

BLACKBURN AND DISTRICT TRADES UNION COUNCIL

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Response to Blackburn with Darwen Borough Council Consultation on Local Plan Review

February 2021

Introduction

1.1 A danger of which we are aware, as we consider the draft Local Plan, is what one might call “Simm City Syndrome”. We appreciate that the Council needs to find a balance between reasonable ambition and simple reasonableness, whereas we may more easily allow ourselves a little more leeway in imagining desirable solutions.

1.2 Trying to bear this in mind we do, nevertheless, believe that circumstances call for any plans to at least be *prepared* for a higher level of strategic investment than appears to be currently envisaged. In our response to the 2019 consultation on “Issues and Options” we argued in particular for exploring the possibility of a number of initiatives – at Imperial Mill, on the redundant Blackburn town centre “Thwaites” site and environs, and by the M65 between Blackburn and Darwen. We felt that these illustrated the level of investment necessary for us to have a chance of phase transition in our towns’ fortunes.

1.3 We think these ideas synchronise with the **NPPF** recommendation that local plans should:

a. “Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; (and)

b. Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”.

1.4 We believe we are justified in lobbying for a significant increase in investment because of our economic situation.

1.5 According to the “**Centre for Cities**” “**UK Unemployment Tracker**”, Blackburn had (when the figures were last updated on 15th December) at 8.1% the 9th highest percentage unemployment rate of 64 compared cities and large towns. (It is not clear if this is for the Borough or the constituency).

1.6 According to “**Lancashire Insight**” the per-head figure for gross disposable household income for Blackburn with Darwen “*was far below the county and UK averages. In general terms the per-head figure for the authority is in long-term decline in comparison to the UK average*”.

“Average earnings in Blackburn with Darwen”, “Lancashire Insight” also says, “are noticeably higher when measured by place of work in comparison to place of residence therefore the authority records a net loss from commuter flows. The figure by place of residence is well below the national average.

“The survey of personal incomes by HM Revenue and customs broadly includes all individuals whose income is higher than the prevailing personal tax allowance and who are therefore liable to tax. The median results are the middle value that best reflects typical income, and they show a result for Blackburn with Darwen that is well below the North West average”.

1.7 The Borough has, at £25,107, one of the lowest levels of median resident earnings in Lancashire. Similarly, it sits below regional (£28,487) and national averages (£30,661).

1.8 Our employment rate (69.4%) continues to fall below regional (72.5%) and national (76.5%) averages, though the gap has narrowed in recent years.

1.9 We feel that our local economy has been particularly influenced by a feature that Dr Steve McIntosh called “hollowing out” in his 2013 Research Paper for the Department of Business, Industry and Skills (**“Hollowing out and the future of the labour market”**). This refers to the idea that local economies have lost jobs in the middle rank by income whilst the number of jobs that were the lowest paid has grown, along with the number of better-paid jobs. The September 2014 **“Centre for Cities” Report “Unequal Opportunity”** showed that this job polarisation affected some cities more than others. Of 59 cities compared, Blackburn with Darwen ranked 7th highest in respect of the growth of polarisation between 2001 and 2011. This finding corresponds to our anecdotal experience, in respect of the firms that we have seen disappear from round our table and in respect of seeing the churn of young people especially through precarious work positions.

1.10 Whilst the air is thick with talk of “levelling up” and “industrial strategy” we have yet to hear the hooves of any approaching cavalry. The Lancashire Industrial Strategy remains in limbo, and the way it was going it held out little hope of specific project investments. Of the £320m spent through the “Growth Deal”, the £20m given to the Advanced Manufacturing Research Centre will hopefully have a positive impact on us - but local investment otherwise appears to have been on infrastructure projects. The same goes for the “Getting Building Fund”. “Transport for the North” has asked the Government to back plans for a £5 billion pipeline of infrastructure projects to create up to 20,000 jobs, but, unless we have misread the information (for which you must go looking in their Board papers), none of the projects would be in East Lancashire.

Strategic Objectives

2.1 The main problem for us with the “Strategic Objectives” outlined in the draft Local Plan is that they are somewhat unobjectionable. They represent generic “goods” that could, overall, be applied to any industrial town.

