

REPORT TO:		Cabinet	
DATE:		18 July 2018	
PORTFOLIO:		Cllr Miles Parkinson, Leader	
REPORT AUTHOR:		Principal Planning Officer - Policy	
TITLE OF REPORT:		Core Strategy Review and Site Allocations DPD – Regulation 18(1) consultation comments and Council response	
EXEMPT REPORT (Local Government Act 1972, Schedule 12A)	Options	Not applicable	
KEY DECISION:	Options	If yes, date of publication:	No

1. **Purpose of Report**

- 1.1 To notify Cabinet of the outcome of the first public consultation exercise held on the Core Strategy Review and Site Allocations DPD (held 28 February 2018 – 11 April 2018), and to seek Cabinet approval of the proposed 'Council Response' to all formal comments received.

2. **Recommendations**

- 2.1 That Cabinet notes the outcome of the public consultation exercise and approves the proposed 'Council Response' (attached) to all comments received during the first consultation period of the Core Strategy Review and Site Allocations DPD.

3. **Reasons for Recommendations and Background**

- 3.1 The Core Strategy Review and Site Allocations DPD form central parts of the new Local Plan for Hyndburn; the Core Strategy sets the strategic overarching planning policy framework for the Borough, including setting housing and employment growth figures; the Site Allocations DPD will identify specific sites for development to help meet the planned growth over the plan period, and also the sites to be protected from development.
- 3.2 In February 2018 Cabinet approved three consultation papers to be the subject of an initial public consultation exercise on the Core Strategy Review and Site Allocations DPD. The consultation papers were:

1. Core Strategy Review: Core Strategy Policies – Scoping Assessment
2. Core Strategy Review: Growth Options and Spatial Options Consultation Paper
3. Site Allocations DPD: Scoping and Site Assessment Methodology

The Consultation Process

- 3.3 The formal consultation process on the above papers took place between 28 February and 11 April 2018¹. In addition to the usual methods of consultation (press, social media, public notices etc.) a number of public drop-in events were also held around the Borough. In total 104 people attended the drop in sessions and had an opportunity to view a consultation video, display boards, and have discussions with Council Officers and Members about the consultation process. A summary of the attendance at each of these events is provided below.

Event Date	Event venue	No. of attendees
05/03/2018	Huncoat Primary School, Huncoat	27
08/03/2018	Arthur Wilson Centre, Clayton le Moors	11
12/03/2018	Hippings Vale Community Centre, Oswaldtwistle	10
14/03/2018	Bank Mill House, Great Harwood	20
20/03/2018	Rishton Conservative Club, Rishton	17
26/03/2018	Town Hall, Accrington	19
Total		104

Consultation Responses

- 3.4 At the public drop in sessions, the Council provided some quick response forms asking for people’s thoughts on the key Growth Options and Spatial Options presented in the consultation material. The quick response forms were provided for people who wished to return feedback there and then, and did not want to take away a more detailed representation form for consideration. Of the 104 attendees 19 individuals completed a quick response form during the drop-in sessions.
- 3.5 More formal and detailed consultation response forms were distributed at the drop-in sessions, and made available at key public locations in the Borough, and on the Council’s website. These asked specific questions on each of the three consultation papers. A total of 23 individuals/organisations responded to the consultation using the formal response forms or writing/emailing comments directly. Officers have reviewed all the responses received and identified a total of 141 individual representations as a result of these submitted responses.

¹ undertaken in line with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council’s Statement of Community Involvement

- 3.6 The attached appendices set out the detail of all the formal representations received during the consultation period. They set out details of who submitted the comments, to which aspect of the consultation papers they relate, and the proposed Council response / further action and associated notes². Cabinet is asked to review and approve the attached reports to ensure that relevant further work can proceed, and that preparation of the Core Strategy Review and Site Allocations DPD can continue in line with the published timetable in the Local Development Scheme (LDS) (2018-2021).

Representations / Issues Raised

Core Strategy Review: Core Strategy Policies – Scoping Assessment

- 3.7 Consultation Paper 1 identified the existing Core Strategy policies that the Council intends to review as part of the Core Strategy Review process, and any other matters that the Core Strategy should consider. Appendix 1 sets out all comments received in relation to this part of the consultation (43 of the total of 141 representations made) along with the proposed Council response.
- 3.8 A number of additional policies are proposed for review following comments received during the consultation process. These include; Env6: High Quality Design; KW1: Strategic Regional Employment Site at Whitebirk; and RA2: Historic Character and Identity in Rural Areas. The reasoning for this is set out in the proposed Council Response column in Appendix 1.

