



THE HOME BUILDERS FEDERATION

Date: 19th March 2015
Consultee ID: 755915
Matter: 1

PENDLE CORE STRATEGY PLAN EXAMINATION

MATTER 1: PROCEDURAL AND OVERARCHING MATTERS

Question 1 to Question 6:

1. The HBF has no further comments at this stage.

Question 7: Is the SA of the Plan satisfactory showing how the different options for growth and development perform?

The Proposed Mitigation Measures within Section 4.4 of the SA do not refer to the submission version of the CS. Have mitigation measures been considered for all the policies within the submission version that would have significant effects?

2. The HBF refers the Inspector to our comments upon the Pre-submission Core Strategy. These comments are still considered valid.

Question 8: Has the Council complied with the DTC, particularly in relation to the distribution of housing within the Burnley and Pendle Housing Market Area and the consideration of strategic sites for employment?

3. The HBF refers the Inspector to the concerns raised within our comments upon the Pre-submission Core Strategy. The HBF is unaware that any further progress has been made between Pendle and Burnley considering the delivery and distribution of housing across the market area. In this regard our initial concerns remain valid.

Question 9: Has the preparation of a series of documents rather than a single Local Plan been clearly justified, particularly the deferral of site allocations?

4. The Pendle Local Plan is intended to be brought forward in two stages; the first part the Core Strategy and a subsequent Site Allocations and Policies DPD. Whilst this is not unusual the NPPF, paragraph 153, clearly indicates that the Government intends local planning authorities to produce a single local plan for its area, producing separate development plan documents only where clearly justified. The HBF is unaware that the Council has

sought to provide any reasoned justification for producing several documents or any local circumstances which would have prevented the preparation of a comprehensive local plan. Whilst this need not be fatal to the soundness of the plan it is recommended that the Council identify what mechanisms will be put in place to ensure a significant boost to housing supply is achieved prior to the adoption of the Site Allocations and Policies document.

Question 10: Is the timeframe for the CS appropriate?

5. The NPPF, paragraph 157, indicates a preference for plans to have a 15 year time horizon. Whilst the Core Strategy end date of 2030 would accord with such a horizon the plan is made up of more than one component. The subsequent Site Allocations and Policies DPD is not anticipated to be adopted until July 2017 at the earliest (Local Development Scheme CD/02/01 page 27). This will provide a maximum 12½ year time horizon post adoption. Given that the Core Strategy defers many elements to the Site Allocations and Policies DPD it is recommended that a longer time frame be considered for the overall plan.

6. If the time horizon of the Core Strategy is extended to conform with the NPPF preference the housing and other plan requirements will need to be adjusted accordingly.

Question 11: Does Policy SDP1 reflect the presumption in favour of sustainable development in paragraphs 14 and 15 of the National Planning Policy Framework (the Framework)?

7. The HBF has no further comments at this stage.

Question 12: Is the drafting of the policies sufficiently clear on what will or will not be permitted and where? Do they provide a clear indication as to how a decision maker should react to a development proposal? Are they concise expressions of policy, excluding explanation and guidance?

8. The HBF provides detailed comments against individual policies within our comments upon the Pre-submission version of the plan and other hearing statements. In the interests of brevity these are not repeated here.

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229