RESPONSE TO HYNDBURN CORE STRATEGY -  
SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION  
On behalf of Goldtique Ventures Ltd /GE  
19.8.11

Section 1  
Para 1.8 Does the CS make sufficient reference to and take account of other plans and strategies?

It does not with reference to the following:

Housing Topic Paper  
- para 3.17 of this topic paper places an over reliance on windfall sites in contradiction to PPS3 and draft NPPF. The Site Allocations DPD should be focussing on the large site allocations to address the housing requirements, not on 'catching' more windfalls. Para 109 of draft NPPF specifically says not to make a windfall allowance in the first 10 years or in the 5 year rolling supply of housing. It also seeks a significant increase in the supply of housing and states that a further 20% over existing targets in the first 5 years will be necessary.

- para 3.19. with the further 20% in housing figures in the first 5 years being advocated by draft NPPF the SHLAA will need to be re assessed and sites that are genuinely available, deliverable, accessible, developable, sustainable and viable should be included. This proposed increase aside, with the over reliance on windfall sites the 15 years supply whether that criterion has been met by the CS is questioned. There is a noticeable lack of larger housing site allocations which will assist in offering the choice and competition the 20% proposed increase in allocations is aimed at. Few such opportunities exist within the existing urban settlement boundaries in Hyndburn - J7 M65 being a notable exception with the further benefits of being enabling development to provide sustainable economic growth and jobs as set out in ‘Planning for Growth’.

- para 3.29 notes the housing market in the borough is not currently delivering new housing development. The economic downturn; the reliance on windfalls; the cessation of the HMRA have all had an impact. The phased release of housing sites must take account of market trends and recognise growth is likely to start in the more affluent parts of the borough rather than the inner areas. This will have the benefit of also addressing the balance of the housing mix which in Hyndburn is disproportionately skewed toward terraced homes compared to the NW and nationally.

- section 4 housing mix and quality – larger sites will enable more 3 and 4 bed detached and semi detached family homes to be delivered. Draft NPPF encourages LPAs to identify additional deliverable sites for housing.
- para 4.8 – the current application for the mixed use redevelopment of J7 business park meets the 3 key objectives set out in this section

- Section 5 para 5.1 - We disagree with the wording of policy H2 of the CS which says the developer will be required to make provision for 20% of the houses to be affordable. If the 20% affordable requirement makes a site unviable it is in direct conflict with PPS3 and draft NPPF which places the presumption on sustainable development and deliverability and viability. As a supporting document to the CS if it is based on such a premise the soundness of the plan is questioned. Furthermore, currently Hyndburn is one of only 4 English LPAs with an affordability ratio at below 4% (3.92% at Oct 2010) - one of the lowest in the country. It has a housing imbalance favouring terraced properties which also mean there is a large pot of homes within the affordable range in the existing dwelling stock.

- para 8.7 J7 Business Park achieves precisely this ie bringing previously developed land (the western third of the site) back into housing use. (See our later comments on Appendix 1 of the Economic Topic Paper)

Economic Topic Paper
- para 1.2 – the rates of development being very low since 2008 is unsurprising given the recession.

- paras 3.13-3.15 J7 Business Park. J7 is not and never has been a strategic site. The dialogue between the LPA and the developers has now become an application for mixed use redevelopment. The site is in a highly sustainable location and combines employment opportunities across a range of sectors, a care home, a generous area of POS and pedestrian and cycle green routes linking to the canal, the existing park, the parkland around the Dunkenhalgh hotel and the Green Belt enabled by high quality 3 and 4 bed detached and semi detached family homes with gardens.

It addresses the statement in ‘Planning for Growth’ recommending LPAs in making planning decisions should support enterprise, facilitate economic and other forms of sustainable development. It presents a unique opportunity on a gateway site in Hyndburn.

