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Pendle Core Strategy Plan Examination

Hearing Sessions

EXAMINATION STATEMENT

20th March 2015

PWA_13-016_ES01

1 INTRODUCTION

- 1.1 This statement is submitted on behalf of Marcus Kinsman (landowners) and supplements previous representations made during November 2014 to the Publication version of Pendle Core Strategy.
- 1.2 PWA Planning is instructed to review and comment upon the emerging Core Strategy in relation to land north of Wheatley Lane Road, Barrowford.
- 1.3 This statement has been prepared with reference to the 'Examination Guidance Notes' (ref I/006) and 'Matters and Issues to be discussed at Hearing Sessions' (ref I/008) documents issued by the Inspector and specifically responds to those issues set out in relation to Session 4 – The Housing Requirement and Session 5 – How Is The Housing Requirement To Be Met. For ease of reference, the statement is structured to reflect the specific questions as set out by the Inspector in respect of each of those sessions.
- 1.4 The matters addressed herein will demonstrate that our statement as submitted in November 2014 remains relevant to the examination of the Pendle Core Strategy in that:
- There exists clear evidence that the Plan in its current form is not sound;
 - Land at Trough Laithe should not form a strategic site and rather should be considered in greater detail alongside other large housing sites at the Local Plan Part 2: Site Allocations and Development Policies Document;
 - If the land at Trough Laithe is to be allocated as a strategic site for housing, there is clear evidence that Land north of Wheatley Land, Barrowford should also form part of a strategic allocation in order that the Authority are able to demonstrate an ability to meet the housing needs of the Borough over the plan period.
 - If the Trough Laithe site is not to be removed from the proposed Core Strategy, the Council should abandon the examination of this document and begin a Local Plan which is able to fully consider site allocations across the Borough and across the Plan period.

2 SESSION 4

- 2.1 The Inspector has allocated Session 4 to deal with the Housing Delivery. In this respect the Inspector has set out a number of key questions this hearing session will consider; we have addressed relevant questions in turn below.

Question 1

Is the housing requirement justified taking into account population and household growth projections, including migration and demographic change, market signals and proposed economic growth? Do any recently released figures suggest that the requirement should be amended e.g. DCLG household projections February 2015?

AND

Question 2

Do the 2012-based SNPP form a reasonable basis for assessing the housing requirement given the extent that they have been influenced by low completion rates in recent years?

- 2.2 The Council commissioned a Housing Needs Study 2012-based SNPP Update (Nathaniel Lichfield & Partners, September 2014) which represents the objectively assessed need for the Borough across the Plan period. That report recommends an Objectively Assessed Needs housing range for Pendle Borough Council of between 250 to 340 dwellings per annum. The report states that this “would, at a minimum, meet need and demand arising from future projected demographic change within the Borough, whilst also supporting economic growth, and delivering affordable housing to respond to identified local needs.”
- 2.3 In determining the housing requirement figure from the OAN range (identified in the SHMA and HNS Update) the Council must ensure that the figure meets the latest population and household projections; makes an allowance for the plan’s economic aspirations for growth; and boosts significantly the supply of housing in the borough in accordance with the NPPF. The Housing Needs Study 2012-based SNPP Update (Nathaniel Lichfield & Partners, September 2014) is underpinned by the 2012-based Sub-National Population Projections published by the ONS on 29th May 2014; indeed this report represents an update carried out by NLP following the publication of these new statistics. In the time since the Housing Needs Study 2012-based SNPP Update (Nathaniel Lichfield & Partners, September 2014) document was completed, the ONS have published further statistics in relation to household projections; 2012 based Household Projections: England, 2012-2037 (27th February 2015). It is considered that this update requires due consideration before the Council can adopt housing requirement figures for the Plan period in order that the OAN can be considered appropriate and up-to-date.
- 2.4 With reference to this evidence in relation to OAN it is considered that the proposed minimum of 5,662 dwellings to be delivered in Pendle over the plan period, equivalent to 298dpa is not justified. The requirement figure for the plan period should be revised to reflect a minimum target of 6,460 across the plan period, equating to 340dpa in line with the upper range recommended in the Nathaniel Lichfield Report (September 2014).
- 2.5 It is noted that the Council refer within the proposed Core Strategy to the previous annual target of 190dpa being relevant to the consideration that 298dpa should be considered as a significant boost to housing, however given that the 190dpa figure relates back to RS figures which no longer hold any weight, it is considered far more relevant to note that this is a reduced figure when applied to the upper limit recommended by the Nathaniel Lichfield Report (September 2014) of 340dpa. Were the Council seeking to genuinely boost the supply of housing land, and indeed ensure general economic growth over the entire Plan period, it would surely be prudent to adopt the maximum upper range of the identified OAN. Indeed it is considered it is evident that there is no likelihood that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of doing so, noting the relevance of the Solihull ruling in this regard there is no significant ‘policy on’ implications to an extent which should lead the Council to propose a figure lower than the upper limit.

Question 3

Is the housing requirement justified taking into account the need for affordable housing and homes for different groups, the demand for housing and the need to boost significantly the supply of housing?

- 2.6 The Council must revisit the housing land requirement figure in order that it can be demonstrated that the Plan will significantly boost the supply of housing in accordance with the NPPF. The current proposed Core Strategy does not reflect the upper range set out by Nathaniel Lichfield in their report

(September 2014) and it is likely that the Council, in seeking to apply the lower of this range, will not achieve the housing provision for the borough which is required in order to support economic and general growth throughout the Plan period. This inability to deliver is accepted by the Council in reducing this target figure for the initial period of the plan to 250dpa for the period 2015-2020.

Question 5

Is there sufficient flexibility built into the housing requirement?

2.7 Policy SDP3 provides a guide for the Local Plan Part 2: Site Allocations a Development Policies document in setting our percentage allocation of housing land by spatial area. This allows for flexibility during the preparation of Local Plan Part 2 in the definition of precise locations for residential development. The allocation of the strategic site at Trough Laithe is not appropriate as it is not a strategic site but rather represents one large potential housing site of which there are numerous examples considered developable by the Council with the SHLAA.

Question 6

Is the stepped approach to housing delivery justified? Will it fully meet the need and demand for housing in the early years of the plan?

2.8 The proposed trajectory of housing delivery is not considered to be consistent with the aims of the NPPF in particular with regards to significantly boosting the supply of housing land. The Authority wrongly seek to back-load development to the later in the plan period and we consider this to be wholly inappropriate. The authority should instead seek to encourage growth in the early years of the Plan period which will minimize the risk of an overall undersupply across the Borough during the Plan period. Indeed, this matter is compounded by the fact that Pendle Borough Council have consistently failed to meet the targets for housing delivery, meaning that a 20% buffer must be added to the five year supply figure for deliverable housing land. In order to be consistent with the front-loading of delivery must be the trajectory for the plan period, albeit this may include an allowance for a lesser annual requirement for the final years of the Plan period.