

LOCAL PLAN PART 2: *LIVES & LANDSCAPES*

**COUNCIL'S RESPONSES TO
GREEN BELT AND URBAN
BOUNDARY REVIEW**

Site Allocations and Development Management DPD

Document 8: **General Comments**



For background information on how to use this document please refer to the Introduction Document which can be found on the Council Website: www.rossendale.gov.uk/land

Other available Council Responses Reports:

1. Document 1: Introduction – How to Use This Document and General Summary
2. Document 2: Haslingden (including Rising Bridge)
3. Document 3: South West (including Helmshore, Edenfield, Ewood Bridge, Irwell Vale, Stubbins & Chatterton)
4. Document 4: Bacup (including Stacksteads, Britannia & Weir)
5. Document 5: Whitworth (including Facit & Shawforth)
6. Document 6: Rawtenstall (including Loveclough, Crawshawbooth & Goodshaw)
7. Document 7: Waterfoot (including Cowpe, Lumb & Water)
8. **Document 8: General Comments**

A total of 32 general, non-area specific comments were received as part of the consultation exercise and are included in this section of the Report.

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Council's Responses Report

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GEN001

General Comments:

Don't think we need more houses. Why don't you move all the elderly people out of their 2/3 bed houses and put families in. We need more places for our children to play. Newchurch is boring for our children and get into trouble a lot. Park needs redoing as well.

Council's Response:

Comments noted however, the Council will need to provide at least 3700 dwellings over the plan period 2011-2026 as required within Policy 2 of the adopted Core Strategy. This includes delivering the right type, size and tenure of housing to meet identified needs and demands. It is recognised that a number of houses are under-occupied but there is a limited amount the Council can do to address this. We note your comments related to amenities for children and parks which is addressed in the Core Strategy chapters on Social Infrastructure and Rossendale's Green Infrastructure.

Recommendations:

No action required.

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GEN002

General Comments:

The County Council is undertaking a series of master plan exercises to cover the county and consider and plan for the future role and opportunities of highways and transport moving forward. Rossendale will be included in the Highways and Transport Master Plan covering East Lancashire and will consider the area's relationship and connectivity with the sub-region and neighbouring areas and priorities for future investment in highways and transport to support this.

Council's Response:

Comment in relation to undertaking a series of master plan exercises is noted.

Recommendations:

No action required.

We have no comments to make on this consultation.

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GEN003			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Thank you for consulting Manchester Airport on the proposed urban and green belt boundary changes in Bacup and Whitworth. We are appreciative of having the opportunity to view and comment on the documents and can confirm that we do not have any comments in relation to the proposed boundary changes.	Noted.	No action required.			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GEN004			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
The consultation which we have been offered the opportunity to comment on is of a low risk/priority for Natural England and so we will not be offering representations at this time. The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may be able to make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of areas affected by this plan in the decision making process.	The views of Natural England as a statutory consultee will be sought at all stages of the plan making process.	Comments noted			

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments

A-GEN005

General Comments:

Thank you for your consultation seeking the views of United Utilities PLC as part of the development plan process. United Utilities PLC wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within the North West. We aim to proactively identify future development needs and share our information. This helps:

- ensure strong connections between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

Water and wastewater services are vital for the future health and well-being of local communities and the protection of the environment. When progressing the development plan and future policies, LPAs should consider the impact of new development and the availability of infrastructure capacity. If infrastructure deficiencies exist, it is preferable to try and seek an alternative location. If this is not possible, consideration should be given to co-ordinating the delivery of the development with the delivery of infrastructure. This should be considered in policy.

At this stage it is difficult to fully predict the impact of development on United Utilities PLC's infrastructure. This is because sufficient details on individual development proposals are not available as part of this urban boundary change consultation. Therefore it will be necessary to continue to hold further discussions with the Council to explore future development options in more detail in the preparation of the Site Allocations Development Plan Document and in any future planning application submissions. In the interim, United Utilities PLC wishes to make the following comments on the Lives and Landscape, Greenbelt and Urban Boundary Review (Rawtenstall and Waterfoot).

i. The area under consideration principally drains to Rossendale WwTW. On the basis of information we currently have available, we are not aware of any capacity issues at this wastewater

Council's Response:

The views of United Utilities in their role as a statutory consultee and as an important infrastructure provider will be taken into account throughout the plan making process.

