

# Appendix 2: Consultation Paper 2 (Core Strategy Growth / Spatial Options)

Comments and proposed Council response

**Q2.a) Please tell us which of the Housing Growth Options at Section 3 (Table 1) you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
403	Matthew Pardoe WYG	Medium housing growth (246dpa)	The Council's own evidence demonstrates that there is a need for between 3,500 and 6,340 dwellings over the full plan period. In order for the plan to be considered sound it needs to address this objectively assessed requirement. As such Option 1 is not considered appropriate, not least as it does not take proper account of local needs or the local housing market, or the Council's economic aspirations. Flexibility should be included within the growth options, particularly one that looks 20 years ahead. As such the medium housing growth option is identified as a reasonable approach given the overriding aspiration for future growth within the borough, and the need to fix the (local) housing market. In this respect, the medium housing growth approach is considered realistic, viable and deliverable.	Noted	Matters of flexibility and economic growth will be taken into account as a preferred housing growth option is developed including taking account of up to date evidence.
417	Warren Hilton Highways England	Medium housing growth (246dpa)	In response to the Council's latest evidence base, three housing growth options of between 3,500 and 6,340 new dwellings are put forward. An additional growth option of 1,200 new homes is also put forward and this has been calculated using the proposed standard methodology for calculating local authorities' housing need. The Council state they expect to allocate land to meet an appropriate level of growth within the range of these four options, a decision which Highways England supports. Selecting a medium growth option will ensure the growth aspirations of the Council are met, whilst also avoiding severe impacts on the highway network of which it is recognised the high growth options could cause.	Noted	The Council is aware of the need to consider impacts of housing growth on the highway network and will continue to engage with HA as the preferred housing growth option is developed.
424	Wallace Barnett	Medium housing growth (246dpa)	It is the closest target to support the Core Strategy led growth	Noted	no further action at this stage
434	Joanne Harding The Home Builders Federation	not stated	The HBF will support the provision of an appropriate level of housing growth to support the housing need and the economic growth of the borough.	Noted	general support for appropriate levels of housing and economic growth noted although no particular option is referred to

**Q2.a) Please tell us which of the Housing Growth Options at Section 3 (Table 1) you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
453	Nick Lee NJL Consulting	High housing growth (317dpa)	<p>NJL welcomes Hyndburn's invitation for stakeholders to contribute to the discussion and debate linked to growth options and spatial options for the Borough. Both have strong ties to future success of our client's assets but also the wider context of the Borough including by meeting demand and provision of associated facilities for its residents, workforce and visitors to it.</p> <p>Having "aspirational but realistic" targets not only demonstrates compliancy with the National Planning Policy Framework (NPPF) (Para. 154), but should be seen as fundamental to promoting Hyndburn through its Local Plan. We disagree with taking forward an approach which relates to the government's suggested growth rates which, in our opinion, do not take into account the local growth aspirations, which are needed to support the success of residents and businesses in Hyndburn.</p> <p>The NPPF is clear that "Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities" (Para. 150). It is therefore imperative that Hyndburn sets optimistic and ambitious targets for housing growth.</p>	Noted	NPPF requirements and economic growth considerations will be taken in to account in developing a preferred housing growth option. Comments on CLG standard methodology also noted.
463	Darragh McAdam Stephen Ward Town Planning & Development Consultants Ltd	High housing growth (317dpa)	<p>New completions are showing an upward trajectory. This is no doubt partly due to more favourable economic conditions since the last recession and it is taking a number of years for new planning permissions to manifest themselves to construction stage. It is considered prudent to plan for more houses than less, as planning for more houses will take account of more strategic matters which would unlikely be considered to the same degree if planning for a lesser number. The CLG Consultation Method is already proving too conservative and inaccurate.</p>	Noted	Housing growth requirements will seek to take account of economic conditions as the preferred growth option is developed. Comments on CLG standard methodology also noted.

**Q2.a) Please tell us which of the Housing Growth Options at Section 3 (Table 1) you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
468	Tim Partridge RPS Planning	High housing growth (317dpa)	CWC would support the High Housing Growth Option 4. Whilst consideration of impact on sensitive environments and Green Belt may be a limiting factor absent of a demonstration of exceptional circumstances the opportunity for transformational growth should not be constrained artificially. As noted this will provide for greater levels of affordable housing and attract increased investment in jobs and infrastructure.	Noted	The preferred housing growth option will need to take account of constraints such as Green Belt and sensitive environments but also the need for affordable housing and economic growth. The SA process will seek to assess these impact and effects.
476	Rachael Graham Persimmon Homes	not stated	Housing Growth Options Persimmon Homes support the provision of an appropriate level of housing growth to support the need and economic growth of the borough.	Noted	Support for appropriate levels of housing and economic growth noted although no particular option is specified.
496	Daniel Hughes PWA Planning	High housing growth (317dpa)	<p>It is considered that the highest housing Growth Option of 6,340 homes should be the option adopted by the Council. The Communities and Local Government consultation method is taken from draft guidance which will be likely be subject to some level of change and as such it would not be reasonable to base the review of housing growth around such a methodology.</p> <p>Additionally, the numbers included within consultation document should not represent a ceiling to development, merely the minimum to meet the OAN. Therefore, the housing requirements should be in line with higher requirement of housing for the plan period of 6,340. This would bring any plan in line with the principles of the NPPF which seeks to boost the supply of housing, as per Paragraph 47 of the NPPF.</p>	Noted	<p>The Council is aware that housing requirements are not to be treated as a ceiling. Requirements of NPPF will be taken into account in developing the preferred housing growth option. Comments on CLG standard methodology also noted</p>

**Q2.a) Please tell us which of the Housing Growth Options at Section 3 (Table 1) you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
505	Rachael Graham	not stated	<p>Housing Growth Options</p> <p>We support the requisite level of growth commensurate with the boroughs aspirations for continued economic productivity. The lower of the four options do not enable this: our understanding of the paper is that standard methodology has been used to inform the lowest of the housing growth options. It is important to remember that figures identified by the standard methodology are only starting points. There are still many concerns surrounding the over reliance on the proposed standard methodology:</p> <ul style="list-style-type: none"> <li>•The methodology is over reliant on past trends without any consideration of future forecasts of need;</li> <li>•It fails to acknowledge the role that housing development (or lack thereof) can play in re-enforcing economies (and potential stagnation).</li> </ul>	Noted	Preferred option not stated. The preferred housing option will need to reflect an appropriate level of economic growth. Comments on CLG standard methodology also noted.