2.2 The one Strategic Objective that is most specific is the one that we disagree with most – Strategic Objective 8. It still seems to us something of a fantasy to refer to Darwen as a “market town”. We recognise, of course, that it does have its own character and traditions – but they are the character and traditions of an industrial town, not of a market town (which is normally understood as the urban centre of a predominantly agricultural hinterland of farms and villages, providing this with a retail, service, and financial point of reference). It is a good idea to encourage in Darwen an interesting variety of smaller retail shops – but clusters like this do not need to have a “market town” context. Just look at Chapel Market in the London Borough of Islington. The present document does seem to be an advance on the “Issues and Options” paper, in that it makes more space for “economic” growth in Darwen – but that is what Darwen needs, just as much as Blackburn, and we see the “spatial gap” between the towns as one potential investment location that might be used to address this.

The “Employment Land Review Study” recognises the continued importance of manufacturing to Darwen: *“Darwen has a specific strength in the manufacture of chemicals and chemical products. 630 people, 4.8 percent of the local labour force were employed in that sector in 2017, with major employers including Lucite and Crown Paints. Manufacture of textiles, which employs 515 in the town and Manufacture of fabricated metal products, except machinery and equipment, (475) also make contributions to the particular dominance of manufacturing in Darwen”.*

2.3 Strategic Objective 10 seems to us to be partly right, but there is a question mark over the ability of high-skill activities to sustain employment at scale. Policy should bear in mind that providing reasonably paid and non-precarious routine work for possibly most workers will not be accomplished only through a focus on high Gross Value-Added sectors.

2.4 Strategic Objective 3 seems to operate on a presumption that the main thing the Borough lacks on the housing front is more better-quality housing. Indeed, the headline take-away from the whole document can appear to be that house-building will be the driving point of regeneration in the Borough. To want more better-quality houses is not a bad ambition, but we ask whether it alone can address “the full diversity of local housing need”. Are too many people depending on private rented accommodation when they would rather have council housing.? Do we have a problem of young single people without adequate accommodation?

2.5 We welcome the commitment in Strategic Objective 5 to a high design quality in new buildings, but this does not in itself entirely fit the aim of improving the Borough’s “historic environment”. In addition to promoting high standards for new buildings we also need to commit to preserving our architectural inheritance. It is a common complaint that Blackburn has failed to do this in the past.

Preservation of our architectural environment need not depend exclusively on nationally listed buildings. The draft plan does say that *“the Borough contains a number of buildings and other structures that are not formally designated as heritage assets, but that nevertheless contribute to the character of the area. These are identified on the Blackburn with Darwen Local List which will be updated when necessary to ensure a comprehensive record of locally important assets”* – but we cannot find this list amongst the plan documentation. The issue of cultural asset preservation factors into some of the specific sites earmarked for economic or housing growth, and it can be difficult to ascertain where matters stand. The old Blackburn Fire Station, for instance, is now both a listed building and identified as an “growth – employment” site. We do not think the listing extends to the homes established around the perimeter for firefighters and their families, but the whole settlement would seem to us to represent a “heritage asset”. There has been planning permission for development in the past, but we don’t know if this is still “live” and whether it needs to be amended to reflect the site’s heritage status.

2.6 We agree with the idea presented by Historic England in their response to the 2019 consultation, that re-use and adaptation of historic mills should be considered – and this can possibly be for residential accommodation as much as for employment. They say they that *“14 out of 96 are vacant and a further 22 only partially occupied or underused”*, but we do not know where to find the details of these or what condition they are in. We would add to this that there could also be consideration of bringing unused space in the upper stories of town centre buildings into use as residential apartments, a measure which could help bring more “life” back into the town centres.

2.7 The protected heritage assets and scheduled ancient monuments do not show up particularly well on the interactive map, but, so far as we can see, Ashleigh Barrow in Darwen is not covered by either of these. We think it should be at least recognised as a heritage site – so far as we know, it is the outstanding example of bronze age activity in Darwen.