Core Strategy Review: Growth Options and Spatial Options Consultation Paper

- 3.9 Consultation Paper 2 presented options for how much growth the Council should be planning for over the plan period, and where it should go (distribution across individual townships as opposed to specific sites). Four Housing Growth Options were presented, three Employment Growth Options, and five different Spatial Options. Appendix 2 sets out all comments received in relation to this part of the consultation (53 of the total of 141 representations made), along with the proposed Council response to each.
- 3.10 In terms of the specific Growth Options and Spatial Options, a summary of the responses obtained from both the drop-in sessions and formal representations is provided in the tables below, where specific preferences were expressed. Where respondents stipulated a combination of options in their response, and were specific about which options to combine, all options have been included.

² Proposed response is either: Noted; Further consideration required; Agree – major modifications; Agree – minor modifications; Agree – no change; Disagree – major modifications; Disagree – minor modifications; or Disagree – no change

HOUSING GROWTH OPTIONS	No. of responses		
	Drop-in	Formal	Total
Please tell us which Housing Growth Option you think is best:			
Option 1: CLG consultation method (1,200 dwellings/60 per year)	4	0	4
Option 2: Low growth (3,500 dwelling/175 per year)	3	0	3
Option 3: Medium growth (4,920 dwellings/246 per year)	9	5	14
Option 4: High growth (6,340 dwellings/317 per year)	4	5	9
	TOTAL		30

EMPLOYMENT GROWTH OPTIONS	No. of responses		
	Drop-in	Formal	Total
Please tell us which Employment Growth Option you think is best:			
Option 1: Low growth (4.4 ha total/0.2 per year)	3	0	3
Option 2: Medium growth (19.1 ha total/ 1.0 per year)	10	3	13
Option 3: High growth (62 ha total /3.1 per year)	5	4	9
	TOTAL		25

SPATIAL OPTIONS	No. of responses		
	Drop-in	Formal	Total
Please tell us which Spatial Option you think is best:			
Option 1: Core Strategy led approach	5	3	8
Option 2: Garden Village led approach	4	2	6
Option 3: Transport Corridor approach	2	2	4
Option 4: Market Focus led approach	0	6	6
Option 5: Land Availability led approach	5	2	7
No preference expressed	1	2	3
	TOTAL		34

- 3.11 From the limited number of responses received, it is evident that there is a preference for the medium growth options to be pursued for both housing and employment. In terms of the spatial options, no preferable approach is clear.
- 3.12 The Council will be undertaking some further evidence base work over the summer relating to housing and economic needs, and will use the findings of this alongside the consultation responses and the sustainability appraisal to finalise a selection of a preferred growth and spatial option later in 2018. The next public consultation on the Local Plan, early 2019, will present the preferred option for public comment.

Site Allocations DPD: Scoping and Site Assessment Methodology

- 3.13 Consultation Paper 3 identified the key matters that the Council proposes to address in the Site Allocations DPD. It also set out a draft site assessment methodology for how

the Council proposes to assess all sites put forward for consideration for allocation. Appendix 3 sets out all comments received in relation to this part of the consultation (29 of the total of 141 representations made) along with the proposed Council response.

- 3.14 In summary, a number of changes to the draft site assessment methodology are proposed to ensure that the process accords with the requirements of statutory consultees such as Historic England, the Environment Agency and the Coal Authority. A revised site assessment methodology will be prepared and published on the Council's website once these changes are approved.

Other representations

- 3.15 A small number of representations (16 of the total of 141 representations made) did not relate specifically to any of the three consultation papers. These are set out in Appendix 4 along with a proposed Council response where this is deemed necessary.

Specific issues raised at the public drop-ins

- 3.16 Although Officers were not formally recording concerns and issues raised at the drop-ins (instead encouraging attendants to complete a representation form) some key themes emerged from discussions with those who attended the six events. These themes were also reflected in the formal representations received and all of them will need addressing through policies in the Local Plan as it is progressed:

- **Infrastructure** – concern over the impact of more growth on already stretched infrastructure in the Borough, particularly highways (Clayton-le-Moors), but also schools and doctors;
- **Regeneration** – concern that focusing the Local Plan on growth and new build will leave some existing areas of housing to decline, and brownfield sites remaining undeveloped;
- **Accrington Town Centre** – concern that the town centre is in decline and that new people will not be attracted to move to the area unless the town centre offer can be improved.