**Q2.a) Please tell us which of the Housing Growth Options at Section 3 (Table 1) you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
512	Stuart Booth JWPC Ltd	High housing growth (317dpa)	<p>The consultation paper identifies that an updated objectively assessed need (OAN) recommends a range of housing requirements, mostly over and above the 213 dwellings per annum in the adopted Core Strategy from 2012. A figure of between 175 and 317 dwellings is suggested as an acceptable range, detailing potential growth scenarios in relation to housing and employment.</p> <p>The partial update of the Strategic Housing Land Assessment (SHLA) provides an important element of the evidence base and, given the early stage of the consultation, it is likely that this may be required to be updated prior to adoption of the reviewed Core Strategy. The suggested new methodology proposed by the government to significantly boost housing supply, based on housing need, house prices and average salaries, strangely suggests a figure of just 60 dwellings per annum, well below the existing number in the adopted Core Strategy. Such a dramatic change would have serious ramifications for the district if adopted, severely restricting the development of new housing.</p> <p>In the six years of the Local Plan period, from 2011-2017, the number of new dwellings built within the district has never reached the level of 213 dwellings per annum. In its assessment of the five-year land supply at 2017, the Council considers that dwellings brought back into active use are a valid source of supply, providing an additional 116 dwellings per annum and reducing the overall shortfall in the first six years of the plan period to 88 dwellings, rather than 666. The reoccupation of vacant dwellings is important, but does represent a somewhat finite resource and provides no opportunity to rebalance the housing stock. In either case, it is clear that the Core Strategy has not delivered in relation to Policy H1, having knock-on impacts on the rest of the strategy. The need for review of the Plan is paramount, particularly in relation to housing development and ensuring it provides a new strategy that meets needs and helps deliver the objectives of the plan.</p> <p>The updated SHLA considers at paragraph 4.33 that if previous reduced housing delivery rates are continued into the new plan period, the population will reduce, resulting in the decline in the size of the labour force and the loss of jobs. Other similar knock-on effects of failure to deliver are important to acknowledge.</p> <p>It is important in the context of providing a growth strategy for the future of Hyndburn that the plan allows for existing issues identified by the Council to be addressed. These include rebalancing the housing stock, promoting housing market growth and providing for a diverse economic model. It is essential that the plan does not stifle growth, either by design or by accident, and therefore the growth strategy that proposes the most appropriate level of housing to address these issues should be the one provided.</p> <p>The negatives of the different housing growth options are set out in Table 1 of the 'Growth Options and Special Options Consultation Paper' and are highly relevant to the future of the borough. The draft government methodology and low housing</p>	Noted	<p>Comments on specific option are noted. Evidence for the housing needs requirement is to be updated and will inform the preferred housing growth option. It is recognised that previous delivery, need for affordable housing, the need to rebalance the housing stock and the need to promote housing and economic growth are factors to be taken into account. Comments on CLG standard methodology also noted.</p>

**Q2.a) Please tell us which of the Housing Growth Options at Section 3 (Table 1) you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
			<p>growth options have significant negatives, including providing lower levels of affordable housing, and no options for economic growth or rebalancing of the housing stock. The options of medium and high housing growth do however provide these as positives, with the negatives being that some sites outside the urban area are likely to be required. These negatives are generally land-based, rather than negatives that affect the overall strategy. It is possible in land terms to choose development sites that have the least impact, whereas choosing low-growth options results in the plan strategy simply not being delivered. This provides a clear justification for the higher levels of growth within the borough to be progressed. The levels of housing completions have been consistently low in the borough, compared to existing population and the development levels of adjacent boroughs, including Blackburn with Darwen, which shares the market area. The Local Plan should provide for a minimum level of growth to ensure need is met and sites can be brought forward which are developable and attractive to the market in a competitive environment. We propose that the higher housing growth and employment growth options are taken forward.</p> <p>Such an approach ensures that sufficient land can be identified and provided for developers to have certainty regarding the opportunities presented in the borough for economic growth, as well as providing the benefits of rebalancing housing stock and more opportunities for affordable housing provision through suitable policies in the Local Plan.</p>		
521	Tim Bettany-Simmons Canal and River Trust	Medium housing growth (246dpa)	<p>The Trust do not have a strong preference on the growth, however this 'medium' options would appear to strike the correct balance. This option would also provide an opportunity for increased usage/access to our waterways, whilst maintaining and protecting the heritage, environmental and recreational value of canals; support the ability to deliver economic, social and environmental benefits to local communities and secure the long-term sustainability of the inland waterway network, their corridors and adjoining communities.</p>	Noted	The reasons of support for the option are noted.

**Q2.a) Please tell us which of the Housing Growth Options at Section 3 (Table 1) you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
529	Judith Douglas Judith Douglas Town Planning Limited	Medium housing growth (246dpa)	<p>It is noted that there are widely varying bases for considering growth options, with:</p> <ul style="list-style-type: none"> <li>• the Core Strategy providing for 213 dwellings per year;</li> <li>• the Strategic Housing Market Assessment (SHMA) concluding that, in order to meet the 'objectively assessed' housing need for Hyndburn, an annual delivery figure in the range of 175 and 317 dwellings would be required; and</li> <li>• the Council's calculation based on the draft CLG standard methodology indicating an annual housing requirement of 60 dwellings.</li> </ul> <p>3.2 Regard should be given to the historic completion rates. The Council's figures indicate that for the period 1991 to 2005 housing completions ranged from a low of just under 150 dwellings in one year and a high of over 350 dwellings in one year. The average was in excess of 200 dwellings per year. With the combination of the 2008 financial crash and the mid-2000s limit on housing delivery imposed by the housing provision policies of the then Structure Plan, housing delivery fell over the period 2007 to 2013. Completions have since risen and, with the addition of long-term vacant houses returned to use, to figures similar to those in the 1991 to 2005 period. This would seem to indicate that there is a demand for and capacity within the housing industry to deliver in excess of 200 dwellings per year. As such, the draft CLG calculation appears to considerably underestimate the potential of the local housing market and the associated positive regenerative impacts of housing development.</p> <p>3.3 Having regard to the above, it is our submission that Option 3 - Medium Housing Growth of 246 dwellings per year should be the minimum to be provided for. This would provide the opportunity not only to meet apparent market demands, but also help to rebalance the housing stock within the Borough and provide for some employment growth, thus assisting with the local economy.</p>	Noted	Past and potential future delivery, the need to balance the housing market and provision for economic growth are all factors that will be taken into account in selecting the preferred housing growth option. Comments on CLG standard methodology also noted.