Recommendations:

Comments noted

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
<p>treatment works at the current time.</p> <p>ii. It is difficult to assess the impact on our infrastructure when there are no details available setting out the nature of the development proposals.</p> <p>iii. In amending the urban boundary it is worth noting that the infrastructure in edge of settlement locations is often at its narrowest point, therefore existing infrastructure may not have the capacity to accommodate any additional development that is proposed.</p> <p>iv. Although the nature of development proposals is not detailed within this document, the Council should give full consideration to the potential for Sustainable Drainage Systems (SuDS) in advance of allocating any site. This reflects Policies 19 and 24 of the adopted core strategy. Connection of surface water flows, directly or indirectly, to the public sewerage network (combined or surface water sewers) is a last resort after all other alternatives have been thoroughly investigated.</p> <p>v. Any historical responses from United Utilities PLC regarding the development plan are still valid.</p> <p>When you have further details on your possible site allocations, please do contact me on the details above or alternatively my colleague Jenny Hope (jenny.hope@uuplc.co.uk), as we would welcome the opportunity for an early discussion.</p>					

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENoo6			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

General Comments:
Thank you for consulting Manchester Airport on the proposed urban and green belt boundary changes in Rawtenstall and Waterfoot. I can confirm that we do not have any comments to make in relation to the boundary review but are grateful for being afforded the opportunity to put forward our views.

Council's Response:
Comments noted.

Recommendations:
No change required.

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENoo7			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Thank you for consulting Manchester Airport on the proposed urban and green belt boundary changes in Rawtenstall and Waterfoot. I can confirm that we do not have any comments to make in relation to the boundary review but are grateful for being afforded the opportunity to put forward our views.	Comments noted	No change required			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENoo8			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
No objections or comments	Comments noted	No action required.			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENoo9			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
No objections or comments	Comments noted.	No action required			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo10			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
No specific observations	Comments noted	No action required			

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments

A-GEN011

General Comments:

No specific objections or comments

Council's Response:

Comments noted

Recommendations:

No action required

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GENo12

General Comments:

Further to your e-mail with regard to RBC's new proposals to change the outline of permitted development, this by allocating more land areas for further housing development. My thinking is based, after speaking to various local folk, that not one that I have spoken to seems to have been advised and therefore does not seem to know much about these proposals, in particular when I relate to the land opposite Overdale and the fact that it will soon be up for development and be made available for some form of housing? Why I have now to ask should we close neighbours be apparently side-lined? We who will be / could be in close proximity /affected, be allowed to even think that we have not been consulted. Should not RBC start all over, firstly by MAJOR PUBLIC ANNOUNCEMENTS notifying folk in the direct firing line. Also by say a formal written advice to all that might possibly be affected by any of these future proposals.

These various methods of communication would allow ALL that could be affected in any way be made aware of the Councils intentions.

I would submit that a further wider / deeper approach be instigated by R.B.C. to ALL that could be affected. BEFORE ANY SUCH PLANS ARE CONTINUED, LET ALONE ADOPTED. To me, whether green belt or not, SOME proposals will simply fit in the surrounding area, whilst other proposals will BE TOTALLY OUT OF THE BOX. These would be proposals displaying no common character or compatibility with the surrounding area. Whilst being totally in favour of any sympathetic development, again to me, ANY NEW BUILD SHOULD REFLECT A COMMON SENSE APPROACH. Again I have to request that, BETTER MORE INFORMED COMMUNICATION FROM THE START WILL SAVE COMPLICATIONS LATER. Trusting that if in any doubt PLEASE get in touch so as to fully understand my thinking.

Council's Response:

The boundary consultation did seek to involve as many people as possible with the limited resources available. There are no legal requirements as to what is required from the consultation process at this stage of plan preparation. Nevertheless there are always lessons to be learnt. It is recognised that letting residents of the most affected sites know of plans affecting their area could be improved in future.

Recommendations:

That targeted leafleting of areas most impacted by proposed new development and greater use of social media will be actively considered for future consultations.

