

Pendle Core Strategy Examination

Pendle Borough Council

Hearing Statement

Session 7 – Thursday 16th April 2015

Matter – How is the Employment Requirement to be met?

1. **Are the circumstances sufficiently exceptional to justify the release of Green Belt land at Lomeshaye for a strategic employment site and, if so, have these been justified in the CS? For example have the options for the use of previously-developed land been fully considered? See in particular C/004 for Council’s response including the need for employment land to meet the full requirements of the Borough and the lack of other suitable sites beyond the Green Belt.**
 - 1.1 The allocation of a strategic employment site within the borough, and more specifically within the M65 Corridor, is necessary to meet the borough’s objectively assessed need for employment land both in terms of the quantity and quality of provision.
 - 1.2 Development sites in a modern business park environment have not been readily available in the M65 Corridor since the construction of three small business units on a 0.25ha site off Pendleside marked the completion of the extension to the Lomeshaye Industrial Estate in 2005. Since that time only the West Craven Business Park to the north of Earby and the B1 (office only) development at Riverside between Nelson and Barrowford, have been brought forward for employment. Neither of these sites addresses the borough’s principal need, which is for sites for B2 uses in a modern business environment, with good access to the motorway.
 - 1.3 Having explored a range of realistic alternatives for delivery within the borough (Strategic Employment Land Site Allocation Report (Parts 1 & 2) [CD/05/02]), a site in the Green Belt to the west of the existing Lomeshaye Industrial Estate was, on balance, considered to represent the most sustainable solution and offer the most attractive location for businesses.
 - 1.4 As national planning policy requires local planning authorities to demonstrate “exceptional circumstances to justify the release of Green Belt land” preliminary discussions were held with planning officers in the neighbouring authorities of Burnley and Craven, to determine whether they could accommodate some of Pendle’s employment land requirement (N.B. Bradford, Calderdale and Ribblesdale do not represent realistic alternatives).
 - 1.5 Whilst these discussions revealed that the provision of employment land to meet some of Pendle’s identified need may be feasible, there were insurmountable issues in both areas that continued to make the site at Lomeshaye the most appropriate and sustainable solution.
 - Craven – As demonstrated in the Employment Land Review [CD/04/01] the overwhelming demand for employment land in Pendle is in the M65 Corridor. This area of the borough has very limited interactions with Craven, primarily due to the poor connectivity between the two areas. As such it was recognised that employment land provision in Craven did not represent a sustainable spatial option and would fail to address the identified economic needs of Pendle.

- Burnley – To provide sufficient employment land to meet its own requirements, Burnley Council is already advocating the need to encroach into the Green Belt west of the town (Burnley Local Plan – Issues & Options Report [CD/03/04]). As such the development of a Green Belt site within Pendle remained the sequentially preferable option.
- 1.6 The re-use of Brownfield sites has been fully considered in the comprehensive two stage site appraisal process included in the Employment Land Review [CD/04/01]. Those sites considered to have the potential for future employment use have been included in the existing supply and make a significant contribution to the 68ha requirement for employment land – the relevant figure is shown in Table WRK2a on page 154 of the Core Strategy (Row I). As brownfield sites, together with vacant premises (Row J), constitute the existing supply, they cannot help to address the identified shortfall of 25ha (Row L).
- 2. Is the Lomeshaye site deliverable? Is Policy WRK3 clear on how and what will be delivered? Are B8 uses appropriate? Are there any significant constraints such as access, topography, flood risk and biodiversity which may prevent the site coming forward?**
- 2.1 The deliverability of Lomeshaye is set-out in Chapter 6 of the Strategic Employment Land Site Allocation Report (Parts 1) [CD/05/02] (Page 79). This indicates that the current viability of the site is questionable, but highlights that there is developer interest in bringing it forward. Delivery will be assisted through the pursuit of grant funding from the Lancashire Local Enterprise Partnership (LEP) and other sources. A successful bid for the Burnley & Pendle Growth Corridor Fund has already secured funding for improvements to junctions 12 and 13 on the M65 motorway.
- 2.2 A preliminary Transport Review (Traffic, Transport and Highways Consultancy, 2014) concludes that there are “excellent existing and established links to the local, national and international transport infrastructure”; that the site “is capable of being developed without any detrimental impact in respect of the transport network performance” and that “the highway network is capable of delivering full extent of development at the Lomeshaye Extension Site without compromising the performance of the local highway network and amenity.”
- 2.3 A Level 2 Flood Risk Assessment Scoping Study (Flood Risk Consultancy, 2014), has informed the provisional layout of that part of the site falling within Flood Zones 2 and 3. The findings have been accepted by the Environment Agency. Similarly an Environmental Review (RPS Health, Safety & Environment, 2006) has influenced the provisional layout of the remainder of the site, ensuring that areas which will form an integral part of the borough’s ecological network remain free from development.
- 2.4 The owners of the proposed site have not objected to the development of the land in principle. Discussions with them on how to bring the land forward are progressing.