**Q2.b) Please tell us which of the Employment Growth Options at Section 4 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
418	Warren Hilton Highways England	not stated	The Growth Options and Spatial Options consultation paper also outlines three options for employment growth within Hyndburn, ranging from 4.4 hectares to 62.0 hectares. The Council draw a similar conclusion here, stating that land allocations will be made to deliver employment floorspace growth somewhere within this range. However, unlike the Council's approach to assessing the strengths and weaknesses of each housing growth option, the impact of the three employment growth options on infrastructure is not assessed, which is of concern to Highways England as considerable employment floorspace growth could have significant impacts on the SRN. We would welcome further detail on each of these options as the document emerges, to ensure growth is appropriately assessed and considered and that sustainable transport schemes to support this growth are identified as part of the decision-making process.	Noted	The employment growth options considered whether sites outside the urban area would be required. Consideration to be given to impacts on infrastructure as preferred option is developed.
425	Wallace Barnett	Medium growth (1.0ha/annum)	Similar to the housing growth, it is compatible with the Core Strategy led growth.	Noted	no further action at this stage
454	Nick Lee NJL Consulting	High growth (3.1ha/annum)	NJL (and our client) highly support Hyndburn's view to adopt a high growth assumption. In line with our comments at 2a) above, we believe it is fundamentally wrong to accept the government's (low and unambitious) housing target for the Borough. The development of new or modified employment floorspace is intrinsically linked to housing growth. Hyndburn should use planning policy as an opportunity to be ambitious whilst practising realism.	Noted	Comments relate to preference for high housing growth option with intrinsic links between two.
464	Darragh McAdam Stephen Ward Town Planning & Development Consultants Ltd	Medium growth (1.0ha/annum)	There is little to suggest in the Consultation Document that high growth is likely. In any case, the 2016 Employment Study found there was 102ha of vacant land with development potential for employment. Thus the Borough is very well catered for. Indeed a case can be made to lessen existing employment land designations as a means of encouraging more residential and mixed use development. There is much existing/occupied employment land with potential for greater intensity of use. Furthermore normal turnover of employment sites contributes to employment growth. It is unlikely that vacant / under-utilised employment zoned land in the area around the abattoir will come back into employment use.	Noted	The evidence base in relation to future employment land is to be updated to inform selection of a preferred growth option. The availability of potential employment land and sites will also be updated to assist in preparing the Site Allocations DPD.

**Q2.b) Please tell us which of the Employment Growth Options at Section 4 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
469	Tim Partridge RPS Planning	not stated	In respect of Employment Growth Options as noted above the employment evidence base, The Employment Land Review Jan 2016, effectively discounts the former power station site as a future employment use and indeed the Local Plan review is partly necessitated by the failure of the allocation to generate any employment uses. Our own investigation of the site has confirmed that a wholly employment use is not a viable option. Any consideration of employment growth options needs to take account that this site is not suitable for employment uses.	Noted	Comments noted which relate to the Huncoat strategic employment site, though the conclusions of the Employment Land Study (ELS) related to lack of infrastructure which may be resolved through Housing Zone masterplanning work. Specific conclusions are set out in paragraphs 8.38-8.39 of the ELS. It is proposed that the policy (A8) will be reviewed as part of the Core Strategy Review.
497	Daniel Hughes PWA Planning	High growth (3.1ha/annum)	In a similar context to the above comments it is considered most appropriate for the Council to aspire to a high level of employment. Table 2 details that low growth would result in zero net jobs growth and no new inward investment, pursuing such a route would not be in the best interests of the Borough. Regardless, there needs to be a clear link between these growth aspirations and the repercussions on the housing need of the area and consequently suitable allocations for housing sites to deliver sustainable patterns of development.	Noted	reasons in support of option noted and links to preference for high housing growth option.
513	Stuart Booth JWPC Ltd	High growth (3.1ha/annum)	We propose that the higher housing growth and employment growth options are taken forward. Such an approach ensures that sufficient land can be identified and provided for developers to have certainty regarding the opportunities presented in the borough for economic growth, as well as providing the benefits of rebalancing housing stock and more opportunities for affordable housing provision through suitable policies in the Local Plan.	Noted	reasons in support of option noted and links to preference for high housing growth option.

**Q2.b) Please tell us which of the Employment Growth Options at Section 4 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Growth Option	Reasons	Council response	Council Notes
522	Tim Bettany-Simmons Canal and River Trust	Medium growth (1.0ha/annum)	The Trust do not have a strong preference on the growth, however this 'medium' options would appear to strike the correct balance. This option would also provide an opportunity for increased usage/access to our waterways, whilst maintaining and protecting the heritage, environmental and recreational value of canals; support the ability to deliver economic, social and environmental benefits to local communities and secure the long-term sustainability of the inland waterway network, their corridors and adjoining communities.	Noted	Reasons in support of the option are noted.
530	Judith Douglas Judith Douglas Town Planning Limited	High growth (3.1ha/annum)	Regard to historic take up / completion rates for employment land shows an average rate of 3ha plus per annum. In order to continue to provide such delivery rates, our submission is that Option 3 – High Growth of 3.1ha per year should be the minimum to be provided for. This would allow Hyndburn to provide for past take-up, continue to deliver growth in local job opportunities, to sustain and expand the local economy, and to allow for inward investment.		Reasons in support of option noted in allowing past take up rates to continue.

**Q2.c) Please tell us if you think there are any further Housing or Employment Growth Options the Council should consider and your reasons; and  
Q2.d) Tell us if you have any other comments on the Housing and Employment Growth Options which are not covered already**

Rep ID	Name / Organisation	2c) Further growth option to consider?	2d) Any other comments on growth options?	Council response	Council Notes
397	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside		<p>It is not sufficient that growth will protect adequately the natural environment, when the NPPF requires the natural environment to be enhanced.</p> <p>In Table 1: Summary of Housing Growth Options, none of the growth options gives any positives or negatives in terms of impact on biodiversity / the natural environment.</p> <p>In Table 2: Summary of Employment Growth Options, none of the growth options gives any positives or negatives in terms of impact on biodiversity / the natural environment.</p>	Further consideration required	further consideration of impacts on natural environment will be considered as the preferred spatial option is developed, including through the sustainability appraisal process.
426	Wallace Barnett	High growth option may possibly stimulate the local economy.		Noted	The link between housing and economic growth is recognised and will be a factor in determining the appropriate levels of growth as the evidence base is developed.

