 'Labour Supply' scenario 	<ul style="list-style-type: none"> 'Labour Demand (adjusted)' scenario 	<ul style="list-style-type: none"> 'Past take-up'⁶

⁴ Levels of employment growth are net land requirements in hectares (ha). Figures are based on the modelling undertaken in the Employment Land Study (ELS) 2016, specifically Tables 7.21 and 7.23 (allowing for losses and choice and flexibility).

⁵ The Employment Land Study (ELS) modelled a number of different scenarios of employment growth for Hyndburn. For more detailed information refer to Chapter 7 of the ELS 2016

⁶ Paragraph 9.11 of the ELS 2016 suggests there is a strong case for Hyndburn to plan for either past take-up, or a blended policy approach. This option broadly equates to a level of growth planned for in the adopted Core Strategy.

Sustainability Appraisal findings

- 3.2. A detailed Sustainability Appraisal (SA) of the three Employment Growth Options was undertaken by LUC. The final SA report was published alongside the Local Plan Regulation 18 consultation material in February 2018. Table 5.1 of the report (on p41) summarized the findings of the SA process against each of the Employment Growth Options, identifying the positive and negative effects anticipated against each of the 20 different SA objectives.
- 3.3. Table 6 below provides basic scores and weighted scores of the SA findings in line with the same method set out and discussed under the Housing Growth Options (paragraphs 2.3 – 2.6 of this report and Table 2).
- 3.4. All three options come out with a positive sustainability score overall when a weighted scoring approach is applied. When considering the SA findings in balance between economic, social and environmental benefits, Option 1 (Low Growth) appears to be the most sustainable option, followed by Option 2 (Medium Growth) and Option 3 (High Growth).

Table 6: Sustainability Appraisal 'score' taken from Table 5.1 of the SA Final Report

SA Objective	GROWTH OPTIONS: EMPLOYMENT		
	1: Low Growth	2: Medium Growth	3: High Growth
1: Employment	1	5	5
2: Economy	0	1	5
3: Education	0	1	1
4: Health	0	0	0
5: Crime	0	0	0
6: Poverty	1	3	3
7: Access to facilities	1	0	0
8: Transport	1	0	0
9: Housing	0	0	0
10: Centre Vitality & Viability	1	0	0
11: Historic Environment	0	-3	-3
12: Waste	0	-1	-1
13: Resources	0	-1	-5
14: Climate Change	5	3	0
15: Flooding	0	-1	-1
16: Biodiversity & Geodiversity	0	-3	-3
17: Landscape	5	0	-3
18: Water	0	-1	-1
19: Pollution	5	3	0
20: Soil	5	0	-5
Total	1.3	0.3	-0.4

Overall Weighted Total ('Economic' objectives 1, 2, 8 and 10 left as is) ('Social' objectives 3-7 and 9 multiplied by 0.66) (Environmental objectives 11-20 multiplied by 0.4)	0.6	0.4	0.2
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3.5. As set out in 2.8, scoring the SA is only one way of attempting to differentiate at a strategic level between the development options, and specific qualitative matters highlighted in the SA under each are particularly relevant. These are discussed further in the Conclusion on Preferred Employment Growth Option. For specific details and commentary on the findings set out in Table 6, the [SA report](#) itself should be consulted.

Relevant economic strategies / Council policy ambitions

3.6. Appendix 1 of the SA report provides a full list of plans, strategies and programmes relevant to plan making in Hyndburn. The key strategies relevant to matters of employment land, and considering employment growth, are summarized below.

[Lancashire Strategic Economic Plan \(SEP\) 2015-25, and the Lancashire Growth Deal 2015-21 \(Lancashire Enterprise Partnership, 2014\)](#)

3.7. The overarching purpose of the SEP is to re-establish Lancashire as an economic powerhouse and a national center of excellence in advanced manufacturing by maximimising its clear competitive strengths and capabilities in the aerospace, automotive, energy and health science related sectors.

3.8. The Growth Deal sets out six key priorities to help realise these aims:

- Sector development and growth;
- Innovation excellence;
- Skills for growth;
- Business growth and enterprise;
- Realising local growth potential; and
- The renewal of Blackpool.

3.9. The implications of both the SEP and Growth Deal for the Hyndburn Local Plan should be the promotion of economic growth and inward investment in the Borough. Realizing this ambition will be about creating the right conditions for both existing business and investor growth, and unlocking new development and employment opportunities.

Pennine Lancashire Growth and Prosperity Plan 2016-2032 (Pennine Lancashire, 2016)

3.10. The strategic aim of the Growth and Prosperity Plan is to sustain growth and productivity in the area above national rates, significantly reducing the productivity gap between outputs in the Pennine Lancs. economy and the national average.

3.11. Four strategic objectives are set out:

- Strategic Objective 1: Population, Labour Supply and Housing Growth – to grow, retain and attract a skilled working age population resident in Pennine Lancs. facilitated by a major house building programme to significantly improve the quantity, quality and range of the housing offer;
- Strategic Objective 2: Productivity, Employment Growth and Innovation – to significantly improve the productivity of the existing Pennine Lancs. business base, particularly in advanced manufacturing, and to attract and grow businesses in higher value sectors (particularly digital, professional and financial services and logistics);
- Strategic Objective 3: Education, Skills and Workforce Participation – to improve educational attainment and remove barriers to workforce participation; and
- Strategic Objective 4: Connectivity and Infrastructure – major investment in infrastructure to support housing and employment growth for residents and businesses to be well connected.

3.12. The implication of the Growth and Prosperity Plan for the Hyndburn Local Plan should again therefore be the promotion of economic growth and inward investment in the Borough.