3. Will the proposed new Green Belt boundary endure beyond the Plan period so that it has permanence or is there a need to identify 'safeguarded land' between the urban area and the Green Belt?

- 3.1 The main purpose of the Green Belt designation at this location is to check the growth of the built-up areas to the south, thereby preventing the towns of Nelson and Brierfield merging with the linear village of Fence.
- 3.2 The Strategic Employment Land Site Allocation Report (Part 1, Page 17) [CD/05/02] provides an assessment for the parcel of land in question, which has strong boundaries to the north (A6068), east (Lomeshaye Industrial Estate), south (Pendle Water) and west (Old Laund Clough). The topography of the site also means that it is relatively isolated from adjacent areas of open countryside. Development of the site represents an opportunity for planned growth rather than the "unchecked sprawl" Green Belt status is intended to safeguard against. The report assesses the development of the site against the five purposes of Green belt as set out in the NPPF (paragraph 80) and concludes that its development would not undermine the role of Green belt in this location.
- 3.3 The Green Belt criterion concerning urban regeneration can be applied equally to all land within the Green Belt and is not site specific. Green Belt status has helped to reduce the pressure to allocate or develop a number of urban fringe sites in Pendle. To date the emphasis has been to look at meeting the development needs of the Borough elsewhere and in particular to recycle previously developed land within a defined settlement boundary. However, the evidence base underpinning the Core Strategy demonstrates that this is no longer possible.
- 3.4 The strength of the boundaries to the north and west, particularly if structural planting is carried out alongside the A6068, provide assurance that the revised Green Belt boundary would endure well beyond the end of the plan period, thereby:
- checking the unrestricted sprawl of the built-up areas to the south;
 - preventing any merger between the industrial towns of the M65 Corridor and the Pendleside villages to the north; and
 - safeguarding the countryside from encroachment.
- 3.5 Future development in the M65 Corridor is severely constrained both topographically and by the significant extent of Green Belt to the north of Brierfield, Nelson and Colne. There is pressure for Greenfield release to the north of the M65 motorway and that includes the Green Belt. The Council intends to review the extent of the Green Belt as part of the site allocations process. Any proposals to bring forward sites for safeguarding will be considered as part of this review. If timescales permit this work will also form part of the joint review proposed for the Green Belt in Pennine Lancashire.

