

APPENDIX 3

Information received to support comments on the Rossendale Draft Local Plan (Regulation 18 Consultation)

Individual Reference Numbers

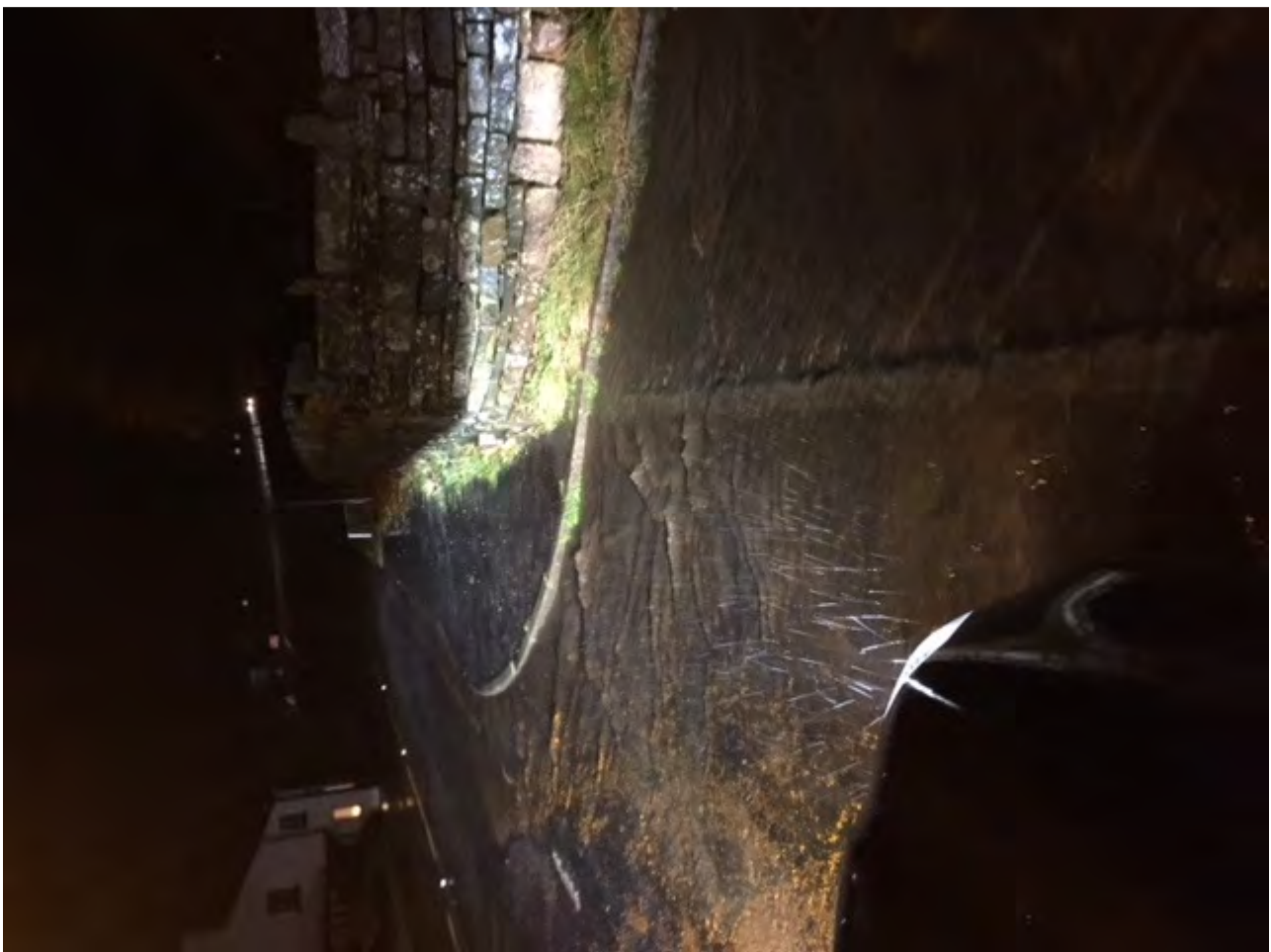
1750 - 1814

Contents

This appendix includes information we have received from individuals to support their comments on the Rossendale Draft Local Plan which are too large to include in the main body of the report. This information includes photographs, maps and reports and it is organised numerically by the individual reference number for each person. Confidential information including personal addresses, signatures, contact details etc. have been removed.

Individual Reference	Name	Policy or Site Reference	Type of Policy or Site	Site Name (if applicable)	Appendix Number	Page No.
1750	Cllr Andrew Walmsley	Site HS16.1	Housing Site	Tooter Hill	3	427
1764	Graham Lamb on behalf of Taylor Wimpey	Site HS2.78	Housing Site	Grane Road	3	428
1766	Felicity Collins, Turley on behalf of Peel Holdings	Site not allocated	A site that was examined in the SHLAA but that has not been taken forward in the Draft Local Plan	Land at Burnley Road, Edenfield	3	492
		Site HS2.33 / Site not allocated	Housing Site / A site that was examined in the SHLAA but that has not been taken forward in the Draft Local Plan	Land at Kirkhill Avenue, Haslingden / Moorland Rise	3	507
		General	Various Policies and Sites	General comments	3	523
		Site HS2.60 / Site not allocated	Housing Site / A site that was examined in the SHLAA but that has not been taken forward in the Draft Local Plan	Haslam Farm (northern part) , Rawtenstall / Haslam Farm (southern part), Rawtenstall	3	581
		Site HS2.79	Housing Site	Rosendale Golf Club	3	598
		Site HS2.71	Housing Site	Blackburn Road, Edenfield	3	613
1767	Mr & Mrs B Scholes	Site not allocated	A site that was examined in the SHLAA but that has not been taken forward in	Land at Scout Road, Whitewell Bottom	3	632

			the Draft Local Plan			
1768	David Smith, Curtins on behalf of Jerry Malik & Abid Hussain	Site not allocated	A site that was examined in the SHLAA but that has not been taken forward in the Draft Local Plan	Land off Burnley Road, Loveclough	3	638
1771	Mohammed Ali Ahmed, Lancashire County Council	Various comments	Various Policies and Sites	Various Policies and Sites	3	671
1772	Peter Wood	Policy ENV8	Wind Turbine Area of Search	Wind Turbine Areas of Search	3	699
1773	Stephen McGrail	Site HS2.66	Housing Sites	Land behind no. 173 to 187 Haslingden Old Road	3	749
1790	David Trivett	Site HS2.13 / Policy ENV2	Housing Site / Heritage Assets	Bankside lane and Heritage Assets Policy	3	750
1794	Justin Cove, Nexus Planning on behalf of The Methodist Church	Site HS2.71	Housing Site	Land off Exchange Street, Edenfield	3	767
1807	Steven Hartley on behalf of Bob Killelea	Site EMP2.12	Employment Site	Mayfield Chicks, Ewood Bridge	3	827
1812	Philip Carter, Environment Agency	Various comments	Various Policies and Sites	Various Policies and Sites	3	837
1814	Mr P N Heath and Mrs J Heath	Site HS2.77	Housing Site	Land Off Curven Edge, Helmshore	3	847



ROSSENDALE DRAFT LOCAL PLAN
REGULATION 18 CONSULTATION (JULY 2017)

REPRESENTATION BY TAYLOR WIMPEY (UK) LTD

LAND AT GRANE ROAD, HASLINGDEN

Date: 09 October 2017

Pegasus Reference: GL/MAN.0006/R003v1

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APPENDIX 2 - RANDALL THORP LANDSCAPE REBUTTAL – GRANE VILLAGE

1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Rossendale Draft Local Plan Consultation, which ran between 24th July and 9th October 2017.

Taylor Wimpey's Land Interests

1.2 Taylor Wimpey are pursuing various interests within the Rossendale Local Authority Area and have made separate site specific representations on the following sites:

- Land West of Market Street (Draft Allocation HS2.71)
- Land at Grane Road, Haslingden (Draft Allocation HS2.78)

1.3 This document provides general comments on the consultation and supporting evidence base involving the land at Grane Road, Haslingden, which is hereafter referred to as Grane Village.

Representation Structure

1.4 The structure of these representations takes the following form:

- In Section 2 we provide general comments on the various strategic and development control policies (which are largely duplicated across both representations, with some site specific references).
- In Section 3 we make site specific comments on Grane Village which is divided into 3 subsections:
 - i. Outlining **the site's current status.***
 - ii. Assessment of the evidence base documents concerning Grane Village.*
 - iii. Conclusions on Grane Village.*
- In Section 4 we provide our overall conclusions on the draft plan and allocation of the Grane Village site.

2. STRATEGIC AND DEVELOPMENT CONTROL POLICIES

2.1 This section comments on the strategic and development control policies in the Draft Plan, how the allocation of the Grane Village site for residential purposes upholds their objectives, and justifies the requested amendments where necessary.

Policy SD2: Urban Boundary and Green Belt

2.2 As we understand it, this policy confirms that the Green Belt boundaries will need to be amended **to accommodate the Borough's development needs. We fully support this assertion, as it reflects the Council's evidence base, which demonstrates that the authority area is highly constrained, by topography, ground conditions and other issues, meaning that there is insufficient suitable and viable non-Green Belt land to meet the borough's needs in full.** This has also been acknowledged in the text supporting Policy HS2.

2.3 However, paragraph 83 of the NPPF confirms that Green Belt boundaries should only be altered in **'exceptional circumstances', which have not been established or even mentioned within policies SD2 or HS2 as currently drafted;** whilst the recent Housing White Paper suggested further amendments to this guidance in terms of justifying Green Belt release (paragraph 1.39).

2.4 In our view, it is the combination of increased housing need (both market and affordable) and insufficient supply, and the harm that will occur from failing to meet these needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances for Green Belt release in Rossendale, and we would ask that the policy text is updated on this basis.

Policy HS1: Meeting Rossendale's Housing Requirement

2.5 This policy outlines that 4,000 dwellings will be required over the plan period (2019-2034), which equates to 265 dwellings per annum (dpa), and represents a slight increase from the 247 dpa set out in the previous Core Strategy which was based on the RSS.

Strategic Housing Market Assessment (SHMA) December 2016

2.6 This figure comes from the SHMA which was produced in December 2016 by Lichfields, and **suggested that Rossendale's objectively assessed housing need (OAN) is 265-335 dpa.**

2.7 **Whilst we do not dispute the SHMA's findings, and accept that the proposed target represents an increase from the adopted Core Strategy, we have concerns with the Council's adopting a figure at the lower end of the range.**

2.8 Firstly, we note that the 265 dpa figure represents the demographic baseline with uplifts for market signals and affordable housing; however it does not take account of economic aspirations, as employment-led needs suggested a range of 269-335 dpa. Yet the NPPF is clear that housing strategies within Local Plans must take account of economic aspirations (paragraph 158), whilst

the NPPG (paragraph 2a-018-20140306) notes how failing to align housing and jobs *"could result in unsustainable commuting patterns... and reduce the resilience of local businesses"*.

- 2.9 Secondly, adopting a figure at the lower end of the OAN range provides no flexibility to take account of potential unmet needs of adjacent authorities, and whilst we accept that Rossendale is **considered to be its own Housing Market Area for the purposes of the SHMA**, it's level of containment is actually lower than the 70% threshold set out in the NPPG and it is directly adjacent to Greater Manchester, where a new Spatial Framework (GMSF) is being prepared across the 10 authorities which will necessitate substantial housing growth. Indeed the SHMA acknowledges that Rossendale has strong commuting flows with Manchester, and significant housing market overlap with both Bury and Rochdale, with paragraph 13.3 noting:

"Through the Duty to Co-operate process RBC must consider the housing issues of adjoining authorities, particularly Bury and Rochdale, and assess any additional need required to be met. The target requirement is for Rossendale to judge based on the evidence provided to them."

- 2.10 In light of this, it is pertinent that neither Manchester or Bury are currently able to demonstrate a 5-year supply, whilst Rochdale claim between 5.1 – 6.1 years, suggesting existing issues in respect of housing capacity.
- 2.11 Moving onto the GMSF itself, the December 2016 draft set a housing target of 227,000 from 2015-2035 and proposed significant Green Belt across 55 large strategic allocations, totalling close to 70,000 units; although this still left over 157,000 units to be met by each individual authority.
- 2.12 However since then, the new Metropolitan Mayor, Andy Burnham has called for the plan to be redrafted to minimise Green Belt release and therefore it looks likely that the 10 GM authorities will be looking for even greater numbers within their urban areas. This will generate huge delivery **challenges in these areas and unless the Mayor's position changes, this is likely to generate unmet need**, which will need to be accommodated by the surrounding authorities, unless they can demonstrate and evidence that this is not achievable.
- 2.13 As such we would recommend an uplift to take account of employment needs, and to provide some flexibility to accommodate any unmet needs from surrounding GM authorities. Adopting a higher figure, which goes above and beyond meeting just **Rossendale's** basic need, would align with paragraph 154 of the NPPF which states that Local Plans should be aspirational, as well as realistic.
- 2.14 Furthermore, paragraph 47 of the NPPF requires local authorities *'to boost significantly'* the supply of housing. Adopting a housing requirement which utilises a higher figure within the OAN range would therefore obviously assist in achieving this overall goal, and would provide a more aspirational figure to drive growth in Rossendale.

Consultation on Standard Housing Need Methodology– 14th September 2017

- 2.15 Following the publication of the SHMA and Draft Local Plan, the government have issued a consultation paper proposing a new standardised approach to calculating housing need. At the outset, it must be noted that this is only a consultation document at this stage and cannot be afforded any meaningful weight at the present time. It is likely to generate a significant number of responses and objections, given it is such a fundamental element of the planning process, and therefore it is entirely possible that it will be subject to change before it makes its way into formally issued policy.
- 2.16 **In Rossendale’s case, the proposed methodology generates a housing need of 212 dpa from 2016-2026; which is below the OAN range suggested in the December 2016 SHMA (269-335 dpa). However, there are a number of flaws/implications that result from the Government’s drafted approach, which we have identified.**
- 2.17 Firstly, the suggested calculation of objectively assessed housing need is simply based on anticipated demographic change and uplifts associated with affordability market signals. It does not automatically include the need to take account of economic considerations.
- 2.18 Helpfully, the consultation does note that authorities will be able to plan for higher housing numbers to support a strategic infrastructure project, or increased employment ambitions (giving examples of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or a modern Industrial Strategy). In short, economic considerations effectively become a ‘policy on’ decision rather than a direct input in terms of calculating what the OAN will be.
- 2.19 The critical point to note is that the revised housing OAN methodology does not obviate a Local Planning Authority from promoting a sound Development Plan, which needs to be positively prepared, justified, effective and consistent with national policy.
- 2.20 Importantly, there is no proposed change to the relevant Acts which require a Development Plan to embody the principles of ‘sustainable development’ and there is no proposed change to the definition of sustainable development, which embodies economic, social and environmental considerations, as set out in the NPPF.
- 2.21 Indeed, the NPPF will continue to state that *“local planning authorities should positively seek opportunities to meet the development needs of their area”*, as required by paragraph 14. Given such needs include economic development as well as housing development, it is difficult to see how the two considerations can be meaningfully separated when preparing a holistic, sound Development Plan and one that fully adheres to the principles of delivering the *“presumption in favour of sustainable development”*.
- 2.22 Furthermore, this methodology only covers the period 2016-2026, whilst most emerging or adopted Local Plans cover a 15-20 year period, with Rossendale’s running from 2019-2034, and therefore the current figures cover less than half the plan period.

- 2.23 In short, the revised OAN methodology will still only continue to represent the starting point in forging a sound Local Plan.
- 2.24 The SHMA has already confirmed that a minimum of 269 dpa would be required to support their job growth aspirations and align with the NPPF requirement. Furthermore, affordable housing need is real issue in Rossendale with the 2016 SHMA (paragraph 13.19) confirming a need of between 158-321 dpa, which would also justify an uplift, whether as part of the OAN calculation as it is now, **or as a 'policy on' adjustment if this new methodology is adopted.**
- 2.25 There are also other economic objectives within Rossendale that will be aided by an uplift in housing. Much of the borough currently suffers from low property values, with more than half of **the Borough's properties** (51%) falling in Council Tax band A, well above the Lancashire County average of 37% and more than double the average for England of 25%.
- 2.26 Providing additional housing beyond the minimum demographic need, and particularly greenfield and Green Belt development, which promotes lower density, higher value, large family housing, will help to raise this profile and secure higher Council Tax bandings and receipts which can then be reinvested in local services, which have been subject to significant cuts in recent years. This additional choice and variety of housing will also help to inject more dynamism and mobility at all levels of the local housing market.
- 2.27 Penultimately, the consultation proposes that Local Authorities agree Statements of Common Ground with neighbouring authorities on areas of cross-boundary housing need and other strategic matters. Given the issues raised above in terms of supply pressures within Greater Manchester, and particularly the adjacent authorities of Bury and Rochdale where there this significant housing market overlap; this would again support Rossendale building some flexibility into their housing requirement to accommodate unmet need as part of this SoCG/ duty to cooperate process.
- 2.28 **Finally, a criticism we will be raising in relation to the government's revised OAN approach is that** it effectively restarts the clock on housing need, without looking at what backlog or concealed households have been generated in years gone by due to the lack of delivery.
- 2.29 In the case of Rossendale, the Borough has been without a full Local Plan (i.e. one that specifically allocates housing sites to direct the development industry in where it should seek to develop) for a considerable period of time. Indeed, the Core Strategy was adopted in 2011, prior to the NPPF. It does not allocate housing sites. Furthermore, the previous Local Plan dates back to 1995 and its **Proposal's Map is still being** relied upon for settlement boundaries. Whilst we note there are other issues within Rossendale (such as the topography), combined with the lack of a full and directional Local Plan, this has seriously restricted housing delivery across the Borough for over of 20 years.
- 2.30 To continue to delay the delivery of the Local Plan will only continue to compound affordability **issues in certain parts of the Borough, which could ironically push the Council's housing requirement** up further overtime. For the above reasons, we consider the Council should press on with the

submission of the Local Plan but should consider an increase in the housing requirement to take account of economic needs, to address structural issues in the housing market, and to provide flexibility to accommodate unmet needs of adjacent authorities if required in the future.

Policy HS2: Housing Site Allocations

- 2.31 Taylor Wimpey wholly support the allocation of the Land south of Grane Road, Haslingden (HS2.78) for residential development, and we discuss this site, and its delivery assumptions in more detail in Section 3 of these representations.
- 2.32 We would also reiterate our comments on policy SD2 **in that we support the Council's acceptance** that Green Belt release is necessary, but that the Plan needs to clearly articulate the exceptional circumstances that support the amendment of their Green Belt boundaries.
- 2.33 Looking at the allocations themselves, there are 109 in total, with an expected capacity of 3,622 dwellings based on a standard density 30 dph; which falls short of meeting the proposed housing requirement of 4,000 dwellings in full.
- 2.34 The supporting text does state that sites with extant consent and those nearing completion have **not been included with reference to the Council's 5-Year Housing Land Supply Report (2017-2022)**. This document suggests an existing deliverable supply of 985; however it should be noted that this covers the period 2017-2022, whilst the plan covers the period 2019-2034, and when you consider the 5 year trajectory only 174 of the 985 dwellings are to be delivered from 2019 onwards, with the numbers set out below (2019 onwards in brackets):
- Dwellings under construction: 436 (48)
 - Dwellings with planning permission: 261 (54)
 - Dwellings with resolution to grant permission: 256 (40)
 - Small sites allowance: 32 (32)
 - Deliverable Capacity: 985 (174)
- 2.35 **This generates an overall capacity of 3,796 and suggest that Council's proposed allocations** and existing supply will not meet its basic housing requirement to 2034, and this shortfall would be even greater if the housing requirement is increased as we advocate above.
- 2.36 We would ask that the Council provide clarification on this matter, particularly the relationship between the allocation figure in the consultation document and the 5 year supply figures, given the differing time periods; as this is not explained within the Draft Plan.
- 2.37 If our calculations are correct, then clearly the Council will need to allocate additional sites to meet its basic requirements, which we consider should be increased anyway.

2.38 Furthermore, the NPPF is categorical that housing requirement is a minimum figure which Local Plans should seek to surpass, and this interpretation has been endorsed in numerous Local Plan examinations. Exceeding the basic requirement also generates a buffer in the supply and provides flexibility within the plan to take account of under-delivery and additional choice in the market.

2.39 A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Such an approach is recommended within the LPEG report to Government (dated March 2016), with recommendation 40 (at Appendix A) noting that Local Plans should:

'focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances.'

2.40 As such the Council should consider allocating additional sites over and above its housing requirement. Based on the Council's current requirement a 20% uplift would require allocations for up to 4,800 dwellings, and based on our findings above this would require land for approximately 1,000 additional dwellings to be identified.

5 Year Supply

2.41 **Moving on to the Council's 5-Year Housing Land Supply Report (2017-2022)** we note that this confirms that Rossendale are currently unable to demonstrate a 5 year supply, and claim between 2.4 and 2.6 years depending which scenario is used.

2.42 This is a clear indication that there are a lack of deliverable housing sites in the borough and that the Council could be vulnerable to speculative development proposals through S78 appeals until they get a robust plan in place.

2.43 **Whilst we welcome the Council's** acknowledgement of this issue and the detailed trajectories included in this document we do raise the following issues with the methodology:

- The Council add the 20% buffer before adding the shortfall; however the approach adopted by Pegasus Group is to apply the NPPF buffer to the requirement and backlog combined, and this has been endorsed in several appeals, including the Droitwich Spa decision (Refs: APP/H1840/A/13/2199085 & APP/H1840/A/13/2199426).
- The Council have not applied any discounts to their claimed supply to allow for under-delivery; yet a 10% lapse rate is generally advocated by S78 Inspectors (see Droitwich Spa **decisions above**), and would be appropriate here given Rossendale's physical constraints and historic under delivery.

2.44 If the above adjustments are made in the methodology this gives a 5 year supply figure of between 2.11 and 2.33 years:

Figure 2.1 – Rossendale’s 5 Year Housing Land Supply

	Council's 5 Year Supply Doc 2017-2022			New Method
	Scenario 1	Scenario 2	Scenario 3	
Annual rate	247	Variable	265	212
5 year rate	1,235	1,335	1,325	1,060
Shortfall against Core Strategy target/ CS trajectory (variable)	425	249	425	425
Shortfall then buffer (Correct)	1,992	1,901	2,100	1,782
Buffer then shortfall (Rossendale)	1,907	1,851	2,015	1,697
Claimed supply	985			
10% lapse rate	886.5			
5 year supply (Correct)	2.23	2.33	2.11	2.49
5 year supply (Rossendale)	2.32	2.39	2.20	2.61

2.45 Finally, we note that if the **Government’s** draft/proposed standard housing needs methodology were applied in Rossendale, it would still only result in a 2.49 year supply (or 2.76 years with no lapse rate deductions). In short there are acute supply issues in the area that should be addressed at the earliest opportunity.

Policy HS4: Affordable Housing

2.46 Taylor Wimpey fully support the need to deliver affordable housing, and agree that policies of this nature should be set within a Local Plan or other statutory planning policy. Taylor Wimpey also recognise their obligations as a responsible housebuilder to assist in meeting such needs.

2.47 As noted above the SHMA confirms that there is acute affordable need in Rossendale, ranging from 158-321 dpa, which equates to between 60% and 121% of the Council’s chosen housing requirement. Meeting this need in full is unlikely to be realistic as this must balance against the impacts that the policy requirement has upon the viability of development. As such, we welcome **the Council’s flexible approach in HS4 part a, in applying a 30% requirement for market housing schemes ‘subject to site and development considerations (such as financial viability)’.**

2.48 We also welcome the requirement in part c that the tenure, size and type of affordable provision be based on the **‘latest available information on housing needs’** rather than any prescriptive requirement. This allows the plan to be more flexible and individual schemes to respond to more localised needs at the time they are being considered. That said, we reserve the right to make further comments on future local needs assessments.

2.49 In respect of part d, we note that some schemes may lend themselves, or specific Registered Providers may prefer, to locate the affordable housing in a specific part of the site for practical purposes (i.e. maintenance) or for other site-specific reasons (proximity to public transport routes etc.), and therefore we would ask that some flexibility is built in, such as adding the wording **“should be evenly distributed throughout the development, where practical”.**

2.50 Finally, we welcome the acceptance that both on and off-site provision of equivalent value will be considered.

Policy HS5: Housing Density

2.51 We agree with Policy HS5 as drafted, as it allows for sufficient flexibility and variation in density, based on the characteristics of the individual site; rather than a blanket prescriptive requirement.

Policy HS6: Housing Standards

2.52 Policy HS6 indicates that the Council intend to introduce accessibility standards (at least 30% of housing to be wheelchair adaptable) and national internal space standards and we comment on these in turn.

a) Access- meeting the needs of elderly or disabled residents

2.53 Whilst Taylor Wimpey are committed as a responsible house builder to deliver accessible forms of housing if required, this must be based on a demonstrable need, and therefore we would request that evidence and clarification is provided on this matter.

2.54 Part A requires at least 30% of any new housing development to meet the needs of elderly or disabled residents, or be easily adaptable; subject to site-specific factors and viability.

2.55 Whilst we welcome the flexibility provided within this policy, and would highlight that site specific factors such as topography are a major issue in Rossendale, we do raise concerns with the 30% starting point.

2.56 The explanatory text to this policy indicates that the SHMA highlights a considerable growth in the number of elderly households, as well as a high percentage of households containing one or more adults with some form of disability.

2.57 This reflects the aging population trend which can be seen nation-wide. Paragraph 10.74 of the SHMA also confirms that 18.5% of households in Rossendale contain one or more adults with some form of disability. However, whilst the SHMA provides a starting point in establishing demographic trends, it does not provide enough evidence to translate this into a policy threshold for housing to be adapted to these specific groups and certainly not one set at 30%.

2.58 Firstly, neither the SHMA nor wider evidence base confirms the proportion of these groups who will require dedicated, and wheelchair adaptable new housing, as many may wish to stay put and adapt their own homes. Furthermore, whilst the Viability Assessment states that it has factored these requirements in, these are insufficiently evidenced and justified in the report, which gives no detailed breakdown of the costs involved.

2.59 It is worth reiterating Section 56 of the NPPG, which confirms that the introduction of new enhanced standards on water efficiency, accessibility and spaces are optional, and must be justified by specific

evidence on need and viability before they can be implemented. The evidence in this instance falls well short of demonstrating the need or viability of a 30% target.

b) Internal Space- National space standards

- 2.60 As with the elderly housing requirement, we have concerns with the application of the National Space Standards on the basis that the need and viability for this has not been sufficiently demonstrated within the evidence to meet the requirements of the NPPG (paragraph 56-020-20150327). The SHMA does not consider housing size in this context, and whilst the Viability Assessment states that it has factored these standards in, the implications are not properly articulated.
- 2.61 In respect of the space standards, the NPPG also requires that transitional arrangements are considered following adoption to enable developers to factor the associated costs into future land acquisitions, and there has been no discussion of this in the Draft Plan or evidence.
- 2.62 As such we would request that this requirement is removed or that additional evidence and clarification is provided.

Policy HS8: Open Space Requirements in New Housing Developments

- 2.63 This Policy confirms that the existing SPD on Open Space will be updated to discuss minimum local standards and appropriate financial contributions. We therefore reserve the right to comment on these local standards and financial contributions as and when the SPD is updated and consulted on.

Policy HS9: Playing Pitch Requirements in New Housing Developments

- 2.64 Again, it is stated that an accompanying SPD will be produced to establish minimum local standards and appropriate financial contributions from new residential development. We reserve the right to comment on this matter further as and when the SPD is produced and consulted on.

