

Subject:	"Lives and Landscapes" Local Plan Part 2- Response to consultation and next steps	Status:	For Publication
Report to:	Council	Date:	9 th December 2015
Report of:	Planning Manager	Portfolio Holder:	Operational Services and Development Control
Key Decision:	<input checked="" type="checkbox"/> Forward Plan <input checked="" type="checkbox"/>	General Exception <input type="checkbox"/>	Special Urgency <input type="checkbox"/>
Equality Impact Assessment:	Required:	Yes/No	Attached: Yes/No
Biodiversity Impact Assessment	Required:	Yes/No	Attached: Yes/No
Contact Officer:	Adrian Smith/Anne Storah	Telephone:	01706 252418/9
Email:	adriansmith@rossendalebc.gov.uk/annestorah@rossendalebc.gov.uk		

1.	RECOMMENDATION(S)
1.1	That Council note the responses received to "Lives and Landscapes", the Local Plan Part 2, and the preliminary findings from the Strategic Housing Market Area Assessment (SHMAA) which provisionally provides for the Borough's Objectively Assessed Housing Need (OAHN).
1.2	That Council gives authority to proceed with the production of a new Local Plan and Community Infrastructure Levy document for the Borough (Option 3).
1.3	That Council authorise the Section 151 Officer to examine the options to revise the budget to enable additional expenditure on Local Plan/CIL production.

2. PURPOSE OF REPORT

2.1 To inform members of the results of the recent consultation on "Lives and Landscapes", the Local Plan Part 2; to set out the options available to Council in progressing the Plan and to make a recommendation for preparing a new Local Plan; and to identify the implications for the Local Plan timetable and associated financial considerations.

3. CORPORATE PRIORITIES

3.1 The matters discussed in this report impact directly on the following corporate priorities:

- **Regenerating Rossendale:** This priority focuses on regeneration in its broadest sense, so it means supporting communities that get on well together, attracting sustainable investment, promoting Rossendale, as well as working as an enabler to promote the physical regeneration of Rossendale.
- **Responsive Value for Money Services:** This priority is about the Council working collaboratively, being a provider, procurer and a commissioner of services that are efficient and that meet the needs of local people.
- **Clean Green Rossendale:** This priority focuses on clean streets and town centres and well managed open spaces, whilst recognising that the Council has to work with communities and as a partner to deliver this ambition.

4. RISK ASSESSMENT IMPLICATIONS

4.1 All the issues raised and the recommendation(s) in this report involve risk considerations as set out below:

- Progressing with the current Local Plan Part 2 could result in "Lives and Landscapes" not being found sound by a Planning Inspector and even if approved there would be a need for an immediate review as it fails to provide an up to date housing requirement
- There is a risk of future legal challenge with continuing the current process, especially from developers

- Some developers will proceed with planning applications prior to the Local Plan being adopted
- Proceeding with a new Local Plan will produce a more robust long-term document but will extend the plan preparation timetable
- Developing a new Plan would involve higher housing provision and a further review of urban boundaries and Green Belt in areas not previously affected.

5. BACKGROUND AND OPTIONS

5.1 “Lives and Landscapes” consultation

A consultation was held on “Lives and Landscapes” Local Plan Part 2 between 20th July and 7th September. This attracted a significant amount of comment with over 2 700 comments received from nearly 1 750 different contributors. This is substantially more than received by other Pennine Lancashire authorities for similar consultations. Over 2 000 of the comments were from local residents, the vast majority being objections to individual housing or Gypsy sites. 8 petitions were also received; three related to opposition to proposed Gypsy sites in Stacksteads; one to a proposed housing site at Waingate, Rawtenstall; two to previously proposed boundary changes at Helmshore and Crawshawbooth; one opposing a proposed employment site off New Line, Britannia and another opposing proposed housing development near to Maden Recreation Ground, Bacup. A much smaller proportion of comments (200) were received on the proposed Development Management policies, with most of these coming from statutory bodies such as Environment Agency and planning consultants. There was a broad range of opinion on the content of policies.

5.2 The greatest numbers of comments were received on the sites listed below.

G1-Gypsy site, Baxenden Chemicals – 288 comments of which 287 were objections

- H64 – Rawstron Street Playing Pitch, Whitworth-257 comments of which 256 were objections
- H62- John Street Football Pitch, Whitworth -254 comments of which 253 were objections
- H54- Land off Rochdale Rd, Bacup – 104 comments, 103 which were objections
- H44- Land adjacent to Maden Recreation Ground- 79 comments, of which 77 are objections
- H71/72-Land at Park Road and Heyhead, Waterfoot- there were 67 and 66 comments respectively on these adjacent sites, of which 64 were objections
- H68 – Shadlocks Skip, Stacksteads- 59 comments, of which 57 were support
- H13- Land at Cloughfold, Rawtenstall – 53 objections of which 51 were opposed.

The full list is included in the Appendix, and a number of sites attracted 30+ comments. While the number of responses is an important barometer of public opinion, some locations with fewer objections raise important issues. The number of representations/objections is not necessarily an indicator of whether an allocation is suitable. Assessment should be based on material planning considerations and compliance with national policy. It should be noted that a significant number of comments addressed issues that cannot be dealt with as part of the Local Plan process such as loss of view from a house or effects on property values. Many respondents questioned why the Council is building more houses when there are many empty homes in the valley. This is because Government guidance does not allow these to be counted as part of the supply of additional new homes.

5.3 For non-housing sites the greatest number of comments were received on employment locations at Height Barn Lane, Bacup (E13-47 comments of which 46 objected) and land north of Hud Hey, Haslingden (E16-42 comments with 41 objections). With respect to policies, the housing policy received the largest number of comments (40) with 17 objections and the rest split between to support and observations. The only other policies to attract double figures in comments were on Design, Landscape and Wind Turbines.