4. Is the site at Lomeshaye capable of being made accessible by public transport, walking and cycling?

- 4.1 The findings of the Preliminary Transport Review (Traffic Transport and Highways Consultancy, March 2014) indicate that "with appropriate improvements, the highway network is capable of delivering the full extent of development at the Lomeshaye Extension site without compromising the performance of the local highway network and local amenity." More detailed modelling will take place as development proposals for the site advance.
- 4.2 Although Churchill Way provides the existing Lomeshaye Industrial Estate with direct access from the A56 via Junction 12 on the M65 motorway (J12), it is effectively a long cul-de-sac. This has proved to be a significant draw-back in seeking to provide regular bus services into the estate. The nearest bus stops with regular services are:
- Lomeshaye Business Village (hourly service Route 65) – adjacent.
 - Carr Road / Richmond Road (hourly service and Routes 65 and 93) – approximately 400 metres
 - Waggon & Horses, Colne Road (every 10-15 minutes, Routes 21, 24, 25, 28, 29, 451, 837, 919, M65, SMC3) – approximately 500 metres
- 4.3 The eventual extension of Churchill Way to join up with the A6068 will provide an opportunity to operate regular 'Mainline' bus services through the estate. The diversion of these services along Churchill Way and the A6068 would allow some of the popular 'Mainline' services between Burnley and Nelson to serve both the estate and the popular Nelson and Colne College, without adding significant time to the journey. It could also offer direct bus services from places as far afield as Accrington, Clitheroe, Padiham, Keighley and Skipton.
- 4.4 Transdev Burnley & Pendle recently launched the new 'Burnley Connect' local bus service. This has reconfigured a number of local bus routes to offer services to popular destinations, such as Boundary Mill, which were not previously on a traditional bus route. It is anticipated that the opportunity to run services through the Lomeshaye Industrial Estate, will encourage Transdev Burnley & Pendle to consider providing 'Burnley Connect' services into the new and larger estate. These could connect with the regular train service at the nearby Nelson Interchange (approximately 2km from the site). Trains operate on an hourly frequency in each direction between Colne and Blackpool South offering connections to Manchester (approximately one hour via Rose Grove or Blackburn) and the West Coast Mainline at Preston for services to London, Birmingham and Glasgow and further afield.
- 4.5 Whilst traffic flows on the A6068 will increase, there is available capacity. On balance the creation of this new link is considered to be a positive step for businesses on the estate and, in particular, for future public transport connections.

- 4.6 Two existing cycle routes penetrate the existing industrial estate from nearby Nelson to the east. Although funding has yet to be found, Pendle Council proposes to extend the southernmost route through the estate to connect with the B6248 (Clitheroe Road) approximately 0.75km to the south-west. The Pennine Cycleway (Sustrans National Route 68) passes along the towpath of the Leeds and Liverpool Canal immediately south of the estate, making off-road cycle journeys possible from Burnley, Nelson, Colne and farther afield. The Pendle Cycling Strategy 2011-16 [CD07/014] proposes the creation of a new cycleway alongside the A6068, which forms the northern boundary of the proposed strategic site. The route will link Nelson and Barrowford with Fence and the cycle network in neighbouring Burnley. It is also included in the Lancashire Cycling Strategy [CD/07/11] and identified on Page 31 of the Burnley Green Infrastructure Strategy 2013-2031 (TEP Consultants, 2013) as a greenway – a safe route for pedestrians, cyclists and horse-riders remote from traffic.
- 4.7 Numerous public footpaths criss-cross the existing estate and the area of the proposed strategic site. Three footpaths offer access from the north (Fence); two from the east (Nelson) and four from the south and west (Brierfield). There are good pavements within the site, and several footpaths offer pleasant riverside walks, or gentle strolls along wildlife corridors. The topography within the site is gently sloping, making walking and cycling acceptable for most people.
- 4.8 Overall the site has good highway access, which is essential for commercial use. This will be improved further if the strategic site is developed. The provision of a through route will enable the Borough's largest employment site to be much better served by public transport, thereby reducing the need for employees to travel to work by car.

5. Will Policies WRK1 and WRK2 be effective in supporting the sustainable growth of all types of businesses and sustainable jobs in rural and other areas?

- 5.1 The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental.
- 5.2 Policies WRK1 and WRK2 specifically address the economic dimension of sustainable development by seeking to make a positive contribution towards building a strong, responsive and competitive economy; and by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.
- 5.3 This policy response addresses paragraphs 18-22 of the National Planning Policy Framework (NPPF) [CD15/01]; specifically paragraphs 20 and 21 which encourage local planning authorities to *“plan proactively to meet the development needs of business and support an economy fit for the 21st Century”* by providing policies that are *“flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”*