Call for Sites update

- 3.17 As part of the consultation process the Council also notified all interested parties of the closure of the 'Call for Sites' exercise to enable a definitive list of site submissions to be prepared in readiness for site assessments. This proved successful in widening the pool of sites for consideration in the Local Plan review as a total of 30 further sites were submitted during the consultation period. A total of 101 sites have now been received since the Call for Sites was initially commenced in 2015.

- 3.18 No formal responses are provided to site submissions at this stage as they will go through the full site assessment methodology once agreed. Initial findings of the site assessments will be presented as part of the next round of public consultation documents (early 2019) for comment, alongside presentation of the preferred Growth Option and Spatial Option for the Borough. The Council will then be in a position to state its preferred sites for allocation in the Publication version of the Site Allocations DPD in 2020.
- 3.19 The majority of site submissions relate to housing, though a small number do relate to employment allocations, mixed uses and/or protection of sites from development (for open space). All site submissions, along with details of the proposed use of the site, are available to view on the Council's online mapping system [eGGP](#) (select 'POLICY' Category, then 'Call for Sites').

4. Alternative Options considered and Reasons for Rejection

- 4.1 The Core Strategy Review and Site Allocations DPD are being prepared in accordance with the Town and Country (Local Planning) (England) Regulations 2012. As the preparation of this document is to be in accordance with this legal framework there are no alternative options for its preparation.

5. Consultations

- 5.1 A range of people and organisations have been involved in the evolution of the Core Strategy Review and Site Allocations DPD up to this point. This consultation exercise is the first of three planned statutory consultation periods to be undertaken. The other consultations are planned to take place in Feb-Apr 2019, and Feb-Apr 2020, as set out in the Council's recently published [Local Development Scheme \(2018-2021\)](#).
- 5.3 The final version of both the Core Strategy Review and Site Allocations DPD that the Council wishes to adopt (to be submitted to the Secretary of State in 2020) will also be the subject of an examination in public by an independently appointed Government Planning Inspector.

6. Implications

<p>Financial implications (including any future financial commitments for the Council)</p>	<p>There is a need to ensure that there is a robust evidence base in place for the Core Strategy Review and Site Allocations DPD which includes a number of further studies to take place over the next two years. Financial arrangements are already in place to fund this work.</p>
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	<p>The Local Plan documents will also be subject to Examination in Public and there will be a need for the Council to fund this. The cost is likely to reflect the number of representations received at the 'Publication' stage (scheduled for early 2020), as yet unknown. Some funds have already been set aside for this purpose and Officers will seek to identify further funds over the coming 2 years.</p>
<p>Legal and human rights implications</p>	<p>Both the Core Strategy Review and Site Allocations DPD are part of the statutory development plan for the Borough. It is therefore the starting point for considering planning applications and should be given considerable weight in decision-making once they reach the 'Publication' stage. Once adopted, the documents will be given full-weight in decision-making.</p> <p>Consultation on the documents must be undertaken in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
<p>Assessment of risk</p>	<p>There are no significant risks associated with this decision.</p>
<p>Equality and diversity implications <i>A <u>Customer First Analysis</u> should be completed in relation to policy decisions and should be attached as an appendix to the report.</i></p>	<p>The Council is subject to the public sector equality duty introduced by the Equality Act 2010. When making a decision in respect of the recommendations in this report Cabinet must have regard to the need to:</p> <ul style="list-style-type: none"> • eliminate unlawful discrimination, harassment and victimisation; and • advance equality of opportunity between those who share a relevant protected characteristic and those who don't; and • foster good relations between those who share a relevant protected characteristic and those who don't. <p>For these purposes the relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. When making a decision in</p>

	respect of the proposals in this report members should have regard to the Customer First Analysis annexed to this report.
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**7. Local Government (Access to Information) Act 1985:
List of Background Papers**

7.1 *Copies of documents included in this list must be open to inspection and, in the case of reports to Cabinet, must be published on the website.*

Appendix 1: Consultation Paper 1 (Core Strategy Scoping Assessment) - comments and proposed Council response

Appendix 2: Consultation Paper 2 (Core Strategy Growth Options and Spatial Options) – comments and proposed Council response

Appendix 3: Consultation Paper 3 (Site Allocations DPD Scoping and Site Assessment Methodology) – comments and proposed Council response

Appendix 4: Responses / other comments not specific to consultation paper questions and proposed Council response

8. Freedom of Information

8.1 The report does not contain exempt information under the Local Government Act 1972, Schedule 12A and all information can be disclosed under the Freedom of Information Act 2000.