Policy HS18: Self Build and Custom Built Homes

- 2.65 **Taylor Wimpey welcome the Council's identification of suitable land to accommodate self-build** and custom built houses. Indeed, seven housing allocations have been identified specifically for this type of housing and we fully agree with this approach.
- 2.66 In light of this, we are unsure why the policy then also requires developers to make at least 10% of plots available for sale for self/custom build. Whilst this policy suggests that this will be encouraged as opposed to required, it is considered that the appropriate mechanism to deliver self-build and custom-built homes is through specific allocations, as proposed here, rather than a prescriptive requirement for each and every allocated site in the Local Plan.
- 2.67 Requiring private developers to provide service plots available for sale within every housing scheme will place and unnecessary constraints and burdens on those housebuilders, and could potentially

lead to delays in delivery while those plots are being marketed; particularly where there may be little market demand. Indeed, the explanatory text to Policy HS18 explains that evidence from the SHMA indicates that the level of demand for self-build plots is currently low in Rossendale.

- 2.68 As such we would request that the allocations remain, but the 10% requirement be removed. Then through preparation of a self-build and custom build housing register, the Council can continue to effectively monitor demand for self-build and custom homes through the process and identify additional sites for this purpose if necessary.

Policy ENV1: High Quality Development in the Borough

- 2.69 We support the general principles outlined in Policy ENV1, which are all important factors in delivering high quality development in the Borough.
- 2.70 Whilst acknowledging the important role that Development Briefs or Design Codes (point m) can play in delivering high quality development, they can sometimes add an additional administrative burden leading to delays to housing delivery. In order to overcome this, if Design Codes or Development Briefs are to be introduced, this process should involve early engagement with Developers on Masterplan concepts. Frontloading such work will save delays down the line, and provide a high quality design framework which both the Council and Developer are happy with. It should be noted, that Taylor Wimpey have already undertaken such engagement with the Council on the development proposals for Grane Village.
- 2.71 Additionally, Design Codes can sometimes impose constraints on the sale of land to specific housebuilders, if certain standards are outlined which not every housebuilder could deliver. This is something that should be considered as part of dialogue between the Council and developers/landowners for each individual site.
- 2.72 The above points should be seriously considered given the Council is unable to currently demonstrate a 5-year supply of housing and will be under pressure to have this requirement secured upon adoption of the Plan. Necessitating Development Briefs or Design Codes for each allocated site will simply push back delivery rates.

Policy ENV3: Local List

- 2.73 We have no comments on this policy other than to request that the list is well publicised, in order for interested parties to monitor listed sites that affect them. We would also request that the methodology selection criteria for including sites are made clear.

Policy ENV4: Landscape Character and Quality and Policy ENV5: Biodiversity, Geodiversity and Ecological Networks

- 2.74 We support the wording of these policies, which is sufficiently flexible and in line with the provisions of the NPPF.

Policy ENV6: Green Infrastructure

- 2.75 We have no general comments to make on this policy, other than that the Grane Road, Haslingden allocation (HS2.78) will ensure that the development effectively integrates with and protects the designated Green Infrastructure to the south of the site, and the open countryside to the west, and providing such linkages has been a key consideration in the masterplanning for the development.

Policy TR1: Strategic Transport

- 2.76 Taylor Wimpey welcome the focus on developing the potential of the East Lancashire Railway for both transport and tourism purposes, as this would introduce a further sustainable transport mode into the area, and reduce the reliance on the private car for commuting purposes.

Policy TR2: Footpaths, Cycleways and Bridleways

- 2.77 We do not have general comments in relation to this policy, however it is relevant to the Grane Village allocation (HS2.78). This policy states that proposals to improve, extend or add to the existing footpath, cycleway and bridleway network in the Borough and in new development will be supported. National Cycle Route 6 is listed as a key route in the Borough. This policy would therefore support the development of the Grane Village site, as it will link directly to National Cycle Route 6, which runs down the eastern boundary of the site. It will also improve the existing Public Rights of Way which are currently poorly maintained and demarcated and will introduce new walking and cycling routes through the site, improving connectivity between the Cycle Route and urban area to the east, and the Grane Valley and reservoirs to the west.

Policy TR4: Parking

- 2.78 This policy requires compliance with the parking standards set out in Appendix 1. However, Appendix 1 sets out maximum standards (with some exceptions) which are no longer supported by government policy following the written ministerial statement, entitled 'Planning Update March 2015', which states that:

"Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network."

- 2.79 Therefore, unless such justification is provided it is recommended that the maximum standards provided in Appendix 1 should be deleted.

Conclusions on Strategic and Development Control Policies

- 2.80 Overall, Taylor Wimpey are supportive of the Draft Plan, subject to the comments and suggestions above.

3. GRANE VILLAGE, HASLINGDEN (ALLOCATION HS2.78)

Site Status

- 3.1 Taylor Wimpey have sole control over a 6 hectare site at Grane Road, Haslingden known as 'Grane Village' and have been working alongside the Council to promote the allocation of this site for residential development since 2012.
- 3.2 This site was originally put forward for development as part of Council's 'Lives & Landscapes- Green Belt & Urban Boundary Review' consultation in December 2012, as it was recognised as being at the edge of the urban area and in poor condition; therefore making a limited contribution to the countryside. Taylor Wimpey fully supported this boundary change and have since provided further clarification to the Council on the site's suitability and deliverability through a Development Statement, submitted in January 2014 and this is attached at Appendix 1.
- 3.3 The site (SHLAA Ref: 16304) is now proposed as a housing allocation (Site HS2.78) within Policy HS2 of the Draft Plan, although we note this also include another small parcel of land in separate ownership (SHLAA Ref: 16402).
- 3.4 The attached Development Statement and evidence submitted to date have demonstrated that this is a sustainable and deliverable site in accordance with the NPPF, which is capable of delivering up to 160 units, commencing within the next 5 years.
- 3.5 In light of this we would question why this site has been included in Table 1 as delivering in years 6-15, and ask that this be amended to years 1-5, as Local Plans should not be holding deliverable sites back, particularly where there is an existing 5-year supply shortfall as there is in Rossendale.
- 3.6 We would also question the site area and capacity calculations for SHLAA 16304, given that the Taylor Wimpey have confirmed that they control 6 hectares that could deliver up to 160 units, so we would ask that this is amended as well.
- 3.7 We also welcome **the site's categorisation as 'mixed' which acknowledges that it is part brownfield.**

Evidence Base – Grane Village

- 3.8 We now provide comments on the evidence base documents which consider the Grane Village site:

Landscape Assessment

- 3.9 We agree with many of the findings of this report, but have concerns with some of the conclusions in relation to the Grane Village Site. As such, Randall Thorp have provided a comprehensive rebuttal statement which provides commentary on the findings of the Landscape Report, which can be found in Appendix 2. The Randall Thorp note should be read in conjunction with these representations and can be summarised as follows:

- **The Council's Landscape Assessment recommended that planned gaps in the layout of the site should be used to retain views to Tor Hill.** It is not considered that the existing view to Tor Hill from the identified viewpoint on Grane Road is of exceptional quality due to the visual influence of the large scale industrial buildings which dominate the foreground to the left of the view. As such, it is not considered that the quality of this existing view is high enough to require the entire view line to be kept free from development.
- Appropriately designed development can be delivered on the Grane Village site without resulting in significantly adverse effects upon landscape character, landscape features, or visual receptors.

3.10 This demonstrates that development of the Grane Village site will not generate any adverse landscape impacts, reinforcing its allocation in the Draft Plan.

Strategic Housing Land Availability Assessment- Stages 1 and 2 (May 2017)

3.11 The site was assessed in the SHLAA under site reference 16304. Whilst we agree that the site is suitable and achievable, we would question why it has been not been considered deliverable in the short term, and have a few comments on some of the findings. The Council already consider this site a suitable housing allocation, however, in our view, the site actually performs even better in certain categories of the SHLAA as explained below:

- Ecological value- The site is scored as red in this category, with the commentary explaining how a small strip of land in the site is located within woodland and grassland Stepping Stone. The Development Statement for this site considered all ecological matters, and concluded that there are no ecological or arboricultural constraints preventing the development of this site and appropriate mitigation will be provided where necessary. Additionally, the area of high ecological value to the south-east of the site has been excluded from development, and will therefore be protected by proposals. This is not considered to be an issue on site, therefore the site performs better than a red scoring in this category when taking into consideration the masterplan.
- Landscape value- **In the Council's 2015 Landscape Assessment, it is concluded that the Grane Village site is 'suitable for development with mitigation'.** As the 2015 Landscape Assessment conclusions were specific to the site, it is therefore unclear why the SHLAA has stated that this site has a high landscape impact. The Randall Thorp report contained at Appendix 2 further confirms that the site is suitable from a landscape perspective. It is therefore considered that the landscape scoring of the site is incorrect in the SHLAA, and should certainly not be categorised as red.

3.12 We also note that the scoring methodology and scope of the SHLAA does not allow for detailed considerations such as masterplanning and proposed design/mitigation. The Illustrative Masterplan for Grane Village (see Appendix 2) illustrates how the existing public right of way does not pose a constraint on site, on the contrary it can be well-integrated into development proposals.

- 3.13 Therefore, the site will in reality score higher than amber in the recreational value category, when considering the design of development proposals. A similar comment can be made with regards to the flood risk category-the development proposals shown on the illustrative masterplan excludes the area at medium/high risk of surface water flooding. For clarity, the proposed development is located entirely within Flood Zone 1, representing the lowest level of flood risk.

Conclusions on Grane Village

- 3.14 Overall, Taylor Wimpey are wholly supportive of the Grane Village, Haslingden allocation (HS2.78), subject to a few comments on the delivery numbers outlined in Table 1 and the evidence base which assesses the site. In particular, it needs to be clarified in Table 1 of the Draft Local Plan that the Taylor Wimpey site can deliver 160 dwellings, not 106 as currently suggested.

4. CONCLUSION

4.1 Overall, Taylor Wimpey fully support the allocation of the Grane Village site (HS2.78), subject to the comments and suggestions made above, which note that:

- The overall housing requirement should be increased to take account of economic aspirations and to provide flexibility to accommodate any unmet need generated by the adjacent authorities in Greater Manchester.
- The Council should consider allocating additional sites, both as long term reserve sites to provide some headroom in their overall supply, and smaller short term sites to boost 5 year supply, given the current shortfalls.

4.2 This representation has shown that the site is deliverable and developable in line with the NPPF, and has also demonstrated its importance for housing delivery in Rossendale, representing over 4.4% of the total allocated dwelling numbers and will make a significant contribution to 5 year supply.

4.3 Importantly, Taylor Wimpey have been promoting Grane Village for almost 5 years and will continue to work alongside the Council to demonstrate that it can begin delivering in the next 5 years.

APPENDIX 1 - TAYLOR WIMPEY GRANE VILLAGE DEVELOPMENT STATEMENT

APPENDIX 2 - RANDALL THORP LANDSCAPE REBUTTAL - GRANE VILLAGE

Grane Village Haslingden

Development Statement

December 2013





Contents



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Executive Summary

This Development Statement has been prepared by Taylor Wimpey UK Limited. It promotes the allocation of land at Grane Road, Haslingden (known as 'Grane Village') for residential development in the emerging Rossendale Local Plan. In particular, it sets out the reasons why this site can be beneficially and sustainably brought forward within the proposed urban boundary of Haslingden.

Introduction

The proposed development site, which totals approximately 6 hectares, represents a logical boundary and delineation to the settlement of Haslingden. This small sustainable urban extension can accommodate approximately 160 dwellings with associated landscaping and open space. The site is currently designated as open countryside but parts of the site have a history of development, with the southern section being a former gas works.

This Development Statement demonstrates that the Grane Village site:

- Is an entirely sustainable and deliverable site at which to accommodate additional housing provision in Haslingden;
- Will create a sustainable urban extension on a previously developed site within the proposed Urban Boundary of Haslingden;
- Is entirely suitable to be allocated and developed as a residential site, due to the proximity of services and facilities together with the physical containment of the land;
- Accords with the objectives of the NPPF, which clearly states the Government's objective to significantly boost the rate of house building across the Country and to approve applications for housing in sustainable locations without delay;
- Can provide for a choice of high quality homes in terms of tenure, type and size to meet local needs;
- Would contribute towards an identified need for both market and affordable housing in the Borough;
- Will provide high quality public open space for future residents and the existing community;

- Will create a sustainable and well-designed housing scheme in keeping with the character of the local area;
- Will be sensitively incorporated into the existing landscape retaining key existing features and will provide areas of well landscaped open space, particularly with regard to the existing pond and proposed open space area to the south of the site;
- Would generate a number of social, economic and environmental benefits;
- Will benefit the wider economy and help sustain existing services by providing new housing;
- There are no other technical or environmental constraints that would prevent the development of the site.

This document summarises the key reasons why the residential allocation of this site within the emerging plan would be appropriate and in accordance with national and local planning policy. The physical, environmental and technical suitability of this site for residential development has been confirmed by the following assessments, which have also informed the development of the Illustrative Masterplan;

- Ecological Assessment, prepared by TEP;
- Arboricultural Assessment, prepared by TEP;
- Preliminary Environmental / Ground Contamination Assessment, prepared by WSP Group;
- Highway and Access Review, prepared by Croft Transport Solutions;
- Flood Risk Assessment, prepared by WSP Group;
- Proposed Drainage Strategy, prepared by Thomas Consulting;
- Noise Feasibility Report, prepared by Echo Acoustics;
- Archaeological Assessment, prepared by Wardell Armstrong; and

- Outline Utilities Assessment, prepared by WSP Group.

These reports are available on request, with the relevant technical information being included within this Statement where appropriate.



A Suitable and Sustainable Site

The site has long been acknowledged as a suitable and sustainable location for housing provision. The 2010 Strategic Housing Land Availability Assessment (SHLAA) confirmed the site to be previously developed, within a desirable area and with no significant access, ground condition or infrastructure constraints.

The SHLAA awarded the site one of the highest deliverability and suitability scores of all the sites assessed; and it was only on the basis of the site's perceived availability constraints that it was termed a Category 2 site, meaning it was anticipated to come forward for development between 2016 and 2020. However, with Taylor Wimpey UK Limited having now legal control of the site, there can be no concerns regarding its availability and deliverability.

Since the publication of the SHLAA in 2010, Rossendale Borough Council has considered the various settlement boundaries to be adopted within the emerging Site Allocations Development Plan Document (DPD) and has proposed that the Haslingden Urban boundary be extended to include the Grane Village site to enable its development. Consultation on this proposed boundary change ran for a 4 week period in December 2012, and the consultation responses raised very few objections, with a representation from the Rossendale Civic Trust noting that the existing site is in poor condition and that Grane Road provides excellent access. On this basis, it is understood that the Council will seek the site's formal residential allocation as part of the next consultation phase, which is due in early 2014, with adoption due to follow in 2015.

If the proposed urban boundary changes are approved, the Grane Village site has the potential to deliver a significant proportion of the area's housing requirement within the next 5 years, to help address the identified shortfall created by 10 years of persistent under-delivery against housing targets. Accordingly, there is a compelling need to bring this site forward for residential development and therefore Rossendale Council should be pro-active in allocating this site for housing.

This document also demonstrates how the design and form of the development will respond sensitively to the characteristics of the site and the wider Holden Wood area through the masterplanning process.

Taylor Wimpey will also seek to engage with the local community in an attempt to develop these ideas for the site, and identify suitable opportunities to deliver added benefits for the wider settlement.

1.0 Introduction

Figure 1 : Aerial Photograph Showing Site Context



1.0 Introduction

Purpose of Development Statement

This statement must be read in the context of the governments objectives for housing development and remit for continuing economic growth as set out in the National Planning Policy Framework (NPPF), which requires Local Authorities to meet the objectively assessed housing needs for the area through the Local Plan process and seek to 'boost significantly' the supply of housing and consistently maintain a 5 year supply of deliverable sites which could deliver houses prior to 2016.

The Grane Village site should be allocated and developed for residential development in the emerging Site Allocations and Development Management Policies DPD, to assist in meeting the Borough's development requirements to 2026.

Site Location and Context

The site is situated on the western edge of the built up area of Haslingden, approximately 1.1km south west of Haslingden Town Centre and 1km north west of Helmshore, which provide a good range of local services and facilities.

The site is bounded by Grane Road (B6232) to the north, along with sporadic housing, a new employment development and the Holden Arms public house.

Gas Street lies to the east, with residential properties and a caravan park beyond that.

The site is bound to the south by a large pond, and a variety of modern residential and employment uses. Much of this boundary is screened by trees and bushes.

The western boundary comprises an established of trees Holcombe Road (B6235), with open fields and the Holden Wood Reservoir beyond that.

Therefore the wider area accommodates a wide variety of uses, characterised by residential, commercial and community uses to the east, within the built up area of Haslingden, and reservoirs and the Haslingden Grane valley to the west, within the countryside. The residential accommodation predominantly comprises two storey, stone built terraced and semi-detached houses with pitched roofs.

Site Description

The site comprises approximately 6 hectares of land that gently slopes from Grane Road down to the south east corner where there is an existing pond.

The southern part of site is previously developed and once accommodated a gas works, but currently consists of a series of small fields and a storage facility for caravans. The site is currently accessed from Grane Road to the north and Gas Street.

Development Vision

Taylor Wimpey is seeking to deliver an integrated, desirable, high quality residential development which meets the needs of the local community. It is envisaged that the proposed residential development will provide a network of accessible open spaces and routes which connect the site to the "Valley Way" recreational trail along the Swinnet valley. The residential development proposals will act as a catalyst to delivering a thriving and diverse economy, providing an enjoyable place to live.

The development proposals for the Grane Village site will deliver new high quality market and affordable family homes to the benefit of the local community, at a time when there are severe challenges to supply.

Our vision for the site is therefore underpinned by the following goals:

- **Delivering quality new homes** - Taylor Wimpey will build high quality new homes which make best use of the land and are sensitive to the long term aspirations and connectivity to local services.
- **Achieving a choice of housing** - The proposals will offer a mix of housing in terms of type, tenure and size to meet identified local needs and help to rebalance the demographics of the area.
- **Providing affordable homes** - The proposals will provide affordable homes of a range and type to meet the needs of those currently seeking to secure a new home in the area.
- **Provide enhanced linkages** - The proposals will provide a network of open spaces and routes to the surrounding footpath and cycle network, enhancing east-west links between the Swinnet Valley and the Grane Valley.
- **Investing in the community** - The development of this site will represent a significant private sector investment and result in the creation of additional direct and indirect employment both during and after the development.
- **Creating a safe and desirable place to live** - The proposals have been sensitively designed to ensure the creation of a safe and attractive environment which discourages crime and builds upon the strength of the local community.

Figure 2 : Visual Appraisal



Photo 1: Looking east into centre of site



Photo 2: Looking south west into site from Grane Road



Photo 3: Looking west from Gas Street



Photo 4: Looking south west from Holcombe Rd



Photo 5: Holden Wood Reservoir



Photo 6: Looking East along Grane Road



Photo 7: Looking south down Holcombe Road

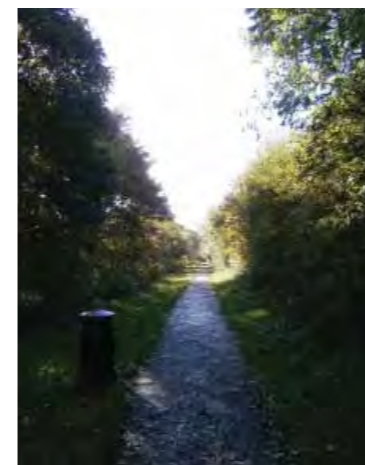


Photo 8: Cycle route looking south



Photo 9: Looking west along Grane Road.



Photo 10: Looking north from Holcombe Road

2.0 Planning Assessment

2.0 Planning Assessment

This section seeks to demonstrate that the Grane Village site meets the relevant local and national government policies (current and emerging), which are relevant to the allocation of land for housing and the form of proposed development. A full review of the relevant national guidance is contained at Appendix 1.

National Planning Guidance

The National Planning Policy Framework (NPPF), published in March 2012, outlines the Government's core objectives for the planning system, including the following which are relevant to the proposed development:

- The site is suitable and deliverable for development. It is located on the edge of the Haslingden urban area, where it is accessible to services, employment and other facilities. Accordingly, the site constitutes sustainable development, as defined in paragraph 7, and given that the 'presumption in favour of sustainable development' forms the central thread of the NPPF, development of this site should be supported.
- The provision of approximately 160 dwellings will assist in meeting the government's aim to 'significantly boost the supply of housing', as set out in paragraph 47. To achieve this, local authorities are required to use their evidence base to objectively assess housing need, and to identify a five year supply of deliverable housing sites, to be updated annually.
- The development will provide a wide range of market and affordable housing of various types and tenures promoting mixed and inclusive communities in accordance with paragraph 50.
- The site is situated approximately 1.1km from Haslingden Town Centre and bus stops are located within 150m of the site. The development therefore promotes the use of sustainable transport choices in accordance with paragraph 34.
- The site is not at risk of flooding and is therefore sequentially preferable in accordance with the tests for flood risk set out in paragraph 100.
- There are no contamination issues, or ecological constraints preventing development of this site. The development of the site therefore meets the requirements of section 11 (paragraphs 109- 125).

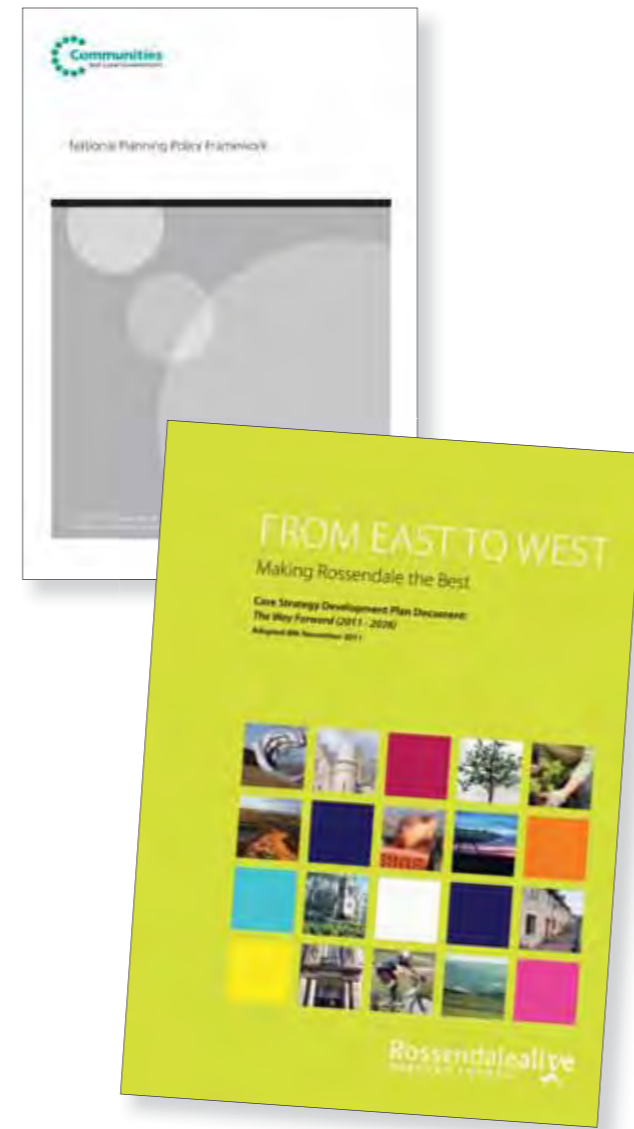


Figure 3 : Planning Documents

*National Planning Policy Framework (NPPF)
Rossendale Core Strategy Document*

Development Plan Guidance

Rossendale Core Strategy

The relevant Development Plan comprises the Rossendale Core Strategy which was adopted in November 2011. The proposed development will meet the following objectives of this plan:

- It will deliver approximately 160 dwellings which will assist Rossendale in achieving its borough wide housing target of 3,700 additional dwellings between 2011 and 2026 (247 dwellings per annum), as set out in Policy 2. It will also assist in achieving the target for Haslingden, as under Policy 3, approximately half of the overall housing requirement is due to be delivered within Bacup, Haslingden and Whitworth.
- The site will provide a wide range of market housing and will also provide up to 20% affordable housing, of various types and tenures, in accordance with Policy 4.
- An Illustrative Masterplan has been prepared which demonstrates that the proposed scheme respects and responds to local context, distinctiveness and character; maintains the relationship between the urban area and the countryside; protects local views; and provides public and private spaces that are safe, attractive, easily distinguished, accessible and complement the existing built form. The proposed development therefore meets the design criteria of Policy 23.

- The site has good access to public transport (with several bus stops within 400m) and enhanced links to services and employment opportunities. It will also link into the local footpath and cycle way network, in accordance with Policy 9.
- The proposed development will conserve and enhance any biodiversity assets found at the site and will not impact on ecological networks or habitats. It will also safeguard and enhance the landscape character of this previously developed site. Furthermore, existing trees and hedgerows will be retained wherever possible, or replaced if necessary; in accordance with Policy 18.

Site Allocations and Development Management Development Plan Document

In December 2012, Rossendale Borough Council consulted on a 'Green Belt & Urban Boundary Review' for a four week period, following a series of developer and community forum events. This consultation represents the first of a three phase approach, with consultations on proposed site allocations and development management policies to follow. Adoption of the overall document is forecast for late 2015.

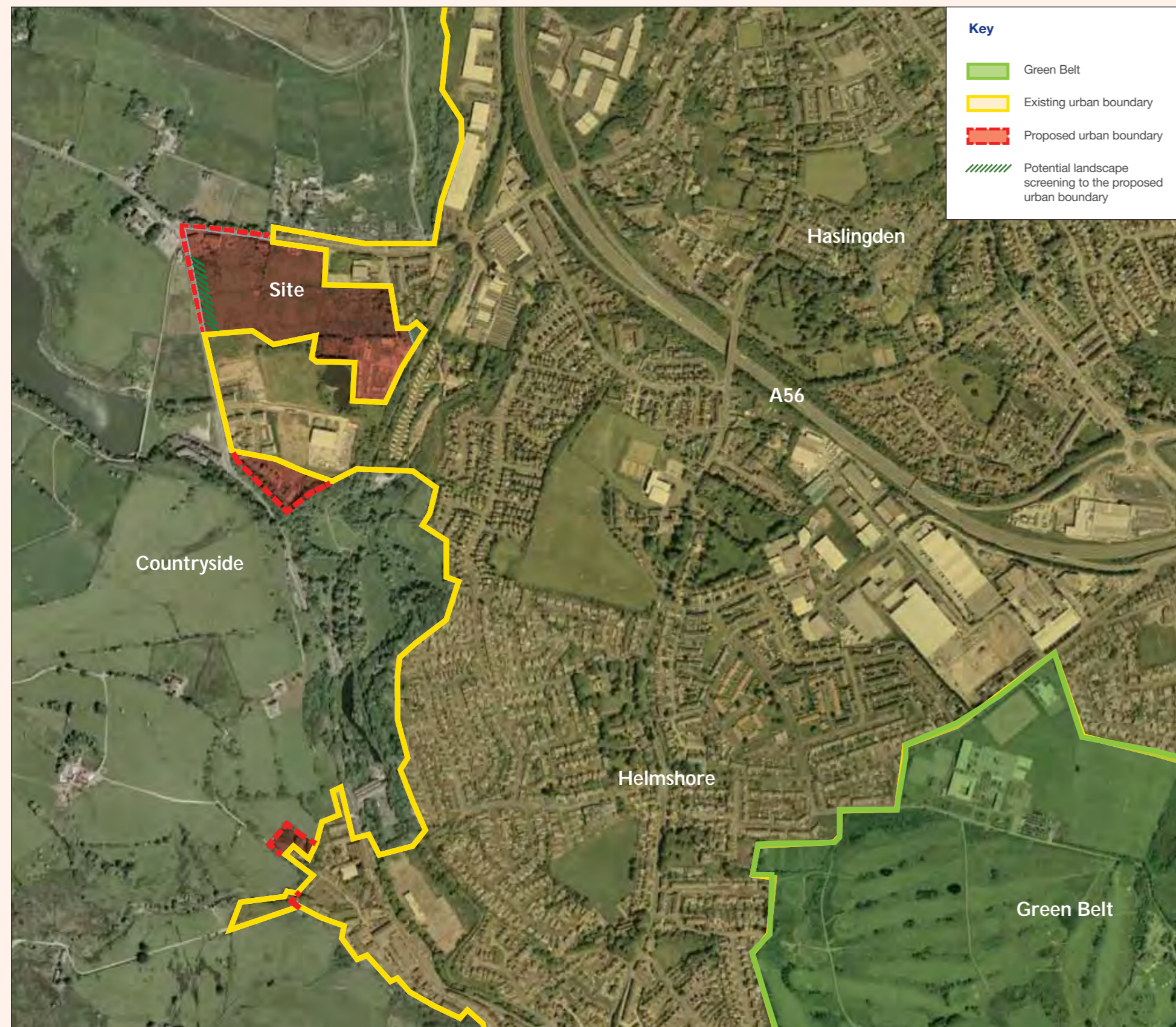
This consultation confirms the Council's intention to remove the entire Grane Village site (Ref: SW(UB)9) from its existing 'Countryside' designation and include it within the Urban Boundary of Haslingden. The document notes that the rationale for this boundary change is to enable the site to be developed in the future; and also notes that the site is of poor visual quality with no formal recreational value.

