

Session 2

Issue 2 - As anticipated growth levels are to be included within Policy SDP2 (see Suggested Modification below) is it necessary to include site selection criteria for new development as shown?

We do not consider that there is a need, per se, for site selection criteria in the Core Strategy now that anticipated growth levels are proposed to be included within Policy SDP2. However, we feel that the more important question is the potential harm that such an approach to site selection may cause to important decision making at the site selection process, particularly in relation to the need to provide attractive, commercially viable sites to bring developers to Pendle to support the levels of new housing delivery proposed in the Plan. There is a danger that a focus on a brownfield first approach that has failed to attract development in the past, will simply repeat the pattern and fail to deliver the Core Strategy. It is also not necessarily consistent with national policy, with the NPPF focusing more on the wider notion of sustainable development. The NPPF encourages the effective use of brownfield land, and states that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. However, due to the substantial undersupply of housing in the Borough and relative unattractiveness of the remaining brownfield sites in the Borough to the market at this time, we consider that such an approach will not support the delivery of new housing in the Borough. A brownfield first approach could be considered to be unsound in this context.

Issue 3 - Does Policy SDP2 provide the framework to encourage the effective use of brownfield land? For example should there be a locally appropriate target for the % of brownfield land in selecting sites for new development? Or is the policy too prescriptive in this regard in prioritising previously-developed land (PDL)?

As outlined above, we consider that a brownfield first approach, and specifically a target driven one, is likely to harm the delivery of new housing in the Borough by reducing the amount of attractive development sites, particularly in the early periods of the plan. The ability of the

Council to attract the larger housebuilders back to the Borough will be hindered by this approach.

Issue 5 - Is the distribution of housing between the spatial areas within Policy SDP3 justified and will it allow the housing needs of the Borough to be met?

The Council's evidence of Development Viability indicates that the delivery of new houses is more likely in the West Craven Towns and Rural Pendle, and that housing development sites in the M65 Corridor are currently unviable. We therefore consider that a greater focus should be directed to these more deliverable areas, particularly in the early phases of the Plan. As outlined above, in order to deliver new housing growth the Council must provide attractive sites for development. East Lancashire has generally experienced low rates of housing development in recent years, which included a period of housing policy restraint in the early 2000's. The result of this is that for a long period of time many regional and national house builders have focused development in other areas. In order to bring those developers back to East Lancashire, and the Borough of Pendle, suitable and attractive sites will need to be provided and promoted by the Council. There needs to be a flexibility built in to the Core Strategy approach to allow the Site Allocation Document to reflect the housing market to attract developers in sufficient numbers to build the required number of houses.

Issue 6 - Does Policy SDP3 incorporate sufficient flexibility to allow the Borough to deliver sufficient new homes, if one of the spatial areas is under performing?

As above, we consider that the policy does not allow sufficient flexibility within the approach and this should be addressed.

Issue 7 - Should a greater proportion of housing development be assigned to the West Craven Towns and Rural Pendle to aid delivery, particularly in the early years of the Plan?

As detailed above, we consider that the early years of the plan should assign more development to the West Craven Towns and Rural Pendle, and this should be tied in with a full assessment of the Green Belt. The current plan approach is too rigid, and likely to result in future Site Allocations being undeveloped during the Plan Period. Local house builders do not have sufficient capacity to deliver new housing at the levels proposed in the Borough without the injection of regional and national housebuilders into the market, to create competition and drive sales.