Hyndburn Corporate Strategy 2018-2023 (Hyndburn Borough Council, 2018)

3.13. The Council published its new Corporate Strategy in 2018 (a strategy for Growth, Efficiency and Quality). It sets out a clear vision for driving growth and prosperity in Hyndburn over the next 5 years.

3.14. In relation to employment ambitions specifically, the strategy seeks to:

- Create greater opportunities for all to access improved employment opportunities;
- To strengthen Hyndburn's economy through employment growth;
- To work with the Homes and Communities Agency, Lancashire County Council, Infrastructure providers, local residents and other stakeholders to complete the Masterplan for the Huncoat Housing Zone; and

- To lobby for improved transport links to provide local people with better access to good job opportunities
- 3.15. The key implications for the Hyndburn Local Plan are therefore to ensure that adequate growth is planned for to meet these ambitions, along with relevant infrastructure improvements, and to ensure that the outputs of the Huncoat Masterplan work are properly reflected in the development plan for the Borough.

Relevant evidence base findings

- 3.16. The publication of the Council's Regulation 18(1) consultation material on employment growth options in early 2018 was based upon the findings from the Council's Employment Land Study (ELS) published in early 2016. The ELS looked at the quantitative need for new employment land, along with qualitative assessments of existing sites.
- 3.17. As set out in Relevant evidence base findings in the Housing Growth Options discussion, the Council has recently completed a new study jointly with Blackburn with Darwen Council, referred to as a Housing and Economic Needs Assessment (HENA). In terms of employment matters, the HENA looked at the following key matters:
- 3.18. The key findings of the study relevant to determining an appropriate quantum of employment development to plan for in Hyndburn are as follows:
- The economic growth scenario, taking into account local and regional strategies, the Hyndburn Business Survey, and knowledge of local pipeline projects and commitments, projects a net growth of 2,331 jobs to 2036;
 - This equates to total floorspace requirements of around 237,000sqm by 2036: this can be broken down into 7,000sqm B1 (office/light industrial), 89,000sqm B2 (general industrial), and 141,000sqm B8 (distribution and logistics);
 - When floorspace is converted to land hectares (ha), the requirement is for a total of 58.7ha of land;
 - The HENA also concludes that a further land requirement to account for future losses will need to be added. The previous Employment Land Study (2016) provides analysis and evidence on this, recommending around 10ha of land over the plan period to be an appropriate flexibility factor to apply for future losses.
- 3.19. Whilst the quantitative forecasting elements of the 2016 ELS are now superseded by the HENA study, the qualitative review of sites⁷ in that study is still considered relevant to considering the land supply/demand balance. A total of 72 sites were assessed by Turley, covering around

⁷ Hyndburn Borough Council Employment Land Study (2016), p102-107

192ha of land. The key findings of the ELS relevant to matters of existing stock and land supply were as follows:

- 108ha (56%) of land assessed as being of 'good' quality – these are sites in sustainable locations that perform well in market terms that should be protected and retained for future employment use;
- 46ha (24%) of land assessed as being of 'average' quality – serve a particular business need but which are of a lower quality to the Borough's stock of 'good' employment sites. Alternative uses may be appropriate, sites should be monitored and released where there is clear evidence that the site is no longer suitable for ongoing employment use; and
- 38ha (20%) of land assessed as being of 'poor' quality – no longer suited to modern day employment uses, high levels of vacancy, in many cases may be better suited for alternative uses.

3.20. In addition to the HENA and ELS studies, the Council published its latest [Authority Monitoring Report \(AMR\)](#) in September 2018. In terms of the economy and employment, there are a range of indicators set out in the report including:

- Changes in the employment rate over time in Hyndburn, compared to regional and national levels;
- The take-up of employment floorspace (and land) over the last 5 years, which has averaged around 3,200sqm net new B Use Class floorspace per year (after losses are taken into account);
- Extant planning permissions showing the pipeline of new employment floorspace, over 118,000sqm of new B Use Class floorspace in total (around 75% on the Whitebirk Strategic site); and
- Specific progress on development of the strategic employment sites allocated in the Core Strategy.

3.21. The findings of the new HENA study, the qualitative assessments of existing employment sites sets out in the 2015 ELS, and the historical land/floorspace take and extant commitments are all important context for consideration of a suitable preferred Employment Growth Option to take forward in the Core Strategy.

Consultation responses (Regulation 18(1) consultation)

3.22. A report on the method and outcomes of the public consultation exercise held in early 2018 was considered at the Council's [Cabinet meeting of 18th July 2018](#).

3.23. Whilst the number of individual responses received was low, a summary of the responses to the Employment Growth Options was provided, set out in Table 7 below:

Table 7: Summary of Reg18(1) responses to Employment Growth Options

SA OBJECTIVE	GROWTH OPTIONS: EMPLOYMENT		
	1: Low Growth	2: Medium Growth	3: High Growth
Responses from drop-in sessions	3	10	5
Responses from formal reps	0	3	4
Total responses	3	13	9

3.24. Of those who expressed a preference, the medium employment growth option was the preferred choice with around 50% of the total responses made. The high growth option was second with around 35% of responses.

Flexibility and delivery

3.25. In terms of flexibility, paragraph 11a of the revised NPPF states that in general *'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change'*. Paragraph 81d states that planning policies in particular should *'be flexible enough to accommodate needs not anticipated in the plan'*, for example to respond to changing economic circumstances.

3.26. In terms of the three employment growth options presented in Table 5, Options 1 and 2 provide a relatively low level of land for businesses to expand within the district. Indeed under both scenarios, the existing commitments at Whitebirk (which is currently developing at great pace) and elsewhere within the Borough would already more than meet the needs over the whole plan period.

