

Pendle Core Strategy Examination

Pendle Borough Council

Hearing Statement

Session 2 – Tuesday 14th April 2015

Matter – Strategy for the Distribution of Development

1. Are the settlements identified in Policy SDP2 in the appropriate position in the settlement hierarchy?

1.1 The settlements identified in Policy SDP2 are positioned in the hierarchy according to their status. The hierarchy has been established through a robust evidence base process. The North West Key Service Centres – Roles and Function report [CD/03/02] and the Sustainable Settlement Study [CD/03/01, Chapter 4, page 72] have been used to identify the relevant hierarchy position for each settlement. These studies consider a number of factors including levels of population, services and facilities, and their relationships and interactions with neighbouring settlements. The Sustainable Settlements Study also considers the future role of each settlement tier and takes account of the capacity of each settlement to grow (as identified by the Strategic Housing Land Availability Assessment and Employment Land Review). The position of a settlement within the hierarchy reflects the Council's overall strategy for the sustainable growth of the borough.

2. As anticipated growth levels are to be included within Policy SDP2 is it necessary to include site selection criteria for new development as shown?

2.1 The Council's response to the Inspector's further questions (C/004) proposed a modification to the plan which would see the policy amended to include the broad, anticipated growth levels for each settlement tier. This amendment will provide clarity to the policy in terms of the expected levels of growth in each settlement.

2.2 The first part of Policy SDP2 sets out where development should be located (i.e. the settlement hierarchy) and the second part of the policy includes site selection criteria to show how sites will be chosen in a given location. The policy sets the spatial development principles for allocating sites in the Local Plan Part 2: Site Allocations and Development Policies DPD and can be used as a tool by Development Management officers in the decision making process. The purpose of the criteria is to encourage the re-use of brownfield land (in line with the NPPF, paragraphs 17 and 111) and aid urban regeneration. It is therefore necessary to include the criteria to ensure the optimum approach to the sustainable development and growth of the borough.

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)? See in particular C/004 for Council's response to the issue of a specific target for the amount of brownfield land to be developed.

3.1 The site selection part of Policy SDP2 aims to provide a balanced approach to the sustainable development of the borough and will be used to prioritise site allocations. It recognises the need to prioritise the use of brownfield land whilst acknowledging the realities of current delivery constraints. It follows the approach in the NPPF (paragraphs 17 and 111) which

encourages the effective use of land. The prioritisation of certain types of land to be used first aims to direct development to the most sustainable locations.

- 3.2 The reasoned justification acknowledges the current difficulties of redeveloping brownfield sites and the policy does not limit development proposals solely to brownfield land. The policy indicates that brownfield land should be prioritised but clearly this must be balanced with the delivery of the plan, which requires other types of land to be used to achieve the proposed levels of development.
- 3.3 The policy does not set a specific brownfield development target. This reflects the viability issues faced by the borough and provides a flexible approach, allowing the development of other types of land. Current market conditions would lead to a very low target being set. The monitoring and delivery table at the end of Policy SDP2 includes a brownfield target of 50% or less as a trigger point for action to be taken to address the reuse of brownfield land.
- 3.4 If no criteria or trigger points were included then there would be no direction given to how sites should be selected and this would undermine the principles of sustainable development.
- 4. Is the division of the Borough into 3 spatial areas appropriate? For example should the M65 corridor be split into more than one spatial area as suggested by Policy LIV4 (M65 Corridor and M65 Corridor North)?**
 - 4.1 The division of the borough into three spatial areas is wholly appropriate for its sustainable development. It reflects the geographical make-up of the borough, the interactions that occur between settlements and the way settlements function individually and together. The M65 Corridor forms a continuous urban belt from the boundary with neighbouring Burnley 8km north-east to the edge of Colne. The West Craven Towns are two independent but closely related towns in the north of the borough and the settlements in the Rural Areas sit in the wider rural landscape/countryside. The three areas were defined by looking at the key characteristics of each settlement (e.g. population, access to services, house prices), the geography of the area, and their ability to grow sustainably.
 - 4.2 Policy LIV4 indicates that when looking at site viability and the potential to deliver affordable housing, the M65 Corridor can be separated into two areas. This distinction reflects the difference in residential values and property markets in these areas but it does not mean that they function independently of each other. The Development Viability Study (DVS) [CD/07/01, paragraph 3.51] explains that the distinction between the two parts of the corridor relates to the nature of the development sites available. However these differences do not warrant dividing the M65 Corridor into separate spatial areas as in all other respects the settlements work together as a contiguous urban area.