Key Areas

3.1 The “six key areas” of the growth strategy strike us as having a mixed level of relevance.

3.2 We struggle to see what the “Blackburn Growth Axis” contributes, other than that it provides a dynamic looking graphic. The proposals in the draft seem to us to form patterns that it does not really express. The growth housing areas, for instance, group in a fashion that does not particularly relate to it.

3.3 The “Darwen Town Investment Plan” just seems to be making a virtue of the necessity attached to securing Town Deal funding. As we write, it has been announced that a “bid” has been made by the Darwen Town Deal Board (based on a Town Investment Plan), but it would seem that this has not been subject to any consultation other than an original call for ideas – and there has, indeed, been an emphasis placed on “confidentiality” around it. There does seem to be some tension between these “TIPs” as “town centre” plans and as “town” plans – the guidance allows for *“the flexibility for towns to prioritise investment across the town – for example, in gateway areas, key education or employment sites”* whilst wanting specific information about “town centre” issues. So far as “town centres” go, we think it is reasonable that there should be a development plan for each town centre, highlighting ambitions at perhaps a closer level of

magnification than is possible in the Local Plan. Without knowing the full details of the Darwen Town Centre TIP we cannot form an opinion as to whether it can carry the weight of being a strategy for Darwen town centre between now and 2037, or if it would be better seen as but one opportunity for inward investment within a broader strategic context. Because of this, we concentrate our “town centre” comments below on Blackburn town centre. The question must also be asked, however, as to what the strategy for Darwen will be if the “bid” is not approved or is approved only in part. Where, in other words, would that leave us?

3.4 In fact, in terms of the draft Local Plan overall we see the key strategic issues rather differently.

They seem to us to be:

- The “distinction” drawn between Darwen and Blackburn, that we disagree with above;
- The economic growth plans;
- The future for each town centre; and
- The housing growth plans

with the “infrastructure plan” being more of a sort of tactical underpinning, in that whatever develops must have a wider functional foundation.

Economic Growth

4.1 In respect of economic growth we welcome the identification of the South East Blackburn Strategic Employment site as a move in the direction of our 2019 proposal that the land between Blackburn and Darwen south of the M65 Jct5 should be considered as a potential area for economic development. It is not clear to us why the plot of land at the centre of this site should need to be “safeguarded” for the future, rather than included in the current plan. Indeed, we would see this PAP9 status as being more relevant to the area further along the motorway (X370839 Y424879?) – which we feel we the Borough should at least be prepared to see brought into use if there were to emerge the prospect of significant investment in an enterprise that would either fill the need for decently paid routine work – eg. a significant production unit – or promise employment in one of the technologies identified in the national industrial strategy. Respondents cited in the “Employment Land Review Study” see the motorway as an employment growth corridor, so it seems to make sense to use both sides of it.

4.2 We can appreciate the strength of the comments on p.43 of the “Employment Land Review”, that the UK logistics market is “expected to continue to benefit from the growth of ecommerce” and that there is a “national vacancy rate for modern B8 at only six percent” (B8 building use being “distribution”). There is currently much speculation that the impact of the pandemic will be to strengthen this trend. Whilst there is nothing intrinsically “wrong” with these activities, they do appear to have become particularly associated with the evils of low-paid precarious and agency work. Given that Frontier Park is already earmarked as a location for B8 expansion, we wonder if the Review’s recommendation on p6 might be refined to be more circumspect about B8 developments in other locations? This also seems to be a relevant moment for us to remind the Borough Council of the representations we made in 2019, encouraging take up of ideas provoked by the **IPPR Report “Decent Work: Harnessing the Power of Local Government”**. One issue we then raised was whether the Borough might at least try to use its role in supporting economic development to encourage beneficiary companies to commit to a minimal suite of employee rights.