5.4 *Strategic Housing Market Area Assessment (SHMAA)*

The role of a SHMAA is twofold:

Firstly it sets out the scale of housing need in the Borough, including breaking it down by housing type and area. To undertake this work Stage 2 Census data is required but this has not yet been released by Office of National Statistics (though it has been confirmed that the data will be released on 3rd December, and will then need to be analysed). The analysis is based both on detailed modelling and representative household surveys. This provisional work, which is being undertaken by consultants NLP, has identified that Rossendale is no longer a self-contained Housing Market Area. Further analysis is still required to identify the extent to which Rossendale interacts with its neighbouring authorities, using detailed census data looking at population movements across sub-district boundaries).

Secondly the SHMAA will establish the Borough's Full Objectively Assessed Need (FOAN) for housing. This sets out the amount of housing that should be provided on an annual basis. Undertaking this work is a requirement of the National Planning Policy Framework and replaces the housing numbers for Districts previously set out in the former Regional Spatial Strategy (RSS). The Core Strategy figures were based on the RSS for the North West, now revoked. The provisional FOAN figure uses a complex formula including census figures, mid-year population estimates and economic projections to calculate a range of housing figures to meet Rossendale's future needs. Case law has established that a FOAN should be the baseline for consideration of housing numbers at housing appeals. The work undertaken indicates that the provisional FOAN for Rossendale is within the range of 285-370 houses per year over the period 2011-2031 (i.e. between 5 700 and 7 400 houses in total). This compares with the Core Strategy figure of 247 houses per year (or 3 700 total additional homes between 2011-2026).

5.5 *Implications and Options*

The results of the public consultation indicate a high level of public opposition to the proposed Gypsy sites and a number of the housing allocations. Virtually all the housing proposals attracted some public opposition although the level of this varied quite widely. Residents also often questioned the need for more housing. The development industry in contrast raised significant concerns about the distribution and level of new housing with some suggesting that because the Plan as published relies on Core Strategy housing figures rather referring to a FOAN it cannot be seen to be robust. The Development Management policies attracted relatively little comment and a higher level of support.

5.6 Preliminary work undertaken for the Borough's emerging SHMAA indicates that the Core Strategy housing figure is lower than the bottom of the provisional FOAN range. Legal advice has been sought and concludes that the Council could carry on with the "Lives and Landscapes" document but it would need to be fully in line with the adopted Core Strategy including the housing numbers and distribution. Even if the document was successfully taken

through the Examination in Public and adopted it would require immediate review. On a separate, albeit related matter, it would also be challenging to resist housing appeals because the authority would not have allocated enough land to meet the FOAN requirement.

5.7 *Timetable issues*

The high number of responses has meant that the current Local Development Scheme (LDS) timetable to produce a Publication version of Local Plan Part 2 in December 2015 for consultation is not feasible. It will therefore be necessary to publish a revised timetable for plan preparation, updating the LDS.

5.8 There are a number of options that could be pursued in taking forward the development plan which are set out below:

Option 1 – Continue with the current document (Site Allocations and Development Management Policies) through to adoption with no further public consultation other than the statutory consultation on the Council’s preferred Plan – the Publication version. Following adoption of the Plan proceed straight to preparing a Local Plan Review.

Pros and cons- This would be potentially the speediest option proposed with possible adoption by Summer/Autumn 2017. However, there are significant risks that the Plan would not be found sound by an Inspector if sites cannot be shown to be deliverable and issues identified in the consultation have not been addressed. A new Local Plan would need to be produced immediately upon adoption to meet the FOAN requirements and in the interim there would be a risk of losing housing appeals.

Option 2 – Given the level of public opposition to some sites, undertake a further informal consultation on a revised version of the existing document before proceeding to the statutory Publication version. Following adoption of the Plan it would be necessary to proceed straight to preparing a Local Plan Review.

Pros and cons- The further consultation period would enable any new sites proposed to be given full public consideration which in turn would increase robustness at Examination. However it would delay submission of the Plan by at least six months until Spring 2018. A new Local Plan would need to be produced immediately upon adoption to meet the FOAN requirements and in the interim there would be a risk of losing housing appeals.

Option 3 – Start work immediately on a Local Plan Review using the provisional FOAN figures and incorporating Core Strategy and Site Allocation / Development Management policies that have been shown to be robust. It will also incorporate a number of site allocations from the previous consultation process. It is also proposed that a Community Infrastructure Levy document would be pursued within the same timeframe.

Pros and cons- Would result in a fully FOAN compliant Local Plan that would be robust for resisting housing appeals. The time frame for preparation would depend on whether one or two rounds of informal consultation are required but earliest adoption would be late 2018. It would require additional evidence base work to be undertaken incurring additional costs “up front” but these would be offset by not having to prepare a complete new Local Plan immediately after adoption. A review of the current Core Strategy by the Planning Advisory Service (PAS) has indicated a significant number of existing policies would require little change to make them suitable to be incorporated within a new Local Plan. There would however be no need to meet the Core Strategy distribution policy requirements nor the

requirement to only make small scale exceptional changes to the Green Belt. This would open up wider areas to potential development especially in the west of the Borough and Whitworth in order to provide a greater amount of housing to meet the FOAN requirement.

Developing a Community Infrastructure Levy (a fixed developer contribution to be spent on improving infrastructure, based on floorspace, replacing Section 106 contributions apart from affordable housing) at the same time would help achieve economies of scale by sharing much of the same evidence base on infrastructure and viability and also a concurrent Examination in Public. It would however increase upfront costs.

- 5.9 **Option 4** – As Option 3 but pursuing the Development Management policies element as a separate document through to adoption.