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo13			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
No comment.	Observations noted.	No action required.			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo14			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
I confirm that The Coal Authority has no comments to make on the detailed boundary changes for the urban areas or the Green Belt boundaries you propose. These are a matter for local determination.	The views of The Coal Authority in their role as a statutory consultee will be taken into account throughout the plan making process.	Comments noted.			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo15			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
I can confirm that the Highways Agency does not wish to raise any observations or objections to the changes as set out for the Green Belt and urban boundaries for the Haslingden and South West areas of Rossendale.	Comments noted	No change required			

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GENo16

General Comments:

When progressing the development plan and future policies, LPAs should consider the impact of new development and the availability of infrastructure capacity. If infrastructure deficiencies exist, it is preferable to try and seek an alternative location. If this is not possible, consideration should be given to co-ordinating the delivery of the development with the delivery of infrastructure. This should be considered in policy.

At this stage it is difficult to fully predict the impact of development on United Utilities PLC's infrastructure. This is because sufficient details on individual development proposals are not available as part of this urban boundary change consultation. Therefore it will be necessary to continue to hold further discussions with the Council to explore future development options in more detail in the preparation of the Site Allocation Development Plan Document and in any future planning application submissions. In the interim, United Utilities PLC wishes to make the following comments on the Lives and Landscape, Greenbelt and Urban Boundary Review (Whitworth and Bacup).

1. On the basis of information we currently have available, we are not aware of any capacity issues at the local wastewater treatment works at the current time, however United Utilities PLC reserves the right to amend this position should further information be provided at a later date that amends this initial view.
2. It is difficult to assess the impact on our infrastructure when there are no details available setting out the nature of the development proposals.
3. In amending the urban boundary it is worth noting that the infrastructure in edge of settlement locations is often at its narrowest point, therefore existing infrastructure may not have the capacity to accommodate any additional development that is proposed.
4. Although the nature of development proposals is not detailed within this document, the Council should give full consideration to the potential for Sustainable Drainage Systems (SuDS) in advance of allocating any site. This reflects Policies 19 and 24 of the adopted Core Strategy. Connection of surface water flows,

Council's Response:

It is recognised that infrastructure provision is a key element within the preparation of the Local Plan. The contribution of United Utilities to this is accepted and the organisation will be fully consulted, particularly on sites or areas with known challenges.

Recommendations:

Comments noted

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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directly or indirectly, to the public sewerage network (combined or surface water sewers) is a last resort after all other alternatives have been thoroughly investigated.

5. Any historical responses for United Utilities PLC regarding the development plan are still valid.

The impact of any new development can only be assessed once more specific details have been provided.

When you have further details on your possible site allocation, please do contact United Utilities.

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GEN017

General Comments:

When progressing the development plan and future policies, LPAs should consider the impact of new development and the availability of infrastructure capacity. If infrastructure deficiencies exist, it is preferable to try and seek an alternative location. If this is not possible, consideration should be given to co-ordinating the delivery of the development with the delivery of infrastructure. This should be considered in policy.

At this stage it is difficult to fully predict the impact of development on United Utilities PLC's infrastructure. This is because sufficient details on individual development proposals are not available as part of this urban boundary change consultation. Therefore it will be necessary to continue to hold further discussions with the Council to explore future development options in more detail in the preparation of the Site Allocation Development Plan Document and in any future planning application submissions. In the interim, United Utilities PLC wishes to make the following comments on the Lives and Landscape, Greenbelt and Urban Boundary Review (South West & Haslingden).

1. On the basis of information we currently have available, we are not aware of any capacity issues at the local wastewater treatment works at the current time, however United Utilities PLC reserves the right to amend this position should further information be provided at a later date that amends this initial view.
2. It is difficult to assess the impact on our infrastructure when there are no details available setting out the nature of the development proposals.
3. In amending the urban boundary it is worth noting that the infrastructure in edge of settlement locations is often at its narrowest point, therefore existing infrastructure may not have the capacity to accommodate any additional development that is proposed.
4. Although the nature of development proposals is not detailed within this document, the Council should give full consideration to the potential for Sustainable Drainage Systems (SuDS) in advance of allocating any site. This reflects Policies 19 and 24 of the adopted Core Strategy. Connection of surface water flows,

Council's Response:

It is recognised that infrastructure provision is a key element within the preparation of the Local Plan. The contribution of United Utilities to this is accepted and the organisation will be fully consulted, particularly on sites or areas with known challenges.