4.3 Consideration might also be given to whether the planning process can be used to reduce the employment disadvantage facing people with disabilities. When the Remploy factories were closed there was much virtuous comment about how people with disabilities would henceforward find support through “mainstream” employment – without, it must be said, much attention being given to what the people directly affected had to say. The reality, of course, has remained that there is a significant disability employment gap. In May 2018 the **ONS** published figures showing that this gap – the difference between the employment of disabled people compared with non-disabled people – has stood at around 30 percentage points for around a decade. Much may be down to “soft” issues, around employment attitudes and practices. We note, however, that the **Equality and Human Rights Commission Research Report 77 “Opening up work: The views of disabled people and people with long-term health conditions”** does contain a whole Section on “Workplace Buildings and Infrastructure”. The Report says that *“It was reasonably common for participants to report barriers in their work buildings and workplace infrastructure”*, and whilst some of the issues raised might be considered a basis for reasonable adjustments there is also a question of how the needs of people with disabilities might be anticipated in the planning process for new developments. Many would like to see Councils “step in” to directly address the loss of capacity contingent on the loss of Remploy, but even if this were to be done there would remain legitimate concerns to ensure that new facilities incorporate the basic suggestions:

Access

- Lifts and step-free access to all sites.
- Two-hinged light doors at all entrances and for internal doors.
- Carparking for disabled people where possible.

Internal layout

- Regular, ordered layout in open-plan areas.
- Permanent desks for disabled people in offices using hot-desking.

Workstations

- Choice over workstation seating for all staff.
- Allowing air conditioning to be switched off at workstations and/or fitting ionizers.

Facilities/equipment

- Health and safety equipment that is accessible.
- A break-out space.

4.4 We remain disappointed at the omission of the site around (X:370020 Y:428648), covering Imperial Mill and its surroundings. Admittedly, this has been the location of unfulfilled ambitions since it was included in the “City Challenge” programme – but this rather highlights it as a litmus test of our ability to attract transformative investment. The Mill is, we think, the only industrial Grade II structure in the Borough (even though it was a bit untypical) and it is a priority project in the Pennine Lancashire “Heritage Investment Strategy”. It has the capacity to be a landmark

gateway building, enhancing both the Greenbank and the Furthergate employment areas. Clearly, any investment there would need to be on a significant scale and would probably require a high degree of external support. Maybe there has also never been a clear commitment to a potential future use for the building.

We previously proposed that it might be an appropriate location for a “Catapult Centre” (<https://catapult.org.uk>), within the High Value Manufacturing, Digital or Satellite Applications clusters. Of these alternatives, we would now more strongly urge consideration of a campus integrated into the Digital Catapult. The idea would be for it to serve a variety of functions; a location for research and development; a source of partnership and support in projects with local businesses; an education centre, from one-off events to short courses; a resource of advanced equipment; and a location for small business starters in a context of mentoring and advice.

Of the 4 Grand Challenges in the National Industrial Strategy the one focussed on “AI and data” strikes us as being the least constrained by geographical location and the most attractive to an increasingly lower-age profile workforce. It does pose particular issues of whether it can “scale up” and of whether it is vulnerable to “precarious” working practices.

The **Lancashire Enterprise Partnership undertook a Sector Skills Baseline Study for “Creative and Digital” in 2015**, and this found that the sector in Lancashire includes some 4,500 companies and is concentrated in IT, software and computer services. Most of these enterprises have only a few employees. Almost 90 per cent are micro businesses with fewer than ten employees, and these account for around half of all creative industry jobs. There are a few large businesses with over 250 employees. Preston, Chorley, and Blackburn with Darwen are the local authorities with the greatest number of employees, being home to over 40 per cent. Regarding current Educational provision, the study found that: *“For computer sciences the Lancashire provision is 7 per cent below the national average and taking into account the wider North West, it is some 5.5 per cent below the national level. Given that the demand from local employers and the Creative Economy as a whole in the UK lies predominantly in the need for an increase in a range of digital skills, this presents a particular local challenge of potential skills recruitment, and the retention of locally developed creative talent”*.

This is far from conclusive, but it does suggest a prime facie case for looking at “Digital and Creative” as a sector in which there may be a foundation for investment in the Borough to support innovation, educational provision, and business growth. Establishing a “Catapult” at the Imperial Mill would also be equivalent to signing a “marquee player” so far as the image of the local economy is concerned.

4.5 The draft Local Plan seems to be an improvement from the Issues and Options consultation when it comes to the recognition of a need for economic growth activities in Darwen, but we wonder why the town’s employment zones have been categorised as “secondary”, rather than “primary”, employment areas. In our response to the 2019 consultation, we also questioned whether areas around Sough Road (eg X:370069 Y:421298) might be added to those earmarked for employment growth.