3.27. To provide further opportunities for existing businesses to expand, promote inward investment, and provide the flexibility advocated in the NPPF, only Option 3 would satisfy this objective. Whilst a higher level of growth may not necessarily materialize over a plan period if economic conditions deteriorate, planning for a higher level of growth naturally provides the flexibility promoted in the NPPF. In addition, provision of an allowance for the replacement of potential future losses of poorer quality employment sites is considered key factor in satisfying the requirement for flexibility.

3.28. In terms of deliverability, paragraph 16b) of the revised NPPF states that plans should *'be prepared positively, in a way that is aspirational but deliverable'*.

3.29. The Council has set out its growth ambitions clearly in its recently published Corporate Strategy (2018-23). The strategy is considered aspirational for the area, and to contribute to both regional and national growth agendas. Evidence on past completions, and market demand from research and consultation with delivery partners, suggests that delivery rates akin to those presented under Option 3 are realistic. Indeed, the option itself is predicated on 'past take up rates' of

employment land, and therefore is by default considered to be realistically deliverable going forward.

- 3.30. Therefore, on the basis of both flexibility and deliverability, Options 1 and 2 should be ruled out from being taken forward as the Preferred Employment Growth Option. Further discussion on an appropriate growth figure is however set out in the Conclusion on Preferred Employment Growth Option below.

Conclusion on Preferred Employment Growth Option

- 3.31. Paragraph 35 of the NPPF states that, to be ‘justified’, and therefore pass the Government’s test of soundness at Examination in Public, Local Planning Authorities must set out in their Local Plans ‘*an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence*’. Importantly, it no longer has to be demonstrated that the strategy taken forward is the most appropriate.
- 3.32. For the reasons set out under Flexibility and delivery above, Options 1 and 2 are both ruled out as a preferred option principle to take forward for Hyndburn. Table 8 however provides an overview of the relative assessment of each of the three employment options against the five key considerations discussed in this report in line with the method set out in 2.33. Green shading represents positive outcomes or conformity, amber mixed, and red negative.

Table 8: Relative assessment measure of Employment Growth Options

Consideration	Employment Growth Option		
	1: Low Growth	2: Medium Growth	3: High growth
SA Findings			
Strategies/policy ambitions			
Evidence base			
Consultation responses			
Flexibility & deliverability			

- 3.33. Table 8 clearly identifies Option 3 (High Employment Growth) as the most positive overall when taking into account all considerations.
- 3.34. Again, as set out in the Conclusion on Preferred Housing Growth Option, the specific figure that relates to a ‘high growth’ option for employment will have changed since the Regulation 18(1) consultation stage. However, the option was based on the following key principles:

- Providing opportunities for significant job growth in the Borough;
- Offering support for existing businesses to expand, and encouraging inward investment; and
- Releasing some green belt land where necessary (if insufficient land was available in the urban area).

3.35. In terms of qualitative issues raised in the SA report under Option 3, any potential negative effects are summarized below. In many cases the negative effects are identified in conjunction with positive effects:

- SA Objective 4: Health –opportunities to walk and cycle are more limited, also higher levels of development increase the risk of adverse effects on existing open spaces should these be developed as employment land;
- SA Objective 6: Poverty – employment land (outside the existing urban area) may not be as easily accessible by sustainable transport thereby limiting opportunities for some people to gain employment in the Borough;
- SA Objective 7: Access to facilities – likely dispersal of high levels of growth outside the urban areas means that access to services/facilities will likely not be possible other than by private car;
- SA Objective 8: Transport – additional demands will be placed on the existing transport infrastructure. Congestion and emissions will also increase;
- SA Objective 10: Centre vitality and viability – there may be pressure for out-of-town retail developments to support the delivery of large scale employment developments which would not maintain or enhance the vitality or viability of town and retail centres in Hyndburn;
- SA Objective 11: Historic Environment – greater development may have adverse effects on the fabric or setting of heritage assets in urban areas and on buried archaeology in greenfield locations;
- SA Objective 12: Waste – new employment will inevitably increase pressures on the Borough’s waste collection and waste management systems;
- SA Objective 13: Resources – likely requirement for greenfield sites means that increased risk of potential sterilization of mineral resources;
- SA Objective 14: Climate Change and SA Objective 19: Pollution – increases in greenhouse gas emissions, noise and light pollution and air pollutants from vehicles is likely
- SA Objective 15: Flooding – new residential development will inevitably lead to a reduction in permeable surfaces;
- SA Objective 16: Biodiversity – potential to affect the biodiversity and geodiversity through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure and other impacts

- SA Objective 17: Landscape – potential to significantly impact upon landscape character through development on greenfield land;
 - SA Objective 18: Water – increase in population will lead to a greater chance of problems regarding water abstraction and water pollution
 - SA Objective 20: Soils – increased development on greenfield land
- 3.36. Of the negative effects listed above, only SO Objective 13 (Resources) and SO Objective 20 (Soil) are identified as having potential significant negative effects in the SA, with no corresponding positive effects identified to balance them out.
- 3.37. All the specific issues raised are noted. The Council will address these and mitigate impacts through a combination of the site selection process (set out in the Site Assessment Methodology for the Site Allocations DPD), the Infrastructure Delivery Plan which will be prepared alongside the Core Strategy, and at a planning application stage through more detailed assessments/studies that are required through the Council's adopted Development Management DPD policies.
- 3.38. In summary therefore, there is no clear reason to discount Option 3 (High Employment Growth) on the basis of the SA process and findings. A high employment growth scenario is considered to be an appropriate preferred Employment Growth Option principle to be taken forward in the Core Strategy Review. As set out in 3.18, the HENA concludes that, based on the most up to date evidence, a High Employment Growth scenario figure based on past take-up rates equates to **58.7ha of employment land 2016-36**, equivalent to an average of 2.95ha per annum. **A further 10ha of employment land will be allocated to allow for potential future losses and flexibility.**

Alignment of housing and economic growth scenarios and the Huncoat Garden Village

- 3.39. Whilst the preferred options arising from this paper are for the medium Housing Growth Option, and high Employment Growth Option, the HENA study has considered these aspects together. The level of housing required to support the planned economic growth is therefore considered to be aligned appropriately. Essentially, the HENA has modelled the level of population growth that would be needed (and therefore households and dwellings) to ensure that the resident labour supply within Hyndburn broadly increases in accordance with the forecast increase in jobs.