In addition, the responses from this consultation have now been published and a representation from the Rossendale Civic Trust noted that Grane Road provides good access to the M61, M6 and the nearest hospital making it suitable for commuters and the retired. This representation also supported the view that the existing site is in poor condition.

Furthermore, this proposed boundary change is one of the most significant extensions proposed within the consultation document for the whole authority area, as it will release a 6Ha site with the potential to accommodate 160 dwellings. There is only one similarly sized extension proposed within the Haslingden Area (Refs: HRB(UB)2; and HRB(GB)6), which could release two sites at Kirkhill Avenue & Moorland Rise, on the eastern side of the built up area of Haslingden. These sites are being promoted for a total of 110 new dwellings, however these were ranked in Category 2 and Category 3 respectively within the SHLAA, as part falls within the green belt and there are other identified constraints relating to access overhead power lines. On this basis this site is considered less sustainable.

Overall, the proposal to include the site within the Urban Boundary is acknowledged by the Council to be the first formal step in promoting the site's allocation and subsequent development. Taylor Wimpey wholly endorse and support this objective and recommend that its allocation is prioritised over the less sustainable sites noted above

Figure 4 : Proposed Urban Boundary Extension



Rossendale Strategic Housing Land Availability Assessment 2010

Rossendale's SHLAA was last updated in December 2010 and summarises the Council's position in respect of housing supply, by identifying and categorising deliverable housing sites. Within the SHLAA, the Grane Village site (Ref: 635) is confirmed as being previously developed land where housing delivery is suitable and achievable, however it is not considered to be available within a 5 year timescale, and is therefore ranked as a Category 2 site (to be developed between 2016 and 2020). Clearly, as Taylor Wimpey now controls this land it can be demonstrated that the site can be brought forward immediately.

Indeed, the Council have acknowledged this in their 5 Year Housing Land Supply Report 2012-2017, published in 2012, where they confirm the site to be an available, suitable, achievable and viable location to accommodate 160 dwellings. Taylor Wimpey welcomes this acknowledgement and will continue to work alongside the Council in seeking to deliver the proposed scale, mix and quality of housing envisaged.

Housing Delivery

The 2010 SHLAA identified 416 sites capable of delivering 15,676 dwellings, from which the Council suggested a 5.15 year supply.

However, these supply predictions are not reflected in the number of dwellings which are actually being brought forward. The 2010 SHLAA confirmed that between 2003 and 2010, only 1,238 completions were recorded across the Borough, reflecting an average annual completion rate of 177 dwellings, which is well below the Core Strategy target of 247 dwellings per annum. The latest Annual Monitoring Report (AMR), published in October 2013, confirms that this under delivery has worsened since 2010, with just 328 dwellings completed at a rate of 109 dwellings, lowering the average over the last 10 years to 157 completions a year. The housing trajectory within the AMR has been increased to a target rate of up 275 dwellings per annum for the next 5 years to take account of this shortfall. Therefore, there is an acknowledgement that the existing housing supply is not delivering the scale of development required to meet the Council's future housing target. The proposed residential development of this site will help to address this shortfall over the next 5 years and this should be considered as a key benefit of the scheme.

Planning Policy Summary

The NPPF is categorical in promoting sustainable development and encourages local planning authorities to be proactive in maintaining a deliverable supply of housing sites.

The Rossendale Core Strategy identifies Haslingden as a Key Settlement, where a large proportion of the Borough's housing provision should be directed to between 2011 and 2026.

The 2010 SHLAA ranked the Grane Village site as a Category 2 site for delivery in 2016-2020 due availability concerns; however Taylor Wimpey now control the site, so it should be considered a Category 1 site capable for immediate development.

The emerging Site Allocations and Development Management Policies DPD is seeking to amend the localised Urban Boundary to accommodate the Grane Village site; a process wholly supported by Taylor Wimpey. Subsequently, representations will be made to seek the residential allocation of the site.

Furthermore, whilst the 2010 SHLAA suggested a housing supply figure of 5.15 years, the Council have persistently failed to deliver their annual target over the last 10 years, suggesting that the current supply is insufficient. The allocation of the Grane Village site will help to address this shortfall.

In overall terms, the adopted and emerging policy framework wholly supports the allocation and development of the site to accommodate residential development in the near future.

3.0 Economic Investment and Community Benefits





3.0 Economic Investment and Community Benefits

Economic Investment

The development of the site will result in significant private investment and job creation. It will:

- Produce approximately £20m investment into the local area through the construction process.
- Produce approximately £1.1m through the Government's new homes bonus scheme to be spent by Rossendale Borough Council in the area.
- Produce approximately £1.6m new spending annually in the local economy for the site's new residents, which could support around 16 additional jobs across various sectors such as retail, leisure, hospitality and catering.
- Offer the potential for apprenticeships and training opportunities with Taylor Wimpey and its suppliers for residents in the local area.
- Generate an additional 62 jobs associated with the construction process and could sustain over 94 additional indirect jobs within the local economy.

Community Benefits

The development of the site will:

- Provide a range of open market housing comprising various types to meet the needs of the local community.
- Provide up to 32 affordable homes of a range and type to meet the identified need in the Rossendale area.
- Provide approximately 1.45 Ha of public open space for future residents in accordance with Rossendale's policy requirements. The open space will also enhance the recreation facilities available to the existing residents in the area.
- Assist in the provision of other facilities where there is an identified need, in accordance with development plan policies.

Conclusion

There is a compelling need to deliver the development needs of the Rossendale Borough in an appropriate way. The future development of the site would deliver a range of sustainable benefits whilst creating no adverse local impacts. The allocation and development of this site is a wholly appropriate and sustainable outcome, which in itself delivers a wide range of local benefits, not least an increase in market and affordable housing. Moreover, the development will deliver significant inward investment from the private sector.

4.0 Suitability of the Site for Development





4.0 Suitability of the Site for Development



The site is a sustainably located development opportunity located within easy access of a range of local services, employment opportunities and public transport routes.

Settlement Hierarchy

The Core Strategy defines Haslingden as one of five key settlements (alongside Rawtenstall, Waterfoot, Bacup and Whitworth), which form the top tier of the settlement hierarchy within Rossendale. It provides a range of facilities and services including a health centre, library, swimming pool, sports centre, as well as various shops and a market.

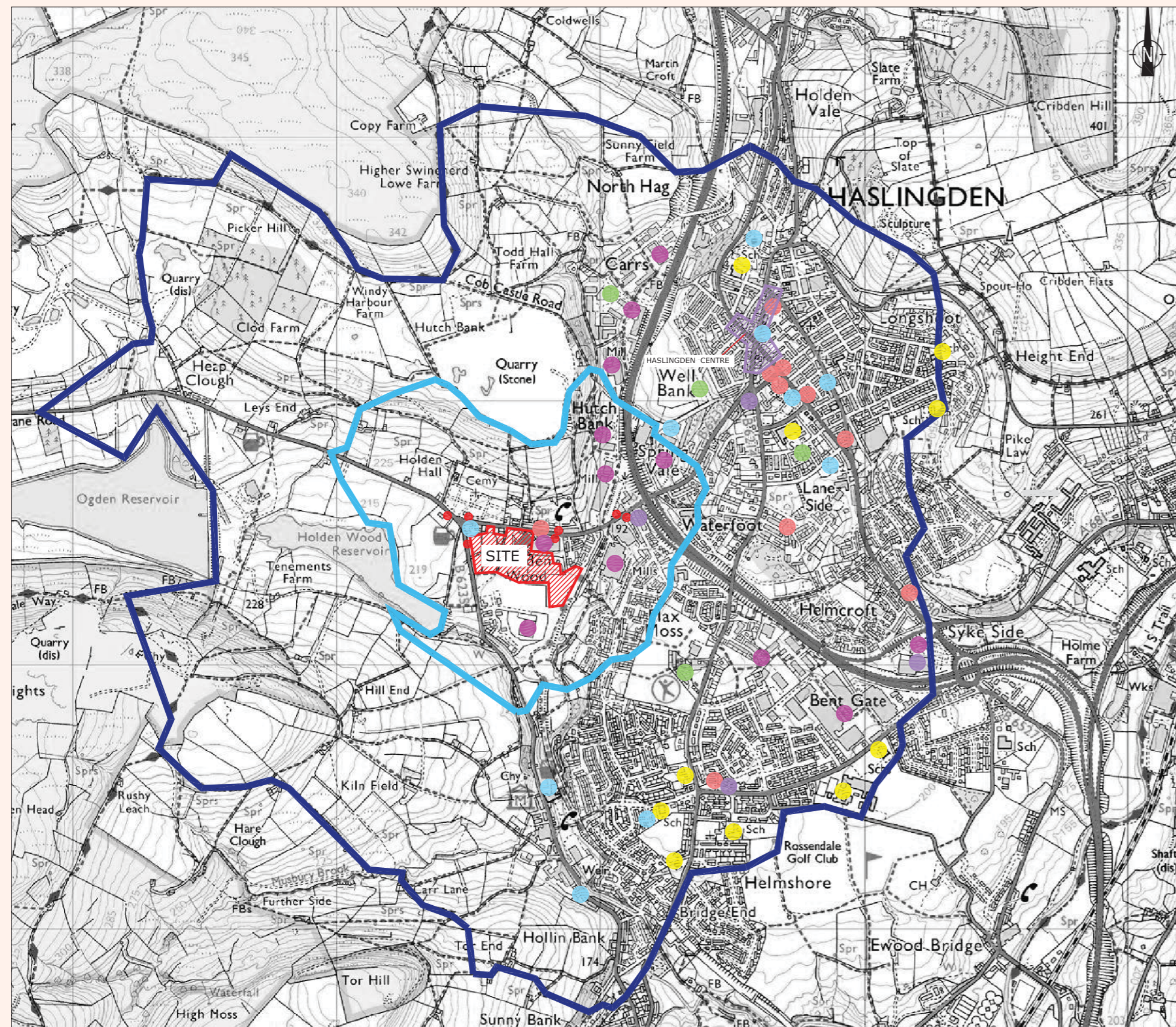
Helmshore, to the south east, sits within the second tier of the hierarchy and is defined as an 'Other Settlement', whilst the area to the west of Haslingden is defined as one of the Borough's Main Employment/ Industrial Areas.

Haslingden will need to provide appropriate amounts of housing and employment development in order to maintain its important role as a Key Service Centre and this is acknowledged in the Core Strategy which states that approximately half of the Borough's overall housing requirement (3,700 dwellings to 2026) will be delivered within Bacup, Haslingden and Whitworth.

Therefore it is clear that Haslingden is a suitable and sustainable location within which to accommodate housing growth. Furthermore it is considered that the Grane Village site is a suitable and sustainable location within Haslingden to accommodate a proportion of this growth.

1. Grane Village
2. Grane Road Bus Route
3. Cycle Network
4. Haslingden Health Centre
5. Haslingden High School
6. Haslingden Sports Centre
7. Haslingden Swimming Pool
8. Haslingden Town Centre
9. Tesco

Figure 5 : Sustainability Plan



Key

- 800m Pedestrian catchment
- 2km Pedestrian catchment
- Site location

Local Amenities

- Bus stop within 400m
- Education
- Retail
- Retail Zone
- Community Facilities
- Healthcare
- Sports and recreation
- Employment Areas



Location and Accessibility

The site is situated to the south of Grane Road in Haslingden. The site is approximately 1.1km south west of Haslingden Town Centre and 1km north west of the local shops in Helmshere.

Employment opportunities exist within Haslingden Town Centre, and adjacent to the site, with The Courtyard 100m to the east of the site; and the employment area off Holcombe Road 200m south of the site. Further employment opportunities are located in areas around the Hutch Bank and Carrs areas to the north of the site (500m and 1.2km respectively).

The site is well served by the existing public transport network. Bus stops are located less than 150m from the site (on Grane Road and Holcombe Road) with a regular (hourly) service to destinations including Haslingden Town Centre, Rawtenstall, Oakley and Helmshere. An additional service offering peak time journeys is available to destinations such as Rochdale, Royton and Manchester. The local hourly bus service provides a direct link to Rawtenstall Bus Station (5km east of the site). This bus station provides links to a wider range of local and regional destinations.

The site is also adjacent to a cycle route which runs along a section of disused railway line linking to Helmshere to the south and forming part of the Lancashire cycle network.

Building Communities

The development of the Grane Village site would complement the existing residential areas and diversify the choice and range of housing to meet local needs. Figure 5 illustrates the site's location in relation to the existing community facilities and services.

In accordance with the NPPF, the site is well related to services and facilities which provide opportunities to use non-car modes of transport. A more detailed list of locally available services is provided at Appendix 2 and a number of these are shown on the previous page.

5.0 Site Technical Analysis



5.0 Site Technical Analysis

The purpose of this section of the statement is to demonstrate that the site is not subject to any technical or environmental constraints that would prevent it coming forward for housing.

Environmental

Landscape

The site lies in the Southern Pennines national landscape character area, and is at the interface of a number of distinct local character areas as identified in the Lancashire Landscape Strategy. However, it does not lie within or adjoining any protected landscape.

To the west lies the Haslingden Grane Reservoir Valley (area 9c), characterised by three large reservoirs with mixed woodlands, stone walls, and gothic architectural detailing. The Grane Valley was once well populated with farmers, quarry workers and mills but it is now increasingly used for informal recreation since the reservoirs were constructed.

The reservoir valley drains to the more incised wooded valley of the Swinnel Brook, to the south, which flows to the Irwell, and this wider area is identified as a “Settled Valley”, containing the legacy of activity from the textile industry. East of the site is the urban area, while to the north, the ground rises rapidly through areas of moorland fringe to the South Pennine moorlands.

The site has been subject to various urban influences. It lies between two employment areas, was in part used as a gas works, and is crossed by the remnant of an old mineral railway. It is now in fringe agricultural uses, but has little landscape merit.

There are no landscape reasons to prevent it coming forward for development.

Ecology and Trees

An Ecological Assessment has been undertaken which confirms that there are no statutorily designated wildlife areas close to the site, and that no protected plant species were recorded during the habitat survey. In addition, no great crested newts or badgers were identified and the site is not considered an ideal habitat for water vole, otters or brown hare.

However, the hedgerows and ponds potentially offer ecologically valuable habitats for a variety of bat species, bird species and amphibian species including the common toad. These hedgerows and ponds will be retained wherever possible or will be offset by planting of native species. In addition any future site clearance works will take place outside the bird breeding season.

Other potential mitigation strategies include bird boxes, bat roost structures, however more detailed species surveys will need to be undertaken to confirm the scope of such works.

An Arboricultural Impact Assessment has also been undertaken and confirms that the site is not within a Conservation Area and is not subject to any Tree Protection Orders. The existing trees do not pose a significant obstacle to development, and it is likely that any trees that are lost would be undesirable for retention within a residential setting in any event. A small section of poor quality hedgerow may need to be removed to create an access point on the northern boundary; however there will be considerable scope for new gardens and urban landscaping within the site to add arboricultural value.

Therefore there are no ecological or arboricultural constraints preventing the development of the site and appropriate mitigation will be provided where necessary.

Archaeology

A desk based archaeological assessment was undertaken and has identified no specific archaeological resources or historically prominent structures within the site which would require significant consideration in terms of its development. The Church of St Stephen, a grade 2 listed church (now the home of Holden Wood antiques), lies along Grane Road to the west of the site, but will remain unaffected by the proposed development.

There are no archaeological constraints which would preclude the site being developed.

Flooding

A Flood Risk Assessment has been undertaken which confirms that the entire site is within Flood Zone 1, which means it has a low probability of fluvial flooding and is suitable for all types of land use, including residential, in accordance with the NPPF.

There are no flooding constraints preventing the development of the site.

Noise

A noise constraints study has identified that whilst there may be some noise impacts on the proposed development from the surrounding commercial/ industrial uses, and the traffic on Grane Road, none prevent the development of the site for residential use. Such impacts can be overcome through careful design, layout and the application of appropriate mitigation strategies and suitable noise conditions to ensure that there they do not affect the amenity of future residents.

There are no noise constraints preventing the development of the site.

Ground Conditions

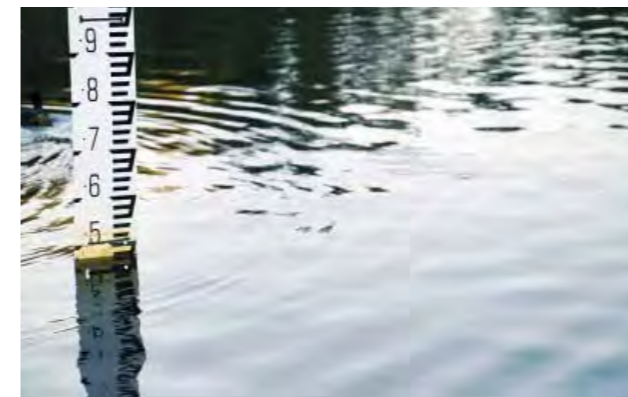
An Environmental Assessment has been carried out which confirms that there was a former gas works and landfill area within the southern part of the site. As part of the redevelopment of the site, this area of land will be mitigated to ensure any existing top-soil and sub soil contamination is dealt within in an appropriate manner.

There are no contamination constraints preventing the site coming forward for development.

Agricultural Land Classification

Provisional survey land mapping shows that the land in and surrounding the site is Grade 4 Agricultural Land. Grade 4 land is defined as poor agricultural land and not the best and most versatile.

There are no agricultural land constraints preventing the site coming forward for development.



Infrastructure

Highways

Initial assessments of the adjoining highway network undertaken by Croft (highways specialists) indicate that there is sufficient capacity within the existing strategic highway network to accommodate this development of approximately 160 homes, with limited highway improvements required within the highway boundary. Taylor Wimpey will consult with the local highway authority, Lancashire County Council, on appropriate mitigation to the local highway network.

The current Illustrative Masterplan shows the main vehicular access coming from Grane Road to the north and a potential emergency access from Gas Street to the east.

Access from Grane Road can be provided via a priority controlled junction that meets highway design standards.

The development proposals will promote pedestrian connectivity by maintaining the existing right of way through the site, whilst creating new pedestrian links and connecting to the nearby rights of way. The site will also link with the existing cycle routes and local amenities in the vicinity of the site, including the cycle route on the disused railway line to the east of the site, which links to Helmshore to the south.

In terms of wider access issues, it is noted that potential exists to greatly enhance the current level of services while improving overall infrastructure that will serve the wider community as well as new residents.

There are no existing highways constraints preventing the site coming forward. However, where required off-site highway improvements will be undertaken in agreement with the Highway Authority.

Drainage and Sewerage

The Drainage Strategy confirms that United Utilities is not aware of any drainage problems in the area and would not restrict foul flows from the site. Existing ordinary watercourses are present on site and these appear to be tributaries of Swinnel Brook which flows to the east of the site. These watercourses shall receive restricted surface water flows from any subsequent development. We will seek to provide a Sustainable Drainage Strategy in accordance with Rossendale Borough Council's guidance.

The proposed future development at Grane Village is not restricted by drainage or sewerage infrastructure constraints.

Utilities

The outline Utility Strategy confirms that services are present in the area and serve neighbouring residential developments. Subject to further discussion with the utility providers it is considered that the provision of services will not constrain the site's development or adversely impact on the service provision to the wider community.

The provision of services will not constrain the development of the site.

Summary of Achievability

The site is not subject to any technical or environmental constraints that would prevent it coming forward for housing. It is achievable without harm to interests of acknowledged importance. It should be allocated for housing as part of the emerging Site Allocations and Development Management Policies DPD.



6.0 Deliverability of Development





6.0 Deliverability of Development

The site will make a valuable contribution with the delivery of approximately 160 dwellings to meet the Borough's quantitative housing requirements as well as meeting the qualitative need to provide family and affordable housing within the area. It is therefore important that the site is deliverable in accordance with the requirements of the NPPF.

Deliverability Criteria

The NPPF and SHLAA Practice Guidance specify that local planning authorities supply sufficient specific deliverable sites to deliver housing in the first 5 years. To be considered deliverable, sites should, at the point of adoption of the relevant local development document:

- **Be available** – there is confidence that there are no legal or ownership problems.
- **Be suitable** – it offers a suitable location for development and would contribute to the development of sustainable and mixed communities.
- **Be achievable** – there is a reasonable prospect that housing will be developed on the site at a particular point in time.

This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.

Available

Taylor Wimpey UK Ltd has legal control of the site, and is seeking to develop the site at the earliest opportunity. On this basis the site could be brought forward for development with the first 5 years of the plan period and it satisfies the relevant elements of the NPPF. This is particularly relevant in Rossendale, where the Council has persistently failed to achieve its annual housing target over the past 10 years, and therefore has a shortfall to address within the next 5 years.

Suitable

The site is suitable for housing development as verified in the Council's SHLAA. In particular the site:

- Offers a suitable location for development and can be developed now;
- Would consolidate existing residential development to the west of Haslingden, being bounded, in part by residential development to the north, south and east;
- Can utilise existing infrastructure surrounding the site with no utilities or drainage constraints preventing the site coming forward for development;
- Can accommodate satisfactory vehicular access, existing bus stops are in close proximity and the local highway can accommodate the provision of 160 additional dwellings;
- Is not subject to any ecological or environmental constraints preventing development on the site; and
- Is sustainably located with numerous local facilities and services within walking distance of the site boundary, including primary schools, a secondary school, shops, healthcare and recreation uses.

The site is therefore suitable in accordance with the NPPF.

Achievable

The Opportunities and Constraints Plan highlights the matters that have been assessed by Taylor Wimpey UK Ltd in the evaluation of the site. The Masterplan illustrates that any constraints can be overcome and that the site could deliver approximately 160 dwellings and thereby make a significant contribution to meeting the housing needs of the area.

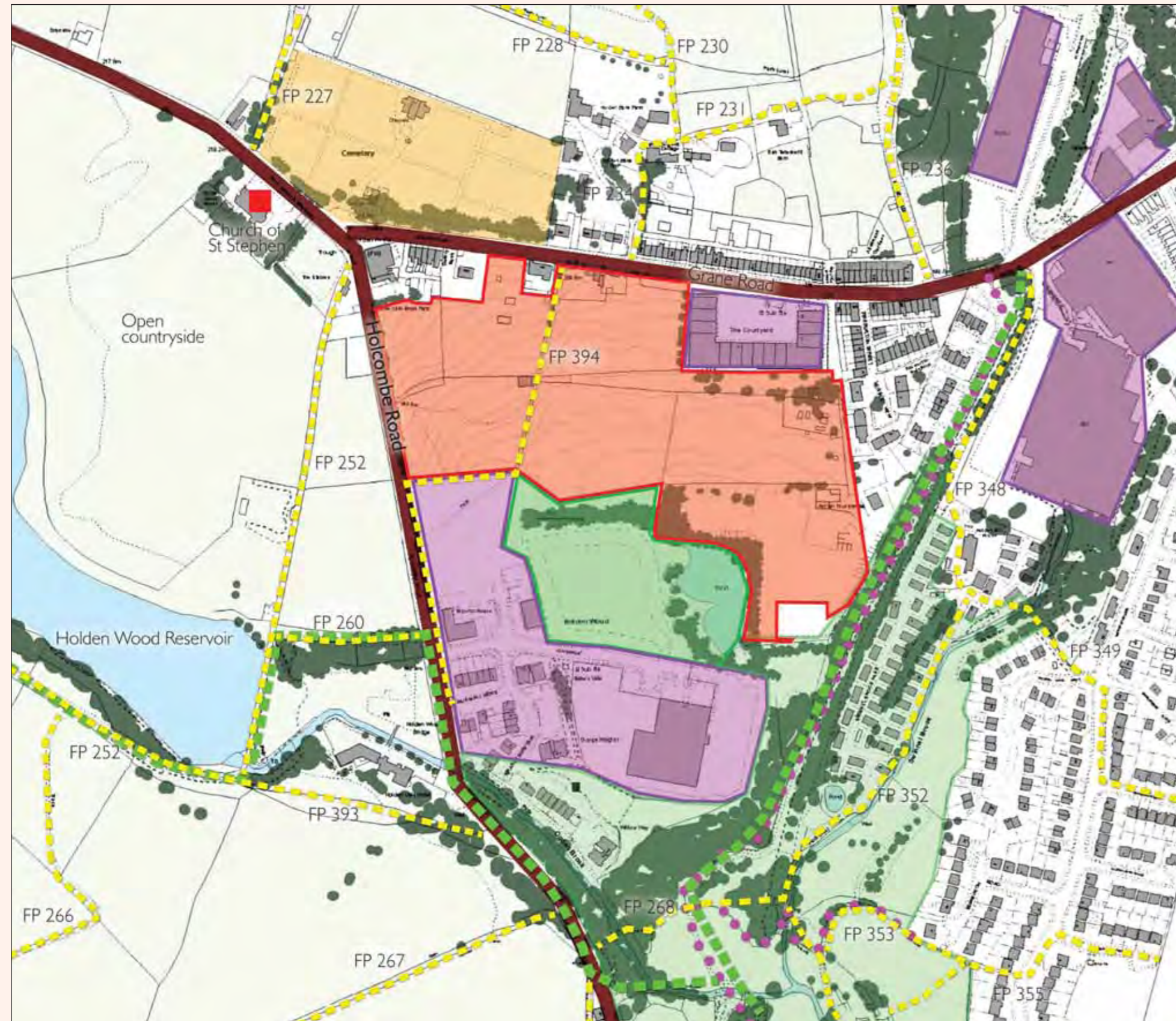
Taylor Wimpey UK Ltd has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand and the projected rate of sales in Haslingden; as well as the cost factors associated with the site including preparation costs and site constraints. Where potential constraints have been identified; Taylor Wimpey UK Ltd has considered the necessary mitigation measures and will use investment in order to overcome any deliverability barriers.

Taylor Wimpey UK Ltd can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and the CLG SHLAA Practice Guidance (2007). As a consequence, the company is committed to investing in the site and is confident that residential development can be achieved within 5 years.

Grane Village is considered to be achievable for residential development as there is an excellent prospect it can be delivered now.

7.0 Design and Form of Development

Figure 6 : Site Context



- Key**
- Site Area
 - Greenland (CS Policies 17&18)
 - Areas in commercial / employment use
 - Cemetery
 - Cycle Route
 - Valley Ways
 - Public Right of Way
 - Grade II Listed Building
 - Main road with bus route

7.0 Design and Form of Development

Taylor Wimpey has developed the scheme shown in this section to demonstrate how the design and form of development will respond sensitively to the characteristics of the site and the wider area, and to demonstrate the contribution that the site could make to the Holden Wood area of Haslingden.

The vision for the site is based on site survey and analysis. It is intended that these ideas will evolve further in consultation with the local community and key stakeholders at the appropriate time.

The Design Context of the Grane Village Site

Architectural Context

Haslingden began as a nucleated settlement on small plateau between the valleys of the rivers Swinnel, Ogden, and Irwell. It developed around the woollen and cotton textile industries but also has a history of stone quarrying, and iron and brass foundries. The earliest industrial development was concentrated on the plateau but had also extended into the Swinnel valley by the beginning of the 19th century. The site therefore abuts areas of mid-19th century workers cottages and lies close to industrial areas. Buildings are predominantly stone or stone and render, although some are red brick with stone detailing. The Church of St Stephen, a grade 2 listed stone church building (now the home of Holden Wood antiques), lies along Grane Road to the west of the site.

