

## **Matter 2: Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process**

**(Policies SS1, SS2)**

**Issue 2 – Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?**

**2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies SS1 and SS2) supported by robust and up to date evidence and otherwise soundly based?**

**In particular:**

- a) Does it reflect the vision and objectives of the Plan?**
- b) To what degree is the distribution of development set out in Policy SS2 based on the settlement hierarchy in Table 1?**
- c) Is the focus on the larger urban settlements justified and soundly based?**
- d) How were the proportions of development proposed for each settlement arrived at?**
- e) Would it provide sufficient development within rural areas and other settlements?**
- f) Does the distribution of employment related development take appropriate account of national and regional programmes and strategies?**

1. The HBF notes that a key part of the Vision of the Local Plan is to support a wide range of high-quality sustainable new housing and supporting infrastructure that will meet the needs of communities. This sits alongside Strategic Objective 3 of the Local Plan which states that the plan will meet a diverse range of housing to meet future needs.
2. The HBF broadly supports this Vision and Strategic Objective 3 but considers that this does not necessarily correspond fully with Part 1 of Policy SS1. Whilst it is appropriate for Policy SS1 to support the use of previously developed sites and sites in and around town and city centres, this needs to be done in the right way and should not prevent the delivery of other sustainable sites or sustainable developments that can meet the needs of all communities all over Central Lancashire (as required by the Vision and Strategic Objectives).
3. The current wording of the policy may be interpreted in a way that the most sustainable locations for development are only to be found in city and town centres and on previously developed land and buildings. This is clearly not the case and in itself would not meet all housing needs. The HBF believes that the wording of this policy should change for it to be effective and positively prepared, by encouraging brownfield development and development in centres but at the same time it is made clear that these are not the only sustainable forms of development that can meet housing needs.
4. Policy SS1 also promotes the use of settlement boundaries with parts 3 and 4 of the policy seeking to promote development on allocated sites and on land within settlement boundaries and only permitting a narrower set of uses outside of settlement boundaries. The HBF considers that for the policy to be positively prepared, the Local Plan should also facilitate the development of sustainable

sites which are adjacent and well-related to the built up areas (most notably those areas which are not entirely surrounded by Green Belt). This will have the benefit of better enabling further windfall development, which will add flexibility to the supply of new homes and will also allow settlements to successfully and sustainably grow over the entirety of the plan period without being unduly constrained by settlement boundaries. This is especially important given that the housing requirement in the plan is expressed as a minimum and that the NPPF is clear on the need for local planning authorities to significantly boost the supply of new homes (paragraph 60).

5. Our Comments in relation to Policy SS2 are found in the response to question 2.2 below.

**2.2 What is the evidential basis for the settlement hierarchy in policy SS2? Is this consistent across all 3 authorities? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?**

6. As outlined in our representations to the Regulation 19 draft Local Plan, the HBF expects the Councils to provide an appropriate settlement hierarchy which is logical and allows for a suitable and sustainable spatial distribution of sites, provides an appropriate development pattern and supports sustainable development within all market areas.
7. In this case, the Councils have presented a settlement hierarchy in Policy SS2 but it is unclear to the HBF from the supporting text how the Councils have formulated the settlement hierarchy. This needs explaining in more detail and should be linked to the relevant evidence base. This will help ensure the approach is justified.

**2.3 What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Integrated Assessment work?**

8. We consider that this is for the Councils to answer.

**2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?**

- a) Is the site selection process transparent? How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?
- b) Were constraints given relative weight in the site selection process? If so, how was this determined?
- c) In relation to flood risk, were sites at low risk preferred over those at greater risk? How did the Strategic Flood Risk Assessment (SFRA) inform site selection? Does the SFRA2 reflect the most up to date flood-mapping? Where sites are proposed for development in areas of flood risk, does the Plan take a sound approach in how these matters will be addressed?
- d) What account was taken of Best and Most Versatile Agricultural Land?

**2.5 Does the Plan allow sufficient development in rural local centres, smaller villages and hamlets, rural areas and settlements to comply with paragraph 83 of the Framework? Are the proposed settlement development boundaries up to date and are these appropriately drawn? What factors were taken into account in designating these?**

9. As outlined in our response to question 2.1, the HBF considers that it is important that the spatial strategy chosen is able to meet the housing needs of all the areas of Central Lancashire and this includes the larger urban areas as well as smaller villages and hamlets.
10. The HBF considers that use of tightly drawn settlement boundaries in some instances may hinder future growth opportunities in some settlements and therefore affect the ability to meet housing needs in those areas.

**2.6 What are the Plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans?**

**2.7 Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?**

11. The HBF has no comments on specific allocations proposed in the Local Plan but is nevertheless keen that the Councils adhere to the requirement in paragraph 70 of the NPPF as part of the spatial strategy and settlement hierarchy so that land is identified to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved.
12. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. The HBF would therefore wish to see the 10% small sites allowance delivered through allocations (and not windfall). Such sites are important for encouraging the growth in small and medium housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan.
13. These therefore should sit alongside larger sites to create a variety of sites which are capable of meeting the housing needs of Central Lancashire.