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Q2.d) Tell us if you have any other comments on the Housing and Employment Growth Options which are not covered already**

Rep ID	Name / Organisation	2c) Further growth option to consider?	2d) Any other comments on growth options?	Council response	Council Notes
455	Nick Lee NJL Consulting		<p>We provide additional comments on this within our supporting cover letter: (Additional details from covering letter: In addition to what is provided within our response form, we set out below additional comments on the Housing and Employment Growth Options including further analysis of these.</p> <p>Across Hyndburn, the five suggested Spatial Options provide very different estimations of anticipated housing and employment growth. Across the five approaches to housing growth, the potential growth estimates in Central Hyndburn, Great Harwood and Rishton vary by 22%, 13% and 15% respectively. A similar situation is true of projected employment floorspace growth where potential growth in the same areas varies by as much as 28%.</p> <p>Hyndburn calculates employment growth options based on low growth, medium growth and high growth approaches. These equate to growth across the Borough and across plan period (2013-2033) of 4.4 hectares (0.2 hectares per annum), 19.1 hectares (1.0 hectares per annum), and 62.0 hectares (3.1 hectares) respectively (Table 2 of Consultation Paper 2). At Hyndburn's employment sites (Whitebirk and Altham), the indicative distribution of growth varies, with Whitebirk's anticipated growth being between 30 and 35%.</p> <p>Table 1 below confirms the potential employment growth at Whitebirk, as anticipated by Consultation Paper 2:</p> <p>Spatial Option Low Growth (ha) High Growth (ha)</p> <ol style="list-style-type: none"> <li>1. Core Strategy led approach 1.32 5.73</li> <li>2. Garden Village led approach 1.32 5.73</li> <li>3. Transport Corridor led approach 1.32 5.73</li> <li>4. Market Focus led approach 1.54 6.69</li> <li>5. Land Availability led approach 1.34 5.83</li> </ol> <p>Table 1: Potential employment growth at Whitebirk Strategic Site</p> <p>We welcome the Council's estimations that over the plan period (2013-2033), regardless of taking a low or high growth approach, Whitebirk will grow as an employment destination, potentially by as much as 6.69 hectares. The potential growth by 6.69 hectares is via the Market Focus led approach (Spatial Option 4). It is important to the attractiveness of the Whitebirk employment site that the most is made of opportunities at the Peel Retail Park, to provide facilities that that are complementary to the nearby planned employment development. Such uses include a range of retail, food and drink, and leisure uses).</p>	Noted	Comments relate to support for further development opportunities at Peel Retail Park at Whitebirk. It is likely that specific policies will be developed in relation to the Peel Centre as part of the Site Allocations DPD. See also response to rep 449 (qu 1.a) where it is agreed that Core Strategy policy KW1 will be reviewed (Whitebirk).

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Rep ID	Name / Organisation	2c) Further growth option to consider?	2d) Any other comments on growth options?	Council response	Council Notes
474	Ian Richardson Blackburn with Darwen Borough Council		The potential growth options are noted by the Council. It is acknowledged in the consultation document (Section 6) that Hyndburn is in a joint housing market area with Blackburn with Darwen. A joint evidence base with respect to housing need has informed previous local plans. It is therefore important that any preferred option that emerges in the review of Hyndburn's Core Strategy is informed by an up to date joint evidence base. This is particularly important given the emerging new methodology from the Government that emphasises that any housing figure that moves away from the amount suggested by the standard methodology may receive particular scrutiny at examination stage of a local plan. It is also an important component of the duty to cooperate and any future statement of common ground that neighbouring local authorities can demonstrate they have cooperated on strategic matters which in this case will include housing, given the existence of the joint housing market area. We are already in contact about duty to cooperate matters and look forward to further discussions on progressing any appropriate joint evidence base to inform our respective local plans.	Noted	the need for up to date evidence is acknowledge and is within the current work plan. The council is currently exploring with BwD the potential for joint evidence update work in relation to housing and economy to inform the emerging plans.

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**Q2.d) Tell us if you have any other comments on the Housing and Employment Growth Options which are not covered already**

Rep ID	Name / Organisation	2c) Further growth option to consider?	2d) Any other comments on growth options?	Council response	Council Notes
481	Mohammed Ahmed Lancashire County Council (Environment Directorate)		<p>We recommend that in seeking to grow Hyndburn's economy and support new developments, consideration should be given to how that growth can benefit communities across the social gradient and address health inequalities.</p> <p>The availability and affordability of housing has a direct impact on deprivation and living standards. Whilst the affordable housing proportion for new developments is set to stay at 20%, the growth options and size of developments will eventually determine the number of affordable homes being built within Hyndburn.</p> <p>We recommend that Hyndburn BC should favour policy options support overall growth, but will bring the most benefit to those living in deprived areas through better access to good quality, affordable housing.</p> <p>Whilst increasing Hyndburn's housing supply will diminish the proportion of poor quality housing stock across the district, and new affordable housing will provide possible opportunities for private renters to buy a home, issues surrounding poor housing will persist in the most deprived areas.</p> <p>We recommend that to meet the needs of the population, Hyndburn BC consider the role and condition of all housing within the district. This should include opportunities (thought grants or developer contributions) to improve the existing housing stock through retrofitting, particularly with a view to improving thermal efficiency.</p>	Noted	The impacts of different options on social considerations are addressed through the SA process. The need for affordable housing is a fundamental component of housing policies within the local plan and a particular aim is to rebalance the local housing market. The Council has a separate programme for housing stock improvements through its grant regime. Developer contributions may be sought for the provision of affordable housing in circumstances where off site provision is considered appropriate (as per policy DM12) but are not generally sought for the improvement of existing stock.

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Rep ID	Name / Organisation	2c) Further growth option to consider?	2d) Any other comments on growth options?	Council response	Council Notes
498	Daniel Hughes PWA Planning		<p>PWA Planning are in agreement that following the latest evidence, the future Local Plan would need to deliver 3,500 – 6,340 new homes for the years up to 2033. In order to deliver this, it is agreed that additional land for the new homes must be found. It is considered that it is integral that the overall strategy for delivering these requirements is in accordance with the spatial strategy set out by the Core Strategy, in particular Policy BD1 which seeks alignment with the NPPF in ensuring development delivered is considered sustainable development. This is pertinent to the delivery of the Core Strategy aims along with the site allocations document, and as such the overall strategy needs to ensure that it meets the principles of sustainable development.</p> <p>Furthermore, it is important for the Council to 'plan for growth' as the new development plan documents represent an opportunity to deliver a step-change in the development scene of the Borough, allowing for good quality sites in sustainable locations, not previously seen in historical housing and employment sites for a number of years.</p>	Noted	<p>Comments noted. Development sites will be selected in accordance with preferred growth and spatial options, informed by updated housing evidence, SA and site assessment methodology. Comments regarding planning for growth noted.</p>



**Q2.e) Please tell us which of the Spatial Options at Section 7 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Spatial Option	Reasons	Council response	Council Notes
404	Matthew Pardoe WYG	Marked focus led	The planning system is underpinned by the need for sustainable development. Given the distances that some residents travel to employment it is the case that growth should be provided in a considered manner. Previously this equated to concentrating development within and around main settlements. This approach should still underpin the allocation of sites but with land along main arterial routes and transport hubs being allocated, recognising the specific characteristics of the borough and its position within the local housing and employment markets. As such a combination of the Spatial Options is advocated (but the form does not support more than one option being identified).	Noted	response relates to combination of options which includes consideration of: some urban concentration; availability of underutilised land in proximity to main arterial routes (esp. public transport links) and to market forces.

