



THE HOME BUILDERS FEDERATION

Date: 19th March 2015

Consultee ID: 755915

Matter: 2

PENDLE CORE STRATEGY PLAN EXAMINATION

MATTER 2: STRATEGY FOR THE DISTRIBUTION OF DEVELOPMENT

Question 1: Are the settlements identified in Policy SDP2 in the appropriate position in the settlement hierarchy? It is noted that the Pendle Sustainable Settlements Study suggested a further tier of 'Rural Hamlets'. Why was this not carried forward?

1. The HBF considers this a matter upon which the Council is best placed to respond.

Question 2: Is Policy SDP2 sufficiently clear as to the anticipated growth levels for each settlement category? If anticipated growth levels are included is it necessary to include site selection criteria as shown?

2. The HBF do not consider that Policy SDP2 provides sufficient clarity to identify the anticipated growth levels for each settlement category. The HBF consider that if anticipated growth levels were included this would provide further transparency to the plan and provide greater certainty for residents and developers alike. The HBF also note the Council's proposed main modifications to this policy. Whilst this provides some further detail it still falls short of providing the relevant guidance required.
3. The inclusion of anticipated growth levels would also enable key decisions such as the need to amend the boundaries of individual settlements to be made within the Core Strategy, rather than deferring this important issue to a later DPD.

Question 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 in the alternative is the policy too prescriptive in this regard?

4. The NPPF, paragraph 111, does enable local authorities to set targets for the percentage of development upon previously developed land. The HBF support the Council in not seeking to apply an inflexible percentage target

within the plan as this could have the effect of suppressing housing delivery at a time when there is a pressing need both locally and nationally to boost the supply of housing. If a target for previously developed land were to be applied the HBF consider this should be a plan wide target and would need to take account of the availability and viability of such sites across the plan area.

5. The proposed site selection criteria within Policy SDP2 seeks to prioritise the development of previously developed land. If strictly applied it is considered that this would be contrary to the NPPF (paragraph 111) which refers to encouraging rather than prioritising such land. The PPG (ID: 10-009-20140306) identifies such encouragement may be through incentives such as lower planning obligations or different funding mechanisms. This further reinforces the Government's desire to encourage the redevelopment of such site rather than prioritise their use.

Question 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)?

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

Question 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?

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

Question 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?

8. No, within our comments upon the Pre-submission Core Strategy the HBF highlighted the need for greater flexibility within the plan to account for under-delivery from one or more spatial areas. This could be provided by way of contingency sites which are released subject to specific criteria such as the lack of a five year supply or slower than anticipated rates of development within any spatial area is under-performing.

Questions 7 & 8

9. HBF has no further comments at this stage.

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