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?

- 5.1 The distribution of housing between the spatial areas in Policy SDP3 is founded on an analysis of the evidence base. Paragraph 7.28 of the justification text sets out the factors taken into account when determining the housing distribution. In particular, the SHMA [CD/04/01, paragraphs 10.20-10.45] provides a suggested housing distribution based on the current population distribution, past housing delivery rates, future housing land supply data and the current affordable housing need. It notes that this information should not form the sole basis for the borough's spatial strategy and that consideration will also need to be given to the viability of sites to deliver the housing requirement.
- 5.2 The findings from the Development Viability Study (DVS) [CD/07/01] indicate that sites in the Rural Areas are currently the most viable, followed by those in the West Craven Towns and finally those in the M65 Corridor. Although the M65 Corridor has the lowest levels of site viability compared to the other areas of the borough, it represents the area in greatest need of new housing. It also has the services and facilities to support the growth in a sustainable way. Any alternative spatial distribution of housing with significantly higher proportions directed to more viable areas would require significant investment in infrastructure and services, would not represent a sustainable approach to the growth of the borough and would not meet the housing needs in the right locations.
- 5.3 It is important to take a balanced approach to the distribution of new housing. Policy SDP3 takes account of the housing needs of the population, the ability to deliver the requirement, the availability of sites for development and environmental constraints.

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?

- 6.1 Policy SDP3 is one of a number of policies which together set out the spatial development principles for Pendle. It is a strategic policy which will primarily be used to guide the allocation of sites in the Local Plan Part 2: Site Allocations and Development Policies.
- 6.2 The intention of the policy is not to set rigid targets but to guide development to the most sustainable locations and those areas in housing need. Policy SDP3 states that the location of new housing "should be guided" by the percentages rather than "must meet" the percentages. This approach allows for a variation to the percentages should circumstances exist which may restrict the delivery of sufficient housing in a particular area.
- 6.3 The Monitoring and Delivery section at the end of the policy includes a number of trigger points which will be used to identify whether a particular part of the borough is under performing in terms of meeting the spatial distribution of housing. The trigger points recognise that it is likely that a lower proportion of development will be achieved in the M65 Corridor in the early years of the plan. These trigger points have been determined through a consideration of the evidence including looking at the impact of current levels of viability on

delivery. Where monitoring work indicates that delivery is off course, then it may be necessary to apply one of the contingencies, such as identifying additional viable sites through a review of the SHLAA.

- 6.4 The wording of the policy and the monitoring framework provide an approach which is sufficiently flexible to ensure the delivery of sufficient new homes.

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?

- 7.1 Directing a greater proportion of housing to the West Craven Towns and Rural Pendle spatial areas would not accord with the overall sustainable development strategy for the borough, particularly in terms of meeting the housing needs, which are mainly within the M65 Corridor (see SHMA) [CD/04/01].

- 7.2 The West Craven Towns and Rural Areas have fewer services and facilities and are not as accessible as the settlements within the M65 Corridor. Assigning a greater proportion of housing developments to these areas would require improved access arrangements including the implementation of the A56 by-pass. The infrastructure capacity of these areas going forward has been identified based on the proposed housing distribution set out in Policy SDP3 and any significant increase in development in these areas may require an increase in infrastructure investment. Furthermore, given the rural nature of these areas and number of sites of biodiversity importance within close proximity, the environmental impact of development on these areas is likely to be greater than in the M65 Corridor.