Landscape and Movement Context

The site lies at the centre of a number of accessible landscape areas. Holden Wood Reservoir lies within the landscape of the Grane Valley to the west of the site, and is accessible via a number of established footpaths across the intervening fields. To the east a disused rail line is now the "Valley Way" a recreational trail along the Swinnel valley. To the north other field footpaths climb the flanks of Haslingden Moor to join the Rossendale Way. The landscapes of these three areas are different and complementary and provide opportunities for informal recreation which will be beneficial to the development.

The landscape within the site is disturbed and of little merit in this context. A new landscape within the site has potential to provide an attractive transition between the urbanised valley landscape and the moorland landscapes to the west and north.



Figure 7 : Site Constraints



Key

- Site
- Water body
- 1m contour lines
- Cycle route
- ■ ■ ■ Valley Ways
- Public Right of Way
- Grade II Listed Building
- Existing dry stone with level change
- ➔ Views to countryside & reservoir
- Poor views to big building block
- Former gas works area
- Former tar tank/wells within gas works area
- Existing employment use

Main Design Considerations at Grane Village Haslingden

Topography and ground conditions:

The Grane Village site has an undulating topography and Holcombe Road, which slopes evenly towards the south, is generally higher than the site. The north-west corner of the site is steeply sloping, and across the centre of the site, there is a line of raised ground retained by dry stone walling, which is the remnant of a former mineral railway. This land supports an area of regenerated trees and scrub which provides some screening of an adjacent industrial building. At the southern end of the site there is an area of potentially contaminated land where a former gas works once stood. The site will be planned with these ground conditions in mind.

Residential amenity and neighbouring land uses:

Neighbouring properties along the northern boundary of the site comprise houses, a public house at the north-west corner, and some modern industrial units. The masterplan will carefully consider the need for screening and the nature of views into or out of the site around each of these neighbouring groups.

Hedgerows and green infrastructure:

Hedges within the site contain gaps and are poor quality, but one hedge follows the line of a public footpath and provides some structure to the site. Trees around a pond adjacent to the southern edge of the site provide habitat, and trees and scrub on the disused mineral rail line provide screening to the adjacent industrial units. Although the vegetation is not of high value, its retention will be considered in the masterplan.

Integration into the landscape:

The site lies between the industrial landscapes around the Swinnel Brook and the open moorland landscapes around the Grane Valley. Tree planting within the site will help create an attractive transition between these areas. This could include coniferous species as well as native broadleaves. There are long views out from the site to the countryside of the Grane Valley which will be considered in the masterplan.

Highway access:

Safe highway access to serve the site will be provided from Grane Road in accordance with the technical assessment.

Urban form and movement:

The masterplan will consider the potential for pedestrian and cycle connections between the site and the surrounding area, and will ensure that the site layout complements the likely movement patterns into and out of the area. The line of the existing public right of way between Grane Road and Haslingden Road will be respected and incorporated into the scheme.

Drainage and services:


The land drains towards the Swinnel Valley and there is an existing pond outside the site on low lying land. Consideration will be given to the requirement for SuDS within the scheme.



Figure 8 : Site Opportunities



Key

-  Site
-  Water body
-  Cycle route
-  Valley Ways
-  Public Right of Way
-  Grade II Listed Building
-  1m contour lines
-  Potential to keep existing dry stone wall as site feature
-  Potential to keep views to countryside
-  Potential to screen poor views to big building block by new trees
-  Potential development area
-  Potential site access
-  Potential emergency access
-  Potential pedestrian/cycle link to Valley Ways
-  Potential strategic open space
-  Potential landscape node
-  Potential green link



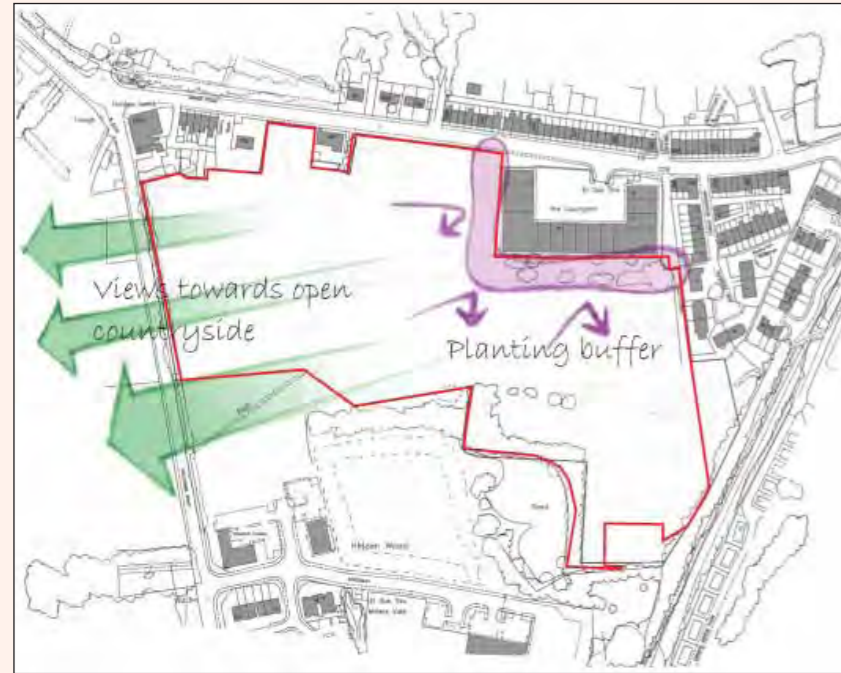
Opportunities Arising from Development

- **Housing need:** there is a clear need to identify new housing land and a strategic site needs to be brought forward through the LDF process to meet the needs of Haslingden and the wider Rossendale Valley. Grane Village could contribute around 160 new dwellings towards meeting the overall housing need.
- **Affordable housing:** The development of this site would enable the provision of new affordable housing in accordance with current Development Plan policies.
- **Sustainable location:** The site is well served by roads, buses, footpaths and cycle routes. The site lies within walking distance of the town centre and all key facilities and is therefore a highly sustainable site.
- **Potential to screen poor views to big building block by new trees**
- **Viable town facilities:** Haslingden is an active town with good local shops, schools and community facilities. Development of the Grane Village site would make a significant contribution to ensuring the viability of established local facilities and the development of key resources.
- **Town character:** The site lies at the western entry to the town. Development here provides an opportunity to create an attractive introduction to the town. The size of the site allows for a mix of properties to be provided which will cater for the needs of young couples, families of all sizes and older people who wish to remain in the town. There is also an opportunity to develop a housing layout which responds positively to the location of the site in the wider landscape.
- **Local connections and open spaces:** The development of the site will provide an opportunity to create new connections to the surrounding footpath and cycle network, and to create new areas of open space which will complement the character of the town. East-west links between the Swinell Valley and the Grane Valley will be created.
- **Ecological enhancement:** Existing hedges provide the bones of a landscape structure which can be retained and enhanced. The incorporation of SuDS has potential to enhance biodiversity value within the development

Figure 9 : Concept Sketches

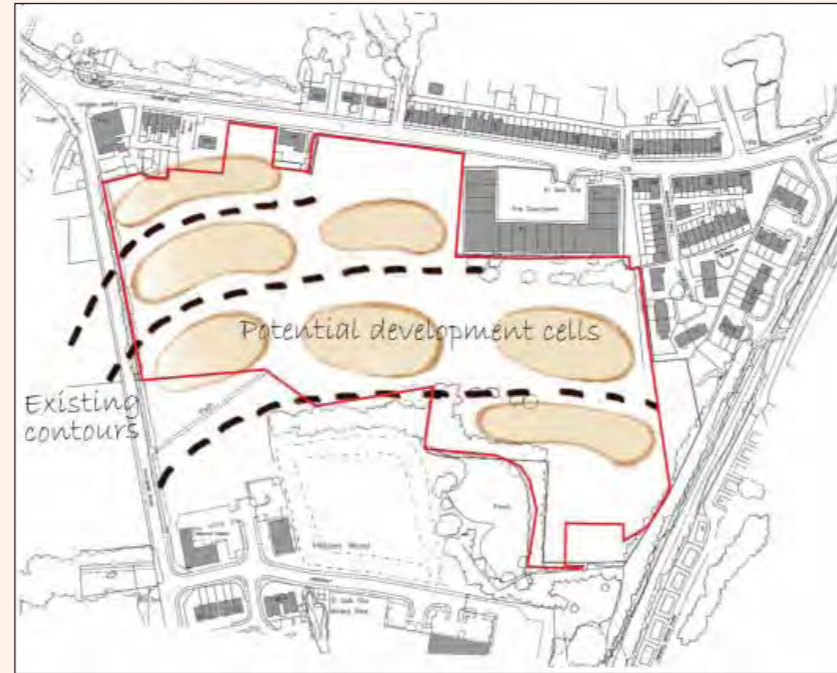
Concept 1: Views and Screens:

Integrate important existing views into the scheme and create new screening woodland.



Concept 2: Urban Grain:

Integrating with landform: create a series of development cells responding to existing contours.



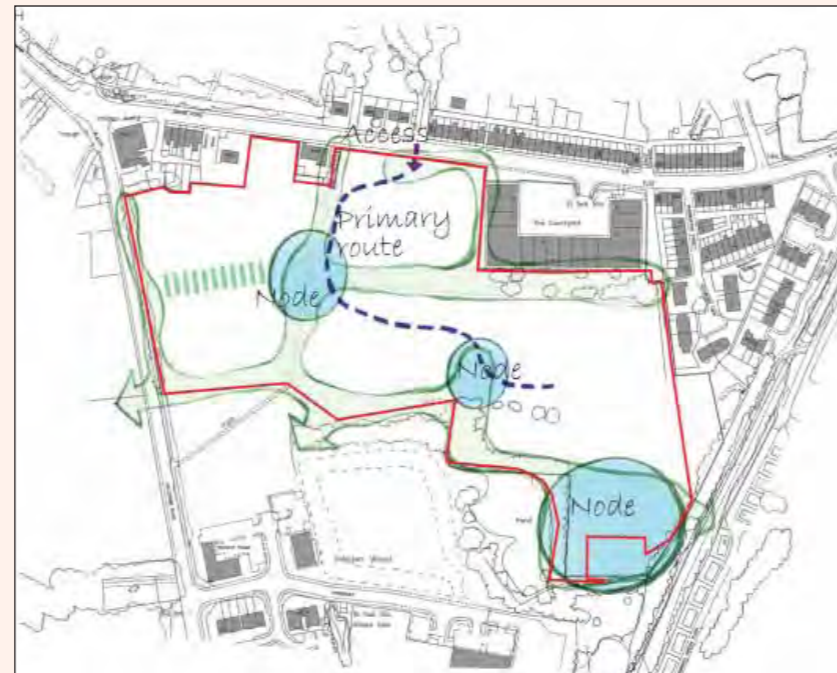
Concept 3: Multifunctional Green Space Network:

Create a green space network accommodating footpaths, SuDS and existing features.



Concept 4: Legibility and Local Distinctiveness:

Provide safe highway access which uses site features and views to create an interesting journey around the site.



Developing a Masterplan for the Grane Village Site

Vision

- The Grane Village site will be developed with best practice for urban design and green infrastructure in mind. The site layout will seek to retain, protect and enhance key features of the landscape and incorporate them into the development for the benefit of the community. The layout and design of buildings will seek to create a development sympathetic with the local landscape. In particular the development will seek to:
- Create a safe and legible development layout which provides physical and visual connections from the site into the wider landscape;
- Provide an appropriate range, form, and density of housing to help meet local housing needs;
- Provide areas of safe and attractive greenspace which will complement the movement network, incorporate sustainable drainage (SuDS) and recreational greenspace; and provide ecological enrichment; and
- Create an attractive edge to Haslingden in which development relates positively to the wider landscape.

Key Concepts of the Masterplan

The masterplan responds directly to the local landscape context, and to the opportunities presented by the landscape features within the site. Four key concepts are illustrated on the adjacent diagrams:

- **Views and Screens:** The adjacent industrial units are a potential visual detractor. Woodland screening at this boundary will create a soft interface with the site. Views out from the site will be channelled towards the Grane Valley.
- **Urban Grain:** The sloping site provides an opportunity to establish a clear urban grain which follows the topography, creates secure development cells, and assists the channelling of views towards the Grane Valley.
- **Multifunctional Greenspace network:** Existing landscape features in the site including footpaths, hedges, trees, and areas of local historic and ecological interest will be incorporated into a network of greenspace running through the site. This will function as recreation and amenity space and will incorporate new pedestrian and cycle routes and SuDS treatments.
- **Legibility and local distinctiveness:** The highway network within the site will be designed to create a distinctive sense of place, by variously passing through, alongside or touching upon areas of greenspace where the adjacent housing will be laid out to frame recognisable local places with views out and/or with distinctive local character.

Figure 10 : Illustrative Masterplan



The Illustrative Masterplan

The illustrative masterplan has built upon the conceptual response to the site character to create a layout which satisfies key elements of the vision for the site.

A safe and legible development layout

Safe vehicular access into the site will be taken from Grane Road to the west of the industrial units. The internal road network will be developed around a single spine road which will connect to an emergency access along Gas Street.

Within the site the street pattern housing layout will be planned to create an interesting visual journey through the site by both vehicles and pedestrians. The design and placement of buildings will frame views, vistas, and interfaces with greenspaces. Best practice in urban design layouts will be employed.

Housing will be laid out in secure new blocks, or will back on to established housing to create a secure block. The retained raised mineral rail line will be incorporated into private gardens at its western end, and at the east will be laid out as woodland with limited access.

Provision of an appropriate range, form, and density of housing

The site will accommodate around 160 dwellings on the lower land at a densities of 30-35 dwellings /ha. Family housing appropriate to the current requirements of the town and ranging from 2 to 4 bedrooms will be provided, a proportion of which will be affordable housing in accordance with approved local policies.

Buildings will be largely 2 storey, designed to complement the existing built form in the town, and will reflect the local character and distinctiveness of the Haslingden area.

Provision of a multi-functional green infrastructure network providing for non-vehicular movement, sustainable drainage, greenspace and ecology

The masterplan will accommodate new pedestrian links within the green corridors and greenspaces in the site to run between Holcombe Road and the Swinnel valley foot and cycle-paths to the east. The amenity of the existing footpath will be protected by the provision of greenspace alongside.

The existing scrub and trees, around the industrial units in the north and the pond in the south will be retained and enhanced to improve their ecological and landscape value. One significant new greenspace will be provided towards the south of the development close to the existing pond, trees, and Swinnel Valley trails which will provide kickabout and play facilities.

Creation of an attractive edge to Haslingden

Along Grane Road a new frontage of development will incorporate infill housing facing the road, and new greenspace around the site entrance road, with a carefully designed focal building adjacent to the existing converted chapel on the road frontage.

Along Holcombe Road the development will be lower than the road, and will be separated from it by hedgerow and trees, with pedestrian connections to the development.

The topography of the site and its surroundings will ensure that the new development is not prominent in the landscape. New tree planting throughout the streets and greenspaces in the scheme will ensure that the development blends harmoniously into its setting.

Figure 11 : Character Areas



The Character of the Development

The masterplan envisages the creation of three character areas as illustrated on the attached plan.

Western Area:

The area to the west of the public right of way and below Haslingden Road will be laid out around a small central framed 'square' to deliver a distinctive cluster of housing with shared surface roads and a village-like character. Building materials will be predominantly stone effect (with the use of some render). Street trees will be used to fill the street scene where appropriate.

Eastern Area:

The area to the south of the industrial units will be typical family housing of brick with stone detailing, laid out to frame the greenspaces and park which define the area. Landscape treatments will include hedging to garden boundaries and tree planting within the public realm greenspaces as well as occasional street trees.

Central Area:

The central area will be transitional between the west and east area with a mix of building materials, utilising stone or stone effect along the Grane Road frontage and moving to more mixed materials including render and brick inside the site. Lines of street trees and linear green spaces with hedgerows and trees will typify the general character of the area.

Perspective Sketch 1:

View of the new park in the eastern area



Viewpoint 1 - For Illustrative Purposes Only



Perspective Sketch 2:

View from retained stone wall looking west towards countryside



Viewpoint 2 - For Illustrative Purposes Only



8.0 Conclusions





8.0 Conclusions

It is considered that the entire site should be allocated for housing development in the emerging Rossendale Local Plan. The site can accommodate a 160 dwelling urban extension to Haslingden which will include associated landscaping and open space. This statement has clearly demonstrated that the site represents an excellent and much needed opportunity to deliver a sustainable urban extension to Haslingden, comprising previously developed land with good access from Grane Road. Accordingly, it should comprise the Council's priority site for housing allocation and development in this area.

In this statement we have demonstrated that:

- The site is wholly appropriate for housing development.
- It is entirely suitable to be allocated as a residential urban extension due to the proximity of facilities and services.
- The site has good access from Grane Road, and there are no other technical or environmental constraints preventing its delivery for housing.
- There are a number of significant material planning benefits through the development of the site for economic investment and job creation, including:
 - The delivery of up to 32 affordable homes on site.
 - £20m in the local area through the construction process.
 - £1.1m through the governments new homes bonus scheme to be spent by Rossendale Council.
 - £1.6m new spending annually in the local economy.
 - 62 additional construction jobs and a further 94 additional indirect jobs within the local economy.
 - Up to 1.45 Ha of on-site public open space.
 - The potential to provide training opportunities with Taylor Wimpey UK and its supplier for residents of the local area.
- The proposed inclusion of the site within the Urban Boundary of Haslingden, put forward for consultation by the Council, is wholly appropriate and reflects the logic attributable to the site coming forward for development. Given the character of the surrounding area, the site's housing allocation and development is wholly appropriate and beneficial.

There is a compelling need to deliver the development needs of Rossendale Borough Council in an appropriate way. The site forms a suitable, available and deliverable opportunity, which can be developed without giving rise to any adverse impacts. Instead, it will deliver a range of benefits, principally the provision of market and affordable housing within a sustainable location.

Furthermore, it will be the largest site in the Haslingden area to be released if the proposed urban boundary changes are approved. Therefore it has the potential to deliver a significant proportion of the area's housing requirement within the next 5 years, to help address the identified shortfall created by 10 years of persistent under-delivery against housing targets. Accordingly, this site should be considered as a priority location for housing development and allocated as such within the Local Plan.

Appendix

1.0 Planning Guidance



Appendix 1.0 Planning Guidance

National Planning Policy Framework

The Presumption in Favour of Sustainable Development

Paragraphs 11 and 12 confirm the planning system is still plan led and that the NPPF does not alter the statutory status of the development plan, but confirms that it is highly desirable that local planning authorities have an up-to-date plan in place.

At the heart of the NPPF is a 'presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (Paragraph 14).'

Paragraph 14 confirms that for plan-making, this means that local planning authorities should positively seek opportunities to meet the objectively assessed development needs in the area, unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
- Specific policies in the Framework indicate development should be restricted.

Paragraph 15 confirms policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.

Delivering Sustainable Development

The bulk of the NPPF sets out 13 facets of 'delivering sustainable development'. These include:

- Building a strong, competitive economy;
- Ensuring the vitality of town centres;
- Supporting a prosperous rural economy;
- Promoting sustainable transport;
- Supporting a high quality communications infrastructure;
- Delivering a wide choice of high quality homes;
- Requiring good quality design;
- Promoting healthy communities;
- Protecting Green Belt land;
- Meeting the challenge of climate change, flooding and coastal change;
- Conserving and enhancing the natural environment;
- Conserving and enhancing the historic environment; and
- Facilitating the sustainable use of materials.

We address the relevant parts for this site and the proposed development below.

Building a strong, competitive economy

Paragraphs 18 and 19 confirm the Government's commitment to securing economic growth in order to create jobs and prosperity and ensure the planning system does everything it can to support sustainable economic growth.

The allocation of the site for housing will help secure the development of the site which will create a number of on-site construction jobs and training and apprentice opportunities and result in wider economic benefits throughout the construction supply chain.

Promoting Sustainable Transport

Paragraph 34 confirms that plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport can be maximised.

Paragraph 38 confirms that key facilities such as primary schools and local shops should be located within walking distance of most properties.

The site has been demonstrated to be within easy walking distance of a number of regular bus routes and associated stops and is within walking distance of a Town Centre, local shops and other community facilities.

Delivering a Wide Choice of High Quality Homes

Paragraph 47 highlights the need to 'boost significantly the supply of housing and local authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area;
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing with increased buffers of 5% and 20% to promote competition and offer come records of persistent under delivery;
- Identify a supply of specific, deliverable sites or broad locations for growth for years 6-10 and where possible, for years 11-15
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy and how they will maintain a 5 year supply of land; and
- Set out their own approach to housing density to reflect local circumstances.

Paragraph 49 reconfirms that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable sites. As such, it is within the Council's interests to ensure that it accurately identifies how it will meet its housing targets over the plan period.

Paragraph 50 goes onto confirm that a mix of housing should be planed for based on current and future demographics, providing different sizes, types, tenures and affordability all set in a range of locations, reflecting local demand.

Paragraph 52 highlights that the supply of new homes can sometimes be best achieved through planning for larger scale development and settlement extensions that follow 'Garden City' design principles.

The allocation of the site for housing will help secure the delivery of up to 160 new family homes, including a proportion of on-site affordable homes, on a sustainably located site, thereby making a positive contribution to the Borough's housing needs within the first part of the plan period.

Requiring Good Design

Paragraph 56 confirms the Government attaches great importance to the design of the built environment with good design forming a key aspect of sustainable development and should contribute positively to making places better for people.

Paragraph 60 confirms that planning policies and decision should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative. However, it is proper to seek to promote or reinforce local distinctiveness.

Paragraph 61 goes onto confirm that design goes beyond appearance and is as much about addressing the connections between people and places and the integration of new development into the natural, built and historic environment.

Taylor Wimpey are committed to delivering a high quality designed development proposal. The design process explained within this document highlights how natural and environmental considerations have fed into the indicative layout. The layout also seeks to maximise linkages with the surrounding urban and natural environment and promotes walking and cycling.

Promoting Healthy Communities

This section promotes the benefits of community engagement and to ensure communities are properly served by a range of social, recreational and cultural facilities and services. The importance of accessibility to shops, schools, open space are all highlighted.

Paragraph 74 confirms that existing open space, sports and recreational buildings and land should not be built on unless:

- An assessment has been undertaken which has clearly shown the open space to be surplus to requirements; or
- The loss resulting from the proposed development would be replaced; or
- The development is for alternative sports and recreation provision.

Taylor Wimpey is committed to providing necessary contributions to local schools and other community facilities, which the development might impact upon. Taylor Wimpey is also committed to opening up part of the site for public open space use.

Meeting the challenge of climate change, flooding and coastal change

Paragraph 93 confirms that planning has an important part to play in securing radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy.

Paragraph 98 confirms new developments should be planned to avoid increased vulnerability and when brought forward in areas of risk, care should be taken to ensure that risks can be managed through suitable adaption measures, including through the planning of green infrastructure. Paragraph 100 also states that inappropriate development in areas at risk of flooding should be avoided but goes onto note that where necessary, development should be made safe without increasing flood risk elsewhere.

The site is not within an area at risk of flooding, and there are no reported drainage issues on the site.

Conserving and enhancing the natural environment

Paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, geological conservation interests and soils;
- Recognising the wider benefits of the ecosystem services;
- Minimising impacts on bio-diversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Taylor Wimpey has carried out various technical reports confirming the site does not contain any protected ecosystems or habitats and there are no contamination constraints preventing its development. The site is also not agricultural in nature and therefore any development will not result in the loss of the best or most versatile agricultural land. All protected trees will be retained and areas of open space and landscaping schemes will be designed to increase bio-diversity.

Conserving and enhancing the natural environment

Paragraph 126 states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment.

Paragraph 128 states where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Taylor Wimpey has commissioned a desk-based heritage assessment which confirms the site is not next to any statutory heritage assets or areas of local significance.

The Development Plan

Rossendale Core Strategy

The Rossendale Core Strategy was adopted in November 2011. Policy 2 notes a requirement to deliver 3,700 net additional dwellings within the Borough between 2011 and 2026, equating to an annual target of 247 additional dwellings. This figure takes account of the historic undersupply of housing within the Borough arising partly from the imposition of a housing restraint policy in 2003.

Within the supporting text of this policy, it is acknowledged that a significant shortfall in local housing provision figures remains and that this position of continued undersupply is only likely to increase as the ongoing recession continues and potentially deepens (paragraph 183).

At paragraph 184, the Core Strategy notes that it will remain difficult for the Council to achieve even the reduced provision targets for the Borough identified within the North West RSS (222 dwellings per annum), regardless of the ongoing latent undersupply.

On the basis of the above, the Core Strategy encourages that the provision and delivery of housing sites be increased to address existing undersupply and meet built up demand. As such, the Core Strategy is clear that a significantly enhanced range of housing provision must be delivered in the coming years and that it is essential that suitable, available and deliverable housing sites be identified and built to meet these targets.

Policy 3 of the Core Strategy states that approximately half of the Borough's overall housing requirement (3,700 dwellings to 2026) will be delivered within Bacup, Haslingden and Whitworth.

Policy 4 notes a maximum requirement for 20% affordable housing on brownfield sites capable of delivering 15 or more dwellings.

Site Allocations and Development Management Development Plan Document

Following a series of developer and community forum events, the Council published its consultation document regarding the Proposed Boundary Changes for Rossendale Borough in December 2012. Comments on the proposed changes were invited until mid January 2013.

The consultation on boundary changes represents the first of a three phase approach, with consultations on proposed site allocations and development management policies to follow. Adoption of the overall document is forecast for late 2015.

The boundary changes consultation confirms the Council's recommendation that the entire site be removed from its existing 'Countryside' designation and instead be included within the Urban Boundary of Haslingden.

The Grane Village site is referred as Site Reference SW(UB)9 within the consultation document. The proposed boundary change in this instance seeks the entire site being included within a new Urban Boundary. The reasoning and rationale for this proposed change is noted to be 'to enable it to be developed in the future'. The document also notes the site to be of poor visual quality and of no formal recreational value.

The proposal to include the site within the Urban Boundary is acknowledged by the Council to be the first formal step in promoting the site's allocation and subsequent development. Taylor Wimpey wholly endorse and support this objective.

Rossendale Strategic Housing Land Availability Assessment 2010

Rossendale's SHLAA was last updated in December 2010 and summarises the Council's position relevant to housing supply. The Assessment's methodology focuses on identifying and categorising deliverable housing sites. A total of 416 potential residential sites are identified within the SHLAA, which are subsequently split into three categories – Category 1 – Most Deliverable Sites, identified for residential development between 2010 and 2015, Category 2 – Moderately Deliverable Sites, identified for residential development between 2016 and 2020 and Category 3 – Least Deliverable Sites, not expected to come forward for residential development before 2020.

10.46 These 416 sites are considered capable of delivering 15,676 dwellings, from which the Council suggested a 5.15 year supply.

The proposed residential development of this site will assist the Council in meeting its future housing development targets. This should be considered as a key benefit of the scheme.

The 2010 SHLAA assesses the Grane Village site (SHLAA Ref: 635). The SHLAA confirms the site to be previously developed land and that it is suitable and achievable in housing delivery terms. The site is awarded one of the highest overall scores in the SHLAA in terms of the requisite assessment terms.

The only meaningful site constraint that is identified in the SHLAA is that it is not considered to be available within a 5 year timescale; hence it is downgraded to a Category 2 site, coming forward between 2016 and 2020. Clearly, the resultant purchase of this site by Taylor Wimpey removes this constraint. As such, the site should be considered as a Category 1 site from this point onwards, as our representations to the SHLAA 'Call for Sites' exercise submitted in December 2011.

The Council's 5 Year Housing Land Supply Report 2012-2017 published in 2012 summarises the authorities views as to which sites are expected to come forward in the coming years to meet housing needs.