Pros and cons—Largely as Option 3. The production of a Development Management Policies DPD would be relatively uncontroversial and would provide a broader range of policy support for deciding planning applications. It could be adopted by early 2017. However there would be additional costs in undertaking a formal Publication Consultation and undertaking the Examination in Public as well as staff time, and likely to delay preparation of a new Local Plan. The newly adopted Plan would probably only be in place for two years before replacement by a new Local Plan.

Option 5 – Do not produce a Local Plan

Pros and cons— This would save initial costs. However it is a statutory duty to produce a Local Plan and the Government has indicated that it will step in and prepare Plans at the Local Authority's cost if a Plan is not in the process of being produced by 2017. The Council would also face the likelihood of losing many housing appeals.

- 5.10 *Ongoing consultation*

The speed of Plan development is influenced by a number of factors including the need to update the evidence base and wider pressures on staff resources. One constriction on Plan development is the timeframe for when public consultation can be undertaken. There is a formal period of “purdah” before annual elections but in practice this often impacts on the preceding period, from January onwards, as we approach the end of the financial year as work load becomes heavier, including the priority of budget setting. In addition, immediately post elections there is delay associated with the formation of a new Council, and the establishment of Committees and working groups so there is no Council meeting where consultation can be authorised until June. Undertaking consultations over the summer and Christmas holidays is unpopular with the public. Taken together, this effectively significantly constrains the time windows when consultation can be carried out and can delay overall plan preparation.

- 5.11 Advice has been sought from the Planning Advisory Service (PAS) on project management of the Plan. This identified the current limited time window for consultation as an issue and with respect to governance has recommended the all party member Local Plan Steering Group should be given greater responsibility to both scrutinise and make decisions on preparation of the Plan. It was also suggested it should meet more frequently. This would increase member involvement and ownership in the plan-making process. If given delegated responsibility for authorising consultation to take place it could also potentially speed up the process by removing the need to wait for an appropriate Council meeting. This would require a change to the Constitution. A further Report will be brought forward to the Governance Working Group to consider this issue with their recommendations reported back to Council for decision.

5.12 Undertaking two stages of informal public consultation on the Plan before the formal consultation stage can be valuable in resolving difficult issues and identifying alternatives. However it can delay Plan adoption by around a year or more, depending on when it is possible within the timetable to undertake the consultation. Such delays do not stop planning applications coming forward but can lead to a local policy vacuum in which planning applications have to be determined. In such circumstance the National Planning Policy Framework has a presumption in favour of development. Furthermore, on some sites the difference of opinion between landowners/developers and local residents will never be resolved by further consultation and has to be left to the Examination in Public Inspector to determine. While it is recognised that new sites will be brought forward in a future consultation there will also be a significant number where public and developer opinion has already been sought. On balance, it is therefore suggested that in order to expedite Plan preparation that one stage of informal consultation is the most appropriate. This approach can be supplemented by Round Table Forums with Residents Groups, Developers, etc. to further discuss matters of concerns.

5.13 *Finance*

Production of the Local Plan is currently funded from reserves largely set aside from the former Planning Delivery Grant. This was given to Local Planning Authorities by Central Government in the period up to 2010 to stimulate Local Plan production. It paid for the production of the Core Strategy and all the consultancy and consultation work undertaken so far on the Lives and Landscapes document. Once this Reserve is utilised there is no money specifically allocated in the Council budget to fund Local Plan production.

5.14 The budget for production of the Site Allocations and Development Management DPD is £254 800. Approximately a quarter of this would be used to pay the Planning Inspectorate for the Examination in Public with the remainder largely being used to pay consultants for studies such as the SHMAA; Viability Assessments and Strategic Flood Risk. The need to procure such information is set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) and without it the Plan risks being found “unsound”. By law a full Sustainability Appraisal of the Plan is also required. Officers undertake a considerable amount of site assessment work internally but there is limited staff resource and some of the studies require specialised skills not available within the team.

5.15 The production of the “Lives and Landscapes” DPD up to adoption was projected to utilise the entire existing budget with completion early in the 2017/2018 financial year. Production of a new Local Plan will use a large proportion of the existing evidence base but further work will need to be commissioned, partly to meet changing government requirements. It is projected that this additional work on the Local Plan will cost up to £205 000 in the period up to 2019/2020. This should however be offset against the fact that there will not be a need to produce a new Local Plan immediately after adoption of “Lives and Landscapes” should that route be chosen. Production of such a Plan would be more expensive than doing the work now as the existing evidence base would be more out of date. The cost of fighting Planning appeals on housing sites due to a lack of enough allocated sites to meet the FOAN should also be offset against the costs. Overall therefore it is considered that producing a Local Plan should be seen as “cost-neutral” even though there will be higher initial costs.

5.16 The Government is encouraging Councils to pursue the Community Infrastructure Levy and limit Section 106 agreements to affordable housing. Pooling of Planning contributions is already limited by law and the Council will reach the point where it will not be able to request

contributions for things such as Public Open Space. A Community Infrastructure Levy requires two key elements; an Infrastructure Schedule setting out broad topic areas where money can be spent and a viability assessment of what types of development could sustain a CIL contribution and how much, which can vary by area of the Borough. These documents have to be inspected by a Planning Inspector. As part of the Local Plan it is necessary to produce an Infrastructure Delivery Plan and assess the viability of development, though not to the same level of detail as for CIL. A lot of work has already been done on viability in particular which identifies that CIL is viable for residential development in substantial parts of the Borough. It is estimated around £40 000 of extra costs may be necessary to complete the studies and fund the additional examination time. Internal procedures would also need to be set up for managing CIL. Once established however CIL would establish a non-negotiable funding input to the Council and the costs should also be offset against a reducing number of section 106 monies if CIL is not pursued. Putting a CIL in place has the potential to generate additional income for the provision of infrastructure in the Borough. This would, in the view of officers justify the costs of producing the CIL documentation.