Recommendations:

Comments noted

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
	<p>directly or indirectly, to the public sewerage network (combined or surface water sewers) is a last resort after all other alternatives have been thoroughly investigated.</p> <p>5. Any historical responses for United Utilities PLC regarding the development plan are still valid.</p> <p>The impact of any new development can only be assessed once more specific details have been provided.</p> <p>When you have further details on your possible site allocation, please do contact United Utilities.</p>				

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GENo18

RCGL5043

General Comments:

See attached letter on 'Response to the 5 year Housing Land Supply'.

Council's Response:

A detailed case is made with respect to the suitability or otherwise of the inclusion of sites within the Five Year Land Supply Report published by the Council in September 2012.

The SHLAA commissioned from Roger Tym assessed sites into three different categories according to a range of criteria. While the exercise did have value it does not carry any weight in making planning decisions. The Council recognises that market viability is an important element of selecting sites. An updated 5 Year Land Supply Report is expected to be published in July.

When assessing boundary changes there are a range of other factors to be taken into account, particularly relating to physical features on the ground. These are set out in the boundary change criteria. The wider policy context also has to be taken into account. Policies AVP4 and Policy 3 of the Core Strategy are particularly relevant in this instance.

Recommendations:

No boundary change is being proposed.

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo19			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Thank you for providing Manchester Airport with the opportunity to comment on the proposed urban and green belt boundary changes in Haslingden and South West. We welcome the consultation and confirm that we have no comments to make in relation to the boundary changes that are identified.	Comments noted and welcomed	No change			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo20			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
No comments but wants to be placed onto the consultation database.	Mrs Peel has been added to the Consultation Database	N/a			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo21			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Rossendale - Lives and Landscapes Boundary Review Consultation for Haslingden & South West - Network Rail has no comments to make on the above.	Comments noted and welcomed	N/a			

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo22			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Thank you for your notification of the above consultation in respect of Rawtenstall. National Trust has no particular observations that it wishes to make upon these particular proposals. I note that the other consultation will be of greater relevance to us, especially that relating to "South West", and I would be pleased to be notified of the future consultations so that we can scope them and respond as necessary.	As a registered consultee, the National Trust will be kept informed of all future consultations.	Comments noted			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo23			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Thank you for your notification of the above consultation in respect of Waterfoot. National Trust has no particular observations that it wishes to make upon these particular proposals. I note that the other consultation will be of greater relevance to us, especially that relating to "South West", and I would be pleased to be notified of the future consultations so that we can scope them and respond as necessary.	Comments noted	No change required			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo24			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Lives & Landscapes - Consultation on the Green Belt & Urban Boundary Review - Rawtenstall and Waterfoot. Network Rail has no comments on the above.	Comments noted and welcomed	No change			

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo25			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Proposed Urban and Green Belt Boundary Changes Consultation. Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	Comments noted and welcomed	No change			
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo26			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Thank you for consulting the Highways Agency on the above proposal. My response relates only to those aspects of the proposals that might impact on the strategic road network, i.e. the A56 trunk road (please see attached). Whilst there are currently no major scheme proposals for the A56 trunk road on this part of the network, the Highways Agency would require that the proposed designations do not compromise the ability of the Highways Agency to safely and effectively manage transport infrastructure within this Strategic Corridor to allow us to maintain journey reliability. In addition to its routine maintenance activities, the Highways Agency must also retain the scope and potential to deliver future improvement schemes that will enhance safety and efficiency for trunk road users. Other than ensuring that our ability to deliver future schemes, as set out above, is not compromised, the Highways Agency would remain neutral on the proposed boundary alterations. I trust that the above and attached is acceptable and please let me know if you wish to discuss further.	Comments noted. The Council recognises the importance of effective management of essential pieces of infrastructure such as the A56.	No change required			

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GENo27

General Comments:

The consultation which we have been offered the opportunity to comment on is of a low risk/priority for Natural England and so we will not be offering representations at this time. The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may be able to make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of areas affected by this plan in the decision making process.