Appendix

2.0
Site
Sustainability

A2

Appendix 2.0 Site Sustainability

Access to Education Facilities

Education facilities are shown in yellow on Figure 5 and described below:

There is one secondary school within 2km of the site: -

- Haslingden High School (2.0km).

There are six primary schools within 2km of the site comprising:-

- Haslingden Primary School (1.3km);
- St Mary's Primary School (2.0km);
- St James Primary School (1.6km);
- Helmshore Primary School (1.6km);
- St Veronica's Primary School (1.7km); and,
- Broadway Primary School (2.0km).

There are four nursery schools within 2km of the site:-

- Hillside Nursery School (2.0km);
- St James Nursery School (1.6km);
- Helmshore Pre-School (1.9km); and,
- The Village Nursery, Helmshore (1.7km).

The Grane Village site is therefore well located in relation to education facilities and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Access to Healthcare Facilities

Healthcare facilities in the vicinity of the site are shown in pink on Figure 5 and include one GP Practice or Health Centre within 2km comprising of:-

- Haslingden Health Centre (1.2km)

Five dental practices are located within 2km of the site:-

- Denpoint Dental Care (100m);
- J Hayton Dental Practice (1.3km);
- Haslingden Dental Surgery (1.2km);
- Deardengate Periodontal Centre (1.6km) and,
- Entwistle Dental Laboratory (1.9km).

Four pharmacists are located within 2km of the site:-

- Co-op Pharmacy (1.2km);
- Cohen's Chemist (1.2km);
- Boots Chemist (1.7km); and,
- Helmshore Pharmacy (1.7km).

Additionally, the closest hospital to the site is Rossendale Hospital (2.3km). The Grane Village site is therefore well located in relation to healthcare facilities and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Access to Retail Facilities

The site is located approximately a kilometre to the south west of Haslingden Town Centre, which provides a wide range of services and facilities, meeting local shopping and employment requirements for the site. The below listed retail facilities are indicated in purple on Figure 5.

Neighbourhood convenience stores in the vicinity of the site include: -

- Jubilee Newsagents & Convenience Store (500m).

One major supermarket within 2km of the site:-

- Tesco Supermarket (1.9km).

Haslingden Post Office is located approximately 1km from the site and Helmshore Post Office is located approximately 1.7km from the site.

The Grane Village site is therefore well located in relation to local shops and services and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Access to Sports and Recreation Facilities

Sports and recreation facilities are shown in green on Figure 5. The site is located in close proximity to the following key sports and recreation sites:-

- St Mary's Community Sports Club (1.2km);
- Haslingden Swimming Pool (1.2km);
- Haslingden Sports Centre (1.2km); and
- Run-Amok Play & Party Centre (1.2km).

Other sports and recreation uses within 2km of the site include a fitness centre and a dancing school located close to Haslingden Town Centre.

The Grane Village site is therefore well located in relation to sports and recreation facilities and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Access to Community Facilities

The community facilities listed below are shown in blue on Figure 5. The nearest library to the site is Haslingden Library:-

- Haslingden Library (1.0km).

The site is located in close proximity to a number of public houses:-

- The Holden Arms (100m);
- Roebuck Inn (900m);
- Robin Hood Inn (1.4km); and
- Holden Vale Inn (1.8km).

Additional restaurants and public houses are located within Haslingden Town Centre approximately 1.0km from the site.

The closest community centre to the site is:-

- Haslingden Community Link and Children's Centre (1.3km).

The site is within 2 km of approximately ten places of worship, the closest three to the site consisting of:-

- St Peter's C of E Church (1.3km);
- Manchester Road Methodist Church (1.2km); and
- St Mary's RC Church (1.5km).

The Grane Village site is therefore well located in relation to library and community services and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Appendix

3.0 Taylor Wimpey

A3



Appendix 3.0 Taylor Wimpey

“We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers quality of life and adds value to their homes.”

Taylor Wimpey PLC is a dedicated home building company with over 126 years experience, we have unparalleled record in our industry. We aim to be the home builder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers quality of life and adds value to their homes. We draw on our experience as a provider of quality homes but update that, to the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry.

Our 24 regional businesses in the UK give our operations significant scale and truly national geographic coverage. Each business builds a range of products, from one bedroom apartments and starter homes to large detached family homes for every taste and budget and as a result, our property portfolio displays a surprising diversity.

The core business of the company is the development of homes on the open market, although we are strongly committed to the provision of low cost affordable housing predominantly through partnerships with Local Authorities, Registered Social Landlords as well as a variety Government bodies such as the Homes and Communities Agency.

With unrivalled experience of building homes and communities Taylor Wimpey today continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction. Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike.

Taylor Wimpey combines the strengths of an international developer with the focus of small local business units. This creates a unique framework of local, national and international knowledge, supported by the financial strength and highest standards of corporate governance of a major plc.

Taylor Wimpey Strategic Land, a division of the UK business, is responsible for the promotion of future development opportunities, such as this site, through the planning system. The local business unit that will, in conjunction with Strategic Land, carry out housing and related development as part of this is Taylor Wimpey North West based in Warrington.

For further information please view:

www.taylorwimpey.com

Grane Village Haslingden

Published by Taylor Wimpey UK Limited

Rossendale Draft Local Plan

Rebuttals to Council's
Evidence Base relating to
Grane Village, Haslingden

18 September 2017

Prepared for:

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1. Introduction

- 1.1. Land at Grane Village, Haslingden is being promoted by Taylor Wimpey for the delivery of approximately 160 new family and affordable homes during the next plan period. The site extends to 6 Ha and is located on the western edge of Haslingden, bounded by Grane Road to the north and Holcombe Road to the west.
- 1.2. The case for allocating this site for housing development as part of the emerging Rossendale Local Plan has been presented within a Development Brief relating to the site which was submitted to Rossendale Borough Council in November 2016. The Development Brief seeks to establish the principle of residential development on the Grane Village site, to support its timely delivery through the emerging Local Plan, where it has been continually identified for development since 2012.
- 1.3. The site has been included as a draft allocation within the new Draft Local Plan, which we strongly support, however we have concerns over the analysis and conclusions in relation to the site as presented within the following evidence base document for the Draft Local Plan:
 - **Lives and Landscapes Assessment for Rossendale Borough Council (July 2015)**
- 1.4. This note considers the assessment of the site within the above report, drawing attention to analysis and/or conclusions with which we disagree, or where we consider that further clarification or detail is required within the evidence base documentation.

2. Lives and Landscapes Assessment for Rossendale Borough Council (July 2015)

The study and its aims

- 2.1. 'Lives and Landscapes Assessment' contains landscape appraisals of all sites which *'have potential landscape sensitivity within the Borough'*. The sites include those identified by both the Council and potential developers.
- 2.2. The Assessment draws conclusions for each assessed site, concluding that a site is either:
 - Undevelopable area;
 - Developable area with mitigation;
 - Developable area.
- 2.3. Within the 'Lives and Landscapes Assessment', the Grane Village site falls within a site which is referred to as *'The Courtyard'*. The southern part of the Taylor Wimpey site is located outside of the area assessed within the 'Lives and Landscapes Assessment'. An area of industrial use is located outside of the proposed Grane Village site, but is included in the area assessed as *'The Courtyard'*, as are some existing residential dwellings on the southern side of Grane Road.

The report conclusions and recommended mitigation in respect of the site

- 2.4. The Assessment concludes that the Taylor Wimpey site at Grane Village is *'suitable for development with mitigation'*.
- 2.5. The Assessment places strong emphasis on the views from Grane Road to Tor Hill, to the south, *'which places the site in its South Pennines context'*. The Assessment recommends that *'planned gaps in the layout'* should be used to retain views to Tor Hill.
- 2.6. While views to Tor Hill can be seen from Grane Road, these are intermittently screened by existing vegetation along the site frontage. The view line to Tor Hill as identified on the proposed mitigation plan within the Assessment is not a remarkable or unique viewpoint when considered in the wider context of the site. The existing view to Tor Hill from the identified viewpoint on Grane Road is not of exceptional quality due to the visual influence of the large scale industrial buildings which dominate the foreground to the left of the view. We do not consider that the quality of this existing view is high enough to require the entire view line to be kept free from development.
- 2.7. The topography of the site, which slopes steeply southward away from Grane Road, will assist in ensuring that appropriately scaled development which is set back from Grane Road (as is indicated on the illustrative masterplan presented within the Development Brief) will be set lower than Tor Hill. Views to Tor Hill will remain above the proposed development from

viewpoints along Grane Road.

- 2.8. The proposed mitigation plan within the Assessment indicates locations for '*new planting wildlife corridors and soft SUDS incorporated into layout*'. The principle of multi-functional green space corridors being provided through the development, which may accommodate SUDS features should this be appropriate or necessary, is one which we agree with, however the location of these corridors as indicated on the mitigation plan appear to be indicative. We wish to highlight that the location of the proposed green space corridors do not need to be restricted to the locations indicated on the mitigation plan.
- 2.9. Appropriately designed development can be delivered on the Grane Village site without resulting in significantly adverse effects upon landscape character, landscape features, or visual receptors.

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Rossendale Draft Local Plan

Representations by The Peel Group

Development Opportunity: Land at Burnley Road, Edenfield

October 2017



Turley

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Contact

Nick Graham

Client

Peel Holdings (Land and Property) Limited

Our reference

PEEM2067

9th October 2017

1. Introduction

- 1.1 This representation is prepared by Turley on behalf of our client Peel Holdings (Land & Property) Limited (hereafter “Peel” or “our client”). It provides comments to Rossendale Borough Council (RBC) in respect of the Rossendale Draft Local Plan¹ (July 2017) (‘DLP’) which is currently the subject of public consultation.
- 1.2 This document relates exclusively to the promotion of land at Burnley Road, Edenfield, as a development opportunity. It should be considered in conjunction with the overarching representation submitted by Turley on behalf of Peel.

Draft Rossendale Local Plan

- 1.3 As set out in the overarching representation submitted, Peel has continuously and historically engaged with the plan-making process for Rossendale. This has included the submission of detailed representations to the previous Core Strategy and the draft Lives and Landscapes DPD (since withdrawn), including Development Frameworks that set out the development potential at four sites:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden (allocated in part)
 - Land at Haslam Farm, Rawtenstall (allocated in part)
 - Land at Blackburn Road, Edenfield (allocated)
 - Land at Burnley Road, Edenfield (not allocated)
- 1.4 Peel welcomes the progress which has been made on the emerging Local Plan and supports, in principle, the proposals for development within it. In particular, Peel strongly supports the allocation of land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield, which include some or all of three of the sites previously put forward (as above).
- 1.5 It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full development needs of the Borough. Additional land will need to be allocated for residential development, above that which has been identified in the DLP.
- 1.6 This opportunity is being taken to make representations in relation to the sites previously identified by Peel as capable of accommodating development in the Borough that have not been put forward in the DLP for allocation and/ or Green Belt release. Peel is preparing updated Development Frameworks which will promote and justify its landholdings within Rossendale. Matters addressed below and in the overarching representation which directly affect its landholdings will be discussed in detail in each Development Framework.

¹ *Rossendale Draft Local Plan: Regulation 18 Consultation*, Rossendale Borough Council (July 2017)

Additional Site Allocations

- 1.7 In the context of the need for the Rossendale DLP to allocate additional land for development, Peel wish to reiterate the development opportunities at each of the four sites previously identified, as well as proposing a further potential site at Rossendale Golf Club.
- 1.8 These sites can each provide a deliverable housing development site in sustainable locations adjoining existing settlements. Initial reviews of site constraints and opportunities, landscape and highways have indicated that there are no significant barriers to development.

Development Frameworks

- 1.9 Further site appraisals are being undertaken to inform updated Development Frameworks which will be provided to the Council in due course.
- 1.10 The updated Development Frameworks will:
- Provide analysis of the site constraints and opportunities.
 - Where relevant provide details of the findings of further technical assessment (such as highways, flood risk, ground conditions).
 - Consider the key principles for development of the site.
 - Present a proposed site layout plan illustrating development parcels, access, landscaping, etc.
 - Comment on the economic benefits of development.
 - Address comments / observations made within the recently published evidence base for the emerging Local Plan.

Proposed Development Opportunities

- 1.11 In advance of the full Development Frameworks, the individual site representations are submitted providing initial reviews of the development opportunities.
- 1.12 The Sites are represented as follows:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden
 - Land at Haslam Farm, Rawtenstall
 - Land at Blackburn Road, Edenfield
 - Land at Burnley Road, Edenfield (**this document**)
 - Land at Rossendale Golf Course, Helmshore

1.13 This representation relates to land at Burnley Road, Edenfield, and includes:

- Section 2: A description of the site and its location
- Section 3: Details of the consideration of the site in the Strategic Housing Land Assessment (SHLAA)² and a review of the planning policy context including the Draft Local Plan
- Section 4: A Green Belt appraisal, commenting on the findings of the Green Belt Review
- Section 5: Concluding comments

1.14 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted here for residential development.

² Strategic Housing Land Availability Assessment Stages 1 and 2, May 2017

2. Site Opportunity

Site Description

- 2.1 The land at Burnley Road site is located c. 0.7 km miles north of Edenfield village centre. It extends to c. 1.07 ha (2.6 acres), is broadly rectangular in shape, comprising an open field currently used for grazing.
- 2.2 The site is located to the east of Burnley Road which forms the western site boundary. It is surrounded by residential development to the north, south and west
- 2.3 Buildings and wooded areas to the east help to provide a sense of enclosure. Beyond these are open fields as the land rises towards a low ridge. The southern boundary comprises modern residential properties and playing fields associated with the adjacent Edenfield Church of England Primary School.

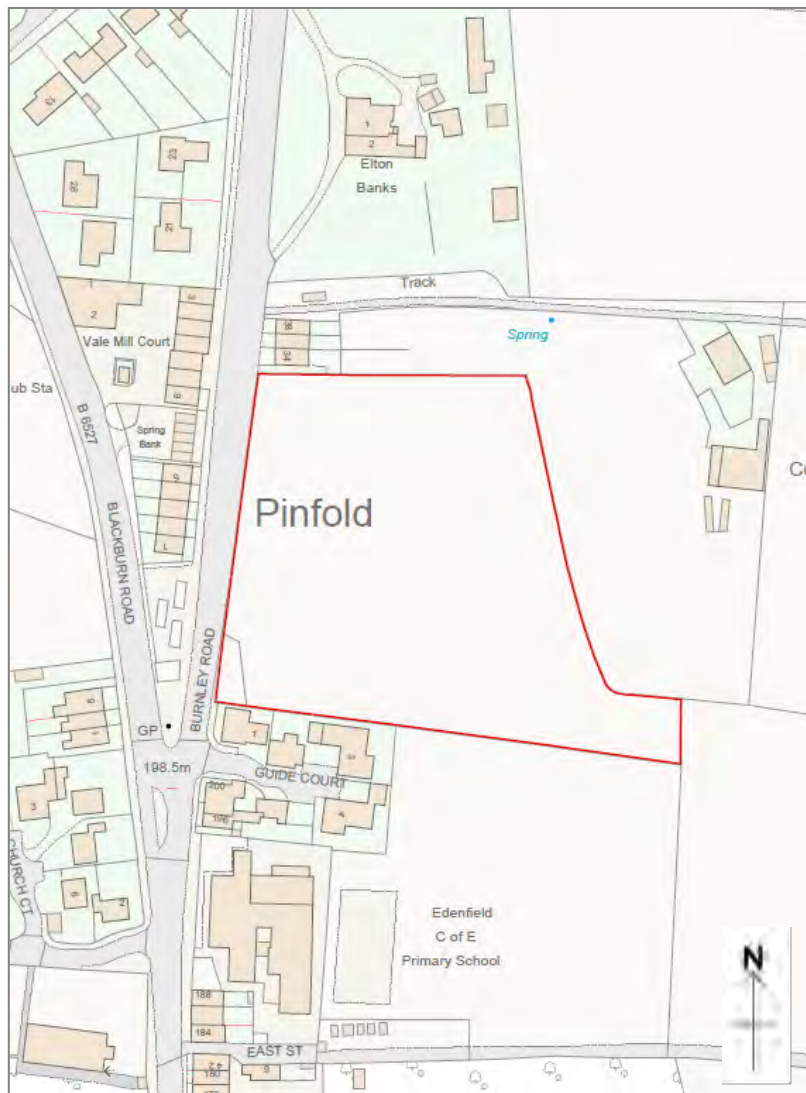


Figure 2.1: Site Location – Land at Burnley Road

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Local Facilities

- 2.4 The site is located within easy walking distance of Edenfield village centre (approximately 8 minutes walk) which has a number of services and amenities including a butcher, bakery, chemist, post office and two public houses. The town of Rawtenstall is 3.5 km north east of the site and includes a wide variety of traditional town centre uses including supermarkets, national banks and building societies, dentist, high street chemist and a number of restaurants and bars.
- 2.5 Edenfield Church of England Primary School is located around 50m south of the site on the same side of Blackburn Road. The closest High School to the site is Haslingden High School, located approximately 1.9 km; there are 4 other secondary schools within 5 km of the site.
- 2.6 Bus stops are located on Burnley Road, c. 300 m north of the site and on Market Street c. 225m south of the site. These stops are served by the half hourly 482 and 483 bus services, which connects Edenfield with Bury in the south and Burnley and Bacup in the north.
- 2.7 There is a Metrolink station in Bury (c. 9 km south of the site) which connects to the wider Greater Manchester tram network. The site is also well connected to both the local and national highway, with the A56 0.5 km from the site which connects to the M66 (2 km) and in turn the M62 and M60 (15 km).

3. Planning Policy Context

Consideration in SHLAA

- 3.1 The Draft Local Plan evidence base includes the 2017 Strategic Housing Land Availability Assessment (SHLAA), which aims to identify the land supply for housing within the administrative boundary of Rossendale within the next 15 years (2017 – 2032).
- 3.2 The Site is promoted in the SHLAA (Site Ref 16258). The SHLAA Site Assessment confirmed that it is a viable and achievable site for up to 25 homes in the medium to long term (6-10 years, 10+ years). It is noted that more than 10% of the site is at high risk of surface water flooding, and that heritage and landscape impacts would need to be addressed given the proximity to Elton Bank (grade II listed building) and the location within the Settled Valleys landscape character.

Local Plan Part 2: Site Allocations and Development Management DPD

- 3.3 The Draft LP Part 2 was withdrawn. The plan did not propose the release of this site from the Green Belt. Representations made by Peel in response to that Plan challenged this proposal.

Saved Policies

- 3.4 As the Local Plan Part 2: Site Allocations and Development Management DPD” (LP Part 2) was not taken forward by Rossendale BC, in relation to site allocations and designations, the Proposals Map and Saved Policies³ remain relevant as part of the development plan.
- 3.5 The Proposals Map identifies the Site as outside the Urban Boundary (Policy DS1) and in the Green Belt (Policy DS3)
- 3.6 However, Policy 1 of the Core Strategy states that the Urban Boundary defined in Local Plan Saved Policy DS1 and the Green Belt boundary defined in Saved Policy DS3, will be reviewed and where necessary amended in the Site Allocations DPD. The reviews would take into account criteria set out in Policy 1 including:
- Where small scale selective rounding off of Green Belt boundaries would promote sustainable development opportunities.
 - An extension/amendment to the urban boundary would not adversely affect aspects of the natural environment.
- 3.7 The Core Strategy Figure 15, identifies Edenfield as an area for Green Belt review.

³ Continuation of Local Plan: Saved Policies through the Core Strategy DPD, December 2010.

Rossendale Draft Local Plan

- 3.8 As discussed in the overarching representation, the Draft Local Plan (DLP) recognises that some release of Green Belt land will be required to meet the housing requirements and the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites (DLP, page 12).
- 3.9 The evidence presented in the DLP indicates that 4,425 dwellings will need to be delivered over the period to 2034. Considering the under provision of 425 dwellings since the adoption of the Core Strategy and the potential land supply from non- Green Belt sources of 2,907 dwellings, there is a significant gap of approximately 1,518 dwellings.
- 3.10 The DLP proposes areas for release from Green Belt, allowing for a delivery of a further 715 dwellings. It is therefore evident that the Green Belt releases proposed by the DLP need to be more than doubled - to accommodate 1,518 dwellings - if the emerging Local Plan is to be found sound.
- 3.11 In relation to this Site specifically, the DLP does not propose to extend the Urban Boundary and the site would remain designated Green Belt. Policy SD2: Urban Boundaries directs all development within such boundaries '*except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.*'
- 3.12 The DLP notes the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites that can meet housing needs. It recognises that some release of Green Belt land will be needed to meet this requirement (page 12) and a Green Belt review⁴ forms part of the evidence base for the DLP.
- 3.13 As above, it is clear that there is a significant gap between the housing land supply identified in the DLP and the demand, which cannot be met by non-Green Belt sites alone.
- 3.14 Peel contends that the inclusion of this Site as a housing allocation and its release from Green Belt would be in keeping with the NPPF and would assist in addressing the shortfall of land within the Borough necessary to meet the evidenced housing land demand. The following section considers this in greater detail.

⁴ Rossendale Green Belt Review, LUC, November 2016

4. Green Belt Appraisal

- 4.1 The Site is currently designated as Green Belt. A Green Belt review⁵ (GBR) forms part of the evidence base for the DLP which has informed the plan's proposed retention of the Site within the Green Belt.
- 4.2 The strategic purpose of this area of Green Belt, is to provide separation between Haslingden and Rawtenstall to the north/ north west from Edenfield to the south.
- 4.3 The Site sits to the north of Edenfield village centre, and to the east of development along Blackburn Road and Burnley Road. It corresponds with the central part of GBR Parcel P38.



Figure 4.1: P38 (Site location indicated)

- 4.4 The GBR rates the contribution of the land parcel to the five Green Belt purposes.
- 4.5 It is important to note at the outset that there are very clear and accepted exceptional circumstances which justify the release of significant amounts of land from the Green Belt to meet Rossendale's housing and employment needs. All land within the current Green Belt, fulfils at least some aspects of Green Belt purposes. As such, it will not be

⁵ Rossendale Green Belt Review, LUC, November 2016

possible to meet the identified housing needs of Rossendale without some impact on the Green Belt.

- 4.6 It is also important to note when considering what land to release from the Green Belt to be clear that the “golden thread” which runs through plan making and decision taking is the achievement of sustainable development. The NPPF confirms this at paragraph 84 when it states that “...when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...”. In considering the release of land from Green Belt it is therefore essential to consider what releases of land will achieve sustainable development while minimising the impacts on the purposes of Green Belt.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 4.7 The GBR identifies that this parcel plays a moderate role in respect of this purpose. It notes that the parcel is adjacent to Edenfield which forms part of the large built up area of Ramsbottom/Bury. There are few urbanising features within the parcel apart from a detached house with surrounding large yard area and a detached bungalow. The influence of these urbanising features is limited with the parcel displaying a relatively strong sense of openness.
- 4.8 This assessment is contested. The DLP proposes to extend the urban boundary on the west side of Blackburn Road and allocate that land for some 450 homes. In allowing additional limited development to the east side of Burnley Road, adjacent to the newly extended urban boundary, would enable additional housing to be delivered without compromising this Green Belt purpose. A similar release to the suggested is proposed at site HS2.74.

Purpose 2 - To prevent neighbouring towns merging into one another

- 4.9 The GBR considers that the role of P38 in this respect is weak. It notes that there is limited intervisibility between Edenfield and Rawtenstall which at this point are more than 2km apart with intervening steep valley sides. It notes that the parcel forms part of the settlement gap but it is not of critical importance and plays a limited role in preventing the merger. A loss of openness in the parcel is unlikely to be perceived as reducing the gap between the settlement areas.
- 4.10 Peel supports this assessment and is in agreement that the development of this land does not have an important role in preventing towns from merging.

Purpose 3 - To assist in safeguarding the countryside from encroachment

- 4.11 The GBR found that the parcel's contribution in this respect was moderate. It found a sense of encroachment within the parcel as a result of the visual influence the adjoining settlement edge to the west and a residential property with large yard area located along the eastern boundary. Open pastoral land and characteristics of the open countryside were noted, but with a somewhat weakened rural character. Importance of the contribution to safeguarding large area of open countryside to the east was noted.
- 4.12 Peel does not agree with this assessment. Large areas of open countryside are present to the east of the site and beyond Rossendale's Borough boundary. The development of this site would sit within the redefined urban boundary of Edenfield, between existing development along Burnley Road and with a direct relationship to existing and

anticipated development of the village. Existing field boundaries lined with trees on the eastern perimeter would define the extent of the village and form a buffer with the open countryside to the east.

- 4.13 Whilst it is accepted that it is important to protect the countryside from encroachment, it is considered that the release of the Site would be a logical small scale extension to the village, together with the allocation to the west, and that any limited harm in this respect would be outweighed by the benefit of meeting housing land supply requirements in a sustainable location such as this one.

Purpose 4 - To preserve the setting and special character of historic towns

- 4.14 The GBR recognised that P38 did not make any contribution to this purpose. As, in practice it would have little intervisibility with the historic settlements of Ramsbottom. The openness of the land within the parcels was not considered to be important to setting or historic significance.

- 4.15 Peel agrees with this assessment.

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 4.16 The GBR notes that all parcels make an equally significant contribution to this purpose.

- 4.17 The DLP proposes to optimise the re-use of brownfield sites to meet development needs and in doing so support ongoing urban regeneration.

- 4.18 As noted above, and in the overarching representation, the supply of deliverable brownfield land is insufficient to deliver the number and type of new homes and employment land required. As such, the extent of urban regeneration which can be achieved is not enough to meet Rossendale's sustainable growth needs and must be accompanied by development on Green Belt land. Exceptional circumstances to justify Green Belt release have been proven through the Greater Manchester Spatial Framework. The release of land from the Green Belt will not therefore undermine this purpose.

Green Belt Appraisal Conclusion

- 4.19 The strategic purpose of the area of Green Belt which the Site forms part is to provide separation between Haslingden and Rawtenstall in the north/ north west from Edenfield to the south (with Ramsbottom/ Bury urban area beyond).

- 4.20 The site does not perform a strategic Green Belt function. Its development would not result in encroachment into the wider countryside which surrounds Edenfield and it would relate well to existing development along Burnley Road and to new development under the housing allocation proposed to the west of Blackburn Road to the A56.

- 4.21 It would not result in urban sprawl or lead to the merger of separate settlements and would not reduce the gap between existing settlements. It would not have a significant impact on ongoing urban regeneration. In fact by providing for good quality family housing including elements of aspirational housing the development of this land would support the ongoing economic regeneration of Rossendale.

- 4.22 The proposed boundary will provide a long term defensible Green Belt boundary with the field boundaries to the east and south being strengthened with additional planting.
- 4.23 It is considered that this Site is suitable for development and is in a highly sustainable location. Its release from Green Belt will therefore contribute to a sustainable pattern of development which makes the most of proximity to nearby highway infrastructure. There are therefore clear exceptional circumstances to justify its release from the Green Belt.
- 4.24 Peel recommends the Council allocate this land for development to ensure the identification of sufficient land to meet the housing needs of the borough.

5. Conclusion

- 5.1 In relation to Peel's land interests in the Borough, this document concerns one of four sites which have been subject of previous Development Frameworks and representations in the context of the Local Plan development. Updates to these frameworks will be provided to RBC in due course, setting out a clear vision and proposals for the development of these sites.
- 5.2 This representation provides an initial review of the development opportunity at Burnley Road, Edenfield, including details of the site and its location, consideration of the site in the Strategic Housing Land Assessment (SHLAA) and planning policy; and a Green Belt appraisal, commenting on the findings of the Green Belt Review which forms part of the evidence base to the DLP.
- 5.3 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted for residential development.
- 5.4 The SHLAA identifies the land at Burnley Road as having potential for development, subject to mitigating site constraints; the DLP proposes it remain within Green Belt. Peel considers that the site can be developed with sensitivity to landscape and heritage features, and together with the large scale allocation to the west (HS:3 Edenfield), there is potential for this site to form part of the extension to the village. The updated Development Framework to follow this representation will further illustrate the opportunity for development of this site and give comfort that it should reasonably be released for development.
- 5.5 **Peel requests the designation of land at Burnley Road as a housing allocation and welcomes further discussion on this.**

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Rossendale Draft Local Plan

Representations by The Peel Group

Development Opportunity: Land at Kirkhill Avenue and Moorland Rise, Haslingden

October 2017



Turley

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Contact

Nick Graham

Client

Peel Holdings (Land and Property) Limited

Our reference

PEEM2067

9th October 2017

1. Introduction

- 1.1 This representation is prepared by Turley on behalf of our client Peel Holdings (Land & Property) Limited (hereafter “Peel” or “our client”). It provides comments to Rossendale Borough Council (RBC) in respect of the Rossendale Draft Local Plan¹ (July 2017) (‘DLP’) which is currently the subject of public consultation.
- 1.2 This document relates exclusively to the promotion of land at Kirkhill Avenue and Moorland Rise, Haslingden, as a development opportunity. It should be considered in conjunction with the overarching representation submitted by Turley on behalf of Peel.