- 7.3 The spatial distribution is to be achieved over the lifetime of the plan and therefore the policy provides flexibility and scope for a slightly higher proportion of housing to be delivered in the West Craven Towns and Rural Areas in the early years of the plan. It is acknowledged that sites in the West Craven Towns and Rural Areas are currently more viable to develop than sites in some parts of the M65 Corridor and therefore could contribute to the early delivery of the housing requirement. However, this is likely to have implications for the infrastructure and service capacity of these areas and will not address the housing need in the M65 Corridor. This approach would also need to be countered with lower levels of delivery in these areas later in the plan period.

8. Is the distribution of employment between the spatial areas within Policy SDP4 justified and will it allow the economic needs of the Borough to be met?

- 8.1 Policy SDP4 is concerned with how the employment land requirement (identified in Policy WRK2) should be distributed in Pendle over the plan period. The main factors that have influenced the Council's final decision are outlined in the Employment Land Review (ELR) [CD05/01] and considered briefly below.

- 8.2 Before considering the local factors that have influenced the proposed distribution, it is important to note that at a wider scale Pendle sits within the Pennine Lancashire sub-region.

The Pennine Lancashire Integrated Economic Development Strategy [CD/05/05] examines the trajectory of key economic indicators and identifies other related factors that will influence the economic performance of the sub-region up to 2020. It also identifies the key areas of under-performance and proposes strategic interventions to help address this. These considerations have also influenced decisions on the requirement for, and distribution of, employment land in Pendle.

- 8.3 The more localised factors considered when establishing the proposed distribution of employment land include:
- Existing distribution of the population
 - Settlement size and service provision
 - Past completions – housing and employment
 - Proposed location of new housing
 - Availability land – housing and employment
 - Market demand
- 8.4 The settlement hierarchy (Policy SDP2) was informed by three documents: the Pendle Sustainable Settlements Study [CD/03/01], The North West Key Services – Roles and Functions [CD03/02] and the Pennine Lancashire Spatial Guide [CD03/03].
- 8.5 The hierarchy closely aligns with the current distribution of the population. This is an important consideration in terms of delivering sustainable development, as it helps to inform where jobs need to be located in order to maximise accessibility for the workforce and minimise the need to travel.
- 8.6 Whilst there is no reliable way to distribute Sub-National Population Projections (SNPP) below the district level, recent housing completions show that although the distribution of new dwellings has varied from year to year, the general trend has been for the majority of all new housing to be delivered in the M65 Corridor.
- 8.7 Looking to the future, the Core Strategy is proposing the main proportion of housing in the M65 Corridor. This reflects the size, function and greater levels of service provision easily accessible from towns in this part of the borough; helps to foster more sustainable patterns of development and supports regeneration activity associated with housing market failure. It is also informed by the Strategic Housing Land Availability Assessment (SHLAA) [CD/04/03], which provides data on the amount of land which could potentially be developed for new housing.
- 8.8 The ELR identifies the availability of employment sites across the borough. Pendle Council has monitoring data for the past take-up of employment land dating back to 1982/83. From 2003 onwards the results for the previous financial year have been published on an annual basis and are currently made available through the Authority's Monitoring Report (AMR) [CD/02/03a and CD/02/03b]. Table 5.2 in the ELR shows the spatial distribution of available sites and past take-up.

- 8.9 The ELR considered market (revealed) demand in a number of ways including an assessment of current enquiries and feedback from agents. Specifically Pendle Council has carried out an Employment Land Survey in 2000, 2007 and 2012, to help identify the expansion requirements and locational preferences of businesses within the borough. The results of the 2012 Survey helped to inform the ELR, which at paragraph 3.16 notes that there are two commercial property markets within Pendle:
1. M65 Corridor – including Nelson, Colne, Brierfield and Barrowford
 2. West Craven – including Barnoldswick and Earby
- 8.10 In addition the accessibility provided by the M65 motorway, and the convergence of three Trans-Pennine routes at Junctions 13 and 14, makes the area accessible from throughout Pendle, and from neighbouring authorities in Pennine Lancashire and West Yorkshire.
- 8.11 All these factors have helped to inform the spatial distribution proposed in Policy SDP4, which reflects the available evidence that the greatest levels of need and demand for employment land are in the M65 Corridor. As such the distribution is justified and will allow the economic needs of the Borough to be met in a sustainable way.