**Q2.e) Please tell us which of the Spatial Options at Section 7 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Spatial Option	Reasons	Council response	Council Notes
419	Warren Hilton Highways England	2 and 3	<p>Given the information provided, Highways England consider that Spatial Options 2 and 3 represent the best options for the spatial distribution of new development, as they promote the concentration of new development in highly accessible locations. Option 2 intends to take advantage of the Department for Communities and Local Government (DCLG) awarding Huncoat the status of 'Housing Zone', which is expected to make a major contribution towards future housing growth in the Borough, subject to sustainable transport enhancements and upgraded local infrastructure. Highways England note the proximity of development to the M65/A56 interchange, which would provide the primary means of access to the site. We would recommend that all potential impacts and mitigation measures are identified if this option is taken forward.</p> <p>We are aware that a masterplan framework and delivery strategy will be prepared for the Huncoat Housing Zone, to ensure it is brought forward in a comprehensive and co-ordinated way. This is a major development opportunity site, which needs to ensure it aligns with the emerging Local Plan if it is to maximise its potential. This means that a boundary for development will need to be agreed and put forward as part of the Site Allocations DPD and it must be demonstrated that the proposed development and supporting infrastructure are deliverable. Furthermore, mitigation will need to be identified to ensure that the impact of development in this location does not affect the future safe operation of the SRN.</p> <p>Option 3 intends to focus the distribution of growth in areas closest to existing strategic and sustainable transport routes and corridors, which will potentially discourage car-dependency and longer journeys. Highways England note that while it is important that new developments are promoted in highly accessible and sustainable locations that are well connected, it will be necessary to ensure that safe operation of the SRN is not unduly affected by the increase in trips from planned growth.</p> <p>The Council state that the final Spatial Option selected may involve blending aspects of the 5 options presented within the consultation paper. It is therefore important to also consider how these options would impact the SRN. Spatial Option 1 would result in a continuation of the existing Core Strategy land allocations policies, Spatial Option 4 would allow market forces to determine the location of new development, while Spatial Option 5 would prioritise new development in areas where vacant land is currently available. The consultation documents do not specifically address the impacts of these options on the SRN, and to some extent this is understandable as at present no specific land allocations have been made. Highways England would highlight concerns over Spatial Option 4, which could result in significant negative impacts upon the SRN, transport, access to facilities, climate change and pollution, due to a greater proportion of development being focused away from the larger defined centres and being located in more peripheral locations, which by their very nature are not as accessible by all modes.</p>	Noted	Support for combination of options noted arising from consideration of impacts on SRN. Council will continue to work with Highways England to consider impacts on SRN as preferred spatial option is developed.

**Q2.e) Please tell us which of the Spatial Options at Section 7 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Spatial Option	Reasons	Council response	Council Notes
			While the impacts of each Spatial Option on local infrastructure are inferred throughout the consultation document, and paragraph 2.4 states the provision of appropriate infrastructure to support housing and employment growth is essential to ensure sustainable growth, measures to mitigate the impacts of all growth on the SRN are not directly addressed. Highways England would welcome the opportunity to work with the Council to understand the impact of the proposed Spatial Options, including both the cumulative and individual impacts of proposals upon the SRN's ability to accommodate the forecast traffic flows in terms of capacity and safety, before any decision is made on the preferred option. We would also welcome the opportunity to engage with the Council on proposed mitigation measures and sustainable travel options and transport infrastructure required to support the preferred Spatial Option.		
427	Wallace Barnett	Core Strategy led	If the core strategy is validated and remains viable, then it follows that the special option has a sound basis for adoption.	Noted	no further comments at this stage
435	Joanne Harding The Home Builders Federation	combination (not stated)	The HBF does not consider that the options identified are mutually exclusive. Most, if not all, of the options have an element of merit. In this regard the HBF suggests that a combination of options may be utilised. In determining which combination is most appropriate the Council will need to have regard to the sustainability of individual settlements together with an appreciation of the prospects for delivery. The HBF will support a strategy for growth that sees sustainable sites, which are deliverable and will appeal to the market brought forward. Private developers will be tasked with delivering the majority of the new housing identified within the plan it is, therefore, important that the majority of the proposed housing is located in areas where the market can deliver. This will require close liaison with the industry, as different developers will seek different types of sites and locations.	Noted	The Council agrees that the options presented are not mutually exclusive and notes the need for deliverable and sustainable sites.

**Q2.e) Please tell us which of the Spatial Options at Section 7 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Spatial Option	Reasons	Council response	Council Notes
456	Nick Lee NJL Consulting	Marked focus led	<p>We have selected Option 4 but on the basis of it incorporating each of the five spatial options. In our professional opinion, the approaches of market led growth and transport corridor led growth are key, but by the very nature of a market led growth approach, consideration of other approaches is essential including through promotion of accessibility and connectivity, and vice versa. We are of the view the Council should not adopt a single option approach as the five options are so intrinsically interlinked and not mutually independent of each other.</p> <p>Partly a victim of its connectivity to other local authority areas, Hyndburn must be ambitious in terms of its housing and employment growth. If the number of residents of the Borough increases and/or the number of people employed in the Borough increases, there will be demand for additional complementary uses including retail, leisure (food and drink, fitness uses), amongst other types of development.</p> <p>(additional details in covering letter: Of the Spatial Options provided at Section 7, we believe a market led growth approach is key. However, on balance, we are of the view no single option is mutually dependent on another and therefore the adopted approach should reflect market and transport considerations as significant factors, but acknowledge other approaches have a role to play in housing and employment growth).</p>	Noted	The combination of aspects of different options is noted with emphasis on market and transport considerations . The council recognises that the options are not mutually exclusive.
465	Darragh McAdam Stephen Ward Town Planning & Development Consultants Ltd	Marked focus led	<p>Generally speaking developers seek to provide development where it is most in demand. Thus, market focus lead growth would best facilitate development where it is needed/desired. This can readily take place within a co-ordinated and planned approach. Other development approaches may prove incapable of meeting overall development targets-for example requiring most development to be garden village led (with more significant growth in Huncoat area) may not provide housing where people actually want to live. With regards employment, it would be the opinion of our client that Great Harwood is less attractive for such development than other areas and the policy should reflect this.</p>	Noted	comments regarding other options are noted too.