4. Preferred Spatial Option

Summary of Spatial Options considered

- 4.1. Paragraph 1.2 of this report provides a summary of the key principle behind each of the Spatial Options considered. The Regulation 18(1) consultation material provided a combination of text, tables and maps illustrating the potential impact on each Local Plan area under each Spatial Option and combination of Growth Option scenarios. The key perceived strengths, opportunities, weaknesses and threats were also presented.
- 4.2. Tables 9 and 10 provide a summary of the anticipated proportion of development for each Local Plan area under each of the Spatial Option scenarios. The figures were highlighted as indicative only, and designed to show the relative impacts of applying the different development principles under each Spatial Option. The actual scale of development was highlighted as relating to both the Spatial Option and Housing and Employment Growth Option selected

Table 9: HOUSING – Indicative distribution of housing growth (% of total planned growth) under each Spatial Option

Local Plan Area		Spatial Option									
		1. Core Strategy		2. Garden Village		3. Transport Corridor		4. Market Focus		5. Land Availability	
Accrington	Central	75% of total	23%	79% of total	19%	73% of total	15%	70% of total	8%	82% of total	30%
	Baxenden		4%		3%		4%		10%		3%
	Church		4%		3%		18%		2%		8%
	Clayton le Moors		10%		8%		8%		5%		5%
	Huncoat		18%		33%		18%		20%		13%
	Oswaldtwistle		16%		13%		10%		25%		23%
Great Harwood		15%	13%	7%	20%	13%					
Rishton		10%	8%	20%	10%	5%					

Table 10: EMPLOYMENT – Indicative distribution of employment growth (% of total planned growth) under each Spatial Option

Local Plan Area		Spatial Option				
		1. Core Strategy	2. Garden Village	3. Transport Corridor	4. Market Focus	5. Land Availability ⁸
Accrington	Central	4%	5%	-	-	-
	Baxenden	-	-	5%	-	-
	Church	5%	6%	5%	-	-

⁸ May not add up to exactly 100% under Spatial Option 5 due to rounding

	Clayton le Moors	6%	7%	20%	12%	21%
	Huncoat	35%	20%	20%	12%	40%
	Oswaldtwistle	3%	4%	-	-	-
	Great Harwood	6%	6%	-	6%	2%
	Rishton	2%	2%	5%	-	-
Employment sites						
	Whitebirk	30%	30%	30%	35%	31%
	Altham	9%	20%	15%	35%	7%

Sustainability Appraisal findings

- 4.3. A detailed Sustainability Appraisal (SA) of the five Spatial Options was undertaken by Land Use Consultants (LUC). The final SA report was published alongside the Local Plan Regulation 18 consultation material in February 2018. Table 6.1 of the report (on p46) summarized the findings of the SA process against each of the Spatial Options, identifying the positive and negative effects anticipated against each of the 20 different SA objectives.
- 4.4. Table 11 below provides basic scores and weighted scores of the SA findings in line with the same method set out and discussed under the Housing Growth Options (paragraphs 2.3 – 2.6 of this report and Table 2). Table 11 therefore provides an overall relative sustainability assessment of each of the five Spatial Options when considered equally against all 20 SA objectives. Due to Hyndburn covering a relatively small geographical area, and with the main settlements being so easily accessible and interconnected, in practice it is perhaps harder to distinguish clear sustainability benefits between the Spatial Options presented, as it is for the various Growth Options presented.
- 4.5. Four of the five options come out with a positive sustainability score overall when a weighted scoring approach is applied. When considering the SA findings in balance between economic, social and environmental benefits, Option 5 (Land Availability led approach) appears to be the most sustainable option, followed by Option 1 (Core Strategy led approach). Options 2 (Garden Village led approach) and 3 (Transport Corridor led approach) are ranked similarly, whilst Option 5 (Market Focus led approach) scores significantly worse overall and the only negative overall weighted score.

Table 11: Sustainability Appraisal 'score' taken from Table 6.1 of the SA Final Report

SA OBJECTIVE	SPATIAL OPTIONS				
	1: Core Strategy	2: Garden Village	3: Transport Corridors	4: Market Focus	5: Land Availability
1: Employment	0	3	3	3	3

2: Economy	1	5	5	1	5
3: Education	0	0	0	0	1
4: Health	3	0	0	-3	3
5: Crime	0	0	0	0	0
6: Poverty	5	5	5	5	5
7: Access to facilities	3	0	0	-3	3
8: Transport	3	0	0	-3	3
9: Housing	5	5	5	5	5
10: Centre Vitality & Viability	3	0	0	-3	3
11: Historic Environment	-5	-5	-5	-1	-5
12: Waste	0	0	0	0	0
13: Resources	0	0	0	0	0
14: Climate Change	3	0	0	-3	3
15: Flooding	-1	-1	-5	-1	-5
16: Biodiversity & Geodiversity	-5	-5	-1	-5	-5
17: Landscape	-1	-1	-5	-5	-1
18: Water	-1	-1	-1	-1	-1
19: Pollution	0	0	0	-3	0
20: Soil	5	5	5	5	5
Total	0.9	0.5	0.3	-0.6	1.1
Overall Weighted Total (‘Economic’ objectives 1, 2, 8 and 10 left as is) (‘Social’ objectives 3-7 and 9 multiplied by 0.66) (Environmental objectives 11-20 multiplied by 0.4)	0.8	0.6	0.5	-0.2	1.1

4.6. As set out in 2.8, scoring the SA is only one way of attempting to differentiate at a strategic level between the development options, and specific qualitative matters highlighted in the SA under each are particularly relevant. These are discussed further in the Conclusion on Preferred Spatial Option. For specific details and commentary on the findings set out in Table 9, the [SA report](#) itself should be consulted.

