

Matter 2 The Vision and Spatial Development Strategy

Issue 2.1: Is the Plan's overall vision and strategy positively prepared, justified, effective and consistent with national policy in enabling the delivery of sustainable development.

Policy SP1

1. *Is the spatial strategy appropriate and justified taking into account reasonable alternatives and based on proportionate evidence?*

- 1.1. Part 3 of the policy sets out the Council will make sufficient land available to meet the identified requirement for housing over the Plan period of at least 3,686 dwellings (equivalent to an average of 194 dwellings per year). The HBF generally supports the Council in using a housing figure above the local housing need (LHN) identified by the standard method that was in place at the time that this Plan was submitted. The Housing and Economic Needs Update (September 2021) identifies a need for 194 dwellings per annum (dpa) for Hyndburn based on the economic need, using a job-led scenario and commuting ratios based on the Census.
- 1.2. However, the HBF notes that the Growth Option and Spatial Option Justification Paper highlights that the medium housing growth option (246 dwellings per annum), was the preferred option based on the consultation responses. Table 4 of the same document suggests that based on the SA Findings, the Policy Ambitions, the Evidence Base, the Consultation responses, and flexibility and deliverability that Option 3 is the most positive option. The HBF also notes that the current standard method would see Hyndburn seeking to achieve a higher housing figure of 303 dwellings per annum).

2. *Is the Policy consistent with the Framework, is it justified, and would it be effective?*

- 2.1. The HBF considers that part 3 of the policy is not consistent with the Framework and should take a more positive tone, rather than providing 'sufficient' land. An amendment that looks to 'Increase the supply of land within the Borough to meet the identified needs for housing', would be an improvement, this would better reflect the NPPF requirements for plans to be 'positively prepared' and to 'boost significantly' housing supply.

3. *Does the Growth Strategy for Altham take sufficient account of the proposed expansion of Altham Business Park? Is there any contradiction?*

4. *The Policy states that the existing settlement pattern and hierarchy will be maintained. Did the Council review the settlement hierarchy as part of Plan preparation? If not, why not? Is the existing hierarchy justified?*

- 4.1. The HBF considers that this is a question for the Council. However, the HBF would expect the Council to have reviewed the settlement hierarchy to ensure that it remains appropriate, and would provide a logical hierarchy for development.

5. *Are the settlement boundaries illustrated on the Policies Map justified?*

6. *Does the spatial distribution of housing accord with the settlement hierarchy? Is it appropriate and justified, in particular,*
 - 6.1. *should more housing be allocated in Great Harwood and Oswaldtwistle to support their future growth and ability to attract investment?*
 - 6.2. *Clayton-le-Moors is included within the top tier of the Settlement Hierarchy. What is the justification for it being allocated less housing than areas lower down the settlement hierarchy eg Rishton and Great Harwood?*
7. *How does part 2 of the Policy, relating to development in rural areas, take into account paragraphs 84-85 of the Framework to support a prosperous rural economy? Rather than referencing the Framework, should the policy be more specific as to what this means for Hyndburn?*