**Q2.e) Please tell us which of the Spatial Options at Section 7 you most support. Please tell us any reasons in support of your response:**

Rep ID	Name / Organisation	Spatial Option	Reasons	Council response	Council Notes
470	Tim Partridge RPS Planning	combination (elements of most options)	<p>In respect of Spatial Options clearly 5 Options are not mutually exclusive. Indeed, in the case of Huncoat and the former power station site all options are applicable.</p> <p><input type="checkbox"/> Spatial Option 1 - Core Strategy led growth Continue the growth strategy set in the adopted Core Strategy via Policy H1 and strategic allocations Affectively this, The distribution of housing accords with the Balanced Development Strategy in that the majority of new housing will be within the urban area of Accrington and the adjoining townships, Great Harwood and Rishton. The distribution is also a reflection of the role and function of these settlements and the regeneration opportunities that exist within them.</p> <p><input type="checkbox"/> Accrington and Townships and Knuzden 75% of new housing  <input type="checkbox"/> Great Harwood 15% of new housing  <input type="checkbox"/> Rishton 10% of new housing</p> <p><input type="checkbox"/> Spatial 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</p> <p><input type="checkbox"/> Spatial 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</p> <p><input type="checkbox"/> Spatial Option 4 - Market Focus led growth Focus development in the areas most desirable to developers and landowners (higher value market areas)</p> <p><input type="checkbox"/> Spatial Option 5 – Land Availability led growth Focus development in areas where land is already known to be available for housing and employment development.</p> <p>CWC would support a Spatial Strategy to concentrate growth around Accrington Urban Area, which includes Huncoat, adopting a Garden Village approach which sees significant growth at Huncoat, based on Transport Corridors including M65 and A56 which define the northern and eastern extent of Huncoat and connects the settlement to the wider region. Concentrating housing growth at Huncoat will also respond to a Market Focus led growth. CWC are a major commercial developer of residential and commercial property and the former power station site, which they own, is readily available for residential development.</p> <p>In respect of land availability for employment uses at Huncoat this will be lower than shown in Table 6 given the acknowledged unsuitability of the former power station site for employment uses. The corollary of this being there is more land available for residential use.</p>	Noted	The Council recognises that the options are not mutually exclusive. A preference for a combination of aspects of options, particularly in support of development at Huncoat is noted.

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Rep ID	Name / Organisation	Spatial Option	Reasons	Council response	Council Notes
			Given that Huncoat meets all the criteria for spatial options indicating its sustainable location further growth should be concentrated here.		
499	Daniel Hughes PWA Planning	combination of 4 and 5	<p>It is considered that an amalgamation of Options 4 and 5 would prove most beneficial.</p> <p>Spatial Option 1 in isolation is clearly inadequate on the basis that in order to meet the revised OAN additional land for strategic allocation will be required as such deviation from the original growth strategy will be necessary. Moreover, locating development in line with Options 2 and 3 would be inadvisable without research as to whether development in such locations would prove both desirable and deliverable. If the Council are minded to adopting either of these options, it will prove important to ensure the data within the most recent SHMA supports such a decision.</p> <p>Based on the above it would appear that an approach which looks for any overlaps between desirable locations (Option 4) and areas where land is readily available for</p>	Noted	The Council recognises that the options are not mutually exclusive. Support for combination of options 4&5 noted.
506	Rachael Graham	not stated	<p>Spatial Options</p> <p>The five options listed should be considered both individually and potentially interlinked. It is possible that elements of several of the options could be used, instead of just a single option. Any preferred option must support the identified and adopted growth option in a sustainable manner. That is to say, through the identification of deliverable, developable and available sites / areas for new homes. The role of the market to deliver the agreed upon housing requirement should not be underestimated. Delivery phasing throughout the lifetime of the plan should also be considered carefully. There is potential for options that are overly reliant on too few, larger allocations to unacceptably push development to the back end of the plan. Such sites often require public sector monies to release them or fund enabling / associated infrastructure. This is discussed in great depth in the 2016 paper entitled 'Start to Finish: How Quickly do Large Scale Housing Sites Deliver' by NLP. Several other similar studies report similar findings (Savills, 2014 &amp; Hurrigan Connolly (Gladman), 2013). This in its self does not have to be an issue if the short term need for development is also met with suitable alternative sites.</p>	Noted	The Council recognises that a preferred option may include aspects of various options. The role of the market in delivering requirements is recognised.

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Rep ID	Name / Organisation	Spatial Option	Reasons	Council response	Council Notes
514	Stuart Booth JWPC Ltd	Core Strategy led	<p>Core Strategy led growth but with a focus on development at the edge of settlements in early phases to increase house building rate to meet shortfall. The proposed growth options as spatial options in the plan provide suitable alternatives, although a likely scenario is a combination of options which makes best use of deliverable sites and offers the benefit of future growth for existing and future residents. The Core Strategy approach currently has not brought forward housing completions to the level anticipated. A land availability-led growth would also to some degree increase the availability and deliverability of sites and, as mentioned above, provide a competitive edge to the borough in attracting developers to the area to deliver the plan strategy.</p> <p>Particular focus should be given to identifying sites on the edge of existing settlements for allocation in the immediate future, during the first five years of the plan, to be clearly highlighted as opportunities in the early phases of the plan.</p>	Noted	The preferred housing growth option has yet to be determined hence the element of shortfall is not yet established. The Council recognises that a combination of aspects of different options may be pursued.
523	Tim Bettany-Simmons Canal and River Trust	Core Strategy led	This option would provide a proportionate approach to the distribution of housing across the authority area.	Noted	Proportionate approach noted.
531	Judith Douglas Judith Douglas Town Planning Limited	Marked focus led	Turning to the Spatial Options, our preference is to see 'Market Focus' led growth as this option will prove to be the most achievable / deliverable, with our second preference being the continuation of the current Core Strategy approach to the distribution of housing growth. In either option we see Great Harwood as an opportunity area for the delivery of new housing and employment. It is a well-established town with good sustainability credentials, attractive to the housing and employment markets and with sites that can be delivered without any undue environmental impacts. The other options, and in particular the Transport Corridor option, underplay the potential of Great Harwood to make an appropriate and positive contribution to economic and housing growth within the Borough. In our opinion, the Transport Corridor approach focuses too heavily on motorway and rail access and does not adequately reflect the contribution that access by public bus can make.	Noted	Comments re choices noted which support development in Great Harwood. For clarification, the Transport Corridor led approach includes the Pennine Reach quality bus route which serves Great Harwood. Nonetheless, Great Harwood is located further from rail connections and the strategic road network resulting in the lowest proportion of housing growth under any spatial option.

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398	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside		The Spatial Options should exclude any important wildlife sites from the development proposals wherever possible and ensure there are strong requirements for mitigation / replacement sites where damage to an important wildlife site cannot be avoided. The local plan must enhance biodiversity overall in line with the requirements of the NPPF.	Noted	The council is aware of the requirements of the NPPF in plan preparation. Impacts on biodiversity will be assessed through the SA process and Site Assessment Methodology in relation to individual sites.
405	Matthew Pardoe WYG	As set out above, a combined approach should be given to the distribution of growth within the borough, with this most appropriately comprising some concentration but also looking at the availability of underutilised land adjacent to or near main arterial transport routes (particularly those which already benefit from public transport links). In order to ensure that housing comes forward, due consideration also needs to be given to market forces, as during a period of national uncertainty too many constraints will inevitably affect deliverability.		Noted	comments in relation to elements of different options noted.