Draft Rossendale Local Plan

- 1.3 As set out in the overarching representation submitted, Peel has continuously and historically engaged with the plan-making process for Rossendale. This has included the submission of detailed representations to the previous Core Strategy and the draft Lives and Landscapes DPD (since withdrawn), including Development Frameworks that set out the development potential at four sites:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden (allocated in part)
 - Land at Haslam Farm, Rawtenstall (allocated in part)
 - Land at Blackburn Road, Edenfield (allocated)
 - Land at Burnley Road, Edenfield (not allocated)
- 1.4 Peel welcomes the progress which has been made on the emerging Local Plan and supports, in principle, the proposals for development within it. In particular, Peel strongly supports the allocation of land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield, which include some or all of three of the sites previously put forward (as above).
- 1.5 It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full development needs of the Borough. Additional land will need to be allocated for residential development, above that which has been identified in the DLP.
- 1.6 This opportunity is being taken to make representations in relation to the sites previously identified by Peel as capable of accommodating development in the Borough that have not been put forward in the DLP for allocation and/ or Green Belt release. Peel is preparing updated Development Frameworks which will promote and justify its landholdings within Rossendale. Matters addressed below and in the overarching representation which directly affect its landholdings will be discussed in detail in each Development Framework.

¹ *Rossendale Draft Local Plan: Regulation 18 Consultation*, Rossendale Borough Council (July 2017)

Additional Site Allocations

- 1.7 In the context of the need for the Rossendale DLP to allocate additional land for development, Peel wish to reiterate the development opportunities at each of the four sites previously identified, as well as proposing a further potential site at Rossendale Golf Club.
- 1.8 These sites can each provide a deliverable housing development site in sustainable locations adjoining existing settlements. Initial reviews of site constraints and opportunities, landscape and highways have indicated that there are no significant barriers to development.

Development Frameworks

- 1.9 Further site appraisals are being undertaken to inform updated Development Frameworks which will be provided to the Council in due course.
- 1.10 The updated Development Frameworks will:
- Provide analysis of the site constraints and opportunities.
 - Where relevant provide details of the findings of further technical assessment (such as highways, flood risk, ground conditions).
 - Consider the key principles for development of the site.
 - Present a proposed site layout plan illustrating development parcels, access, landscaping, etc.
 - Comment on the economic benefits of development.
 - Address comments / observations made within the recently published evidence base for the emerging Local Plan.

Proposed Development Opportunities

- 1.11 In advance of the full Development Frameworks, the individual site representations are submitted providing initial reviews of the development opportunities.
- 1.12 The Sites are represented as follows:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden **(this document)**
 - Land at Haslam Farm, Rawtenstall
 - Land at Blackburn Road, Edenfield
 - Land at Burnley Road, Edenfield
 - Land at Rossendale Golf Course, Helmshore

1.13 This representation relates to land at Kirkhill Avenue and Moorland Rise and includes:

- Section 2: A description of the site and its location
- Section 3: Details of the consideration of the site in the Strategic Housing Land Assessment (SHLAA)² and a review of the planning policy context including the Draft Local Plan
- Section 4: A Green Belt appraisal, commenting on the findings of the Green Belt Review
- Section 5: Concluding comments

1.14 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted here for residential development.

² Strategic Housing Land Availability Assessment Stages 1 and 2, May 2017

2. Opportunity Site

Site Description

- 2.1 The land at Kirkhill Avenue and Moorland Rise comprises two sites - land at Kirkhill Avenue (A) and land at Moorland Rise (B) on the eastern edge of Haslingden.

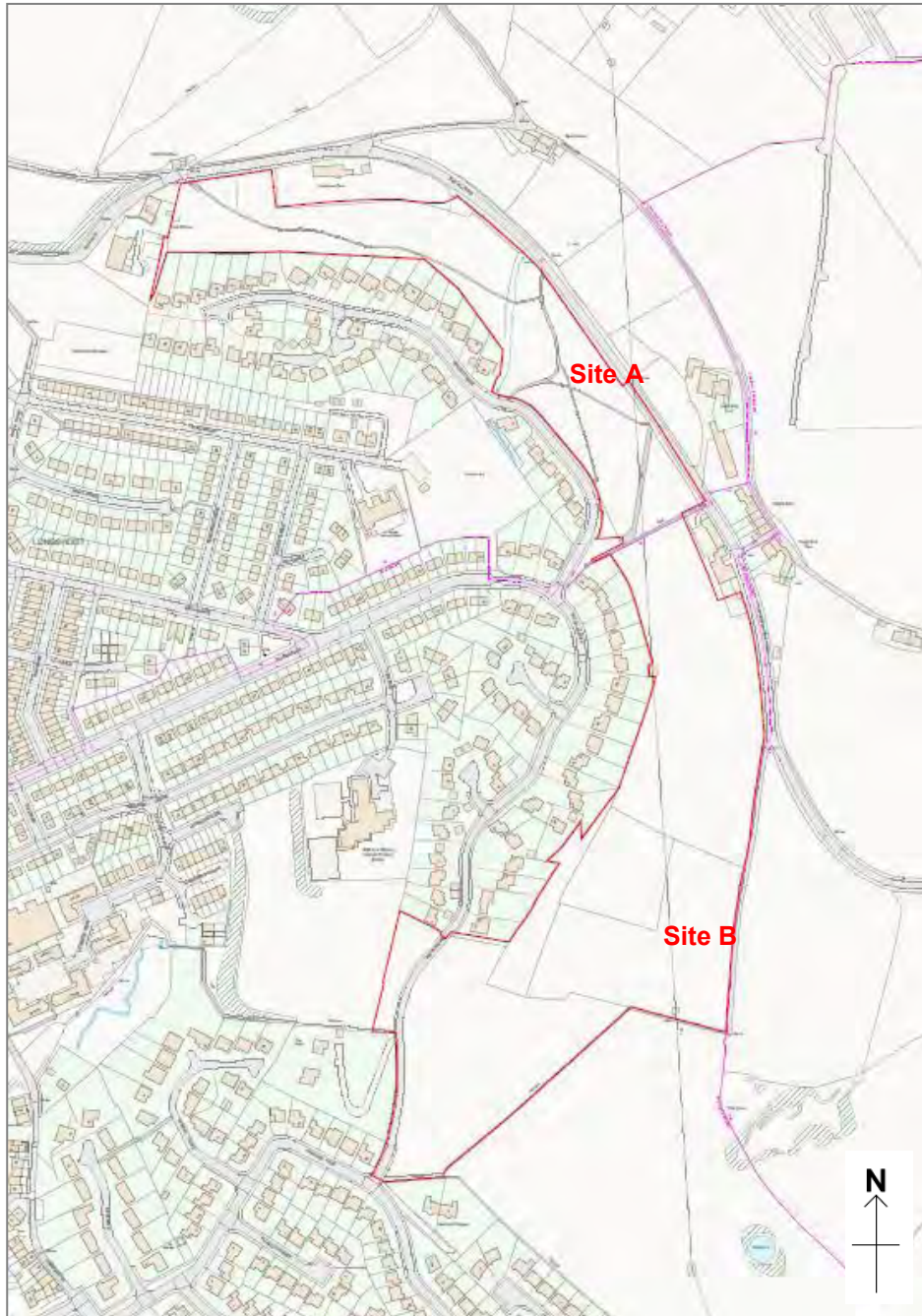


Figure 2.1: Site Location – Land at Kirkhill Avenue and Moorland Rise

© Crown copyright OS 100018033

- 2.2 Site A extends to c. 2.4 ha (5.9 acres) and is located to the north east of Kirkhill Avenue. It comprises open grassland, which rises towards the north and east and is used for informal recreation. Kirkhill Road forms much of the northern and eastern boundary of the site. Kirkhill Avenue forms the southern boundary of the site beyond which lies a large residential estate. Residential properties form the western boundary.
- 2.3 Site B extends to c. 5.05 ha (12.47 acres) and is located to the east of Moorland Rise, Haslingden. Comprising open land, the site is bound to the north, south and west by residential properties. St Mary's Roman Catholic Primary School and playing fields lie south west of the site. Immediately north west of the site is a modern housing estate, comprising detached houses. Haslingden Old Road forms the north eastern part of the boundary; the remaining eastern boundary is defined a track. The south eastern boundary is defined by a footpath.

Local Facilities

- 2.4 The sites lie approximately 0.75 km to the east of Haslingden Town Centre, with Rawtenstall Town Centre approximately 3.5 km to the east. Haslingden Town Centre is home to a number of services and amenities including a dental surgeries; off-licence / grocery stores; national banks and building societies; and a pharmacy. The nearest large supermarket (Tesco superstore) is located c. 0.7 km south of the site.
- 2.5 St Mary's Roman Catholic Primary School is the closest primary school to the site, located c. 0.3 km south of the site. All Saints Roman Catholic H School is c. 2.5 km south of the site, with Haslingden High School 2 km away. There are a total of 5 secondary schools and 18 primary schools within 5 km of the site.
- 2.6 There are a number of bus stops located along Manchester Road in the centre of Haslingden c. 0.75 km south of the site. These stops are served up to every 10 minutes by the 464, 244 and 484 bus services, which connect Haslingden with Bury and Rochdale in the south, Rawtenstall in the West and Blackburn, Accrington and Burnley in the north. The nearest train station is located 8.5 km north of the site in Accrington. The site is also well connected to both the local and national highway, with the A56 c. 0.75 km from the site which connects to the M66 (c. 5.5 km) and in turn the M62 and M60 (c. 20 km).

3. Planning Policy Context

Consideration in SHLAA

- 3.1 The Draft Local Plan evidence base includes the 2017 Strategic Housing Land Availability Assessment (SHLAA), which aims to identify the land supply for housing within the administrative boundary of Rossendale within the next 15 years (2017 – 2032).
- 3.2 Site A: Land at Kirkhill Avenue was promoted in the SHLAA (Site Ref 16319). The SHLAA Site Assessment confirmed that it is a viable and achievable site for up to 22 homes in the short term (1-5 years), subject to overcoming site constraints. Peel consider that the site could accommodate 50 units.
- 3.3 The SHLAA notes that the site specific landscape study (2015) concluded that the majority of the site was not suitable for development on landscape grounds, but it is argued in the assessment that the site can become suitable in the medium to long term with appropriate landscape mitigation. The site is considered to be suitable for a housing development subject to the mitigation of the constraints identified.
- 3.4 Site B: Land at Moorland Rise was assessed in the SHLAA (Site Ref 16395) but not promoted for development due primarily to landscape impact, and due to access constraints and electricity wayleaves. The SHLAA noted that the site is physically developable if these issues can be resolved. Moorland Rise was previously identified as an area for Green Belt Review and release from Green Belt in the 2011 Core Strategy.

Local Plan Part 2: Site Allocations and Development Management DPD

- 3.5 The Draft LP Part 2 was withdrawn. Within that plan, 'Site A' – Kirkhill Avenue was proposed for housing development (site ref. H36). Part of 'Site B' – Moorland Rise - comprising 1.2ha of land to the south west of the site, was proposed as safeguarded land by the LP Part 2 (site ref. H92), with a potential capacity of 30 dwellings. The wider site comprising c. 5.05 ha of land located to the east of residential dwellings on Moorland Rise, which would have remained within the Green Belt in the LP Part2.
- 3.6 Representations made by Peel in response to that Plan supported the housing allocations and made further comment in relation to landscape and access to support the proposal. Both matters can be resolved through mitigation, which will be considered fully and illustrated in the updated Development Framework.

Saved Policies

- 3.7 As the Local Plan Part 2: Site Allocations and Development Management DPD" (LP Part 2) was not taken forward by Rossendale BC, in relation to site allocations and

designations, the Proposals Map and Saved Policies³ remain relevant as part of the development plan.

- 3.8 The Proposals Map identifies the Site as outside the Urban Boundary (Policy DS1); Site A being in an open 'Countryside Area' (Policy C1) and Site B being within the Green Belt (Policy DS3).
- 3.9 However, Policy 1 of the Core Strategy states that the Urban Boundary defined in Local Plan Saved Policy DS1 and the Green Belt boundary defined in Saved Policy DS3, will be reviewed and where necessary amended in the Site Allocations DPD. The reviews would take into account criteria set out in Policy 1 including:
- Where small scale selective rounding off of Green Belt boundaries would promote sustainable development opportunities.
 - An extension/amendment to the urban boundary would not adversely affect aspects of the natural environment.
- 3.10 Moorland Rise was identified as an area for Green Belt Review and release from Green Belt in the 2011 Core Strategy. Core Strategy Figure 15 identifies the east of Haslingden as an area for Green Belt review.

Rossendale Draft Local Plan

- 3.11 As discussed in the overarching representation, the Draft Local Plan (DLP) recognises that some release of Green Belt land will be required to meet the housing requirements and the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites (DLP, page 12).
- 3.12 The evidence presented in the DLP indicates that 4,425 dwellings will need to be delivered over the period to 2034. Considering the under provision of 425 dwellings since the adoption of the Core Strategy and the potential land supply from non- Green Belt sources of 2,907 dwellings, there is a significant gap of approximately 1,518 dwellings.
- 3.13 The Draft Local Plan proposes areas for release from Green Belt, allowing for a delivery of a further 715 dwellings. It is therefore evident that the Green Belt releases proposed by the DLP need to be more than doubled - to accommodate 1,518 dwellings - if the emerging Local Plan is to be found sound.
- 3.14 In relation to Site A specifically, the DLP proposes to extend the urban boundary to include this land and it is proposed to be allocated for housing development, Ref. HS2.33:
- 'Land at Kirkhill Aveune, Haslingden' 0.74ha, for 22 dwellings, deliverable within 1-5 years.
- 3.15 Peel supports this proposal and welcomes the allocation of the site.

³ Continuation of Local Plan: Saved Policies through the Core Strategy DPD, December 2010.

- 3.16 In respect of the land at Moorland Rise (Site B) however, the DLP does not propose to include this land within the Urban Boundary and the site would remain designated Green Belt. Policy SD2: Urban Boundaries directs all development within such boundaries *'except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.'*
- 3.17 As above, it is clear that there is a significant gap between the housing land supply identified in the DLP and the demand, which cannot be met by non-Green Belt sites alone.
- 3.18 Peel contends that the inclusion of the Moorland Rise (Site B) land as a housing allocation and its release from Green Belt would be in keeping with the NPPF and would assist in achieving the shortfall of land within the Borough for the necessary housing development to meet demand. Continuation of the proposal to release this land from the Green Belt as in the Lives and Landscapes Plan, albeit it is now a housing site and not safeguarded land.
- 3.19 The following section considers the role of the land in terms of its contribution to Green Belt purposes in greater detail.

4. Green Belt Appraisal

- 4.1 The land at Moorland Rise (Site B), is currently designated as Green Belt. A Green Belt review⁴ (GBR) forms part of the evidence base for the DLP which has informed the plan's proposed retention of the Site as Green Belt.
- 4.2 The strategic purpose of the area of Green Belt which the Site forms part, is primarily to provide separation between Haslingden and Rawtenstall to the east. It also contributes to the separation of those two towns in the north from Edenfield to the south.
- 4.3 The Site sits is on the eastern periphery of Haslingden. Site B at Moorland Rise corresponds with the western part of GBR Parcel P13, closest to the development at the edge of Haslingden, see below.

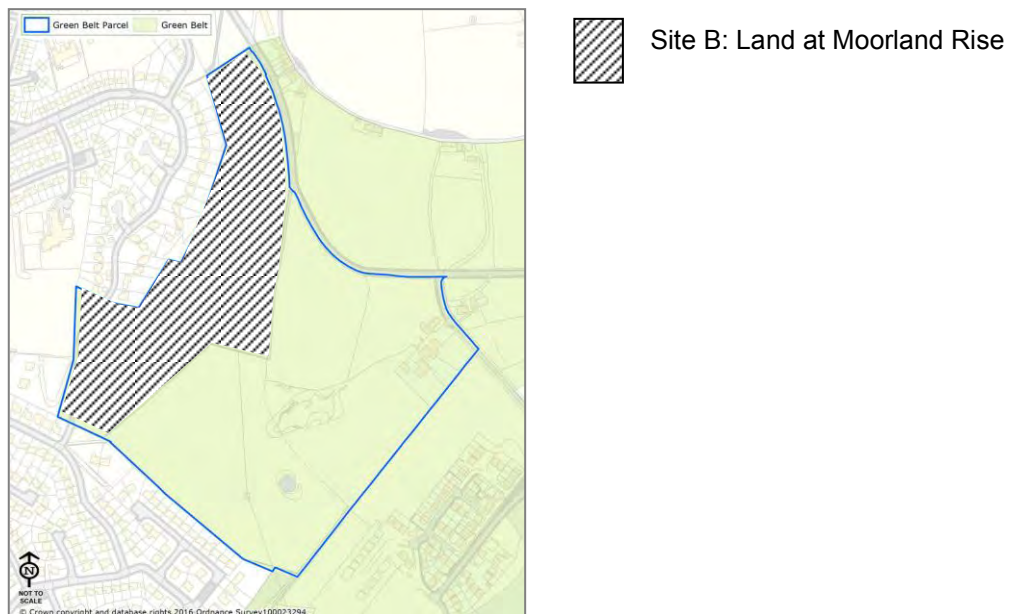


Figure 4.1: P13 (Site location indicated)

- 4.4 It is important to note at the outset that there are very clear and accepted exceptional circumstances which justify the release of significant amounts of land from the Green Belt to meet Rossendale's housing and employment needs. All land within the current Green Belt, fulfils at least some aspects of Green Belt purposes. As such, it will not be possible to meet the identified housing needs of Rossendale without some impact on the Green Belt.
- 4.5 It is also important to note when considering what land to release from the Green Belt to be clear that the "golden thread" which runs through plan making and decision taking is the achievement of sustainable development. The NPPF confirms this at paragraph 84 when it states that "...when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...". In considering the release of land from Green Belt it is therefore

⁴ Rossendale Green Belt Review, LUC, November 2016

essential to consider what releases of land will achieve sustainable development while minimising the impacts on the purposes of Green Belt.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 4.6 The GBR notes that Haslingden is not considered to be a large built up area, and therefore Green belt surrounding it cannot play a role in achieving this purpose.
- 4.7 Peel agrees with this assessment.

Purpose 2 - To prevent neighbouring towns merging into one another

- 4.8 The GBR considers that parcel P13 has a strong role in preventing towns merging, namely Haslingden and Rawtenstall. These settlements are within very close proximity (within 0.5km) and have good intervisibility in the lower lying areas to the south. The GBR considers that Pike Law - an area of elevated land - forms a visual barrier between the two settlements that is of critical importance. It notes that the parcel plays an essential role in preventing the merging or erosion of the visual gap between Haslingden and Rawtenstall, any new development that took place within the parcel could lead a loss of openness and the perception of narrowing the gap between the two neighbouring towns.
- 4.9 Peel disagrees with this assessment. It is considered that it is incorrect to treat Haslingden and Rawtenstall as separate settlements for the purpose of the Green Belt review. Whilst they may be distinct in terms of their urban character, they have already physically merged. The curtilages of properties at the east of Haslingden (to the rear of Yarmouth Avenue) and at the west of Rawtenstall (at the rear of the former NHS site off Haslingden Road) are back-to-back; the buildings in this location are very close.
- 4.10 In any case, when considering only the western strip of the parcel P13 (the location of Site B land at Moorland Rise), in isolation from the eastern part of the parcel, the contribution to this purpose is even further limited. As set out in Peel's representation to the Local Plan Part 2, the release of the site would not significantly reduce the distance between Haslingden and Rawtenstall as the gap between the two settlements in this location would reduce by only 100m and would still be approximately 300m wide at the closest point.
- 4.11 Therefore it is concluded that the land could be released from Green Belt without harm to this purpose.

Purpose 3 - To assist in safeguarding the countryside from encroachment

- 4.12 The GBR found that the parcel's contribution in this respect was moderate. It found a sense of encroachment within the parcel as a result of the visual influence of the neighbouring settlement edge of Haslingden to the west and a small number of residential properties in the east. Despite this urbanising influence, the GBR found that the parcel displays characteristics of the open countryside, but lacks a strong and intact rural character. Due to the elevated topography of Pike Law, located within the parcel, the neighbouring settlements of Haslingden, Rawtenstall and Helmshore are highly visible from within it, although this does not substantially detract from its character.
- 4.13 Peel considers that the land within their ownership does not accord with this assessment. The site adjoins the settlement of Haslingden and does not include the

higher ground to the east (the remainder of the parcel P13), where Pike Law is located, which is of a more rural character. In following existing field boundaries lined on the eastern perimeter the development would be contained, maintaining the openness of the land to the east.

- 4.14 Whilst it is accepted that it is important to protect the countryside from encroachment, it is considered that the release of Site B, together with the proposed DLP allocation to the north at Kirkhill Avenue, would be a logical extension to Haslingden, and that any limited harm in this respect would be outweighed by the benefit of meeting housing land supply requirements in a sustainable location.

Purpose 4 - To preserve the setting and special character of historic towns

- 4.15 The GBR considered that P13 has intervisibility with Rawtenstall Town Centre. The openness of the parcel is not considered to form key part of the setting of these historic settlements but could form part of the wider setting; therefore effects of development within the parcel on the character of the historic settlements would be limited.
- 4.16 Peel agrees with this assessment. Residential development to the edge of the existing developed area of Haslingden would not have a detrimental impact on the setting or character of Rawtenstall or Haslingden town centres.

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 4.17 The GBR notes that all parcels make an equally significant contribution to this purpose.
- 4.18 The DLP proposes to optimise the re-use of brownfield sites to meet development needs and in doing so support ongoing urban regeneration.
- 4.19 As noted above, and in the overarching representation, the supply of deliverable brownfield land is insufficient to deliver the number and type of new homes and employment land required to meet the needs of the borough. As such, the extent of urban regeneration/ brown field development which can be achieved is not sufficient to meet Rossendale's sustainable growth needs and must be accompanied by development on Green Belt land. Exceptional circumstances to justify Green Belt release have been proven through the Greater Manchester Spatial Framework. The release of land from the Green Belt will not therefore undermine this purpose.

Green Belt Appraisal Conclusion

- 4.20 The strategic purpose of the area of Green Belt which the Site forms part, is primarily to provide separation between Haslingden and Rawtenstall to the east. It also contributes to the separation of those two towns in the north from Edenfield to the south.
- 4.21 Site B does not contribute to that strategic Green Belt function. It has been assessed in the GBR as part of a larger parcel, extending to the east including higher ground at Pike Law. The GBR accepts that this is not an area of Green Belt that restricts the sprawl of built up areas. Peel contests the view that Site B has any role to play on preventing Rawtenstall and Haslingden from merging, due to its isolated peripheral location within the context of the wider Green Belt parcel.

- 4.22 Sensitive site masterplanning, together with the housing allocation to the north at Kirkhill Avenue (Site A), would deliver a sustainably located housing development. The proposed boundary will provide a long term defensible Green Belt boundary with the field boundaries to the east being strengthened with additional landscaping.
- 4.23 It is considered that this Site is suitable for development and is in a highly sustainable location. Its release from the Green Belt will therefore contribute to a sustainable pattern of development which makes the most of proximity to nearby highway infrastructure. There are therefore clear exceptional circumstances to justify its release from the Green Belt.
- 4.24 Peel strongly supports the allocation of Site A and recommends the Council allocate Site B to ensure sufficient land is allocated to support the housing needs of the borough.

5. Conclusion

- 5.1 In relation to Peel's land interests in the Borough, this document concerns one of four sites which have been subject of previous Development Frameworks and representations in the context of the Local Plan development. Updates to these frameworks will be provided to RBC in due course, setting out a clear vision and proposals for the development of these sites.
- 5.2 This representation provides an initial review of the development opportunity at Kirkhill Avenue and Moorland Rise, Haslingden, including details of the site and its location, consideration of the site in the Strategic Housing Land Assessment (SHLAA) and planning policy; and a Green Belt appraisal, commenting on the findings of the Green Belt Review which forms part of the evidence base to the DLP
- 5.3 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted for residential development.
- 5.4 Site A has been allocated for housing development in the DLP. **Peel strongly supports this allocation.**
- 5.5 The SHLAA identifies Site B as having potential for development, but with landscape impact as the major constraint; the DLP proposes it remain within Green Belt. Peel considers that the site can be developed with sensitivity to landscape features, and together with the allocated site, there is potential for a logical extension to the west side of Haslingden. The updated Development Framework to follow this representation will further illustrate the opportunity for the development of this site and give comfort that it should reasonably be released for development.
- 5.6 **Peel requests the designation of Land at Kirkhill Avenue and Moorland Rise, Haslingden in its entirety as a housing allocation.**

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Rossendale Draft Local Plan

Representations by The Peel Group

Overarching Representation

October 2017



Turley

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Nick Graham

Client

Peel Holdings (Land and Property) Limited

Our reference

PEEM2067

9th October 2017

1. Introduction

- 1.1 This representation is prepared by Turley on behalf of our client Peel Holdings (Land & Property) Limited (hereafter “Peel” or “our client”). It provides comments to Rossendale Borough Council (RBC) in respect of the Rossendale Draft Local Plan¹ (July 2017) (‘DLP’) which is currently the subject of public consultation.

Peel Group

- 1.2 The Peel Group is a major investment company and is one of the leading infrastructure, real estate, transport and investment enterprises in the UK. Peel is a major investor, infrastructure provider, landowner and developer. We have major interests and assets across the United Kingdom. Our diverse network of businesses ranges from ports to airports; land to leisure; media to hotels; wind farms to shopping centres, nature parks to canals, residential sites to agricultural uses.
- 1.3 Peel’s track record is one of delivering transformation and creating vibrant places through regeneration and innovation. We invest for the long term. For example, at MediaCityUK in Salford we delivered our £650 million investment in Europe’s largest construction project during the recession. Our £400 million investment in the Port of Liverpool will open up new export markets for the North.

Peel Land and Property

- 1.4 Peel Land and Property has extensive real estate assets which consist of 1.2 million m² (13 million ft²) of investment property and over 15,000 hectares (37,000 acres) of strategic land and water throughout the UK, with particular concentrations in the North West of England, Yorkshire and the Medway. The breadth of Peel Land and Property’s assets covers transformational developments including MediaCityUK and Liverpool Waters. Our landholdings accommodate offices, retail and business parks, shopping centres, leisure and sports venues, residential developments, agricultural land and a ground rent portfolio.