Relevant strategies / Council policy ambitions

- 4.7. Appendix 1 of the SA report provides a full list of plans, strategies and programmes relevant to plan making in Hyndburn.
- 4.8. Whilst a number of strategies relevant to considering the Housing and Employment Growth Options have been set out earlier in this report, not many specifically reflect issues around the location or distribution of development, and therefore impact upon the choice of Spatial Option for the Borough. The Specific points that are covered in these strategies are however summarized below.

Pennine Lancashire Growth and Prosperity Plan 2016-2032 (Pennine Lancashire, 2016)

- 4.9. The Growth and Prosperity Plan highlights the following housing sites in Hyndburn as 'strategic' in the context of Pennine Lancashire:
- Lyndon Playing Fields, Great Harwood (~200 units) - now under construction;
 - Clayton Triangle, Clayton-le-Moors (~200 units); and
 - Huncoat, Accrington (~800 units on the existing strategic allocations)
- 4.10. The Growth and Prosperity Plan also highlights employment sites of strategic significance in Pennine Lancashire. In Hyndburn these include:
- Whitebirk (Frontier Park) at J6 of the M65 – now under construction
 - Junction 7 Business Park at J7 of the M65; and
 - Huncoat (strategic allocation set out in the adopted Core Strategy) at J8 of the M65.

East Lancashire Highways and Transport Masterplan (LCC and BwD Council, 2014) and East Lancashire Strategic Cycle Network Investment Plan (LCC, 2014)

- 4.11. The East Lancashire Transport Masterplan and Strategic Cycle Network Investment Plan seek to deliver good, reliable connections for people, goods and services across East Lancashire, and to facilitate modal choice of transport. Specific projects relevant to Hyndburn include:
- Pennine Reach quality bus route – work completed in 2017
 - Whinney Hill Link Road (Huncoat); and
 - East Lancashire Strategic Cycle Network improvements between Accrington and Rossendale, and along the Huncoat Greenway.

Hyndburn Corporate Strategy 2018-2023 (Hyndburn Borough Council, 2018)

- 4.12. The Council's new Corporate Strategy (2018-2023) identifies a number of key regeneration priorities on brownfield sites in the Borough, including Clayton Triangle and Woodnook Vale (Accrington). These include plans for both new build and refurbishment of existing stock.
- 4.13. The Corporate Strategy also highlights the key role that housing growth at Huncoat, in the Government's designated Housing Zone, should play in the future rebalancing of the housing market in the Borough.

Relevant evidence base findings

4.14. There is currently no specific evidence base document that alone is relevant to considering the spatial distribution of growth. Elements of numerous studies (such as the Hyndburn Retail Study, Strategic Housing Land Availability Assessment, Employment land Study, and Green Belt Assessment along with Highways Masterplans etc.) are appropriate to consider in relation to issues around spatial distribution.

Consultation responses (Regulation 18(1) consultation)

4.15. A report on the method and outcomes of the public consultation exercise held in early 2018 was considered at the Council's [Cabinet meeting of 18th July 2018](#).

4.16. Whilst the number of individual responses received was low, a summary of the responses to the Spatial Options was provided to Cabinet, this is set out in Table 12 below. It is clear from the data set out in Table 12 that no clear overall preferred Spatial Option arises from the consultation responses.

Table 12: Summary of Reg18(1) responses to Spatial Options (where specific preferences were stated)

SA OBJECTIVE	Spatial Options				
	1: Core Strategy	2: Garden Village	3: Transport Corridor	4: Market Focus	5: Land Availability
Responses from drop-in sessions	5	4	2	0	5
Responses from formal reps	3	2	2	6	2
Total responses	8	6	4	6	7

Flexibility and delivery

4.17. Paragraphs 11a and 81d of the revised NPPF refer to the need for plans to be sufficiently flexible in their approach.

4.18. In terms of selecting a preferred Spatial Option to take forward in the Core Strategy Review and Site Allocations DPD, relevant factors to consider when thinking about flexibility are:

- The identification of broad locations for development (in line with para 23, NPPF), identified through provision of a key diagram;
- Being able to provide an adequate mix of small and large sites in the Site Allocations DPD, ensuring there is not an over-reliance on strategic allocations;
- Avoiding being overly prescriptive/specific about quantum of development by settlement; and
- Considering identification of safeguarded land for beyond the plan period.

- 4.19. In terms of deliverability, paragraph 16b of the revised NPPF states that plans should '*be prepared positively, in a way that is aspirational but deliverable*'.
- 4.20. In terms of the five spatial options presented at Regulation 18(1) stage, indicative proportions of development were provided for each (set out in Tables 9 and 10 of this report). To ensure sufficient flexibility in the plan, and to ensure the preferred Spatial Option is deliverable, the Council will seek to avoid being overly prescriptive in the quantum of development by Local Plan area in the final adopted Core Strategy. Instead, an approach that ensures a response to land availability and viability issues, ensuring that the plan is deliverable, will be one to be taken forward.
- 4.21. Some thoughts on issues relevant to each Spatial Option that may have an impact on flexibility and deliverability though include:
- Option 1: Core Strategy led approach – predicated on a balanced development strategy, therefore would provide a good mix of sites for housing. Questions remain over deliverability of employment uses at scale at Huncoat;
 - Option 2: Garden Village led approach – significant housing focus at Huncoat to be supported by Masterplan and delivery strategy. Employment uses shifted more to Altham considered more deliverable from a market perspective. Risk of overreliance on strategic sites however;
 - Option 3: Transport Corridor led approach – Significant shift of development from Great Harwood to Rishton. Though less attractive to the market, still considered deliverable, and development site options are available;
 - Option 4: Market Focus led approach – an approach fully led by the market would have no anticipated delivery issues, however it would be unlikely to provide a sufficiently balanced range of site types and sizes to ensure sufficient flexibility over the plan period;
 - Option 5: Land Availability led approach – this would see the greatest focus of development in Accrington of all the options (over 80% of the housing and 60% the employment) therefore least flexible in terms of range of sites and locations. Accrington typically has the more significant viability issues as well.