Council's Response:

Comments noted. Natural England will be consulted at all stages of the Plan preparation process.

Recommendations:

Comments noted

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo28			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
<p>1.0 Rossendale, in these Comments, is seen as 3 distinct areas: West, Central and East.</p> <p>1.1 In general, these related reviews for Rossendale Central, East and West, follow the commitments, made in the Approved Core Strategy, and which themselves stem from the Planning Inspectors Report's response to various representations made at the Public Hearings in 2011.</p> <p>Most amount to a series of "tidying-ups" of boundaries to take them to logical physical features, such as roads, paths, and hedges or fences. However there are 3 areas, which need more detailed considerations: Small Development Sites, Status of Gardens and Treed Area, and Larger Development Sites.</p> <p>1.2 Small Development Sites. RCT note many locations where land is taken from the Green Belt or other open countryside and added to the Urban Boundary. Where this is to enable development, this could affect the openness of the Green Belt. Also in a significant number of locations, these sites do not appear to have a simple means of access from existing roads.</p> <p>1.3 Status of Gardens and Treed Areas. RCT note proposed changes to boundaries to include or exclude garden areas from the Green Belt. In the Rossendale Central proposals, those to north of Lower Cribden Avenue are proposed as additions to the Green Belt, whereas in other areas they are proposed to be taken out of the Green Belt.</p> <p>1.4 Larger Development Sites. RCT assume that these are a response to the Core Strategy's policy, to have a supply of land, which is capable of sustaining its assumed need for an increased rate of house building; that's hoped will follow the end of the UK's present "double or triple dip" recession?</p> <p>1.5 Green Belts - National Context. RCT trust that the guidance in National Town Planning Framework will inform the eventual outcomes of fully publicised Public Hearings into these Reviews. The NTPF has both references to Green Belts in terms of general</p>	<p>Thank you- comments noted</p> <p>The Boundary changes have been made to implement Policy 1 of the Core Strategy, both with respect to the Urban Boundary and Green Belt. These set out criteria that will be considered as part of the review and have been incorporated within the consultation.</p> <p>With respect to small sites that may be suitable for development, the Council has assessed these against all the criteria. The impact on the openness of the Green Belt has been a key consideration in the assessment process with the different elements of Criteria 2 particularly reflecting this. This consultation is focussed on boundary changes-should the site come forward for development access issues will be given full consideration.</p> <p>It is recognised that there is a need for consistency of approach yet each site must also be considered on its own merits. The land was placed into the Green Belt at Lower Cribden Avenue in order to define a robust boundary rather than cut through the middle of gardens. Given the visibility and openness of the site it was decided that it would not be appropriate to move all the gardens into the urban area so an extension of Green Belt here was more appropriate.</p> <p>Larger sites have been considered in the context of the Green Belt criteria including impact on openness and the overall extent of the changes proposed.</p> <p>Your observations about the National Planning Policy Framework (NPPF) are noted. We have sought to fully align the consultation with this document.</p>	<p>Comments noted-no change proposed</p>			

planning polices, and a quite extensive section dealing with them in some detail. They are therefore clearly an important part of national planning policy. Here's what look particularly important to Rossendale Civic Trust:-

The NTPF's Core planning's 12 principles include: "promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it".

Note that in protecting Green belt land NTPF's: "79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

And that NTPF's: "81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land".

And also that NTPF's: "83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period".

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo29			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
2.0 Rossendale West - Haslingden, Helmshore, Edenfield and adjacent Settlements	Comments noted. Development along the A56/M66 corridor has stimulated people to chose to relocate to the area and commute to Greater Manchester where higher paid jobs are available. This does increase demand on the transport network and demand for new housing. Core Strategy Policy 3 seeks to set out a clear strategy for where growth will occur to manage the demand for growth.	No change required.			
2.1 In general these areas have seen much new development, which it's suggested was due to improved access into Greater Manchester, created by the construction in the 1970s of the dual carriageway M66 and A56T. This has been further improved by the 1980s extension of A56T to join the M65, and its 1990s connections to M61 and M6 near Preston.					
This route is now sometimes referred as the M66 Growth Corridor, linking Greater Manchester to the Ribble Valley, and there will clearly be tensions in maintaining the Green Belts and other countryside through which it travels.					