4.6 We note that in the “Employment Land Review Study” (p56) there is a comment about provision of car parking in Darwen that may be intended to refer to the proposed Balle Mill employment growth site: *“Car-Parking is a major issue with some 1,000 employees tending to be in the centre daily, and only 400 car-parking spaces to serve them. Many are parking on the main road which causes extra traffic related problems. The Kenley Haulage site includes a large area of open space, some 2 ha, south of Balle Street. India Mill Managers argue that It would benefit the Council to do something with this space. Could it become car parking for the centre? This would entice more and bigger businesses to the centre”*. So far as we can see, there is no consideration of car parking support for business use in any part of the borough in the “infrastructure plan”, though it is mentioned as a growth constraint in this context (and also with regards to Blackburn Town centre office development).

Blackburn Town Centre

5.1 In respect of the future for Blackburn Town Centre, we tend to see this as being a rather wider area than that given on the interactive map. We see it more along these lines:



with a view to encouraging development at the “eastern gateway” (where the road from the motorway comes to Eanam roundabout) and in what appears now to be called the St. Peter’s Quarter (the areas around Wainwright Way and between it and Mincing Lane). The “Employment Land Review Study” seems to have included at least part of the latter as an employment growth site, but this designation does not appear to have been carried through – and we wonder why not?

5.2 There are specific issues around regeneration in Blackburn Town Centre – such as repair of St John’s Church, supporting the restoration of the Exchange and opening it as a vibrant and diverse arts venue, the future use of the old police station and of Blakey Moor school – that, as we indicate earlier, might best be dealt with in a specific town centre plan. We agree, however, that the most important strategic issue is what happens to the “Blackburn Town Centre Major Development Site”, which we think should incorporate not only sites S210 and S211 but also much of the “island” created by Starkie St., Vicar St., Salford and Penny St. (the Salford/Penny St. Junction crying out for a distinctive “corner” building like the lost “Lord Nelson” – though perhaps it was just the fluorescent “OBJ” sign that made it stand out!).

5.3 In our response to the 2019 consultation, we said: *"We don't see how it would help to have either the "former Market Site" or the "Thwaites Site" developed for retail purposes, preferring to see these developed for office employment to create a sort of "commercial district" of the town centre".* We appreciate that the "Mixed Use" designation has the virtue of keeping all options open, but we have been impressed by the argument - put forward in the **2019 Centre for Cities Report "City Centres: past, present and future"** - that the incorporation of employment opportunities makes a big difference to the vitality of urban centres. *"In those places that do have struggling high streets....." they wrote, "their challenges stem from relatively lower levels of investment into their city centres from high-skilled businesses. This has implications for the availability of high-skilled jobs in the city more widely. These firms increasingly prefer a city centre location – as the dense business environment allows them to share ideas and knowledge easily. If a city centre is failing to attract these types of firms, the city as a whole will likely lose out on this investment. This affects the wage and career progression opportunities these cities can offer".*

There could not now, unfortunately, be a worse time to consider the viability of this idea or figure out the best way to use a space that could define Blackburn's image for a generation. The pandemic is calling into question how sustainable both big retail outlets and "office work" are going to be. A recent **KPMG Report "The future of towns and cities post COVID-19"** notes that *"The deep recession triggered by the pandemic has squeezed profit margins across a swath of businesses; many CFOs are delighted at the opportunity to cut costs by downsizing on expensive property commitments. Some businesses, including our own, have already gone down the route of transforming their offices into collaboration hubs where many workers will come to meet rather than sit at a desk and perform tasks individually. Surveys show that most workers would prefer to return to a hybrid mode of work combining days with clients and colleagues in the office and days at home".* The Report accepts that there is some debate as to how permanent these changes will prove, and it has Blackburn as amongst the less affected areas – but this may just reflect the low level of our town centre business employment to start with. Jane Parry, Lecturer in Organisational Studies and HRM, University of Southampton, argued in an article on **"The Conversation" ("Remote working is here to stay – but that doesn't mean the end of offices or city centres")** that *"only a few companies are suggesting abandoning their offices completely".*