Conclusion on Preferred Spatial Option

- 4.22. Paragraph 35 of the NPPF states that, to be 'justified', and therefore pass the Government's test of soundness at Examination in Public, Local Planning Authorities must set out in their Local Plans '*an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence*'. Importantly, it no longer has to be demonstrated that the strategy taken forward is the most appropriate.

4.23. Table 13 provides an overview of the relative assessment of each of the five Spatial Options against the five key considerations discussed in this report, in line with the method set out in 2.33. Green shading represents positive outcomes or conformity, amber mixed, and red negative. Grey refers to no specific assessment against that measure.

Table 13: Relative assessment measure of Spatial Options

Consideration	Spatial Option				
	1: Core Strategy	2: Garden Village	3: Transport Corridor	4: Market Focus	5: Land Avail.
SA Findings	Green	Amber	Amber	Red	Green
Strategies/policy ambitions	Green	Green	Green	Amber	Amber
Evidence base	Grey	Grey	Grey	Grey	Grey
Consultation responses	Green	Green	Amber	Green	Green
Flexibility & deliverability	Amber	Amber	Amber	Amber	Amber

4.24. Whilst there are clear differences in some of the considerations, when it comes to ‘flexibility and deliverability’, it is hard to assess relative advantages/disadvantages between the different Spatial Options. This will in effect be resolved through the Site Allocations DPD process as Site Assessments take place.

4.25. As summarized in Table 13, the SA identified the ‘Land Availability’ led approach as one of the most sustainable approaches overall when assessed against the 20 different SA objectives. Whilst the Council recognizes merit in taking into account land that is known to be available, it does not consider this to be an appropriate overarching development strategy. Plan making, and the future development of the Borough should be driven by policy ambitions, as opposed to just where land is known to be available. In any case, since the Regulation 18(1) consultation took place, more additional land has been identified as having potential for allocation through the Call for Sites exercise. This means that the specific distribution by settlement set out under this option may have changed.

4.26. Following the SA process, the other principles judged to be sustainable overall were to follow the existing Core Strategy approach (in effect a balanced development strategy across the major settlements), a Garden Village approach, focusing a significant element of the Accrington housing allocation in one location to ensure infrastructure improvements and Masterplanning can take place, and a Transport Corridor approach ensuring that development is focused to the more accessible settlements in general.

4.27. Taking into account the strategies and policy ambitions of the area, the Council considers that the preferred Spatial Option to take forward should therefore be one that combines all the principles set out in 4.26

4.28. As stated in 4.20, the Council is not seeking to be overly prescriptive in the quantum of development by Local Plan area in the final adopted Core Strategy. However, the summary below and Figures 1 and 2 provide an indication of how the different principles have influenced the decision on the distribution of development to be taken forward in the Core Strategy Regulation 18(2) consultation:

- Core Strategy approach – housing is distributed broadly in accordance with the existing population base. Employment is focused around the strategic sites at Whitebirk and Huncoat, along with minor expansion at Altham;
- Garden Village approach – an adjustment is made to reflect the strategic role of Huncoat for housing under the Garden Village concept. A Garden Village would shift focus away from employment to a greater housing role in that area.
- Transport Corridor approach – adjustments to housing proportions by some settlements are made in accordance with their proximity and accessibility to key transport corridors (railway line and strategic road network equal priority, then Pennine Reach). For employment, the strategic road network is first priority over public transport.
- Land Availability led approach – the final adjustments will take into account ‘land availability’. For housing, the Council has created a Housing Scenario Model⁹, details of which are set out in Appendix A. Outputs from the site assessment process in tandem with preparation of the Site Allocations DPD, will help gain a clearer picture on land availability. The Housing Scenario Model can then be used to ensure that the final distribution of allocations (to be confirmed at the Publication stage in 2020) balances policy aspirations with minimizing impact on Green Belt / Countryside Area around the Borough.

4.29. Following the principles set out above, the final Preferred Spatial Option will therefore be a new Spatial Development Strategy for the Borough¹⁰, incorporating a new Garden Village at Huncoat, and strategic employment allocations along the M65 corridor. The strategy reflects the aspirations for growth and transformational change in the Borough over the plan period. The Garden Village is supported by Government following its designated Housing Zone status. Alongside the emerging masterplan for Huncoat, the Council has commissioned a

⁹ The Housing Scenario Model is designed to help ensure that the maximum use of available land is made in selecting a preferred option, and for helping to demonstrate the impact of different distributions and quantum of development

¹⁰ This will replace the existing Policy BD1: The Balanced Development Strategy set out in the adopted Core Strategy

delivery strategy that will ensure that the final scheme taken forward is achievable in line with NPPF.

- 4.30. The Council currently has a pool of sites from which it will select its preferred ones for allocation at Regulation 19 stage of the Local Plan (scheduled for early 2020). These are due to go through the agreed Site Assessment Methodology as part of the preparation of the Site Allocations DPD. Whilst the land known to be available from the 'long list of sites' that the Council is currently considering will diminish, the general principles for the Spatial Development Strategy are set out above and the Council does not intend to change at this stage.