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo30	Land adjacent to Rossendale Hospital on Union Road	160	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
I refer to our meeting of 9 January 2013 and our letter of 14 January 2013 regarding Hurstwood's submissions.	Thank you for your response. All information received will be given full consideration in the context of national policy set out in NPPF, the adopted Development Plan (Core Strategy) and local circumstances. With respect to the Union Road site the key issues will the narrowness and prominence of the Green Belt in this location which forms a strategic gap between Rawtenstall and Haslingden; impacts on the overall landscape as well as the challenges of the road access.	Comments noted			
We are currently arranging the further information requested at the meeting and hope to have all that information submitted to you by the end of February. Please advise if that's unacceptable?					
With regard to one of the land submissions: Land adjacent to Rossendale Hospital on Union Road, Council Ref:160 we enclose an A3 copy of drawing HH/UR/SK/01 which was done in May 2012 in conjunction with the Taylor Wimpey scheme on the Rossendale Hospital site. We understand that this does not incorporate the items discussed at our meeting but would welcome your comments prior to submitting a revised scheme.					

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
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A-GENo31

General Comments:

General comments from a letter are summarised below:

- CPRE Lancashire will take a close interest in the Rossendale Review of Green Belt.
- National Planning Policy - CPRE Lancashire hopes that the Council will not be unduly pressurised into releasing Green Belt due to development and growth policies that...could serve to undermine regeneration efforts in central urban locations by providing alternatives preferred by developer interests due to higher margins. There is a sequential test in place via the Regional Spatial Strategy to ensure brownfield land is developed as a priority, and an important purpose of Green Belt is to steer new development to previously developed sites with existing infrastructure. The Council should rigorously test the capacity of alternatives to developing on Green Belt land...to increase the number of dwellings that may be achieved from the existing land supply. In accordance with NPPF, the review should make absolutely clear that there is a presumption against any change to Green Belt boundaries unless exceptional circumstances are demonstrated. The loss of Green Belt is tremendously significant due to the negative impact on the environment. CPRE does not agree that 'the aspiration for future growth' constitutes an exceptional circumstance in itself and that the Local Plan evidence needs to be reviewed first to demonstrate need. This evidence would include as a minimum: An up to date review of the forecasts of economic growth and job creation based on the realities of the recent economic recession; a review of household projections related to the job creation forecasts and to environmental capacity; widespread consultation on aspirations across the whole of the community; and robust assessments of the capacity of brownfield (including windfall) and other land to accommodate growth across the whole of the Borough. The Council is responsible for the achievement of a range of beneficial uses including access to sport/recreation, retention and enhancement of landscapes/biodiversity (NPPF Para 8i).
- Participation / Duty to Cooperate - We very much appreciate the Council's willingness to invite written comments from ourselves and other relevant bodies. It is important that the Local Plan is in place as soon as possible to help steer development to the most appropriate locations and avoid the real threat to countryside

Council's Response:

Comments noted. The important role of Green Belt is recognised. The Green Belt Boundary Review was a recommendation of the Core Strategy Planning Inspector and was included within Policy 1 of that document as a task that would be undertaken as part of the preparation of the Site Allocations DPD.

Recommendations:

