

Response to Local Plan Part 2 Consultation:

1. Role of Strategic Housing Site

In the Pendle Local Plan Part 1 Core Strategy a strategic housing site was considered necessary "to increase delivery of housing, reduce the deficit and meet the housing requirements of the Borough in a timely manner".

There was no written indication at this stage, or throughout the Core Strategy consultation process, that the location chosen for the Strategic Housing Site would not have that Site taken into consideration in the allocation of housing identified for it in the Local Plan Part 2 housing distribution.

Trough Laithe in Barrowford was selected and planning permission for 500 houses has been passed.

It is therefore the case that Barrowford has already achieved well in excess of its allocation of 10% of the M65 Corridor requirement.

The Local Plan Part 2 para 3.1 mentions the Strategic Housing site Policy LIV2 but again gives no indication of its effect on the settlement chosen.

It is not until Section 3.54 that the previously hidden intention of the creation of the Strategic Housing Site becomes clear, as it is now described as "an allocation seeking to contribute towards meeting the housing needs across the whole of this spatial area" and its total number is to be subtracted from the total requirement for the M65 corridor.

At a stroke of the pen, taking the 500 houses in Barrowford out of the allocation table 3.11 gives the village a significantly greater allocation, indeed more than any other settlement in the Borough, including the biggest towns of Nelson and Colne.

Furthermore section 3.53 states that Trough Laithe is an edge of Barrowford site. This is not factually or materially correct when you consider it encompasses two wards within Barrowford Carr Hall and Newbridge and is separated from the perceived edge of Barrowford Carr Hall Road and Noggarth Top by some distance.

Barrowford Parish Council argues that this is a greatly excessive over-allocation of housing for the village, both in terms of simple fairness, and on grounds of infrastructure which will be dealt with below.

2. Addressing Infrastructure Issues:

Sustainability factors and current infrastructure provision within the LP2 are centred around table 3.8 page 23. These sustainability factors covering Key Services and Infrastructure are based on a 2008 study updated in 2016 and consist of a list of Key Services with boxes ticked to highlight the presence of specific key services within a given location.

Barrowford Parish Council feels that this simplistic tick box approach to whether a specific area currently provides specific Key Services is meaningless in regards to the provisions for additional housing, unless the current capacity and the spare capacity are also quantified, particularly in education, health and essential services such as public transport.

Using over-simplified data correlation in this manner gives no depth to the data contained in the Key Services section and as such gives no tangible basis to ascertain whether any particular service has spare capacity or is oversubscribed. In the case of Barrowford it does not indicate if the additional

needs of the Strategic Housing Site for 500 houses have been factored into the current Key Service infrastructure projections.

3. Long Term Key Service Provision;

The LP2 document feels to have a piecemeal approach to both the provision of Key Services and Infrastructure with no co-ordinated coherent plan to address the long term needs of expanding Key Service provision in Pendle during the timescale that the envisaged 4,808 houses are built.

This is particularly relevant in the M65 Corridor, the largest spatial area which is expected to absorb an additional 3,336 houses. The current method of assessing Key Services requirements at the planning stage looks on each individual application in isolation. What is needed is a measured integrated approach to providing the increase in Key Services necessary to accommodate the number of houses that the Local Plan is set to deliver over its life.

This problem is most acutely shown when the need for additional school places is assessed. Lancashire County Council assess additional need on their own formula, which including current surplus capacity within a two mile radius for primary and a three mile radius for secondary schools. This approach does not take into account parental choice with many parents buying houses within the catchment area of their preferred school.

LCC is currently consulting on their School Place Provision Strategy 2017/18 to 2019/20 which looks at past school place trends and addresses any shortfalls. This strategy pays only scant provision to new housing requirements and concentrates solely on the implementation of Section Agreements for funding if new housing requirements exceed current capacity. The LCC strategy already highlights both Colne and Barrowford & Rural as hotspots where there is likely to be a significant and sustained shortfall in available primary capacity. (Page 25 LCC Draft School Place Provision Strategy). This raises several questions regarding infrastructure provision:

- **Have LCC been consulted on the Local Plan and has there been adequate vectoring in of the housing requirement for Pendle contained in the Local Plan in relation to Schools, Social Services and public transport?**
- **Are there similar strategies and data relating to medical provision across Pendle and have these been considered?**
- **Have highways and utility providers prepared reports or strategies how this additional stress on existing infrastructure will be met?**

4. Barrowford's Role as a Local Service Centre:

Development within the M65 Corridor has already been set in the Core Strategy as 70% of Pendle's total requirement (LP 1). As stated at the outset of this response the figure highlighted in LP 2 has been netted off to take the Strategic Housing Site into consideration as a M65 Corridor wide figure reducing the housing needed in the four constituent parts (Nelson, Colne, Brierfield and Barrowford) along with completed housing and empty property reuse. This reduced figure is then divided between the three Towns and one Village, and on paper reflects their current size and proportion within the M65 Corridor. What the Plan does not reflect is the fact that Barrowford is the only Local Service Centre, whilst the other three are Key Service Centre's which are the highest in the local planning hierarchy.

The decision to site the Strategic Housing Site at Trough Laithe and the manner in which the 500 houses have been 'divvied' pro rata amongst the four parts enabling Pendle to significantly reduce the provision needed in three of these areas. The result is to add their reduction to Barrowford total without offsetting this in any way. With Barrowford being on the second tier of the planning Hierarchy the proposed additional allocations in LP 2 would seem an abuse of the parish's lower planning status.

The proposed further 230 houses, when added to the 500 strategic houses site houses, makes Barrowford the largest contributor of housing in the Borough, exceeding the three Key service Areas (Nelson by 20, Colne by 217 and Brierfield by 384).