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411	Emily Hrycan Historic England - NW Office		At this stage, we have few comments to make regarding the different Spatial Options. In terms of the historic environment, the Sustainability Appraisal considers that four of the Spatial Options would be likely to have an uncertain negative effect upon SA Objective 11 (historic environment) as they are all directing new development to areas where there is a high concentration of designated heritage assets. It will be essential, therefore, as part of the more detailed work on the future strategy of the Plan, to evaluate what impact each of these Options might have upon the Borough's historic environment and how the scale of growth proposed might be delivered in a manner compatible with the appropriate conservation of the heritage assets in each of these areas.	Noted	Impacts on heritage assets will be considered as part of the SA process and also the Site Assessment Methodology as the preferred option is developed.

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413	Natural England		<p>We have no specific comments to make on the growth options and spatial options, nor do we have any sites we wish to suggest for future development. We do, however, request that due consideration of our interests is given when selecting and assessing sites for allocation.</p> <p>In order to allocate the most appropriate sites to deliver high quality, sustainable development, environmental issues and opportunities should be considered as an integral part of the assessment process. In line with the National Planning Policy Framework, we offer the following generic advice on key natural environment considerations which we hope is of use.</p> <p><b>Landscape</b>            Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes.            Impacts of new housing upon landscape may be positive or negative, direct or indirect, short or long term and reversible or irreversible. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.            The assessment of potential housing sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. These update the national framework of Joint Character Areas and Countryside Character Areas that are used to inform LCAs. Further information is available at NCAs Landscape Character Assessments (LCAs) identify the different landscape elements which give a place its unique character and can help inform the location and design of new development. Further information on LCAs is at Landscape Character Assessment.            More detailed study (e.g. Landscape and Visual Impact Assessment) of the sensitivity of the landscape and capacity to accommodate change may be necessary to determine the suitability of potential housing sites, particularly those within or near protected landscapes.</p> <p><b>Biodiversity</b>            Avoiding harm to the international, national and locally designated sites of importance for biodiversity.            International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites<sup>1</sup>. National sites include biological Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites are Local Wildlife Sites</p>	Noted	the generic advice is noted and the council is aware of the need to consider environmental factors as part of the overall plan making process, including the SA process and the detailed Site Assessment methodology. The Council will continue to engage with Natural England as the preferred options emerge.

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(a variety of other terms are also in use).  
 The potential impacts of new housing upon such sites may be positive or negative, direct or indirect and short or long term. Cumulative impacts may also occur as a result of the combined effects of more than one housing development. Indirect impacts may be experienced several kilometres distant from new housing e.g. water pollution. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites. Impact Risk Zones (IRZs) are a GIS tool that can be used by LPAs to consider whether a proposed development (or allocation) is likely to affect a SSSI. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Information about using this data can be found here. The Magic website is a useful source of information on the location and qualifying features of the international and national designations. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites. Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations  
 Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here UK BAP priority species and habitats. Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species. Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Priority habitats can be found on the Nature on the Map website referred to above. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able

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provide these.

It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species.

[Footnote 1 The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites]

More information is available here Phase 1 Habitat Survey.

Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement

Where Nature Improvement Areas (NIAs) are identified they can provide a focal point for creating more and better-connected habitats. Where housing allocations are proposed in the environs of NIAs the potential to contribute to habitat enhancement should be considered. Further information on NIAs is available here NIAs.

Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Further information through the UK BAP link above.

Seeking opportunities to enhance and create Green Infrastructure

Green infrastructure is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification. Green infrastructure maintains critical ecological links between town and country.

The Growth Options and Spatial Options should consider the

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availability of GI and opportunities to enhance GI networks when considering sites for development.

**Geological conservation**

Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites). The Nature on the Map website referred to above is a useful source of information on the location and qualifying features of geological SSSIs. Local Environmental Records Centres should also be of assistance and often hold information on Local Geological Sites. Housing development may present opportunities for the enhancement of geological sites e.g. exposure sites in road cuttings. Further information on geological conservation is available on the Natural England website here [Geodiversity](#).

**Seeking opportunities to contribute to landscape restoration and enhancement**

The NCAs profiles identify potential opportunities for positive environmental change. LCAs also identify opportunities for landscape restoration and enhancement. These can help identify potential opportunities for housing developments to contribute to landscape enhancement in an area.

**Best and Most Versatile Agricultural Land**

**Avoiding Best and Most Versatile Agricultural Land**

Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1, 2 and 3 a) is available from the Agricultural Land Classification (ALC). ALC maps are available on the [MAGIC](#) website. Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites. Further information is available here [ALC](#).

**Public rights of way and access**

Seeking opportunities to enhance public rights of way and accessible natural green space

Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails. More information is available here [National Trails](#).

Accessible natural greenspace should be provided as an integral part of development. Housing should make provision for appropriate

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			<p>quantity and quality of green space to meet identified local needs as outlined in paragraph 73 of the NPPF. Natural England's work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.</p> <p>Existing open space should not be built on unless the tests of NPPF para 74 have been met. Open space is construed in the NPPF as all open space of public value which offer important opportunities for sport and recreation and can act as a visual amenity.</p>		
428	Wallace Barnett	Both the Market Focus and the Land Availability options have some merit as they may be easier to enable targeted development.		Noted	comments noted
439	Liz Locke Environment Agency		No comments to make on Growth Options and Spatial Options	Noted	none
457	Nick Lee NJL Consulting	No comment		Noted	none

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458	Nick Lee NJL Consulting		<p>Section 2.0 of Paper 2 sets out the strategy of 'Planning for Growth in Hyndburn' through meeting needs for new homes, new jobs/employment, new retail, and new infrastructure. In relation to retail it confirms there is 'a potential requirement for between 2,300 sq.m and 5,800 sq.m of new retailing floorspace DEPENDING on the housing growth options employed' (NJL highlighted for emphasis). Paper 2 continues to explain 'additional levels of new retail floorspace over and above these amounts could serve to claw back expenditure currently leaking outside the Borough', which according to the most recent Hyndburn Retail Study (June 2016) equates to approximately two-thirds of comparison goods expenditure across the Borough (as low a retention rate as 21.5% in Great Harwood and Rishton). This is clearly a very sustainable aspiration which we support.</p> <p>NJL invites the Council to draw links to other complementary uses (non-retail) such as opportunities for leisure (food and drink, fitness, etc).</p>	Noted	<p>Support for claw back of "leaked" expenditure noted. See also response to rep 449 where it is agreed that CS policy KW1 will be reviewed.</p> <p>The Site Allocations DPD is also likely to include a policy in relation to the Peel Centre.</p>