COMMENTS FROM STATUTORY OFFICERS:

6. SECTION 151 OFFICER

6.1 The report notes that £205k of additional budget resources are required over the medium term to complete the Local Plan putting further pressure on the Council’s medium term financial strategy. Alternatively, Members may wish to review resources currently allocated to earmarked reserves.

6.2 Option 3 mitigates the potential for successful housing appeals over the longer term and their associated costs to Council.

6.3 Option 3 will result in income from CIL. The best estimate is £30k pa per every one hundred houses constructed.

7. MONITORING OFFICER

7.1 The legal implications are covered within the body of the report.

8. POLICY IMPLICATIONS AND CONSULTATION CARRIED OUT

8.1 An extensive consultation was undertaken as part of the “Lives and Landscapes” process. The results of this are referred to in the body of this Report and have influenced the conclusions reached. Human resources implications are identified in the body of the Report.

8.2 The Portfolio Holder has been consulted. The options outlined in this Report have also been discussed with the Local Plan Steering Group.

8.3 There will be further ongoing informal and formal consultation as the Plan is developed further.

9. CONCLUSION

9.1 On balance it is recommended that Council pursue Option 3. It is recognised that this will delay adoption of the Plan, have greater initial costs and risk greater levels of objection from the allocation of further sites. However many of the existing policies and a number of the proposed allocations can be carried forward into this document, with relatively little change and large parts of the evidence base are already in place. Overall it would provide the Council with a fully National Planning Policy Framework compliant Local Plan more quickly and the long-term costs are likely to be no greater. Introduction of CIL would increase initial costs but would provide a reliable revenue stream to be spent on infrastructure in the medium term, particularly as ‘pooling’ s.106 contributions to fund infrastructure will be more restricted in the

future. Undertaking CIL as an exercise separate from the Local Plan would be more costly than doing the work together, with the risk that the Evidence Base, especially on viability, becomes out of date.

- 9.2 It has been identified that the role of the member Local Plan Steering Group should be strengthened to ensure a stronger scrutiny role and to expedite a more streamlined decision making process. A future Report will be brought before the appropriate Committee to address this issue and to agree a new Local Development Scheme timetable.

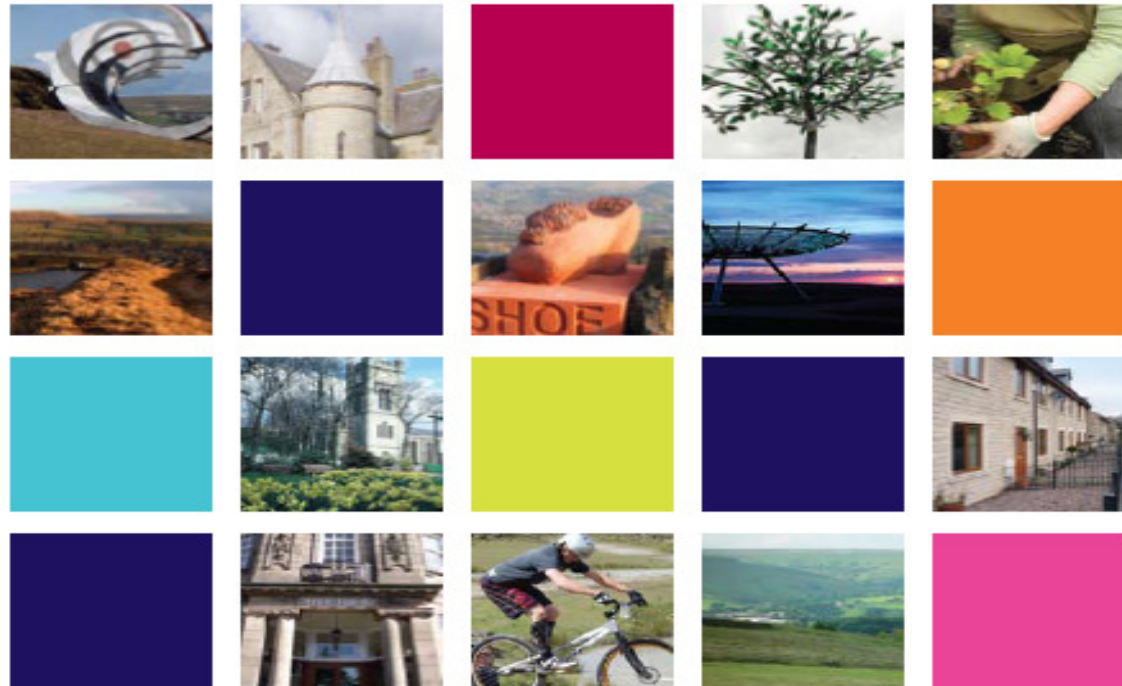
Background Papers	
Document	Place of Inspection
<p>Link to Consultation responses http://www.rossendale.gov.uk/info/856/local_development_framework/294/lives_and_landscapes</p> <p>Summary of consultation responses</p> <p>Technical Note - Objectively Assessed Need</p> <p>Draft Timetable</p>	<p>One Stop Shop, Business Centre, Futures Park, Bacup, OL13 0BB</p>

Local Development Framework

Lives & Landscapes

Local Plan Part 2:

COMMENTS RECEIVED DURING THE SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES CONSULTATION (20TH JULY – 7TH SEPTEMBER 2015)



1. Introduction

This document sets out the comments that the Council has received on its consultation on the Draft Local Plan Part 2 – the Site Allocations and Development Management DPD. This consultation ran for seven weeks from 20th July to 7th September 2015.

The Council has recorded all the comments that we received. We have tried to ensure that the comments have been replicated exactly, word for word, with spellings corrected where appropriate. Any comments we received which are defamatory, racist, discriminatory or threatening have not been published. If the Council publishes comments of this type, it may leave the respondent as well as the Council open to legal action. Similarly personal information about someone else, or where it has been sought to represent someone else's views without their specific permission to act as their agent, has not been published.