- 5.4 The flexibility referred to by the NPPF relates to both the type of employment to be generated (Policy WRK1) and the quantum of employment land that is needed to meet identified development needs (Policy WRK2).
- 5.5 Policy WRK1 provides the framework for future growth in Pendle. It focusses on providing the right environment for investment that will help to build on the areas existing strengths in advanced engineering and precision engineering; and in particular the aerospace industry. Alongside the proposed extension to Lomeshaye, a hierarchy of existing sites will provide the best possible environment for future economic growth.
- 5.6 It is difficult to provide certainty with regard to the type of employment opportunities that will be provided, as the planning system has little influence over the end occupier of a unit except in terms of the use-class it operates within. The proposed approach will allow flexibility for end-users to determine the format of their development. When referencing employment in this context we are referring to businesses in the B1, B2 and B8 land-use classifications. These encompass traditional employment uses (industrial, offices and warehousing). Development on any protected and/or allocated employment sites in Pendle will normally be restricted to such uses as, with the exception of B1-uses, they cannot readily be accommodated within built-up residential areas. However, Pendle Council recognises that the NPPF when referring to “economic growth” and “business” is looking more broadly than traditional employment land uses. Policy WRK1 recognises the need to diversify the local economy and to be flexible in how employment land is utilised, but balances this flexibility against the need to deliver sustainable development and will not damage other facets of the local economy.
- 5.7 Paragraph 22 of the NPPF also requires local planning authorities to *“avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”*. Pendle has one of the highest proportions of its workforce employed in manufacturing. Those sites in the borough which continue to support employment in the broad range of industries that make up this important sector should continue to be maintained for that purpose. However, the ELR has considered the continued suitability of the protected employment sites in the borough and the Council is confident that only those sites with a reasonable prospect of being developed for employment in the long-term will continue to receive protection through planning policy.
- 5.8 Policy WRK1 also recognises town centres as highly sustainable locations which alongside allocated sites should be the focus for new economic growth. The vitality and viability of town centres should be promoted by the encouragement of a wide range of both day-time and evening uses, including a good mix of shops, leisure uses, and local services. This is taken forward in Policy WRK4.

- 5.9 The Government has been clear that it also wishes to stimulate economic growth in rural areas. This is exemplified by the National Planning Policy Framework (NPPF) [CD/12/01] and the extension of permitted development rights, for example over change of use for redundant farm buildings. It also recognises the importance of retaining and developing local services and community facilities in rural areas.
- 5.10 Policy WRK1 is supportive of business growth that will promote sustainable development in rural areas. Whilst the land-based sector (agriculture, forestry and fishing) employs less than 1% of the local workforce, it continues to play an important role in supporting other businesses. By helping to maintain the beauty, character and diversity of the countryside upon which recreation and tourism rely, it supports employment in many hotels and catering establishments. A high quality environment also helps to attract inward investment and a skilled workforce.
- 5.11 Additionally, economic diversification is important for the land-based sector to remain viable, to thrive and be more resilient. But, beyond this sector the range of rural economic activities largely mirrors that in urban areas. Where employment in rural areas differs is in:
- (i) the significantly higher rates of home-working than those in urban areas; and
 - (ii) the prevalence of micro and small businesses.
- 5.12 Such businesses frequently show a greater compatibility with sustainable rural communities, and their growth is supported. Micro and small enterprises have the potential to foster economic growth in ways that use local natural and historic assets sustainably. Through home-working and, where appropriate, the re-use of redundant agricultural and industrial buildings, they are capable of operating at a scale that is sympathetic to a rural setting. The opportunity to carry out business from rural locations across Pendle has recently been enhanced with the roll-out of Superfast Broadband.
- 5.13 In addition, rural businesses often exhibit strong ties with the local community where established connections with other local businesses help to further support the rural economy by providing jobs and services, which add greater diversity and distinctiveness to the area. Premises which serve the well-being of the local community such as local shops, public houses and community halls are also valuable for economic development and are addressed by Policy SUP1.
- 5.14 Policy WRK2 addresses the quantum of employment land that is sought. It is the Council's view that this policy is sufficiently flexible to meet all reasonable eventualities. The projected requirement of 68 ha has been calculated using an established methodology based on past take-up rates, and this includes a flexibility factor and allowance for losses. The methodology is considered in greater detail in Chapter 6 of the Pendle Employment Land Review [CD/04/01], in particular paragraphs 6.172-6.186.

6. Is it necessary for Policy WRK2 to refer to the Riverside Business Park?

- 6.1 Policy WRK 2 is concerned with employment land supply. Whilst the supporting text makes reference to the key role of the borough's Protected Employment Areas (paragraph 11.50), particularly in the context of M65 Corridor and its future growth, there is no need to make specific reference to any of these sites (including the Riverside Business Park) within a policy that is primarily concerned with identifying a figure for the employment land requirement over the plan period and the amount of new land to be allocated.