Figure 1: Indicative proportions of housing development under the Council’s emerging preferred spatial option for growth

HOUSING - PREFERRED SPATIAL DISTRIBUTION (indicative proportions)

	Wards	(1) Core Strategy Approach - starting point	(2) GV approach adjustments	(3) Transport corridor adjustments	(4) Land availability adjustments - to be made for Reg19	Final Distribution (indicative)
Accrington	Accrington (Central)	Barnfield, Central, Milnshaw, Peel, Spring Hill	23%	22%	22%	?
	Baxenden	Baxenden	4%	4%	3%	?
	Church	Church	4%	4%	5%	?
	Clayton-le-Moors	Altham, Clayton-le-Moors	10%	9%	8%	?
	Huncoat	Huncoat	18%	23%	28%	?
	Oswaldtwistle	Immanual, St. Andrews, St. Oswalds	16%	15%	13%	?
Great Harwood		Netherton, Overton	15%	14%	11%	?
Rishton		Rishton	10%	9%	11%	?
Total			100%	100%	100%	0%

(1) - housing is distributed broadly in accordance with the existing population base, equating to 75% Accrington, 15% Great Harwood, 10% Rishton

(2) - an adjustment is made to reflect the strategic role of Huncoat for housing under the Garden Village concept. The proposed Garden Village is one that fits with the Governments requirement for ‘aspiration’ set out in the NPPF, and builds on the Housing Zone designation granted by Government in 2016. A Garden Village would however shift focus away from employment to a greater housing role. Huncoat accordingly takes a significant amount of the level of housing development planned for Accrington as a whole (around 30% minimum - assumes 1,000 dwellings at Huncoat), or 23% of the Borough wide housing. The remaining 77% of the Borough's requirement is distributed in accordance with the existing population base.

(3) - Huncoat, Rishton and Church see a 20% increase in proportion based on their access to both rail and SRN, offset by reductions in Great Harwood, Oswaldtwistle, Clayton and Baxenden depending upon their access to public transport and/or SRN

(4) - final land availability adjustments will be made for Reg19 Publication (in 2020) following the assessment of Site Allocations at Reg18(2) stage - the assessments will give an idea of truly 'available' sites from the long list - this remains too uncertain at the moment

Figure 2: Indicative proportions of employment development under the Council’s emerging preferred spatial option for growth

EMPLOYMENT - PREFERRED SPATIAL DISTRIBUTION (Indicative proportions)

			(1) Core Strategy Approach - starting point	(2) GV approach adjustments	(3) Transport corridor adjustments	(4) Land availability adjustments - to be made for Reg19	Final Distribution (indicative)
Accrington	Accrington (Central)	Barnfield, Central, Milnshaw, Peel, Spring Hill	4%	4%	0%	?	?
	Baxenden	Baxenden	0%	0%	0%	?	?
	Church	Church	5%	5%	5%	?	?
	Clayton-le-Moors	Altham, Clayton-le-Moors	6%	6%	20%	?	?
	Huncoat	Huncoat	35%	20%	20%	?	?
	Oswaldtwistle	Immanual, St. Andrews, St. Oswalds	3%	3%	0%	?	?
Great Harwood		Netherton, Overton	6%	6%	0%	?	?
Rishton		Rishton	2%	2%	5%	?	?
Whitebirk (Frontier Park)			30%	30%	30%	?	?
Altham Business Park			9%	24%	20%	?	?
Total			100%	100%	100%	0%	0%

(1) - employment is distributed broadly in accordance with the existing strategic allocations along with minor expansion at Altham. Remaining employment land to be distributed in accordance with existing provision/supply and recent permissions granted

(2) -reduced provision at Huncoat to reflect increased focus on housing - reduction moved to Altham. Whitebirk retained and remaining locations unchanged

(3) - Adjustments reflecting greater employment at locations closest to Junctions 6, 7 and 8 of the M65

5. Summary / Conclusions

- 5.1. The Council has set out the reasoning in this paper for selection of its preferred Growth Option for both housing and employment in the new Local Plan, and its preferred Spatial Option which will set the broad distribution of growth in the Borough.
- 5.2. In summary the preferred Growth Options are:
- **Housing Growth Option** – plan for at *least 216 dwellings per annum* between 2016 and 2036;
 - **Employment Growth Option** – plan for up to 68.7ha of land for employment uses between 2016 and 2036. This includes land to support the economic growth scenario, and provides an element of flexibility to allow for future losses of existing employment land;
- 5.3. The Growth Option figures set out do not take into account completions since 2016, or existing planning commitments. These will be taken into account in the Site Allocations DPD and any decisions on the amount of land to allocate will equate to residual figures. Sites will be selected from the 'long list of sites' to be presented in the Site Allocations DPD work.
- 5.4. In summary, the preferred Spatial Option is:
- **Spatial Option Distribution** – a new Spatial Development Strategy for the Borough, incorporating a strategic Garden Village at Huncoat, with remaining housing growth focused in a balanced manner around key transport corridors, and any strategic employment allocations focused along the M65 corridor.
- 5.5. These will be taken forward in draft Core Strategy policies to be presented in the Regulation 18(2) Local Plan public consultation scheduled for early 2019. The draft policies will also be subject to further Sustainability Appraisal work.

Appendix A: Hyndburn Council Housing Scenario Model

To help understand the implications of the different Growth Options and Spatial Options being considered by the Council during preparation of the Local Plan a spreadsheet model has been created. This is referred to as the Hyndburn Housing Scenario Model. The model demonstrates the shortfall or surplus of housing land by area, depending upon a given housing requirement and distribution of development across the Borough.

