

**Mark Roberts**

## **Pendle Core Strategy Examination**

### **Hearing Statement Session 5**

Dear Mr Dakeyne

I have a number of further comments in addition to the representations I have submitted to Pendle Borough Council's consultation process. I would be grateful if you could review and consider as part of the Examination process of the Pendle Borough Council (proposed) Core Strategy.

#### **Session 5**

**Is the proposed strategic housing site at Trough Laithe justified (Policy LIV2)? Does it fit with the settlement hierarchy of the Plan (Barrowford is defined as a local service centre)? Should the site form part of the CS or should consideration be deferred to the SAP?**

There is little justification provided for the proposed strategic housing site at Trough Laithe. Barrowford does not have the infrastructure in place (school capacity, highways capacity for example) to be able to accommodate 500 units without significant further impacts to the village. Furthermore in seeking to allocate the site within the CS the Council have failed to assess (or demonstrate publicly) that they have assessed adequately the ability of the site to be delivered either within the early years of the plan or at all in future years. PBC are merely taking the easy option to allocate a large Greenfield site for residential development without first fully considering the redevelopment of other large and small brownfield sites within the borough. There is no evidence base within the proposed Core Strategy at all that suggests that the site either has the capacity or the ability to deliver the amount of dwellings proposed and therefore the Council's approach is unsound and fundamentally flawed. Further there is no assessment at all of the impact that will result from the proposed allocation.

A greenfield site of this nature should continue to be safeguarded and reviewed later in the Plan to ascertain whether it is needed for the delivery of homes and whether it is suitable to deliver the substantive number of homes proposed. The allocation and development of Trough Laithe would only serve to slow down and at worst prevent development and regeneration of other brownfield sites within Pendle (and Burnley for that matter).

**Is the Trough Laithe site deliverable in the early years of the Plan period. Is Policy LIV 2 sufficiently clear on what will be delivered (500 units)? Are there any significant constraints such as historic heritage and access which may prevent the site coming forward? Is the site readily accessible by public transport, walking and cycling? Should there be a requirement for a Development Brief for the site.**

There is no evidence that the site is deliverable in the early years of the plan, apart from PBC's statement that it capable of delivering 50 units per year immediately. This assumption is fundamentally flawed in that build rates would never achieve 50 units per annum and sales rates would never achieve more than 2.5 to 3 units per month. It is simply a flawed assumption. Further

the site has no planning permission and there are significant constraints which need to be addressed, through public consultation, to determine whether it is deliverable.

The high landscape value of the site alone (it is widely visible from views across Pendle) is something that has not been addressed in anyway by the Council, merely assuming that the 'infilling' of this green lung is acceptable. The Development Framework referred to has never been made publicly available – again this is a flawed approach by the LPA especially when seeking to include a site of this scale in the Core strategy.

**The proposals to meet the requirement are not justified and are not effective for the reasons outlined above. Given the above issues there is an overreliance on Trough Laithe to deliver the Council's Housing requirement as a strategic allocation, and therefore the Council's approach is not justified. The Plan is unsound.**