

PENDLE LOCAL PLAN CORE STRATEGY

MATTER 2: STRATEGY FOR THE DISTRIBUTION OF DEVELOPMENT

STATEMENT BY BARTON WILLMORE

ON BEHALF OF

JUNCTION PROPERTY LTD

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Issue 1: Are the settlements identified in Policy SPD2 in the appropriate position in the settlement hierarchy?

1. Junction Property Ltd (JPL) supports the settlement hierarchy set out in Policy SDP2, in particular the identification of Nelson, Colne and Barnoldswick as the highest order settlements.
2. The Pendle Sustainable Settlements Study (CD/03/01) shows that Nelson and Colne are significantly larger than the other settlements in the Borough and offer the greatest range and type of facilities including higher order shopping and leisure, jobs, frequent public transport, and secondary and further education facilities. They are the most sustainable settlements for new development.
3. Barnoldswick offers a significantly lesser range of facilities than Nelson and Colne but is the main service provider for the northern and more rural parts of the Borough.
4. All the other settlements in the Borough including Barrowford are much less sustainable for new development than the identified Key Service Centres.

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

5. In line with our original representations, we support the Council's proposed modification to include within Policy SDP2 the part of paragraph 7.22 dealing with the roles and anticipated growth levels of the various settlements.

6. JPL considers that the second part of the policy dealing with site selection should be amended. Both the SHLAA and the ELR show that greenfield sites outside currently defined settlement limits will need to be developed to meet the immediate development requirements of the Borough. In these circumstances, there is little point to a policy which "*prioritises*" brownfield sites and land within existing settlement boundaries.
7. To better reflect national policy, we consider that the second part of the policy SDP2 should be reworded as follows:

In allocating land for new development, full and effective use should be made of previously developed land which is within and adjacent to the settlements identified above, subject to environmental and other sustainability considerations.

8. Whatever wording is chosen, it is important that no sequential approach is introduced for new development. Such an approach would be contrary to national policy.

Issue 3: Does Policy SDP2 provide the framework to encourage the effective use of brownfield land? 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?

9. See our response to Issue 2.
10. We agree with the Council's response that a brownfield land policy target is neither necessary nor desirable. Delivery of sufficient new housing is one of the most urgent priorities of planning in the Borough. The low levels of past delivery are linked to the lack of viability of many previously-developed sites and planning policies which have restricted the release of market-attractive greenfield sites.
11. Any brownfield policy target, enforced by restrictions on the grant of planning permissions for greenfield sites, would greatly exacerbate the problems of housing delivery. It would also frustrate the Council's effort to rebalance the Borough's housing stock as most of the larger brownfield sites are in areas where only lower-cost housing can be provided.

Issue 4: Is the division of the Borough into three 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)

12. JPL considers that the split of the Borough into three areas for housing distribution is broadly appropriate, provided the policy retains the requirement that within each spatial area, the scale of provision should follow the settlement hierarchy set out in Policy SDP2.
13. In relation to the second question, we can find no definition of what constitutes the M65 Corridor North, either in the CS itself or any evidence base document. It clearly includes Barrowford which is north of the motorway. However we also understand from Council Officers that it includes part of Colne but there is no plan available which shows which part. Any sub-division of the built-up area of Colne must be very arbitrary and would be difficult to justify using the present evidence base. We would oppose such a change.

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?

14. The housing distribution shown in Policy SDP3 follows the recommendation of the Burnley SHMA (pp 170-178) which is based on factors such as the current population split, past housing delivery, housing land supply and affordable housing need. JPL broadly supports the proposed split but considers that a slightly higher proportion than 70% of housing development should be directed towards the M65 Corridor. This is the part of the Borough where the most sustainable settlements are located together with some 75% of deliverable/developable housing opportunities (according to the 2014 SHLAA). The SHMA gives no details on how it arrived at the 70% figure.
15. JPL considers that a target in excess of 70% of housing completions within the M65 Corridor is achievable over the plan period provided that sufficient market-attractive sites are released. The low delivery rates over the past decade are as much a reflection of the very restrictive planning policies (which have limited to the supply of good quality housing sites in the M65 Corridor) as they are of market demand. The Development Viability Study (CD/07/01) provides evidence for this at pages 36-37.

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?

16. JPL considers that the submitted policy includes some flexibility as it says that the location of new housing "*should be guided by*" the percentages in table SDP3a. As such, we consider that the figures in the table are not prescriptive requirements which must be achieved, but are instead guidelines which should be followed in the allocation of sites.

17. However, JPL would be concerned if the policy builds in much greater flexibility than already exists. It is a fundamental objective of the CS to direct development to the M65 Corridor. This is the most sustainable location in the Borough for major new housing development and also the area with the greatest regeneration and affordable housing needs. The policy direction should not be diluted. Instead, if housing delivery begins to fail in the M65 Corridor, the Council should seek to address it by removing the obstacles which are restricting the delivery of sites (for example through the removal of onerous planning obligations or requirements) and by improving the range of market-attractive sites. If such measures eventually prove unsuccessful, it should trigger a review of the Plan as the focus upon the M65 Corridor is such a fundamental part of the overall CS planning strategy.

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?

18. JPL would not support any increase in the amount of housing being assigned to the West Craven Towns and Rural Pendle as this is likely to divert housing demand away from the M65 Corridor. This would have a particularly harmful impact in the early years of the Plan when the housing market within the M65 Corridor is relatively fragile and viability is limited on many sites.

Issue 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?

19. No further comments.