Layout of the Report

The comments have been listed according to the issue (policy or site reference) to which they refer. For the site allocations please note that the comments have been arranged according to the reference number, with the site name also given for ease of reference.

We have not specifically named the commentators but have noted their status as a representor (e.g. resident, site owner, statutory consultee).

Where there are no comments listed under a particular Policy or site within the Table it is because none were received.

Analysis of the Responses.

In total 2629 responses were received by 1726 contributors. The bulk of the representations (2033) came from residents, and in addition we received comments from site owners, developers and statutory consultees.

The following tables list the policies and site allocations and notes how many comments were received on each policy or site, the number of supports and objections, and the number of representations that were received from each category of respondents (eg residents, site owners etc).

Table of Policies

Policy Reference	Policy Names	Total No Representations	Number of Objections	Number of Support	Observations/ Neutral	Number received from						Resident from other authorities
						Residents	Landowners	Agent	Developer	Statutory Consultee	Other	
PUBLIC FACILITIES												
PF1	Playing Pitches and Recreation Areas	3	1	1	1	1	0	0	0	2	0	0
PF2	Community Facilities	2	0	1	1	0	0	0	0	2	0	0
PF3	Open Space Provision	6	2	3	1	0	0	3	0	3	0	0
QUALITY OF PLACE												
QP1	Design	10	5	3	2	0	0	5	0	4	1	0
QP2	Design Principles and Energy Efficiency	9	4	2	3	0	1	4	0	4	0	0
QP3	Listed Buildings	2	1	1	0	0	0	0	0	2	0	0
QP4	Development affecting Conservation Areas	2	1	1	0	0	0	0	0	2	0	0
QP5	Local Listing	2	1	1	0	0	0	0	0	2	0	0
QP6	Archaeology	2	1	1	0	0	0	0	0	2	0	0
QP7	Advertisements	0	0	0	0	0	0	0	0	0	0	0
QP8	Telecommunications	3	2	1	0	0	0	0	0	3	0	0
EMPLOYMENT												
E1	Employment Allocations	1	1	0	0	0	0	0	0	1	0	0
E2	Existing Employment Areas	4	2	1	1	0	0	2	0	2	0	0
E3	Mixed Use Areas	3	2	1	0	0	0	0	0	3	0	0
E4	Home Working	0	0	0	0	0	0	0	0	0	0	0
HOUSING												
H1	Housing Allocations	40	17	14	9	21	2	9	0	7	1	0
H2	Backland Development and Areas of Land left over after Planning	2	2	0	0	0	0	0	0	2	0	0
H3	Private Outdoor Amenity Space	2	1	1	0	0	0	1	0	1	0	0
H4	Supported Housing	2	1	1	0	0	0	2	0	0	0	0
H5	Sub-Division of Dwellings	0	0	0	0	0	0	0	0	0	0	0
H6	Self-Build and Custom-Build Housing	0	0	0	0	0	0	0	0	0	0	0
H7	Gypsy and Traveller Sites	4	1	2	1	3	0	0	0	1	0	0

Policy Reference	Policy Names	Total No Representations	Number of Objections	Number of Support	Observations/ Neutral	Residents	Landowners	Agent	Developer	Statutory Consultee	Other	Resident from other authorities
RURAL												
R1	The Conversion and re-use of Buildings in the Countryside	4	1	1	2	0	0	0	0	4	0	0
R2	Horse-related Development	3	2	0	1	0	0	0	0	3	0	0
R3	Farm Diversification	3	1	1	1	0	0	0	0	3	0	0
R4	Rural Workers Dwellings	3	1	1	1	0	0	0	0	3	0	0
ACCESSIBILITY												
A1	East Lancashire Railway	6	1	2	3	1	0	1	0	3	1	0
A2	Parking	2	1	0	1	0	0	1	0	1	0	0
A3	Walking, Cycling and Public Rights of Way	7	2	4	1	3	0	1	0	3	0	0
RETAIL AND TOWN CENTRE USES												
TC1	Town Centre and Retail Areas	2	1	0	1	0	0	1	0	1	0	0
TC2	Hot Food Takeaways	2	2	0	0	0	0	2	0	0	0	0
TC3	Shop Fronts	1	1	0	0	0	0	0	0	1	0	0
ENVIRONMENT												
EN Policy (General)		7	6	1	0	4	0	0	0	3	0	0
EN1	Landscape, Character and Quality	9	1	8	0	0	0	4	0	4	1	0
EN2	Biodiversity, Geodiversity and Ecological Networks	8	3	4	1	2	0	3	0	3	0	0
EN3	Green Infrastructure	3	0	3	0	0	0	1	0	2	0	0
EN4	Greenlands	2	1	1	0	0	0	0	0	2	0	0
EN5	Environmental Protection	3	0	3	0	0	0	0	0	2	1	0
EN6	Wind Turbine Areas of Search	12	6	4	2	3	0	1	2	5	1	0
EN7	Wind Farms and Individual Turbines	10	4	4	2	3	0	1	1	4	1	0
EN8	Surface Water Run-Off, Sustainable Drainage and Water Quality	8	0	7	1	0	1	1	0	6	0	0
EN9	Trees, Hedgerows and Woodlands	6	1	5	0	0	0	3	0	3	0	0
Boundary Change		23	14	9	0	16	2	5	0	0	0	0
Evidence Base		11	1	0	10	0	0	1	0	10	0	0
General Comments		36	17	1	18	27	0	1	0	7	1	0

