HYNDBURN BOROUGH COUNCIL
LOCAL DEVELOPMENT FRAMEWORK

EXAMINATION OF CORE STRATEGY SUBMISSION DOCUMENT

MATTER 3: SPATIAL STRATEGY – A BALANCED DEVELOPMENT STRATEGY

Key Issue:
Is the Spatial Strategy soundly based, effective and deliverable, appropriate for Hyndburn, supported by a robust and credible evidence base, and consistent with national policy?

Blackburn with Darwen Borough Council (BwDBC) considers that the spatial strategy, as expressed in the proposed new policy BD1, does meet these requirements.

3.1 Balanced Development Strategy

Is the Spatial Strategy clearly expressed and soundly based on a robust, credible and up-to-date evidence base, consistent with national planning policy and aligned with the strategies, priorities and projects of adjoining areas and other agencies (eg. Pennine Lancashire Multi-Area / Local Area Agreements / Spatial Strategy etc, Blackburn with Darwen Core Strategy, housing renewal programmes, and other relevant strategies)?

3.1.1 BwDBC objected to the Core Strategy as published on the basis that the spatial strategy was not clearly expressed (representation ref CS/015/01). Specifically we commented that there was no overarching strategic policy that users of the Core Strategy could refer to. In our view this meant that the Core Strategy failed the “effectiveness” test of soundness.

3.1.2 Since the Pre-Hearing Meeting, Hyndburn Borough Council (HBC) has published a proposed new policy BD1, drawing mainly on information which was already found elsewhere in the plan, which aims to provide such an overarching strategic policy.

3.1.3 Our comments below relate to the Core Strategy as it would be with the proposed Policy BD1 included.

3.1.4 Overall BwDBC is of the view that the introduction of Policy BD1 would address the issue of soundness (effectiveness) in relation to this issue raised in our original representation CS/015/01.

3.1.5 Policy BD1 provides a clear expression of the overall spatial strategy for Hyndburn when read in conjunction with the rest of the plan. It incorporates all of the types of information suggested by BwDBC (roles of places, distribution of development, changes to Green Belt etc) in its representation on the published plan.

3.1.6 We remain of the view that the clarity of the Core Strategy would be improved by the inclusion of the general extent of the Green Belt on the Key Diagram. This would allow users of the plan to gain a better understanding of a key strategic policy and of where change to the boundary is proposed.

Clearly expressed

Soundly based on a robust, credible and up to date evidence base
3.1.7 BwDBC has raised no issues in relation to the evidence base underpinning the overall spatial strategy.

**Consistent with national planning policy**

3.1.8 BwDBC has raised no issues in relation to the consistency of the Core Strategy with national policy.

**Aligned with the strategies, priorities and projects of adjoining areas and other agencies (e.g. Pennine Lancashire Multi-Area / Local Area Agreements / Spatial Strategy etc, Blackburn with Darwen Core Strategy, housing renewal programmes, and other relevant strategies)**

3.1.9 BwDBC is satisfied that the overall spatial strategy is adequately aligned with other strategies in the sub-region. In particular:

- The overall amount, distribution and priorities for development proposed are consistent with BwD’s Core Strategy, and also with RSS which remains part of the development plan.
- The roles of places and priorities for development, including the strategic sites identified, reflect those set out in the Pennine Lancashire Spatial Guide.

3.1.10 BwDBC has objected to the affordable housing threshold in Policy H2 on the grounds that it is inconsistent with the BwD Core Strategy and is not supported by the evidence. We address this issue in full in our paper on Matter 5.

b. **Is the Spatial Strategy the most appropriate and sustainable option for this Borough when considered against reasonable alternatives?**

3.1.18 BwDBC has raised no issues in relation to this aspect.

c. **Should the Balanced Development Strategy be set out in the form of an over-arching strategic policy to provide the context for the thematic policies which follow?**

3.1.19 Yes, it should. BwDBC objected to the published Core Strategy on the basis that there was no such overarching policy, which rendered the plan unsound as being ineffective.

3.1.20 BwDBC is supportive of the proposed inclusion of an overarching policy BD1. In our view it is important for users of the plan to be able to understand the overall spatial strategy, and the way the Borough can be expected to develop.

3.1.21 We note that BD1 is based largely on information that was already found in other parts of the published plan, mainly in introductory or supporting text. It is our view that this information does need to be included in policy text, in order that it has an appropriate status in:

- Making a meaningful assessment of the consistency of the rest of the Core Strategy,
- Shaping subsequent work on site allocations, and
- Determining planning applications in line with the approach required by s38(6) of the Planning and Compulsory Purchase Act 2004.
3.1.22 We are satisfied that BD1 does not alter the overall spatial strategy from that previously set out in the published Core Strategy, hence we are satisfied with the level of consultation and appraisal that has taken place in respect of it.

d. Does the Balanced Development Strategy give sufficient strategic guidance and spatial direction about the scale, location, timing and implementation of new development, in order to guide subsequent Development Plan Documents and development decisions?

3.1.23 Provided the proposed Policy BD1 is included in the Core Strategy, and when BD1 is read alongside the rest of the Core Strategy, yes it does. Without BD1 the Core Strategy fails to meet this test and is unsound on grounds of effectiveness.

e. Are the main elements of the Balanced Development Strategy justified, effective, deliverable and soundly based, particularly in terms of providing the proposed amount of housing and employment development, and recognising the environmental, physical and traffic / transport constraints to development?

3.1.34 BwDBC has raised no issues in relation to this aspect.

f. Does the Spatial Strategy appropriately reflect the Vision and Strategic Objectives and adequately address cross-boundary issues?

3.1.35 We have raised no issues in terms of the relationship of the Spatial Strategy to the Vision and Strategic Objectives, or in terms of cross-boundary issues in relation to the overall strategy.

3.1.36 We have raised a specific objection to the affordable housing threshold under Policy H2, which is a cross-boundary issue; this is dealt with in our paper on Matter 5.

g. Is the Spatial Strategy sufficiently flexible to respond to a variety of unexpected or changing circumstances in the future?

3.1.37 BwDBC has raised no issues in relation to this aspect.

h. Does the Key Diagram properly illustrate the main elements of the Spatial Strategy, including the future pattern of development (including proposed employment and housing development), the hierarchy / role of centres and the general extent of, and changes to, the Green Belt boundary?

3.1.38 The Key Diagram conveys a number of aspects of the Spatial Strategy but omits some others which are important, particularly the general extent of, and expected change to, the Green Belt.

3.1.39 In our view this reduces the usability of the plan. We do however consider it to be less of an issue than previously, in light of the proposed introduction of Policy BD1.