The 2019 "Employment Land Review Study" did conclude, albeit prior to the pandemic, that *"Private sector office employment is forecast to grow significantly to 2036, a gain of some 3,190-3,240 jobs".* It also says that *"Forecast growth is overwhelmingly focused on office-based sectors. The five sectors which normally require B1(a) accommodation are forecast to gain 3,240 jobs under the Baseline Scenario, 3,190 jobs under the Growth Scenario, on a 2018 level of 12,200. Around 79 percent of that growth, 2,530- 2,570 jobs, is in professional, scientific and technical activities".* It does also say that there is a perception that Blackburn town centre is **not** *"a key location for office development".* Changing such preconceptions, however, is partly what regeneration is about. We see that one of the national agents consulted by the "Employment Land Review Study" already shares our vision: *"Generally, feel that office developments should be focused in Blackburn Town Centre and not at the motorway junctions because of traffic issues. The Old Thwaites brewery, once demolished, would be ideal for office development".* A Regional Agent also agreed there is *"a need to do more to promote offices being in the town centres and make use of the services here, to help keep the high street and retail market performing well".*

We are loath at this point to abandon the idea that future urban centre vitality will depend upon the location in town centres of intellectual-skill businesses, and second in our line of priorities would be recreational assets followed by residential accommodation.

One issue we note is the discrepancy between ourselves and Preston when it comes to Civil Service headcount – Blackburn’s is 500 and Preston’s 4200. The recent **“Northern Policy Foundation”** publication **“Bursting the Westminster Bubble: How moving departments can help level-up”** proposed locating even more Civil Service jobs in Preston whilst allocating nothing at all to East Lancashire – so maybe there is a lobbying battle we need to engage in here.

Housing

6.1 Considering the Borough’s housing strategy, we are struck that the HENAS Report is more of a housing market analysis than a housing needs analysis.

6.2 We have not, for instance, found any mention in it of the “Living Environment Deprivation” domain, which is one of the indices of Multiple Deprivation and which, in part, measures the quality of existing housing. According to the **English Indices of Deprivation 2015**, 36 of the 91 Lower-layer Super output Areas in Blackburn with Darwen were in decile 1 or 2 of this domain (with 1 being the most deprived 10%). This suggests that there may be quality problems with almost 40% of the housing in the Borough. We are not aware of any statistics showing “non-decent homes” as a proportion of housing stock by Local Authority, but the **2019 Report by “Care and Repair England” – “Housing disrepair: Improving non-decent homes A guide for local older people’s forums and groups”** – says that *“there were an estimated 23.9 million dwellings in England, of which 4.5 million (19%) were non-decent”* and that the majority of these non-decent homes *“are now in the owner-occupied sector (2.8 million/19%)”*.

6.3 A possibly associated issue is that of retrofitting existing housing stock to make it more energy efficient. The “Local Plan Climate Change and Natural Capital Study” notes that: **“4.11 The actions relating to emissions reductions for domestic buildings include reducing energy consumption and increasing energy efficiency. Retrofitting existing housing stock is a key aspect of this”**. The **“Climate Change Committee” said in February 2019** that *“Ensuring existing homes are low-carbon and resilient to the changing climate is a major UK infrastructure priority and must be supported as such by the Treasury. Homes should make use of low-carbon sources of heating such as heat pumps and heat networks. The uptake of energy efficiency measures, such as loft and wall insulation, must be accelerated. Upgrades and repairs to existing homes should include plans for shading and ventilation, measures to reduce indoor moisture, improved air quality and water efficiency and, in homes at risk of flooding, property-level flood protection”*.

6.4 We appreciate that the context, and steer, set by national policy has been to give priority to new developments of housing for sale but a consequence of this is that the above issues appear to be left out in the cold. Unless we have misunderstood it, the HENAS Report envisages a housing growth that is not *replacing* existing housing – so it will not touch upon these problems. The “Local Plan Climate Change and Natural Capital Study” explicitly says (p.26) that: *“The Local Plan will have limited influence over the heat demand and other energy demand, of existing*

housing stock". If this is constitutionally inevitable, the "Local Plan" for housing will need to be balanced by a "real" Local Plan, directed at the actual and existing local housing stock.