Such an increase would completely change the current ethos and amenity which have preserved the character of the village and which have created a significant premium in house prices compared with Nelson, Brierfield and to a lesser extent Colne.

5. House Prices Differential; A Further Pressure on Barrowford

The House Sales/Price charts on pages 26 27 of LP2 give a clear indication of what is driving housing policy as they show that Barrowford property prices have been consistently £65-70,000 higher than Nelson and Brierfield for over a decade. Barrowford Parish Council feel that the proposed approach to housing provision in the M65 Corridor will continue to be skew it more towards the site viability for developers than to a Local Service Centre's obligation to meet LOCAL needs.

Given that proposed brownfield housing sites within the Bradley and Whitefield wards of Nelson are currently unlikely to pass viability tests and would remain undeveloped:

- **What provision is included in the plan to ensure that these sites are developed, as development is essential to meet the aspirations of the Local Plan to improve the quality and viability of housing stock within Nelson?**
- **How can development be guaranteed within the lifetime of the plan?**
- **Would failure of the regeneration strategy in Bradley and Whitefield lead to further more viable sites within Barrowford and Colne having to be found?**

Paragraph 3.44 raises serious concerns regarding the intentions and will of Pendle Borough Council and its Planning Department to ensure that the areas of Nelson and Brierfield needing the most regeneration will ever be started in the lifetime of the Local Plan. This paragraph in reality is a get out of jail free card if developers refuse to redevelop Nelson during the lifetime of the plan.

The unrealistic aspirations contained in the Core Strategy and the creation of housing only areas within Bradley and Whitefield have left large sites such as Riverside Mill and Reedyford Mill derelict for years with little or no interest in developing them without Council or Central Government intervention through incentives to enhance the viability of these sites,

6. Robustness of Housing Designation Policy:

Reedyford Mill is a prime example of compromise of housing policy, the site originally earmarked specifically for 120 plus houses and up for sale for several years has recently been sold off with the housing number halved and the inclusion of a petrol station/convenience store. The commercial development has been built across the almost most convenient access to the M65 and the portion for housing

relegated to the rear of the site. The initial developer has got his petrol station/convenience store but has put the housing portion put back on the open market. This deviation from the original housing designation has resulted in the viability of the remaining housing area being so undermined that now it should perhaps be designated employment land.

At the same time a smaller section of land on Carr Road formerly the stock car stadium, which is due to be sold by Pendle as employment land and which is ideally situated near to schools, medical facilities, and adjacent to a park, would be an ideal housing site for potential starter housing.

This inability to look at the redefining of Nelson to meet new ideals of where housing and employment land are should be located, restricts the viability of certain sites in Nelson. Former mill complexes with good access to the M65 have been allocated for housing whilst existing mill complexes situated in residential areas and edge of town sites away from the M65, blight otherwise potential residential areas, such as Brunswick Street, Southfield Street, Hallam Road.

Section 3.45 LP2 acknowledges that desirable locations have a higher demand for housing and the potential reduction in viability created within less favoured areas of the borough. The lack of both significant redevelopment of Nelson and new development in Nelson is of grave concerns to Barrowford.

There is no clear solution given in LP2 to address the reluctance of developers to develop on sites with smaller gains whilst section 3.44 allows a get out clause to allow Pendle to maintain its house building levels to the required numbers by exceeding the recommended numbers for both Barrowford and Colne.

7. Unravelling Housing Numbers:

The assumption that the proposed house numbers in Table 3.11 are the final figures is dispelled in section 3.63 which states that the figures should be regarded as a minimum and strongly indicates that if sufficient developable land is not available in one location then it may be that additional land has to be found in other areas.

This would seem logical to most areas but for Barrowford which already contains the additional 500 house strategic site and the expectation (which is strongly questioned) for a further 230 houses, special mitigation should be in place to stop additional overspill from other less viable areas.

Barrowford Parish Council would like to see the 230 figure reviewed and reduced.

8. Land Banking:

Barrowford as a lower tiered settlement should be protected from potential predatory actions by developers who use viability tests as a standard practice for improving their bottom line. Some of these predatory developers once granted permission land bank for long periods to maximise their return. This long term land banking does not benefit the local area but creates years of uncertainty for local residents and necessitates the granting of additional permissions needed to keep the house built figures within the projections of the Local Plan.

Work should be carried out by the Planning Department on assessing whether it is legally permissible for the planning authority to refuse routine renewal of planning permission on sites which have been brought forward by developers and had

permission approved, but on which no significant development has been carried out during the lifetime of the permission.

The revocation of planning approval would not only allow other developers to submit applications on different sites but would serve as a warning to potential land bankers that the added financial premium on the land with planning approval cannot be retained indefinitely.

9. Trough Laithe Strategic Housing Site and additional Housing Requirements

Barrowford Parish Council has consistently raised concerns regarding the ability and willingness of the owners of the Trough Laithe Strategic Housing Site to bring forward the development within the required timescale.

If additional planning permissions are needed elsewhere due to the failure of the Strategic Housing Site to meet the requirements of LP1 in this regard, will any additional sites be treated in the same way as the Strategic Housing Site, with any shortfall being divided pro rata across the whole of the M65 Corridor? Or will it be left to Barrowford to solely provide alternative sites?

LP2 gives no clear guidance in this scenario.

10. Affordable Housing:

LP2 highlights that the greatest need for Affordable Housing falls within the M65 Corridor, but does not include Barrowford as requiring any.

This would seem strange given that the area with the highest property prices within the M65 Corridor fall within Barrowford, along with an additional premium on rented accommodation. The need for affordable/starter homes for young people brought up in the village must be greater than within of the M65 Corridor especially when the house price differential shows that house prices elsewhere within M65 Corridor are as low as 50% of similar properties in Barrowford.