Peel in Rossendale

- 1.5 RBC will be aware that Peel is the owner and/or promoter of the following sites for residential development:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden
 - Land at Haslam Farm, Rawtenstall
 - Land at Blackburn Road, Edenfield
 - Land at Burnley Road, Edenfield
 - Land at Rossendale Golf Course, Helmshore

¹ *Rossendale Draft Local Plan: Regulation 18 Consultation*, Rossendale Borough Council (July 2017)

Background and Context

- 1.6 Peel has consistently and historically engaged with the plan-making process for Rossendale. This has included the submission of detailed representations to the previous Core Strategy² and the emerging Lives and Landscapes DPD. The preparation of the Lives and Landscapes DPD was, however, abandoned by RBC on 9th December 2015 in favour of the preparation of a new full Local Plan. The current DLP is the first stage of consultation on the new Local Plan.
- 1.7 Peel welcomes the progress which has been made on the emerging Local Plan and supports, in principle, the proposals for development within it. In particular, our client strongly supports the allocation of land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield. It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full development needs of the Borough. This will necessitate the allocation of additional land for residential development, which is required to meet the Borough's identified housing needs. Peel has promoted additional land to that proposed for allocation in the DLP which can help RBC to meet those needs. It is also evident that additional work in respect of the evidence base will also be required.
- 1.8 This Report provides detailed comments on the content of the DLP. Updated Development Frameworks in respect of the sites identified above will follow shortly. Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted for residential development in due course.
- 1.9 A range of evidence base documents have been prepared by RBC and are published alongside the DLP. They are not, however, the subject of public consultation. It is considered that this approach is contrary to best practice as set out throughout the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.10 Peel considers that it is critical that evidence base documents are prepared with meaningful engagement with key stakeholders, including the development industry, to ensure that the evidence is robust and accurate. The lack of engagement is therefore a key flaw in the plan-making process for Rossendale, which could be rectified by public consultation on draft evidence base documents. This report presents some initial high level comments regarding key evidence base documents and is accompanied by a standalone critique of RBC's Viability Assessment³. Peel does, however, reserve the right to provide further comments on the evidence base documents and encourages RBC to ensure that they are all subject to formal consultation.

Structure

- 1.11 The remainder of this Report is structured as follows:
- Section 2: Reviews the policy context for this representation.

² *Core Strategy Development plan Document: The Way Forward (2011-2026)*, Rossendale Borough Council (November 2011)

³ *Updated Economic Viability Study in Relation to Affordable Housing*, Keppie Massie and WYG (June 2017)

- Section 3: Makes comment on the need for a clearer spatial vision, objectives and strategy in the Rossendale Draft Local Plan.
- Section 4: Considers and comments upon the evidence of housing need for Rossendale, the growth options presented in the DLP, the delivery of types of housing and the plan period.
- Section 5: Comments on the DLP's approach to the proposed release of land from the Green Belt and the allocation of development sites to meet the needs of the Borough.
- Sections 6: Comments on other relevant policies of the Rossendale Draft Local Plan, particularly those which are pertinent to the Development Management process.
- Section 7: Concludes the representation.

1.12 A Viability Assessment is provided at Appendix 1.

1.13 Separate 'Site Opportunity' representation documents are submitted alongside this overarching representation in relation to each of the sites promoted by Peel for inclusion in the DLP.

2. Policy Context

2.1 The National Planning Policy Framework (NPPF) provides the overarching policy context for the preparation of the emerging Local Plan. It is a material consideration for the plan-making process. In this regard, insofar as its policies are relevant to this representation, we highlight that the NPPF requires local planning authorities (LPA) to:

- “...**boost significantly the supply of housing**...” (paragraph 47);
- “...ensure that their Local plan **meets the full objectively assessed needs for market and affordable housing**...” (paragraph 47);
- “...**identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand**...” (paragraph 50);
- Ensure that their Local Plan incorporates “...**sufficient flexibility to adapt to rapid change**...” (paragraph 14);
- “...**plan positively to support local development**, shaping and directing development in their area...” (paragraph 16). Indeed, the need for a Local Plan to be “positively prepared” is one of the four tests of soundness;
- Ensure “...that the planning system does everything it can to **support sustainable economic growth**...” (paragraph 19);
- Ensure that Local Plans are “...**aspirational but realistic**...” (paragraph 154);
- Ensure that their Local Plan not only meets needs but also responds “...**positively to wider opportunities for growth**...” (paragraph 17); and
- Conserve and enhance the natural environment (paragraph 109).

2.2 In addition to the above, the NPPF highlights the importance of protecting Green Belt land from inappropriate development. However, it confirms that Green Belt boundaries can be altered in “...*exceptional circumstances*...” (paragraph 83) via the plan-making process. Such exceptional circumstances include an inability to meet development needs, as is currently the case in Rossendale.

2.3 When releasing land from the Green Belt, LPAs should, *inter alia*:

- Identify areas of ‘safeguarded land’ between the urban area and the Green Belt which are capable of meeting longer-term development needs;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period; and
- Define new Green Belt boundaries clearly using physical features that are readily recognisable and likely to be permanent.

- 2.4 We refer to other policies of the NPPF, as well as the Planning Practice Guidance (PPG), elsewhere in this Report.

Planning Policy and Guidance Changes

- 2.5 In February 2017, the Government published its Housing White Paper, which reaffirmed its appreciation of the scale of the national housing crisis and the need for *'radical, lasting reform that will get more homes built right now and for many years to come'*⁴.
- 2.6 On 14 September 2017, the Government published its proposals for consultation, titled *'Planning for the right homes in the right places'*. This incorporates a new methodological approach for calculating housing needs, with the Government publishing an indicative housing need figure for each authority in England based on the proposed method. The consultation period runs until 9 November 2017, with the Government setting itself the ambition of incorporating updates to current guidance alongside a revised NPPF in spring 2018.
- 2.7 The new approach presents a stripped down set of methodological steps which continue to treat the 2014-based sub-national household projections (SNHP) as a 'starting point' before adjusting to take account of a single market signal, with the overall scale of adjustment capped at 40% above recently adopted housing requirements, or household projections if higher.
- 2.8 There is evidently a high degree of uncertainty as to the extent to which current consultation proposals will be translated into statutory policy and guidance. On this basis we have presented high level views on the implications where relevant within the subsequent sections. These are presented without prejudice to the development of separate representations by Peel to the DCLG consultation.

⁴ DCLG (February 2017), 'Housing White Paper: Fixing our broken housing market', pg 7

3. Vision, Objectives and Strategy

3.1 RBC has begun the preparation of a new Local Plan for the Borough due to the clear need arising for future development. However, whilst the DLP is relatively wide-ranging, its vision, objectives and proposed approach are somewhat unclear. This is in part because:

- It does not establish a spatial Vision for the future of Rossendale, which identifies the key aspirations of the Borough and the goals which will have been fulfilled by the end of the plan period.
- It does not identify strategic aims or objectives, which make clear what the Borough is seeking to deliver and achieve over the timeframe of the emerging Local Plan.
- It does not articulate a spatial strategy which sets out how and where the key aims and objectives of the Borough will be fulfilled in different locations within it.

3.2 The NPPF does not strictly speaking set out a requirement for a Local Plan to contain each of the above. However, they are notable by their absence and have the effect that the proposed purpose, direction and approach of the emerging Local Plan to meeting the needs of the Borough are somewhat unclear. Peel therefore encourages RBC to develop these aspects of the emerging Local Plan.

The Plan Period

3.3 The NPPF identifies that Local Plans should “...be drawn up over an appropriate time scale, preferably a 15-year time horizon...” (paragraph 157). The DLP proposes to cover a plan period from 2019 to 2034. Whilst this is a 15-year time horizon, it is dependent upon the Local Plan being adopted in early 2019. RBC’s Local Development Scheme⁵ (LDS) currently anticipates that the Local Plan will be adopted in March 2020. This will mean that it covers only a 14-year time horizon up to 2034. This is considered to be a conservative estimate given the prospect that the adoption of the Local Plan might be delayed at various stages of preparation. Peel therefore considers that the plan period should be extended to at least 2036 in order to ensure that it accords with the guidance set out in the NPPF or that the flexibility to extend the plan period as may be required due to delay is included within the emerging Local Plan.

⁵ *Local Development Scheme and Proposals Map Timetable*, Rossendale Borough Council (December 2016)

4. Scale of Housing Need in Rossendale

4.1 This chapter comments on the DLP's content in respect of the scale of new residential development which is proposed.

Evidence of Housing Need

4.2 RBC commissioned a Strategic Housing Market Assessment⁶ (SHMA) for Rossendale, which was published at the start of the current Local Plan consultation. This provides an objective assessment of housing need (OAN) in the Borough over the plan period. Reflecting the methodology advocated by the PPG, the SHMA follows a stepped approach in establishing the OAN, as follows:

- Using the latest 2014-based household projections as a 'starting point'⁷;
- Sensitivity testing the 'starting point' through the application of alternative assumptions on population and household formation, in order to determine the demographic need for housing⁸;
- Responding to market signals of imbalance between housing supply and demand⁹;
- Taking employment trends into account¹⁰; and
- Taking affordable housing needs into account¹¹.

4.3 The following table summarises this stepped methodology by replicating Table E.1.1 of the SHMA. This indicates a need for between **265 and 335 dwellings per annum** in Rossendale over the plan period (2014 – 2034).

Table 4.1: Approach to OAN for Rossendale 2014 – 2034

	Dwellings per annum 2014 – 2034	Adjustment from previous stage	Uplift from 'starting point'
Demographic 'starting point'	183	–	–
Adjustments to demographic-led needs	220	+37	+20%
Uplift for market signals (10%)	242	+22	+32%
Employment-led needs	269 – 335	+86 – 152	+47 – 83%
Affordable housing needs ¹² (10%)	266 – 335	+83 – 152	+45 – 83%
Objectively assessed need	265 – 335	+82 – 152	+45 – 83%

Source: Lichfields, 2016

⁶ Rossendale Strategic Housing Market Assessment, Lichfields (December 2016)

⁷ PPG Reference ID 2a-005-20140306

⁸ PPG Reference ID 2a-017-20140306

⁹ PPG Reference ID 2a-019-20140306

¹⁰ PPG Reference ID 2a-018-20140306

¹¹ PPG Reference ID 2a-029-20140306

¹² 10% uplift applied to need implied by demographic projections (266dpa) to establish lower end of OAN range

4.4 The OAN concluded in the SHMA evidently uplifts the ‘starting point’ referred to above by at least 45%. This reflects a series of adjustments following the PPG methodology, including:

- A sensitivity testing of the ‘starting point’ projections to take account of the impact of factors shaping recent trends. This includes a stated preference to base needs on a demographic scenario based on longer-term migration trends recorded over ten years (2004 – 2014), as opposed to the five year trend (2009 – 2014) which largely underpins official 2014-based projections. The demographic scenario preferred also allows for an improvement from suppressed household formation rates¹³;
- A 10% uplift from the preferred demographic scenario to reflect the ‘moderate’ imbalance between housing supply and demand in the Borough, following a review of market signals;
- The need to accommodate the labour force growth required to support job creation forecast by Experian (269dpa) and currently planned by the Core Strategy (335dpa). This recognises that a continuation of recent demographic trends will not provide an adequately sized labour-force to support forecast and planned job growth in Borough; and
- A further 10% uplift on the implied need related to demographic and market signals adjustments to reflect the high level of affordable housing need in Rossendale.

4.5 The approach followed in the SHMA is considered to align with the PPG methodology as currently drafted, and confirms that a minimum of 265 dwellings per annum are needed in Rossendale over the plan period. Provision of this scale would not, however, provide the growth in labour force required to support the level of job growth indicated by the Strategy’s adopted target of 3% net growth in jobs over a fixed five year period, with at least 335 dwellings per annum required to ensure that housing and economic policies are fully integrated. This is a requirement of the NPPF (paragraph 158) and would support the creation of 3,115 jobs over the plan period, or 156 jobs per annum.

4.6 The SHMA notes that such a level of job growth exceeds that implied by the then-latest Experian forecasts used within the SHMA, which were released in September 2016 and forecast the total creation of 1,800 jobs in the Borough over the plan period (90 jobs per annum).

4.7 A review of the latest available data confirms, however, that the most recent Experian forecasts released in September 2017 indicate a level of job growth which more closely aligns with RBC’s adopted target, as summarised in the following table. This suggests that it remains appropriate to retain the employment target adopted in the Core Strategy, particularly in light of the strong employment growth seen in the Borough since its adoption in 2011¹⁴. This will ensure that the Local Plan remains positively prepared as

¹³ ‘Partial catch-up’ sensitivities assume that headship rates return half way to the level projected by the 2008-based projections between 2017 and 2033

¹⁴ The Business Register and Employment Survey (BRES) indicates that 2,700 jobs have been created in Rossendale between 2011 and 2015, with employment increasing by an average of 675 jobs per annum

required within the NPPF and will contribute to sustaining a strong, responsive and competitive economy (paragraph 7).

Table 4.2: Future Job Growth in Rossendale 2014 – 2034

	Total job growth 2014 – 2034	Annual job growth 2014 – 2034
Adopted Core Strategy	3,115	156
Experian, September 2017	2,600	130
Experian, September 2016	1,800	90

Source: Lichfields; Experian

- 4.8 While the upper end of the range fully takes account of these more positive economic factors, the SHMA indicates that the lower end of the range accommodates only the previously lower forecast level of job growth. This suggests that the lower end of the range risks constraining the potential of the local economy.
- 4.9 The OAN range does, however, take account of proportionate uplifts based on market signals and affordable housing need. With regards to market signals, this reflects guidance in the PPG, which supports reasonable upward adjustments where worsening market signals are identified. The analysis in the SHMA highlights inter alia:
- Relatively significant growth in average house prices, when compared to other areas;
 - A short-term worsening in affordability, based on the relationship between house prices and earnings; and
 - Falling levels of housing delivery since the recession, which have generated ‘adverse outcomes for people who still need to access the housing market’ and resulted in increasing reliance upon the private rented sector.
- 4.10 Although the SHMA presents data which remains comparatively up-to-date, it is of note that the latest available evidence continues to reinforce the fact that there has been no recent improvement in market signals in Rossendale. The ratio between both median and lower quartile house prices and earnings has worsened over the latest calendar year¹⁵ (2015/16) and average house prices in the Borough have also increased¹⁶. The adopted housing requirement has been met only once (2013/14) in the past six years¹⁷, with this an important contributing factor to a worsening of market signals relating to an imbalance of supply and demand.
- 4.11 The SHMA concludes that ‘moderate’ housing demand pressure in Rossendale requires a ‘relatively modest’ increase in housing delivery to improve affordability, indicating that an uplift of 10% from the demographic-led projections would be justified. It is considered

¹⁵ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2016, ONS (2017)

¹⁶ Mean price paid for administrative geographies – HPSSA Dataset 12, ONS (2017)

¹⁷ 5 Year Housing Land Supply Report (2017 – 2022), Rossendale Borough Council (May 2017)

that the evidence of market signals provides a clear justification for this level of adjustment.

- 4.12 The SHMA includes a further adjustment made to reflect the sizeable annual need for 158 – 321 affordable homes, uplifting housing need to the lower end of the concluded range (265dpa).
- 4.13 The Housing Register data favoured in the calculation highlights a net backlog of some 744 households currently in need of affordable housing. While this is annualised over twenty years within the SHMA, clearing this backlog over the next five years – as stipulated within the PPG¹⁸ – would require a more significant elevation in affordable housing delivery in the short-term. An average of 149 affordable homes would need to be annually provided within this period to clear this backlog, which is more than three times the average level of affordable housing delivery in the Borough over the past five years¹⁹ (2012 – 2017). Need is elevated further when taking account of the net newly arising need for up to 285 affordable homes per annum.
- 4.14 The delivery of affordable housing through market-led development will make an important contribution towards meeting this need. This reinforces the need to plan for a boosting of housing supply in Rossendale, with a higher level of housing provision inherently supporting the greatest level of affordable housing delivery on this basis.

Proposed Changes to Methodology for Calculating Housing Needs

- 4.15 As noted earlier in this section, the SHMA correctly follows the methodology currently detailed in the PPG in establishing the OAN for housing in Rossendale. At the current point in time, this remains the latest official guidance on establishing housing needs, pending the outcome of the Government's ongoing consultation on a new draft standardised methodology.
- 4.16 A standardised methodology for calculating housing needs formed one of the recommendations to Government made by the Local Plans Expert Group (LPEG), with its proposed methodology including a number of key deviations from the approach detailed in the PPG²⁰. In establishing the OAN for Rossendale, reference is made within the SHMA to adjustments suggested by LPEG, particularly in relation to market signals and affordable housing needs. Proportionate 10% uplifts applied at these stages within the SHMA align with those advocated by LPEG.
- 4.17 Reflecting the recommendations made by LPEG, the Government's Housing White Paper – published in February 2017 – set out an intention to consult on the introduction of a new standardised approach to assessing housing needs²¹. This followed Government's appreciation of the scale of the national housing crisis and the need for '*radical, lasting reform that will get more homes built right now and for many years to come*'.

¹⁸ PPG Reference ID 3-035-20140306

¹⁹ *Annual Monitoring Report* [2012/13 – 2016/17], Rossendale Borough Council

²⁰ *Report to Government*, Local Plans Expert Group (2016)

²¹ *Fixing our Broken Housing Market – the housing white paper*, DCLG (February 2017)

4.18 Consultation on the draft methodology commenced on 14 September 2017, and runs until 9 November²². The method proposed differs from that suggested by LPEG and represents a considerable simplification of the existing approach, with three stages as follows:

- Starting with the average household growth annually projected by the latest official household projections over the next ten years;
- Adjusting based on the ratio between median house prices and earnings in the latest available year; and
- Capping adjustments to 40% above housing requirements adopted in the last five years, or the latest household projections if higher than a requirement adopted more than five years ago.

4.19 The Government has indicatively calculated a housing need figure for each local authority in England based on its proposed formula, suggesting that a need for 215 dwellings per annum is implied for Rossendale. This is solely derived from the household projections with an adjustment based on affordability, which falls below the 40% cap. The implied outcome for Rossendale is summarised in the following table.

Table 4.3: Indicative Housing Need Based on Proposed New Methodology

	Dwellings per annum
Household projections ²³	187
Affordability ratio	6.14
Adjustment factor	13.4%
Housing need	215

Source: DCLG; Turley analysis

4.20 Application of the proposed draft methodology results in a level of need which falls below that suggested by the SHMA and below that identified in the adopted Core Strategy (247 dpa).

4.21 The methodology is limited to a single upward adjustment of 13% to respond to market signals, a level which falls above the 10% in the SHMA but below that applied when accounting for the identified scale of affordable housing need²⁴.

4.22 It is important to recognise that the proposed removal of the existing requirement to sensitivity test the latest official household projections, which – as demonstrated in the SHMA – would lead to an underestimation of the growth which would occur in Rossendale if longer-term demographic trends persist over the plan period is a key factor in suggesting a lower level of need.

²² *Planning for the right homes in the right places: consultation proposals*, DCLG (September 2017)

²³ Average annual growth projected between 2016 and 2026 with no allowance for vacancy

²⁴ *Planning for the right homes in the right places: consultation proposals*, DCLG (September 2017)

- 4.23 Importantly the proposed methodology also removes the step in the existing methodology which requires the consideration of the relationship between employment growth and housing need. This currently forms the basis for the upper end of the range concluded in the Rossendale SHMA, recognising the need for further growth in the labour force to support likely job creation. The 2014-based projections underpin the new proposed approach, but suggest that the working age population (16 – 64) of Rossendale will decline over the next decade (2016 – 2026) and beyond. This inherently presents a risk to the Borough’s economy and its capacity to support future growth.
- 4.24 The consultation document acknowledges the consequences of this proposed omission, and importantly makes clear that *‘local planning authorities are able to plan for a higher number than set out by our proposed method’*²⁵. The consultation paper recognises that this may result from a range of factors – including increased employment ambition – and indeed makes clear its continued expectation that authorities plan to reflect the effects of the Government’s Industrial Strategy in promoting prosperity in every part of the Country. The NPPF as drafted emphasises the importance of integrating housing and employment strategies in this regard²⁶.
- 4.25 The consultation document includes proposals around transitioning to the new approach, confirming that this is dependent upon the status of current and emerging Local Plans. RBC’s intention²⁷ to submit its Local Plan for Examination in January 2019 means that it will be expected to take account of the implications of the new methodology, as will all authorities submitting after 31 March 2018.
- 4.26 Finally, it is important to note that the formulaic nature of the proposed methodology means that housing needs will iteratively change upon release of new datasets, including new household projections – released in summer 2018 and every two years – and new affordability ratios, updated annually. The minimum need figure implied for Rossendale will therefore be subject to change in advance of the submission of the new Local Plan, further cautioning against reliance upon the current indicative figure published for consultation by DCLG.

Planning for Housing Need

- 4.27 Peel considers that RBC has assembled a robust evidence of housing needs in Rossendale.
- 4.28 The SHMA concludes with a minimum lower OAN of 265 dwellings per annum. This recognises need pressures resulting from projected demographic growth and a positive response to evidence of worsening market signals, which have at least partially resulted from a sustained failure to provide the level of homes needed. This lower end of the range also provides a proactive response to elevating the supply of much needed affordable homes.

²⁵ *Planning for the right homes in the right places: consultation proposals*, DCLG (September 2017) para 46

²⁶ *National Planning Policy Framework*, DCLG (March 2012)

²⁷ *Local Development Scheme and Proposals Map Timetable*, RBC (December 2016)

- 4.29 It is noted that this minimum OAN is somewhat higher than the indicative minimum need implied through the DCLG's current consultation on a draft standardised methodology which indicates a minimum baseline need for 215 homes per annum.
- 4.30 There is currently no certainty around how the proposals set out within the Housing White Paper – including the proposed standardised methodology for calculating housing need – will progress in the coming months, following the conclusion of the current consultation and a subsequent consultation on proposed changes to the NPPF.
- 4.31 Peel strongly considers that RBC should continue to plan to provide for a level of housing growth which exceeds either of these minimum need positions. The evidence published by RBC confirms that planning on the basis of this level of provision (i.e. 215dpa) will mean that there is insufficient labour within the Borough to support the job growth planned through the Core Strategy. This reflects the projected ageing of Rossendale's population under a trend-based demographic projection. Supporting planned levels of job growth without generating unsustainable in-commuting into the Borough will require a retention and attraction of additional working age people. This in turn will result in the need to provide housing to accommodate this additional population.
- 4.32 The Government retains a recognition of the importance of plan-making in supporting economic growth with the current consultation confirming that authorities will be encouraged to plan for levels of housing need above the minimum position where this supports wider economic growth objectives. The wider benefits of growth with regards to investment in infrastructure and the vibrancy and vitality of places across Rossendale must also be considered in this context.
- 4.33 On this basis, and recognising the challenges facing authorities in developing Local Plans through the current period of transition, Peel strongly recommends that RBC plans to provide housing to accommodate its evidenced need for target homes per annum to be in accordance with the SHMA. This is particularly the case given that the emerging standardised OAN identified by the Government is based on past recessionary trends which do not reflect the future needs.

Housing Growth Options

- 4.34 Policy HS1 of the DLP proposes a net requirement for at least 4,000 homes in Rossendale over the plan period (2019 – 2034), or 265 dwellings per annum on average. This is the only housing growth option presented in the DLP.
- 4.35 RBC has, however, also published an overview of the options considered in developing the Rossendale Local Plan²⁸. While the level of development associated with each option is not specified, these options can be summarised as:
- **Option 1 – “Do Nothing”** – reliance upon the existing Core Strategy, with no allocated sites and progressively outdated local policies. There is acknowledgement that this would result in residents leaving the Borough through its failure to meet housing needs, and the relocation of employers due to a loss of jobs or opportunities;

²⁸ *Options for the Local Plan*, RBC (July 2017)

- **Option 2 – “Go for Growth”** – maximising employment and housing growth ‘*at or close to [the] maximum levels achievable*’. It is recognised that this would deliver wider economic benefits and increase provision of affordable housing;
- **Option 3 – “Environmental Protection Focus”** – with a focus on environmental and infrastructure constraints, it is acknowledged that this would not ‘*provide the housing and employment needed*’, restrict opportunities for young people to remain in the Borough and create difficulty in delivering ‘*anticipated housing requirements in full*’, threatening its soundness; and
- **Option 4 – “Draft Plan”** – by seeking to ‘*meet the housing and employment requirements set out in the evidence base*’, this option ‘*aims to balance creation of new employment and housing provision with environmental protection*’ and would help to retain the Borough’s working population.

- 4.36 The absence of detail on the specific level of housing growth associated with each of these options inhibits consideration of their capability to meet housing needs as considered above. The extent to which each has been meaningfully considered in arriving at the position advanced in the DLP is similarly unclear.
- 4.37 Based on the information available, however, it is clear that a “do nothing” approach will fail to meet the need for housing in Rossendale. Furthermore, Government has legislated to make clear ‘*beyond doubt the requirement for all areas to be covered by a plan*’²⁹ and reiterated its intention to intervene where necessary to ensure that plans are put in place. Doing nothing evidently is not an option for RBC, and should not be considered as such.
- 4.38 The “Draft Plan” option is taken forward within the DLP, and provides for at least 265 dwellings per annum over the plan period. This aligns with the lower end of the range concluded within the SHMA, albeit covering a different period. As recognised above this would not provide for the higher levels of housing growth needed to grow the labour force and support future growth in the Borough’s economy, given the SHMA’s conclusion that 335 dwellings per annum will be needed to support a continuation of the Core Strategy’s job target. The statement that this option is sufficient to meet housing needs is therefore unjustified and not evidenced.
- 4.39 The “go for growth” option would maximise housing provision and inherently support the highest level of employment growth, ostensibly exceeding the growth proposed in the DLP. By implication, therefore, this would deliver a level of growth which approaches or indeed exceeds the upper end of the OAN range, delivering the greatest economic benefit and supporting the required elevation in affordable housing delivery as recognised by RBC. Although the absence of detail on the absolute level of growth which could be accommodated under this option is unhelpful, in principle this growth option should be given further consideration in advancing the Local Plan to ensure that housing needs are met in full and that the economic potential of the Borough is realised.
- 4.40 In contrast, the “environmental protection focus” option explicitly recognises that it would fall short of meeting needs, albeit the level of provision is not quantified. Peel considers

²⁹ *Fixing our broken housing market – the housing white paper*, DCLG (February 2017)

that this option should be disregarded given that RBC has not presented evidence to indicate that needs cannot be met in full. Equally, the realisation of this option from a plan-making perspective would have significant detrimental effects on the long-term sustainability of the Borough's settlements and the vibrancy of its communities.

- 4.41 On this basis, Peel strongly suggests that RBC dismiss any consideration of Options 1 and 3 as they will fail to provide a sustainable Local Plan for Rossendale. Peel considers that RBC should continue to explore and articulate in more detail an option which is more aspirational than Option 4 and fully accounts for the benefits associated with pursuing Option 2. This should take into account updates to the underpinning evidence regarding the economic prospects of the Borough and the associated implications for supporting infrastructure including housing.

Meeting the Need for Affordable Housing

- 4.42 As highlighted earlier, there is a sizeable need for affordable housing in Rossendale, which will require a significant short-term uplift in delivery to even clear the backlog of households with unmet needs on the Housing Register. The DLP recognises the importance of tackling this issue '*to prevent the problem becoming more acute*', proposing the delivery of affordable housing as part of market housing-led developments.
- 4.43 The DLP acknowledges the need to '*balance the delivery of affordable housing against viability of delivery*'. In spatially distributing development in the Borough, allocations in stronger, higher value market areas will be important in securing both the quality of housing sought through policy and the viable delivery of affordable housing, in response to the evidence of substantial need. A standalone representation on development viability is included at Appendix 1.

Delivering the Type of Housing Needed

- 4.44 The NPPF requires Local Plans to recognise the '*size, type, tenure and range of housing that is required in particular locations, reflecting local demand*' and encourages authorities to plan for a mix of housing³⁰. More recently, the Government's Housing White Paper reinforced the '*need to build many more homes, of the type people want to live in, in the places they want to live*'³¹ – appreciating both the quantitative and qualitative factors shaping housing needs.
- 4.45 Peel considers that it is critical that the Local Plan seeks to plan positively in providing for the types of homes that will be required in Rossendale over the plan period.
- 4.46 In evidencing its understanding of these future needs, the DLP importantly references the SHMA in highlighting:

³⁰ *National Planning Policy Framework*, DCLG (March 2012) para 50

³¹ *Fixing our broken housing market – the housing white paper*, DCLG (February 2017) foreword from the Prime Minister

“...a need for larger, aspirational property types in Rossendale to rebalance the stock away from small terraced properties and reduce the high levels of out-migration to adjoining areas”³²

- 4.47 Peel strongly supports the planned provision of homes of this type. Qualitative issues in the existing housing stock of Rossendale are highlighted within the SHMA, and are seen to emphasise a ‘*qualitative need to rebalance the housing market*’. The SHMA cites stakeholders’ views that ‘*younger families with children are moving out of the borough seeking more aspirational executive housing*’, and notes that:

“*It is only by developing higher quality 3 and 4-bed detached properties in [areas with poor quality flatted and terraced stock] that Rossendale can hope to effectively compete against more diverse housing markets or housing markets with a higher concentration of aspirational homes nearby, and to stem the tide of out-migration of affluent residents which is currently a serious problem for the borough. This is particularly important if the upper end of the OAN housing range is targeted, which will aim to reverse the trend of out-migration and seek to attract and retain economic migrants to move to the borough*”³³

- 4.48 Accordingly, the SHMA recommends making provision for 60% of all new homes to be houses with at least 3 bedrooms, with half of all homes (50%) detached or semi-detached overall.