6.5 The draft is also silent on the issues of social housing and accommodation for young people.

The HENAS Report does note (at a section numbered 8.25, which should be 9.25) that "in many cases" people will be living in private rented accommodation due to a lack of "social rented" stock and that the number of persons under 35 living in private rented accommodation has risen from 2001 – 2011, whilst there has been a decline of those in home-ownership or social rented housing. In **November 2019 the housing charity "Shelter"** published research that showed *"More than 9 in 10 private renters (91%) who need a social home are unable to get one and are left on waiting lists, often for years on end"*.

It does not appear to make any attempt to assess the level of "sofa-surfing" and precarious accommodation in the Borough. Anecdotally, it seems to us that young men can have difficulty finding stable accommodation (which leads to adverse economic and social consequences for the whole community).

It seems to us that the housing and employment growth strategies attempt to establish a symmetry through which there are enough people available for economic growth on the one hand and enough houses for these people on the other. The whole consequently hinges somewhat on reducing net migration, and the loss of our young people in particular. Section 7.23 of the HENAS report says *"To achieve the economic growth scenario, levels of net migration need to increase notably from the base position shown in the 2016-based SNPP. In BwD, the SNPP shows an average net outmigration of 814 people per annum over the 2016-36 period, with the economic growth scenario reducing this to 370 people per annum (still a level of net out-migration). Hence the economic growth scenario essentially sees the retention of an additional 440 people per annum within the Borough"*.

Whilst the shortfall in social housing for rent is a question of national political failure, the situation facing young people is of some local strategic importance given the desire to "retain" a higher proportion of that part of our "younger population" profile. We think, therefore that there remains a need for specific research on the accommodation needs of young people in the Borough, leading to some idea of what sorts of developments might best address their needs.

Infrastructure

7.1 As we indicated above, the major lacuna in the Infrastructure Plan seems to us to be consideration of car parking. We appreciate that the "Climate Change and Natural Capital Study" actually encourages the Borough to *reduce* provision for car parking – but we see this as putting the cart before the horse. It is one thing to have reduced demand flow from a policy portfolio, another to create inconvenience and obstacles in futile efforts to force change. Parking has been mentioned by consultees in relation to employment sites in both towns, and the availability of cheap or free parking for employees in Blackburn town centre is something that has been raised

by delegates to our Trades Union Council in the past – particularly when the development of Feilden Street car park and of the College campus led to a net loss of cheap and free car parking spaces. We are not aware of any study on this, so it is perhaps something that could be considered as part of the Local Plan development process – particularly in light of the allocation of housing growth areas in Blackburn to boundary locations. Cheap and plentiful town centre parking could be a selling point in respect of attracting both visitors and business to the town centres.

The Infrastructure Plan refers to a “Blackburn Railway Station redevelopment: transport hub and community hub” project, that we do not know the details of. We wonder if this might also look at the contiguous parking on Peel Park and whether this might be enhanced and better promoted as a Blackburn town centre business and visitor car park. We also wonder if it might consider the arrival times of trains to Blackburn in the mornings. They seem to be rather more “passing through” than convenient commuter links.

7.2 The “Infrastructure Delivery Plan” seems to us to be clearer about identifying potential increases in need than it is specific about the solutions. We wonder, in particular, if the potential pressure from housing developments in the North of the Borough suggest a need for more focussed consideration, given that they could involve the injection of a more concentrated new population – at the same time as Ribble Valley Borough Council is also planning for a new housing development close by. In respect of primary school places, for instance, it would be useful to know more about why a new primary school is speculated for the Western division, whose pupil growth is forecast to be equal to that of the Northern Division, when only Roe Lee is really close to the envisaged new housing. We also feel that public acceptance of new housing could be improved if there was greater transparency, and local consultation, about the use of Section 106 monies -and if these were more clearly associated with the developments whose impact they are intended to mitigate.

Karen Narramore
Secretary

c/o Unison Office,
Staff Residence,
Royal Blackburn Hospital,
Haslingden Road,
Blackburn, Lancs,
BB2 3HH

12.02.21