Table of Sites

Site Reference	Site Names	Total No Representations	Number of Objections	Number of Support	Observations/ Neutral	Number received from						Resident from other authorities
						Residents	Landowners	Agent	Developer	Statutory Consultee	Other	
EMPLOYMENT												
E01	Baxenden Chemicals, Rising Bridge	2	1	0	1	0	0	0	0	2	0	0
E02	Rising Bridge Business & Enterprise Village	0	0	0	0	0	0	0	0	0	0	0
E03	Land off Hud Hey, Haslingden	4	1	1	2	0	0	2	0	2	0	0
E04	Land off Manchester Road, Sykeside	4	1	2	1	0	1	1	1	1	0	0
E05	Bridge Mills, Edenfield	1	1	0	0	0	0	0	0	1	0	0
E06	Ewood Bridge	3	0	0	3	0	0	0	0	2	1	0
E07	Land South of New Hall Hey, Rawtenstall	2	2	0	0	0	0	0	0	2	0	0
E08	Builder's Yard Rear of Andrew Ave, Rawtenstall	1	0	0	1	0	0	0	0	1	0	0
E09	The Corn Exchange, Robert Street, Rawtenstall	2	2	0	0	0	0	1	0	1	0	0
E10	Fall Barn, Rawtenstall	3	2	1	0	0	1	0	0	2	0	0
E11	Forest Mill, Water	1	0	1	0	0	0	1	0	0	0	0
E12	Isle of Mann Mill, Water	3	2	1	0	0	2	1	0	0	0	0
E13	Height Barn Lane, Bacup	47	46	1	0	38	0	1	0	1	7	0
E14	Futures Park, Bacup	1	0	0	1	0	0	0	0	1	0	0
E15	Barlow Bottoms, Whitworth	3	2	0	1	0	0	0	0	3	0	0
E16	Land North of Hud Hey. (Reserve as Safeguarded Land)	42	41	0	1	36	1	0	0	1	4	0
E17 /H28	Townsend Fold - New Hall Hey, Rawtenstall	2	1	0	1	0	0	0	0	2	0	0
MIXED USE												
M1	Winfields, Rising Bridge	40	39	1	0	35	1	1	0	0	3	0

Site Reference	Site Names	Total No Representations	Number of Objections	Number of Support	Observations/ Neutral	Residents	Landowners	Agent	Developer	Statutory Consultee	Other	Resident from other authorities
M2	Wavel House, Helmshore	2	0	2	0	0	1	1	0	0	0	0
M3	New Hall Hey, Rawtenstall	4	3	1	0	2	1	0	0	1	0	0
M4	Former Rossendale College Site, Rawtenstall	3	3	0	0	2	0	0	0	1	0	0
M5	Former Valley Centre, Rawtenstall	5	3	1	1	3	0	1	0	1	0	0
HOUSING												
H1	Land East of Hollin Way (Constablee 2), Rawtenstall	2	1	0	1	0	0	1	0	1	0	0
H2	Land to West of Hollin Way (Constablee 5), Rawtenstall	2	1	0	1	0	0	1	0	1	0	0
H3	Land North of Lime Tree Grove, Rawtenstall	4	3	0	1	1	0	1	0	2	0	0
H4	Constable Lee Court, Rawtenstall	1	1	0	0	0	0	0	0	1	0	0
H5	Reedsholme Works (Broadleys Mill) - South, Rawtenstall	1	0	1	0	0	0	1	0	0	0	0
H6	Land at Hollin Lane, Rawtenstall	34	31	1	2	30	1	1	0	2	0	0
H7	Land North of Hollin Lane, Rawtenstall	33	27	6	0	26	6	0	0	1	0	0
H8	Willow Avenue off Lime Tree Grove, Rawtenstall	4	4	0	0	2	0	1	0	1	0	0
H9	Land East of Acrefield Drive (Hollin Way), Rawtenstall	2	1	0	1	0	0	1	0	1	0	0
H10	Valley Centre, Rawtenstall	3	3	0	0	2	0	0	0	1	0	0
H11	Land to Rear of Johnny Barn Farm, Rawtenstall	16	15	1	0	14	0	1	0	1	0	0
H12	Land behind Newchurch Road, Johnny Barn 2, Rawtenstall	13	12	1	0	11	0	2	0	0	0	0
H13	Land at Cloughfold (between Newchurch Road and Bacup Road), Rawtenstall	53	51	1	1	49	0	0	0	1	3	0
H14	East parade, Rawtenstall	2	1	1	0	0	0	1	0	1	0	0

Site Reference	Site Names	Total No Representations	Number of Objections	Number of Support	Observations/ Neutral	Residents	Landowners	Agent	Developer	Statutory Consultee	Other	Resident from other authorities
H32	Clod Lane, Haslingden	4	2	0	2	3	0	0	0	1	0	0
H33	Former Leisure site, Haslingden	1	1	0	0	0	0	0	0	1	0	0
H34	Land adjacent Park Avenue/Cricceth Close, Haslingden	0	0	0	0	0	0	0	0	0	0	0
H35	Land to rear of Fern Terrace, Haslingden	10	10	0	0	10	0	0	0	0	0	0
H36	Land adjacent to Kirkhill Road (A)	8	4	1	3	6	0	1	0	0	1	0
H37	Plot 2, Land off Station Road, Haslingden	1	1	0	0	0	0	0	0	1	0	0
H38	Anvil Street	1	0	1	0	0	0	1	0	0	0	0
H39	Land off Greensnook Lane	5	4	0	1	3	0	1	0	1	0	0
H40	Land off Fernhill Drive	13	12	0	1	12	1	0	0	0	0	0
H41	Land off Moorlands Terrace	4	2	0	2	1	2	0	0	1	0	0
H42	Land at Higher Cross Row	29	28	0	1	28	0	0	0	1	0	0
H43	Green Farm Todmorden Old Road	40	39	0	1	37	0	0	0	1	2	0
H44	Land adjacent Maden Recreational Centre (to the rear of Highfield)	79	77	0	2	73	0	0	0	1	5	0
H45	Bacup Leisure Centre	2	1	1	0	0	1	0	0	1	0	0
H46	Land off Rockcliffe Road, Bacup	3	2	1	0	1	1	0	0	1	0	0
H47	Former Bacup Health Centre	1	1	0	0	0	0	0	0	1	0	0
H48	Reed Street, Bacup	1	0	0	1	1	0	0	0	0	0	0
H49	Thorn Bank, bacup	2	0	0	2	0	1	0	0	1	0	0
H50	Land at Douglas Road/Fieldfare Way, Bacup	4	3	1	0	2	0	0	1	1	0	0
H51	Thorn Gardens, Bacup	1	0	0	1	0	1	0	0	0	0	0
H52	Land Behind Pennine Road To East, Bacup	10	9	1	0	7	0	0	1	1	1	0
H53	Land North East off Pennine Road, Bacup	9	8	1	0	6	1	0	0	1	1	0