No change proposed

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
<p>posed by unplanned "off-plan" development. Best practice would encourage the greatest level of participation throughout the process. We appreciate that it is the Council's intention to accommodate [development] to a large extent within the urban boundary. CPRE Lancashire believes the Council should also demonstrate fully that it has consulted fully with neighbouring local authorities to understand if they could accommodate some of the new 3,700 homes, particularly where it shares a housing market area.</p> <p>Appropriateness and Timing within the Local Plan Process - CPRE Lancashire has difficulty understanding the timing review of Green Belt capacity for development and timing when it is not need driven. Full consideration of Annual Monitoring Reports to gain an understanding of housing completions and data such as the quantity of development that has come forward on site with planning permission granted in the past 5 years is important to know whether the target of 3,700 net new dwellings set out in Part 1 Core Strategy for new housing is still realistic or over ambitious. The release of any Green Belt should be triggered by a shortfall in suitable available land within the urban boundary to meet development needs.</p> <p>Openness and Permanence of the Green Belt - The NPPF states that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belt are their openness and their permanence". The first and overarching study should be to address this, looking at the overall openness and integrity of the Green Belt and how removing any of the parcels identified would impact upon it. The Land Allocation DPD process should ensure that any release of Green Belt land that does take place is truly exceptional, and that there is not general criteria established to allow release of sites from the Green Belt for development, so that the permanence of the designation is upheld.</p> <p>Specific Sites included in Review - CPRE Lancashire has considered the proposals for Whitworth and Bacup and finds that broadly the proposed boundary changes are acceptable to address cartographical corrections and to make Green Belt boundaries more robust. However, there is evidence that the Council has in the past failed to protect and enhance land designated as Green Belt. CPRE would prefer to see no loss of Green Belt, but it does observe that some new Green Belt will be created thereby mitigating the impact of this loss. CPRE Lancashire believes that the revisions can support the Council to prevent future nibbling at the edges of Green Belt for the wider benefit of local people.</p> <p>Habitats Regulation Assessment - There should be a presumption that there would be no boundary change if there is adverse</p>					

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
<p>environmental impact on: Rochdale Canal SAC, South Pennine Moor SAC, Peak District Moors SPA (South Pennine Moors Phase 1), South Pennine Moors SPA Phase 2, Bowlands Fells SPA.</p> <p>Five Purposes of Green Belt - Clear and defensible 'parcels' of Green Belt land with clear defensible boundaries should be considered in terms of landscape, environmental and cultural qualities. The fundamental issue about the Green Belt is its integrity as a whole. It is important to identify the cumulative impact of any removal of areas from the Green Belt, both on the overall openness of the Green Belt and on the five purposes, which are; To check the unrestricted sprawl of large built-up areas; To prevent neighbouring towns from merging together; To assist in safeguarding the countryside from encroachment; To prevent the setting and special character of historic town; To assist in urban regeneration by encouraging the recycling of derelict and other urban land. If a parcel performs well against ANY of the five purposes OR can clearly be considered to contribute to the openness of the Green Belt it should be eliminated from the Land Allocations DPD. It is important to assess any land that is assessed as not performing a Green Belt function against sustainability and accessibility criteria. Tranquillity, flood risk, agricultural grade/quality of land, geological heritage, local amenity, and nature conservation area are all important factors to consider when assessing land use character. The review should establish how the beneficial uses of Green Belt land can be better delivered across the study area. It may be sensible to consider the capacity of undesignated countryside to be included as new or extended Green Belt, if the case for a small planned extension in the Green Belt is made, to mitigate the overall loss of land protected by Green Belt designation.</p> <p>Summary - Please refer to CPRE research concerning Green Belts: A Greener Future. Green Belts are vital green lungs and provide a wide range of key benefits and services to the urban populations they surround. Any reviews should ensure that these benefits and services are assessed and not degraded as a result of the review. CPRE wishes to positively support Rossendale in the preparation of its Site Allocations and Development Management Development Plan Document. CPRE Lancashire wishes to protect Green Belt land wherever possible, if Green Belt is released, CPRE Lancashire would wish to see additional Green Belt designation made on open countryside to mitigate the impacts of boundary changes.</p>					

Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
Boundary Ref	Site Address	SHLAA/Call for Sites	Support	Oppose	General Comments
A-GENo32	Existing Sports Facilities		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General Comments:	Council's Response:	Recommendations:			
Rossendale Football Forum 13/9/12 Site allocation DPD - forum wants to see preservation of existing sports facilities (not just council owned), such as Dark Lane, Waterbarn Cricket Club, Stand and Ewood Bridge.	The Playing Pitch Strategy being prepared with support from Sport England and the relevant Sport Governing Bodies will identify which pitches should be protected and enhanced and which it may be appropriate to release for other purposes. Once greater clarity has been obtained on this it will be possible to give this consideration within the Site Allocation process.	Further consideration will be given to the status of these sites following completion of the Playing Pitch Strategy assessments			

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