This 18.34ha site (not the 17 ha mentioned at para 3.14) and the proposed mixed use scheme meets the requirements of PPS4 providing economic regeneration in a sustainable way on an underused old industrial site wholly within the urban boundary. It will offer more jobs than currently on site and also a wider range of jobs from unskilled to managerial. As we have stated in earlier representations to the CS the on site buildings are currently in a very poor condition and the site
only now employs about 350 people many who are in the distribution sector so not present on site most of the working day. The current application maximises the creation of high value jobs in excess of 2,000 FTE jobs across a range of B1, 2 and 8 sectors. In addition further jobs will be created in the hotel, retail, care home and PFS sectors. These would be provided in high specification, state-of-the-art accommodation which will attract investment from adjoining boroughs.

- para 4.15 reference to ‘Hyndburn possesses a number of strategic sites along the M65...’ should read 2 strategic site – Whitebirk and Huncoat.

- para 4.18 - We object to the statement that existing undeveloped allocations in the Local Plan should be rolled forward unaltered. Firstly this contradicts draft NPPF and PPS4 but also because Site G as listed at Appendix 1 of this topic paper is in fact part of J7 Business Park and which the adopted HLP allocated the western third of this site as an employment site to be development between 1991-2006. Despite consent for large industrial buildings being granted in 2004 there has been no take up and no interest in such development over the last 20 years. The remainder of the J7 site was unallocated in the adopted HLP. It seems whoever wrote this topic paper was unaware site G in the HLP was part of J7 Business Park.

- para 5.3 – We confirm our original objection to policy E2 and the subscript reference to J7 still stands. The subscript reference needs to be removed.

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Section 4 Economy and employment
Policy E2

We confirm our original objection to policy E2 and the subscript reference to J7 still stands. The subscript reference needs to be removed.

Para 4.2 c. Should J7 Business Park be identified as a major industrial estate, and is the strategy for this site consistent with the Pennine Lancs MAA/Spatial Strategy?

No. J7 BP should not be identified as a major industrial estate. It should be identified as a mixed use redevelopment site consistent with PPS3, PPS4, PPG13, Planning for Growth and draft NPPF objectives. The site is in a highly sustainable location and the proposed redevelopment combines employment opportunities across a range of sectors (B1/2/8, hotel, a care home, small parade of local shops, PFS) a generous area of POS and pedestrian and cycle green routes linking to the canal, the existing park, the parkland around the Dunkenhalgh hotel and the Green Belt enabled by high quality 3 and 4 bed detached and semi detached family homes with gardens.
Yes, it is consistent with the Pennine Lancs MAA vision for the future, “to provide a confident, dynamic and growing economy, characterised by a thriving higher value business base, supported by a responsive education and training system; an area with fast and reliable transport links to employment opportunities underpinned by a revitalised housing market and cohesive communities.”

The mixed use redevelopment application currently before HBC achieves all this as explained above in response to paras 3.13-3.15 of the Economic Topic Paper. Furthermore the scheme is consistent with current and emerging national strategy and policy as already stated.

The proposed scheme is the culmination of almost 3 years of discussions with HBC officers and consultation with Members and the public. It offers a genuinely deliverable and unique opportunity to address the MAA vision within Hyndburn.

Section 5 Housing

Para 5.1 Overall housing provision - this will need to be modified and increased by 20% to comply with draft NPPF.

If there is greater reliance on the private sector to deliver housing sites then planning policy and obligations should not impose unnecessary or unduly onerous requirements on a scheme such as to undermine and negate its viability.

Para 5.3 Affordable housing - Policy H2 - We disagree with the wording of policy H2 of the CS which says the developer will be required to make provision for 20% of the houses to be affordable. If the 20% affordable requirement makes a site unviable it is in direct conflict with PPS3 and draft NPPF which places the presumption on sustainable development and deliverability and viability. As a supporting document to the CS if it is based on such a premise the soundness of the plan is questioned. Furthermore, currently Hyndburn is one of only 4 English LPAs with an affordability ratio at below 4% (3.92% at Oct 2010) - one of the lowest in the country. It has a housing imbalance favouring terraced properties which also mean there is a large pot of homes within the affordable range in the existing dwelling stock.