Site Reference	Site Names	Total No Representations	Number of Objections	Number of Support	Observations/ Neutral	Residents	Landowners	Agent	Developer	Statutory Consultee	Other	Resident from other authorities
H77	Gaghills Building Lane, Waterfoot	3	0	2	1	1	1	1	0	0	0	0
H78	Land to Rear of Lyndale Scout Hut, Crawshawbooth	4	2	0	2	2	1	0	0	0	1	0
H79	Thirlmere Way, Goodshaw Chapel, Goodshaw	28	25	0	3	24	1	0	0	2	1	0
H80	Land Adjacent Laburnum Cottages, Goodshaw	22	21	0	1	18	0	0	0	0	4	0
H81	Middlegate Green, Goodshaw Chapel, Loveclough	24	21	1	2	21	1	0	0	1	1	0
H82	Land adjacent Ullswater Way, Loveclough	7	5	0	2	4	0	0	0	2	1	0
H83	Land Adjacent Goodshaw Bowling Green, Loveclough	35	30	1	4	33	1	0	0	0	1	0
H84	Grane Road/Grane Village - Snow King, Helmshore	41	27	7	7	32	6	0	0	2	1	0
H85	Rosendale Golf Club Site, Greens Lane, Helmshore	6	1	5	0	1	0	0	0	1	4	0
H86	End Of Haslingden Sports Centre Playing Fields, Helmshore	18	18	0	0	17	0	0	0	1	0	0
H87	Wavel House, Holcombe Road	1	0	1	0	0	0	1	0	0	0	0
H88	Horse and Jockey, Market Street, Edenfield	5	0	4	1	5	0	0	0	0	0	0
H89	Land at Market Street - Pack Horse Garage, Edenfield	3	0	3	0	3	0	0	0	0	0	0
H90	Hazel Street, Rising Bridge	4	3	1	0	2	0	0	0	1	1	0
H91	Irwell Springs, Weir	0	0	0	0	0	0	0	0	0	0	0
H92	Land to the East of Morland Rise - Safeguarded Site	5	3	1	1	3	0	1	0	1	0	0
Gypsies and Travellers Sites												
G1	Baxenden Chemicals, Rising Bridge	288	287	0	1	221	0	1	0	1	36	29

Site Reference	Site Names	Total No Representations	Number of Objections	Number of Support	Observations/ Neutral	Residents	Landowners	Agent	Developer	Statutory Consultee	Other	Resident from other authorities
G2	Blackwood Road, Stacksteads	91	91	0	0	79	1	2	0	2	7	0
G3	Blackwood Road, Stacksteads (Reserve Site)	38	38	0	0	32	0	1	0	1	4	0
PROPOSED NEW SITE		19	0	18	1	3	9	5	0	0	2	0

In addition to the individual submissions, a total of 7 petitions have been received which are listed below.

Subject of the petition	Number of signatures or expressing support to the petition	Support/Oppose
Removal of Boundary Change around Reeds House, Crawshawbooth (RCGL(UB)10)	43	Support
H44 - Land adjacent Maden Recreation Ground	128	Oppose
G2 – Blackwood Road, Stacksteads	40+	Oppose
G2 – Blackwood Road, Stacksteads	22	Oppose
G3 – Blackwood Road, Stacksteads (Reserve Site)	40+	Oppose
Boundary Change off Alden Lane, Helmshore (SW(UB)3)	205	Oppose
E13 – Height Barn Lane	16	Oppose
H15 – Land behind Waingate Close, Marl Pits	397	Oppose

What happens next?

We expect to be taking a Report to Council in December which will highlight the main issues raised in the consultation as well as identifying the next steps in producing a Local Plan for Rossendale.

With respect to all the responses listed in this Report, the Council's Forward Planning Team is now considering them, and preparing a response to the issues that have been raised. In due course a report will be issued which will address the representations that have been received.

For further information on the Local Plan Part 2 please visit www.rossendale.gov.uk/land.

Taking into account the range of evidence reviewed above the scenarios which have been updated in light of new government data, it is considered that the appropriate stepped approach within Practice Guidance should be applied to Rossendale's housing OAN as follows:

The Starting Point: Household projections published by CLG provide the starting point estimate for overall housing need. Based on average annual household growth between 2011 and 2031 of 211 and taking into account vacancy rates, this indicates a need for **221 dpa** over the plan period 2011-31. These represent more optimistic assumptions around household formation than the 2011-based Interim counterparts; however, a sensitivity scenario which models the implications of adopting higher household formation rates in younger age groups (a partial return to the 2008-based household formation projections) indicates a need for an additional of 16 dpa to allow for this additional household information (i.e. to **237 dpa**).