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483	Mohammed Ahmed Lancashire County Council (Environment Directorate)		<p>Paper Two: Growth Options and Spatial Options Chapter 2 New Homes</p> <p>Within this chapter the initial new housing figure of between 3500 and 6340 dwellings for the term of the plan will have been used to indicate the impact on education across the district. However, recent government proposed methodology indicates 1200 dwellings for the term of the plan or approximately 60 dwellings per year.</p> <p>The broad range has resulted in HBC providing four growth options for housing to be consulted, as it is unclear as to which option the council will take, SPT would take the worst case scenario, and assume that HBC will deliver 6340 dwellings for the life of the plan or 317 dwellings per year.</p> <p>By adopting a worst case scenario the impact across the district would be fully known and therefore, if other growth options were chosen the situation potentially improves.</p> <p>The current forecast across Hyndburn shows there is not a significant issue with capacity at both primary and secondary. Individual schools may require closer monitoring due to popularity or geographical position, for example, the school has a good or outstanding Ofsted rating, or is close to the borders with neighbouring districts including Blackburn with Darwen, potential importers of children in to Hyndburn.</p> <p>The two unitary authorities of Blackburn with Darwen and Blackpool manage the admission criteria independently from LCC, and not legally obliged to provide school places in LCC schools for children located in the unitary authorities. However the close proximity, and parental choice can influence migration in as well as out if the unitary authority has desirable schools close to the border.</p> <p>School Planning Team liaise with colleagues within the unitary authorities to review the current position and to find solutions that benefits all concerned to ensure places are made available in LCC schools.</p> <p>The council will produce an Infrastructure Delivery Plan (IDP), this is a key document SPT have great input into and sets out what infrastructure will be required from new housing. SPT will use the 5 year Housing Land Supply and the Housing Trajectory information enabling SPT to forecast when the infrastructure requires delivery. The IDP is an important document and requires constant review to reflect the needs of the district. SPT will liaise with planning officers</p>	Noted	<p>No preference for any particular option is noted.</p> <p>The lack of issues related to school capacity in general is noted. The Council will continue to engage with the SPT as the preferred option emerges, including the preparation of the IDP.</p> <p>It is unlikely at this stage that HBC would look to neighbouring authorities to meet any of its identified housing requirement.</p> <p>HBC is seeking to work with BwD to update the housing evidence.</p> <p>HBC will also seek to engage with the SPT in preparation the Huncoat Masterplan (separate from the local plan process).</p>



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throughout the process to ensure the information is updated.

**Chapter 3 Housing Growth**  
 In this chapter Hyndburn will set out the options for growth highlighted in chapter 2 and offer 4 potential options based on the lowest and highest construction figures per annum.  
 Each option presents a number positive and negative points and is intrinsically linked to employment growth assuming that population will grow with people moving into the area, taking advantage of employment options across the district. At this point SPT would not have any preferred option and will apply the pupil yield set out in the methodology to provide an indication of pupils yield based on the preferred option for growth.

**Chapter 5 National Policy Context**  
 The National Planning Policy Framework (NPPF) sets out a number of key points for developing. The uncertainty of the number of dwellings to be delivered across Hyndburn for the life of the plan may reduce significantly, therefore NPPF states the need is to be met by another local authority.  
 If this is the case Hyndburn may look towards neighbouring authorities, including Burnley, Rossendale, Ribble Valley and Blackburn with Darwen. If any of the first three districts in Lancashire deliver the unmet housing there will be a requirement to review the impact across the chosen district. SPT would appreciate early indication how the unmet delivery will be achieved, and the opportunity to assess the impact.

**Chapter 6: Selecting a Growth Option for Hyndburn**  
 The shared Housing Market Area (SHMA) between Blackburn with Darwen and HBC requires further understanding and monitoring throughout the consultation process. SPT will seek guidance from HBC and work with planning officers the potential affect this may have as the plan works towards full adoption.

**Chapter 7 Spatial Options**  
 Within this chapter HBC has identified five spatial options, and includes an overview and tables to support of each option. The five provide indicative number of dwellings across the various local plan areas.  
 The table's shows there to be varying growth across the same planning areas, if the highest build out rate of 6340 is applied. SPT would need to assess the impact on education in that specific

**Q2.f) Please tell us if you think there are further Spatial Options the Council should consider and your reasons for them; and****Q2.g) Please tell us if you have any other comments on any aspects of Consultation Paper 2 which are not covered already**

Rep ID	Name / Organisation	2f) Further spatial option to consider?	2g) Any other comments on Consultation Paper 2?	Council response	Council Notes
			<p>planning area to enable HBC to decide on the best option to take forward, and the supporting infrastructure to support growth.</p> <p>The preferred option is to expand existing schools, this would be the most cost effective option. In some cases there may be the need for a new school to meet the demand if existing schools do not have the capacity to expand. If this is the case SPT would look towards HBC planning officers to identify suitable land to provide a minimum one form of entry school and the necessary developer contributions.</p> <p>One of the spatial options is the garden village led growth. LCC are consulting with planning colleagues in Lancaster as they start to master plan the garden village at Bailrigg. If the garden village approach is chosen, SPT would request early involvement in the master planning process to identify new education provision to meet the criteria of the garden village approach, this includes new schools strategically positioned within a site.</p>		
486	Melanie Lindsley The Coal Authority		I can confirm that the Coal Authority has no specific comments to make at this early stage of the process in respect of the consideration for growth and spatial options for Hyndburn.	Noted	none

**Q2.f) Please tell us if you think there are further Spatial Options the Council should consider and your reasons for them; and****Q2.g) Please tell us if you have any other comments on any aspects of Consultation Paper 2 which are not covered already**

Rep ID	Name / Organisation	2f) Further spatial option to consider?	2g) Any other comments on Consultation Paper 2?	Council response	Council Notes
489	Helen Ledger Sport England		<p>Paper two - growth options and spatial options</p> <p>General comment on whole document - This paper rightly considers impact on infrastructure and the various growth options. As the specifics on location at this stage are not known, only very broad locations indicated, it is not possible to assess the impact on sport and in particular any existing sporting infrastructure that may be directly affected by development, e.g. building on playing fields. Or whether existing sporting infrastructure will need to be upgraded or new facilities provided, to meet the need arising from the residents new housing; however this is likely given the rates of development considered. For information on how sport England work to support local authorities planning for sport, the following information from our website will be helpful in developing the preferred option.</p> <p><a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p>	Noted	The Council will continue to engage with Sport England as the preferred option is developed. It is aware of the organisation's tools and guidance for local authorities and is planning to undertake an open spaces study to inform the plan making process to ensure compliance with NPPF (and assessment of playing fields and indoor sports facilities - see response to RepID 491).
515	Stuart Booth JWPC Ltd	Combination of Core Strategy led growth , but with a focus on available land on the edge of settlements to increase house building rate to meet shortfall and provide alternative sites for the market.		Noted	preference for combination of options noted
535	Daniel Hughes PWA Planning	It is considered that an amalgamation of Options 4 and 5 would prove most beneficial.		Noted	Support for combination of options 4&5 noted.