An example of the scenario to be included in the Regulation 18(2) consultation material (justified in this paper), is presented overleaf. It provides the following information on each Local Plan area (ward) in the Borough:

- Housing Requirement
 - Total Housing Requirement (2016-36)
 - Current number of dwellings
- New Dwellings to date (2016-2018)
 - Net completions
 - Net long term vacant properties brought back into use
- Land Supply (2018-2036) relating to planning permissions
 - Net planning permissions already granted likely to come forward
 - Windfalls – dwelling units likely to come forward on unallocated sites
 - Losses – existing dwelling units likely to be lost from residential use
- The Land Supply relating to potential site allocations
 - Within the existing urban area
 - Within the Countryside area
 - Within Green Belt

The outputs from the Housing Scenario Model will be used to develop policies in both the Core Strategy Review and the Site Allocations DPD. The fields relating to land supply from potential site allocations remain incomplete at this stage, pending site assessments and outcomes of the Regulation 18(2) consultation process in early 2019.

The Housing Scenario Model will be updated once more detailed information is available on land availability and suitability and will be used to help produce the Council's Publication version of its Local Plan in 2020.

Hyndburn Council Housing Scenario Model – example housing/supply balance of the Preferred Spatial Option @ 216 dwellings per annum. NOTE: at this stage the full land supply position is unknown; only the total figures for sites within the urban area are entered below to indicate the best possible scenario, although some of these may prove to be undeliverable or unavailable following site assessments and public consultation at Regulation 18(2) stage.

Annual Housing Requirement (Plan Target) (dpa)

216

LOCATION				HOUSING REQUIREMENT (UNITS)		NEW DWELLINGS TO DATE (2016-2018)		LAND SUPPLY (PLANNING PERMISSIONS) (2018-2036)			Residual requirement for SA DPD	LAND SUPPLY (within urban area)			LAND SUPPLY (Countryside Area)			LAND SUPPLY (Green Belt)			Housing supply balance	% growth in dwellings	
				(B)	(C)	(D)	(E)	(F)	(G)	(H)	(B) - (D) - (H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)	
Settlement	Local Plan Area	Wards	HOUSING SPATIAL OPTION	Total Req. (2016-36)	Current no. of dwellings	Net New Completions 2016-18	Net LTVs back into use 2016-18	Net PPs likely to come forward	Wind-falls	Losses		Brown field (PDL)	Mix	Green field	Brown field	Mix	Green field	Brown field	Mix	Green field			
A - breakdown by main Settlement																							
Accrington				78%	3,383	27,917	196	117	352	347	-70	2,440	2,004	66	1,124	0	0	0	0	0	0	754	12%
Great Harwood				11%	458	5,058	7	-11	215	63	-13	196	436	100	351	0	0	0	0	0	0	691	9%
Rishton				11%	488	3,056	48	2	65	38	-8	343	257	0	0	0	0	0	0	0	0	-86	16%
Total				100%	4,329	36,031	251	108	632	448	-90	2,980	2,697	166	1,475	0	0	0	0	0	0	1358	12%
B - breakdown by Local Plan Area and Ward																							
Accrington																							
	Accrington (Central)	Barnfield, Central, Millshaw, Peel, Spring Hill	22%	950	10,705	132	128	104	133	-27	481	496	11	389	0	0	0	0	0	0	415	9%	
	Baxenden	Baxenden	3%	138	1,761	13	-2	3	22	-4	107	39	35	0							-33	8%	
	Church	Church	5%	199	2,014	33	11	98	25	-5	37	187	0	25							175	10%	
	Clayton-le-Moors	Altham, Clayton-le-Moors	8%	346	4,419	0	5	13	55	-11	284	108	0	87	0	0	0	0	0	0	-89	8%	
	Huncoat	Huncoat	28%	1,197	1,931	0	1	38	24	-5	1,139	871	0	458							190	62%	
	Oswaldtwistle	Immanuel, St. Andrews, St. Oswalds	13%	553	7,087	18	-26	98	88	-18	393	303	20	165	0	0	0	0	0	0	95	8%	
Great Harwood																							
		Netherton, Overton	11%	458	5,058	7	-11	215	63	-13	196	436	100	351	0	0	0	0	0	0	691	9%	
Rishton																							
		Rishton	11%	488	3,056	48	2	65	38	-8	343	257	0	0							-86	16%	
Total				100%	4,329	36,031	251	108	632	448	-90	2,980	2,697	166	1,475	0	0	0	0	0	0	1358	12%

Notes

- (A) = % of annual housing requirement to be set out in Reg18(2) Core Strategy consultation paper
- (B) = Total housing requirement is the annual housing requirement X 20 (2016-36) X (A)
- (C) = Existing number of dwellings taken from Hyndburn Ward Profiles (published 2017/18)
- (D) = Completions figures taken from the housing land monitoring data base
- (E) = Allowance for long term vacant units brought back into use between 2016-2018 (data from Empty Property Officer)
- (F) = All extant planning permissions (commenced and not started) with a conservative 25% non-implementation rate applied to all (not practical to use 5YHLS discounting as then have other permissions beyond the 5 year supply still to account for)
- (G) = Anticipated windfalls are based upon the average Borough wide windfall rates (all COU and conversions) of 28pa as set out in the 5YHLS Statement, assumed to start Y3 as set out in 5YHLS Statement
- (H) = anticipated losses = 5 per annum across the Borough based on previous rates, apportioned to Wards proportionately in line with overall distribution
- (I) - (Q) = to be completed following Reg18(2) consultation - figures on land supply within urban area taken from the 'Long list of sites' however some may prove to be unviable/undeliverable following site assessment and consultation process
- (R) = Residual housing requirement is calculated as follows: (B)-(D)-(E)-(F)-(G)-(H)-(I)-(J)-(K)-(L)-(M)-(N)-(O)-(P)-(Q)
- (S) = (R)/(C)