Upwards adjustment in response to market signals: Although Rossendale performs relatively well compared to nationally in many of the market signals, there has nonetheless been under-deliver in the past against both the RS target and the more recent Core Strategy target. In addition, affordability in the Borough has worsened over the last 15 years as a result of relatively low wages, and there has been an increase in the number of concealed households in the Borough. In light of this, it is NLP's judgement that a reasonable uplift which would help to address these market signals would be **10%**, equivalent to 24 dpa, or **261 dpa** total based on the (adjusted) demographic starting point identified above. This is considered to represent the lower end of the range of full, objectively assessed needs excluding affordable housing requirements.

Alignment with economic need: At the top end of the range, the Experian job forecast for the Borough indicates a need for **335 dpa**. The past job trends and job stabilisation both represent unrealistic scenarios for future job growth in the Borough given that the projected population and labour force growth based on the 2012 SNPP would support job growth of 1,337 over the twenty year period, without any uplift on the figure of 221 dpa. The housing need based on the Council's Core Strategy job target is **298 dpa**, which represents a reasonable middle ground between the demographic-led needs (1,337 job growth) and the Experian forecast (3,397 jobs).

In light of the economic scenarios, it is considered that **335 dpa represents the upper end of the range excluding affordable housing**, which would support further job growth over and above that supported by population growth and as indicated in the Core Strategy.

The scale of affordable housing needs, once considered as a proportion of market housing delivery, implies higher estimates of total need, although whether such estimates may be realistically expected to occur is open to question. Nevertheless in

light of the high level of affordable housing need identified, it is considered that this supports an uplift of 10% to the employment-led range, and one that is above the level identified by demographic needs alone.

The resultant housing OAN range would be in the order of **285 – 370 dpa**. The 247 dpa in Rossendale's adopted Core Strategy falls below the bottom end of this range.

On the above basis it is considered that an objective assessment of housing need and demand Rossendale Borough falls within the broad range 285 dpa to 370 dpa over the 20-year period 2011 to 2031. This is equivalent to 5,700 to 7,400 dwellings in total. However it is recognised that this does not comprise the OAN for the whole of the HMA that Rossendale Borough sits within.

This range has been derived based on the following:

- The lower end represents the demographic-led needs based on the latest CLG projections, with an additional upward adjustment to take account of market signals and affordable housing needs;
- A mid-point of the range (around 300 dpa) aligns with the need associated with the current Core Strategy Jobs target, which projects moderate levels of job growth in the Borough; and,
- The upper end represents the housing need based on Experian's unconstrained forecasts of future economic growth in the Borough, and the potential job growth which could be expected to occur. This incorporates a further upwards adjustment on the basis of affordable housing need.

If Rossendale was to pursue a figure significantly lower than the top end of the range whilst also planning for substantial job growth despite an ageing population, it would need to justify how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower growth approach would give rise to. It would also need to evidence how the adverse impact of meeting housing need would '*significantly and demonstrably outweigh the benefits*' [the framework, §14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the wider HMA.

Supply-side factors, such as development constraints, policy constraints, infrastructure and environmental capacity, land supply and development viability amongst other considerations, are beyond the remit of this update, but may give an indication as to where the requirement target may sit within the OAN ranges identified above. Similarly, such factors may provide Rossendale with the rationale to deliver more or less than an objective assessment of need, based upon the range of evidence supporting its Local Plan.

RBC will also be obliged to take into account affordable housing needs, recognising that these were identified on a different evidential basis, with the data focussing on household's ability to pay, rather than demographic change and economic growth.

RBC will need to exercise its policy choice to test whether the delivery of 501 affordable dpa would require a further uplift to the Local Plan housing requirement on the basis of whether this would be economically realistic, and upon a variety of considerations including deliverability and viability.

Draft Local Development Scheme

	<i>Formal limited 6 week consultation on legal/technical matters set by Government</i>		<i>Assembling all comments and Evidence base documents in format set by Regulations to submit to PINS</i>	<i>Controlled by Planning Inspectorate</i>	<i>Council decision to adopt Plan</i>		
	Regulation 18 Consultation	2nd Regulation 18 Consultation	Publication	Submission to PINS (Planning Inspectorate)	Examination in Public (EIP)	Inspectors Report	Adoption
<i>Option 1</i>	Sept-Oct 2016	Jan-Feb 2017	Sep-Oct 2017	Feb 2018	July 2018	Nov 2018	May 2019
<i>Option 2</i>	Sept-Oct 2016		Feb-Mar 2017	Sept 2017	Feb 2018	June 2018	Nov 2018
<i>Option 3</i>	Sept-Oct 2016	Jun-July 2017	Nov-Dec 2017	May 2018	Oct 2018	Feb 2019	Jul 2019
<i>Option 4</i>	Sept-Oct 2016		Jun-July 2017	Jan 2018	June 2018	Nov 2018	Mar 2019
<i>Option 5</i>	Sept-Oct 2016	July-Sept 2017	Jun-July 2018	July 2019	Nov 2019	March 2020	July 2020

Notes

Option 1

1. Option One assumes a 2nd regulation 18 Consultation on the basis that some sites will be put forward that weren't previously consulted upon and will be controversial
2. Having a consultation in January-February may be difficult due to corporate decision making pressures and onset of purdah
3. Reconsultation so soon after initial Regulation 18 may be over-optimistic but otherwise would need to wait until July, delaying programme

Option 2

1. Not having a 2 stage consultation limits public opportunity to comment on further changes
2. Having a consultation in January-February may be difficult because of corporate decision making pressures and onset of purdah

Option 3

1. As having a consultation in Jan-Feb may be difficult this option assumes a longer timescale
2. Gives a relatively short period between the second informal consultation and Publication so will require appropriate resourcing

Option 4

1. Question on whether could submit in February because of Council decision making pressures , etc but may be acceptable

Option 5

1. Worst case scenario, assuming all consultations are in July-September

I have assumed that CIL will be undertaken concurrently with the Local Plan at all stages