Table 4.4: SHMA Recommendation on Size and Type (2014 – 2034)

Size ▶	1 or 2 bedrooms		3 or 4 bedrooms		
All property types	40%		60%		
Type ▶	Semi	Detached	Terraced	Flat	Bungalow
All property types	25%	25%	10%	10%	30%

Source: Lichfields, 2016

- 4.49 The SHMA notes that diversifying the housing stock towards larger, better quality dwellings will ‘*help to ensure that there is a more clearly defined housing ladder within the borough, which is currently overly weighted towards the value end of the market*’.
- 4.50 Planning to support the provision of such homes will contribute towards rebalancing the housing stock profile of Rossendale, which it is agreed is currently skewed towards lower quality homes. In 2017, the Valuation Office Agency³⁴ (VOA) recorded some 51% of the Borough’s properties in Council Tax Band A, which is more than double the national average (24%) and also exceeds the average in the North West (42%).
- 4.51 Delivering higher quality housing in higher Council Tax bands can also have wider benefits in that it offers the potential to increase the revenue of RBC. Households living

³² Rossendale Draft Local Plan: Regulation 18 Consultation, Rossendale Borough Council (July 2017) p7

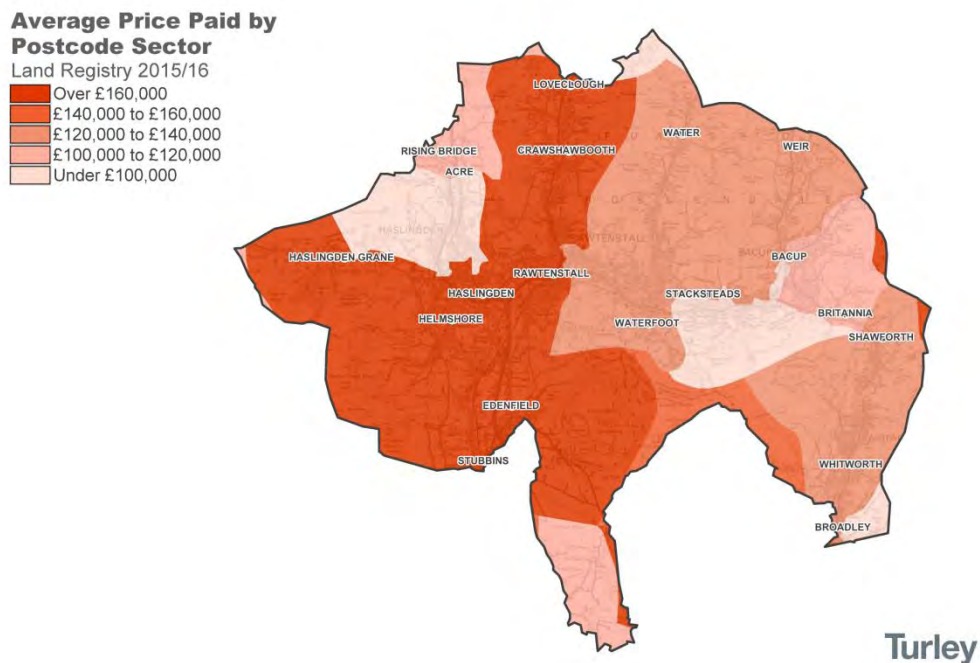
³³ Rossendale Strategic Housing Market Assessment, Lichfields (December 2016) para 12.30

³⁴ Table CTSOP1.0: number of properties by Council Tax band and region, county and local authority district, VOA (2017)

in Band C properties annually pay some 33% more in Council Tax than Band A³⁵, for example, with an increased representation of higher value properties in Rossendale therefore likely to generate an increased financial benefit to the Council over a lasting period. This important revenue source will enable RBC to reinvest in local community infrastructure and services.

- 4.52 Peel considers that in order to support this objective, it is imperative that RBC directs allocations towards areas where this higher quality family housing can be viably delivered. A balanced spatial distribution is required which takes account of these qualitative factors and development viability, and delivering housing of the quality needed will likely require allocations in areas of higher market demand.
- 4.53 Peel considers that this will require a re-consideration of the proposed spatial distribution of the housing supply / land allocations identified within the DLP. This currently suggests that approximately 31% of land allocations are located around Bacup, Stackheads, Britannia and Weir. In other parts of the Borough, there are more established and stronger housing markets to support the delivery of homes which can be considered as more aspirational and of higher value. The following plan highlights western areas in which higher prices were paid on average over the last two years (2015/16), based on Land Registry data.

Figure 4.1: Average Price Paid by Postcode Sector 2015 – 2016



Source: Turley; Land Registry

³⁵ https://www.rossendale.gov.uk/info/210143/council_tax/10533/your_charges_and_bands_explained

4.54 The implications for the spatial approach to providing land allocations taking account of the recognised need for larger higher value homes is considered further in the following section. The additional Green Belt releases required to ensure that the emerging Local Plan is sound must be directed towards those areas at the west of the Borough which are currently under-served in terms of housing land supply.

5. Approach to Land Allocations

- 5.1 This chapter comments on the DLP's approach to the proposed release of land from the Green Belt and the allocation of development sites to meet the needs of the Borough. The chapter concludes that additional land is needed to meet the borough's development needs and that further allocations should be identified through the DLP.

Exceptional Circumstances for Green Belt Release

- 5.2 The DLP states that:

“Green Belt releases have been avoided wherever possible in line with the Government’s White Paper which maintains strong protections for Green Belt, however it is recognised that some releases will be required to meet the housing requirements.”
(page 12)

- 5.3 In respect of housing, it is evident that there is a significant ‘gap’ between the development needs of the Borough and the delivery which can be achieved from the extant housing land supply. The DLP does not itself identify the size of the ‘gap’. However, based on the evidence presented in the DLP, it appears to be approximately 1,518 dwellings based on:

- A need to deliver 4,425 dwellings over the over the period up to 2034 comprised of:
 - A housing requirement of 4,000 dwellings between 2019 and 2034; and
 - The need to address under-provision of 425 dwellings since the adoption of the extant Core Strategy³⁶.
- A potential land supply of 2,907 dwellings from non-Green Belt sources of land (including 997 dwellings from “brownfield”/“mixed” land and 1,910 dwellings from land outwith the Green Belt, including development on land designated as green infrastructure)³⁷.

- 5.4 It is noted that RBC has considered the implications of a lower level of housing growth. For example, the SHMA published alongside the DLP considers the implications of delivery 183 dwellings per annum (dpa)³⁸ – a level of growth which would be broadly consistent with what can be achieved from non-Green Belt sources of land (193 dpa). However, this level of growth would fall significantly short of the identified OAN for the Borough. As noted in the preceding chapter, it would result in significant risk that the identified needs for housing and employment would not be met.

- 5.5 Peel does not consider that this level of growth is a sustainable or “sound” growth option mindful of the tests at paragraph 182 of the NPPF. Whilst it may enable the Borough to

³⁶ Core Strategy Development Plan Document: The Way Forward (2011 – 2026), Rossendale Borough Council (November 2011)

³⁷ Based on Turley's review of the proposed allocations identified in the DLP.

³⁸ Rossendale SHMA Issue, Lichfields on behalf of Rossendale Borough Council (December 2016)

meet its baseline demographic needs, it would mean that the Borough would face a future of gradual economic decline and a housing market which is increasingly inaccessible, particularly to younger and lower/middle income families. It would also result in new housing delivery being focussed in inner-urban areas which are not in high demand; it would provide very little land for new high quality family homes in strong market areas.

- 5.6 Peel considers that such an approach would be contrary to the clearly stated aims of the NPPF that “*Planning should operate to encourage and not act as an impediment to sustainable growth...*” (paragraph 19); it would therefore be unsound. As such, it is evident that there is an urgent need to identify new sources of development land if Rossendale is to be capable of meeting its housing needs and address economic growth requirements.
- 5.7 The Green Belt is not an environmental designation. It is a strategic planning tool which was introduced to manage the growth of urban areas. It is wholly appropriate to revisit Green Belt boundaries when development requirements justify this. This is acknowledged in the recent Housing White Paper³⁹, which states that Green Belt land can be released where all other reasonable options for meeting their identified development requirements have been fully examined.
- 5.8 Peel therefore strongly agrees with RBC that there are clear “...*exceptional circumstances...*”⁴⁰ to undertake targeted Green Belt releases in order to make land available for development to meet the Borough’s needs. Indeed, the release of such land is critical if the Borough is to grow sustainably and deliver its ambitions for growth. Peel notes that the DLP does not explicitly state that exceptional circumstances exist; this should be rectified in the next draft of the Local Plan.

The Scale of the Land Allocations Required

- 5.9 The extent of Green Belt release proposed in the DLP is unclear. However, based upon a high level review of the evidence presented in the DLP, RBC appears to:
- Have identified a “gap” between the housing requirement and the housing land supply from non-Green Belt sources of land of 1,518 dwellings.
 - Propose the release of land from the Green Belt in the DLP to deliver 715 dwellings, which when added to the potential supply from non-Green Belt sources of land equates to a total potential supply of 3,622 dwellings.
- 5.10 Peel considers both that a) the scale of the “gap” is significantly larger than that identified by RBC and b) the extent of Green Belt releases required address that “gap” has been underestimated. This is discussed in the following paragraphs.
- 5.11 It is noted at the outset that the land proposed to be released from the Green Belt falls far short of the “gap”. The 715 dwellings from proposed Green Belt releases are equivalent to less than half (47.1%) of the 1,518 dwelling “gap”; there is a shortfall of

³⁹ *Fixing our broken housing market*, Department for Communities and Local Government (February 2017)

⁴⁰ NPPF, paragraph 83

803 dwellings. It is therefore immediately evident that the extent of Green Belt releases proposed by the DLP need to be **more than doubled** if the emerging Local Plan is to be found sound, before the matters discussed below are taken into account. We highlight that this requirement for additional Green Belt releases is based on the 265dpa requirement proposed by RBC; as such, it is clear that additional releases will be required even if the proposed housing requirement is reduced.

The Extant Land Supply

Deliverability and Developability

- 5.12 RBC's SHLAA⁴¹ does not quantify the scale of the potential housing land supply across the Borough. However, as noted above, the DLP appears to identify the potential to deliver 2,907 dwellings from non-Green Belt sources of land. Peel considers that it is likely to have been overestimated.
- 5.13 For example, the SHLAA identifies two sites north and south of Hollin Lane in Rawtenstall (references SHLAA16184 and SHLAA16392 respectively) which are considered to be developable in years 6 to 10. These two sites have a cumulative dwelling yield of 51 dwellings. It is noted, however, that both are accessible only via Hollin Lane, which is a narrow single-carriageway farm track. As the SHLAA notes, this track would need to be substantially upgraded to facilitate the residential development of both sites. However, the track is enclosed on both sides by existing residential properties so cannot be upgraded to a suitable highway access – including pedestrian footways – without the use of third party land. As such, the current evidence does not demonstrate that the residential development of this land is achievable. This is particularly the case given that the land south of Hollin Lane has previously been included within RBC's 5-year housing land supply with no meaningful progress regarding its delivery, presumably due to the nature of its constraints.
- 5.14 It is therefore considered that the amount of housing delivery which can be secured from the extant land supply is overestimated by the SHLAA. It is considered that sites which are the subject of significant constraints – should be removed discounted from the supply until there is clear and robust evidence that those constraints can be overcome in order to justify their continued allocation, such as the submission of Development Frameworks by the landowner or promoter.

Small sites

- 5.15 66 (48.2%) of the 137 sites which are proposed for allocation in the DLP are small-sites which are under 0.5ha in size, whilst a further 26 sites (19%) are just 0.5-1ha in size. This means that 92 – over two-thirds (67.2%) – of the proposed allocations are 1ha or less in size. These sites have a combined yield of 1,236 dwellings, equating to over one-third (34.1%) of the total supply identified in the DLP.
- 5.16 Peel acknowledges that the Housing White Paper³⁹ encourages greater use of small sites in emerging Local Plans in order to ensure that there are sufficient opportunities for custom and SME builders. It recommends that 10% of sites allocated for development should be on sites of <0.5ha. It is clear that the DLP – which proposes that 48.2% of allocations are such sites – goes far beyond the requirements of the White Paper. It

⁴¹ *Strategic Housing Land Availability Assessment: Stage 1 and 2*, Rossendale Borough Council (May 2017)

must be recognised that the resources of such developers and their capacity to deliver a high rate of completions is limited. This is particularly the case in Rossendale where developments must be of sufficient size such that they have the critical mass required in order to be viable.

- 5.17 Peel supports the ambition to create opportunities for smaller and custom builders. However, it is clear that the housing land supply identified in the DLP is over-reliant upon small sites of less than 10 dwellings. There is therefore a significant risk that this supply will not be delivered in the timeframe envisaged by the DLP.

Providing flexibility through “reserve sites”

- 5.18 It is unrealistic to expect that every identified site – either brownfield or greenfield – will be delivered or will provide the number of new homes from it within the plan period. Recent DCLG analysis⁴² has indicated that between 10-20% of planning permissions are not implemented, whilst a further 15-20% are subject to a revised application process which delays delivery. As a result, it is reasonable to assume that upwards of 15% of the total supply anticipated within the plan period will not come forward by 2034. It is therefore essential to allow the flexibility of additional provision.
- 5.19 Numerous Local Plans have acknowledged that not all allocated sites will come forward in a plan period and have therefore included flexibility allowances or reserve sites. For example:
- The Cheshire East Local Plan provides an additional 7% housing land to provide for an element of non-delivery;
 - The West Lancashire Local Plan includes ‘Plan B’ sites, which was concluded to be “...a constructive response to the uncertainty inherent in planning for housing provision...”⁴³ which would maintain the level of supply whilst allowing for peaks and troughs in the trend of provision; and
 - The draft St Helens Local Plan⁴⁴ has identified land for Green Belt release and safeguarding, and includes a mechanism in Policy LPA05 ‘Meeting St. Helens’ Housing Need’ to undertake a review of those sites for release should there be under-delivery during the course of the plan period. It reduces the capacity of the identified SHLAA supply by 10% to reflect non-delivery and adds a 20% buffer for “...choice, flexibility and to compensate for lead in times...”.

- 5.20 Moreover, this is also an approach currently being taken by the Secretary of State (SoS). For example, in determining a recovered appeal for a mixed-use development proposal including 235 dwellings in July 2017⁴⁵, the SoS considered the housing land supply position of the relevant authority and noted that:

“...planning permissions exist for 4,465 dwellings on sites of fewer than 10 dwellings. The Secretary of State has deducted 10% from this to allow for non delivery...”
(paragraph 22)

⁴² DCLG Presentations to the HBF Planning Conference (September 2015)

⁴³ Report on the Examination into the West Lancashire Local Plan (September 2013)

⁴⁴ St. Helens Local Plan 2018-2033: Preferred Options, St. Helens Council (December 2016)

⁴⁵ Appeal reference: APP/D0840/W/153002925

And that:

“Applying average lead in and delivery rates, the Secretary of State has gone on to deduct 1,458 units from the supply of planning permissions on sites of 10 or more dwellings, to reflect the fact that some sites may not deliver, or may not deliver within the five year period. The Secretary of State considers that this is likely to reflect the overall rate of non-delivery.” (paragraph 23)

- 5.21 RBC has made no such allowances and there is therefore a very high degree of risk that the land supply identified in the DLP will not be delivered. The Local Plans Expert Group⁴⁶ (LPEG) identified this as a particular problem in maintaining the supply of homes which are required to meet needs:

“...because Plans tend only to allocate the minimum amount of land they consider necessary, once adopted, there is little that Local Plans can do to address any shortages that appear in the five year supply...” (paragraph 11.2)

- 5.22 This is a particular issue where, as in Rossendale, Green Belt boundaries are (and as proposed will be) tightly drawn around the urban area. The LPEG report therefore set out a clear recommendation that Local Plans should make provision for, and provide a mechanism for the release of, developable ‘reserve sites’ equivalent to 20% of their housing requirement. The inclusion of a similar approach in the emerging Local Plan for the Borough would be a positive way of reducing the delivery risk which is currently inherent within it and will ensure that it meets the soundness test of being “effective”, i.e. deliverable over its plan period.

Safeguarded land

- 5.23 In accordance with national policy the emerging Local Plan must identify areas of safeguarded land *“...in order to meet longer-term development needs stretching well beyond the plan period...”*⁴⁷. This is necessary to *“...take account of longer-term requirements...”*⁴⁷ and to provide confidence that Green Belt boundaries will not need to be altered at the end of the development plan period. The DLP makes no such provision; rather, given that the extent of Green Belt release is insufficient even to meet the requirements during the current plan period up to 2034, it is clear that a further review will be required to take account of longer-term requirements. This is particularly the case given that the DLP is predicated upon the delivery of all non-Green Belt sources of land within the plan period. As such, the DLP is inconsistent with national policy.

Conclusion on the scale of land allocations and Green Belt release

- 5.24 The DLP makes insufficient land available to meet the Borough’s housing needs. As highlighted above, it is immediately evident that the allocations proposed in the DLP fall short of the proposed housing need by 803 dwellings. However, additional releases will also be needed to take account of the following matters:

- The need to extend the plan period such that the emerging Local Plan is capable of covering a 15-year timeframe, as required by the NPPF (see chapter 4).

⁴⁶ Report to the Communities Secretary and to the Minister of Housing and Planning, Local Plans Expert Group (March 2016)

⁴⁷ NPPF paragraph 85

- The need to revise the potential capacity which can be realistically achieved from non-Green Belt sources of supply, given:
 - the concerns regarding the deliverability and developability of some sites within it which has resulted in the supply being overestimated; and
 - The over-reliance which is placed on delivery from small sites (<0.5ha).
- The need to identify at least “reserve sites” equivalent to 15-20% of the Borough’s development needs, to reflect the risk of non-delivery of sites in the supply.
- The need to identify safeguarded land to take account of longer-term development requirements beyond the plan period.

5.25 It is necessary to identify additional development allocations – and therefore to identify additional Green Belt releases – in order for the emerging Local Plan to be found sound. Peel recommends that the DLP allocate additional sites to meet this requirement.

The Green Belt Assessment

- 5.26 The preparation of the DLP and, in particular, the identification of proposed development allocations has been informed by the Green Belt Review⁴⁸ (GBR). It considers the contribution that specific parcels of land make to the purposes of the Green Belt and the potential degree of harm which might result from the development of that land. Peel notes, however, that the parcels of land which are considered in the GBA in many cases do not relate to the sites which were submitted for consideration via the “call for sites” process or the sites which have been selected for release by the DLP. As such, the findings of the GBR are not directly related to the potential development land available to meet the housing needs of the Borough.
- 5.27 For example, land parcel ref. 25 in the GBR equates to a swathe of land south of Rawtenstall and north of Edenfield (see Figure 5.1 below). Peel has promoted the release of a small area of land to the north of that wider parcel (the merits of this site are discussed in detail in chapter 6). Given its relative size and attributes, that small area makes a much less significant contribution to the Green Belt purposes than the wider land parcel assessed by the GBR. It is therefore considered that the findings of the GBR should be revisited to consider the merits of potential development sites rather than wider parcels of land which are more strategic in nature.

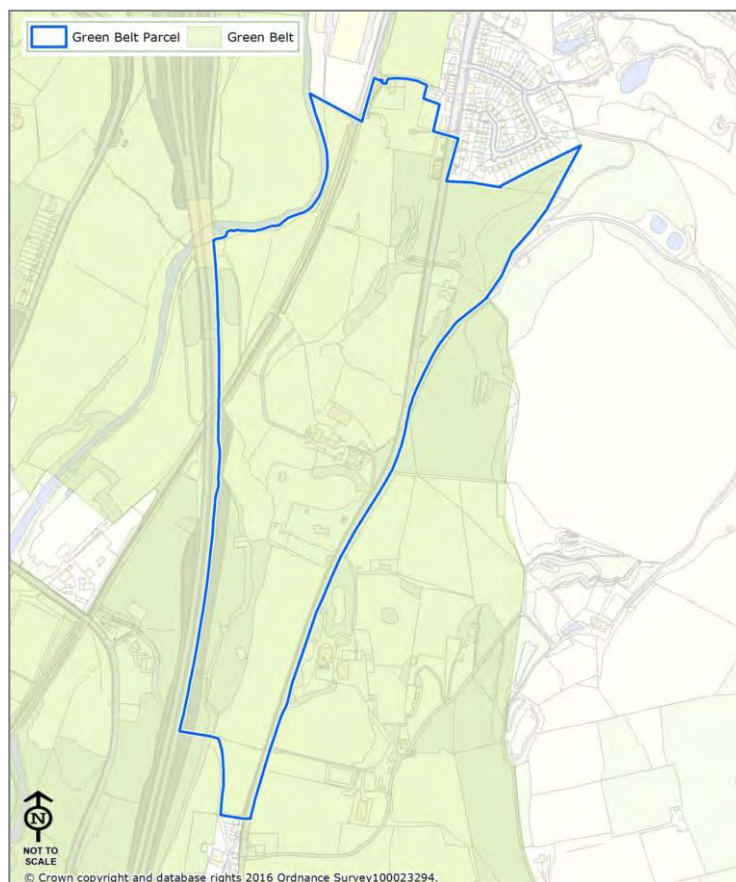


Figure 5.1: Land parcel ref. 25 in the GBR, South of Rawtenstall and north of Edenfield

⁴⁸ *Rosendale Green Belt Review*, LUC (November 2016)

- 5.28 Notwithstanding the above, the methodology of the GBR in assessing specific parcels of land is considered to be broadly appropriate. It is, however, noted that in relation to the second purpose of Green Belt, the GBR considers both the extent to which a parcel maintains the separation of settlements which are physically separate and the role it plays in preventing further coalescence of settlements (or parts of the urban area) which have already merged to varying degrees. Peel does not agree with this approach.
- 5.29 The NPPF clearly identifies that the purpose of Green Belt in this regard is to “...*prevent neighbouring towns from merging into one another...*”⁴⁹. If two towns have already merged then the Green Belt cannot *prevent* them from merging, because it has already occurred. This is the case across various parts of Rossendale, in which many formerly separate settlements and communities have merged over time to form a single contiguous urban area. It is important that merging of settlements is seen in this context. It is acknowledged that Green Belt land can play a role in preventing further merging between settlements which have already coalesced. However, in such cases the contribution that the land makes to the ‘merging’ purpose cannot be considered “strong” because it can only prevent *further* merging and cannot maintain their physical separation. Land can only make a “strong” contribution to this Green Belt purpose where settlements are physically separate.
- 5.30 As such, the GBR has insufficient regard to the nature of the form of the urban area in Rossendale in considering the role of the Green Belt around the settlements. It should be amended in this regard to make clear how land that is between areas of the conurbation – rather than between separate settlements – has been assessed.

Infrastructure Delivery Plan

- 5.31 The DLP is accompanied by an Infrastructure Delivery Plan⁵⁰ (IDP). This notes that the Borough’s infrastructure will be the subject of investment on a case-by-case basis as new development comes on stream. The purpose of the IDP is to identify the infrastructure which may be required. The IDP notes that this may provide a “...*baseline for any contribution requests if the Council decides to pursue the Community Infrastructure Levy (CIL)...*”. The content and potential implications of the IDP is discussed below.

Infrastructure requirements

- 5.32 The IDP is relatively high level and will be further developed as the emerging Local Plan is progressed. However, it is clear that a significant proportion of infrastructure identified within it is strategic in nature and that there is already a need for it. Peel agrees that new development must contribute to infrastructure provision. There are clear legal and policy parameters for how this can be achieved. Contributions must be proportionate to the scale and nature of the development proposed. It is unrealistic to expect that developments can fund new infrastructure without public sector investment where that infrastructure is strategic in nature and relates to existing capacity issues. The NPPF establishes clear tests in this regard; developer contributions must be “...*fairly and reasonably related in scale and kind to the development...*”⁵¹. This test is enshrined

⁴⁹ NPPF, paragraph 80

⁵⁰ *Infrastructure Delivery Plan*, Rossendale Borough Council (July 2017)

⁵¹ NPPF paragraph 204

within legislation⁵². If the scale of the contributions which are sought for new infrastructure are not proportionate, it will undermine the viability of development.

- 5.33 The immediate priority must be to assemble a robust and comprehensive IDP. This should include engagement with Government and infrastructure providers regarding the investment needed to secure growth in the Borough. This should include exploring options for public sector investment in strategic new infrastructure. Peel would welcome discussions with RBC in respect of this matter. This will inform the continued preparation of the IDP and determine the scale of obligations which may be required, having regard to development viability and relevant statutory and policy tests.

Community Infrastructure Levy

- 5.34 The introduction of CIL has the potential to raise questions and uncertainty for landowners and developers, which could deter investment. It is Peel's view that CIL may not form the most suitable vehicle for delivering the infrastructure required in the Borough.

- 5.35 RBC will no doubt be aware that a national review of CIL⁵³ has been undertaken on behalf of the Government. It has concluded that the current system for developer contributions is not as fast, simple, certain or transparent as intended. It therefore recommends the implementation of a new system which will bring back the use of Section 106 Agreements as the primary basis for delivering infrastructure to support development sites, particularly where they are strategic in nature. The Housing White Paper³⁹ confirms that the Government is considering those recommendations and will announce its decision on how to proceed alongside the Autumn Budget. This renders the future of CIL somewhat uncertain.

- 5.36 It is important that the process and mechanism(s) for infrastructure delivery are progressed before the emerging Local Plan is progressed to the next stage.

Development viability

- 5.37 Peel provides comments on the viability evidence published alongside the DLP in a standalone representation which is included at Appendix 1 of this report.

⁵² The Community Infrastructure Levy Regulations 2010 (as amended)

⁵³ *A new approach to developer contributions*, CIL Review Team (October 2016)

6. Proposed Development Opportunities

6.1 As set out in the introduction to this document, Peel has continuously and historically engaged with the plan-making process for Rossendale. This has included the submission of detailed representations to the previous Core Strategy and the draft Lives and Landscapes DPD (since withdrawn), including Development Frameworks that set out the development potential at four sites:

- Land at Kirkhill Avenue and Moorland Rise, Haslingden (allocated in part)
- Land at Haslam Farm, Rawtenstall (allocated in part)
- Land at Blackburn Road, Edenfield (allocated)
- Land at Burnley Road, Edenfield (not allocated)

6.2 Peel welcomes the progress which has been made on the emerging Local Plan and supports, in principle, the proposals for development within it. In particular, Peel strongly supports the allocation of land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield, which include some or all of three of the sites previously put forward (as above).

6.3 It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full development needs of the Borough. Additional land will need to be allocated for residential development, above that which has been identified in the DLP.

6.4 This opportunity is being taken to make representations in relation to the sites previously identified by Peel as capable of accommodating development in the Borough that have not been put forward in the DLP for allocation and/ or Green Belt release. Peel is preparing updated Development Frameworks which will promote and justify its landholdings within Rossendale. Matters addressed below and in the preceding chapter which directly affect its landholdings will be discussed in detail in each Development Framework.

Additional Site Allocations

6.5 In the context of the need for the Rossendale DLP to allocate additional land for development, Peel wish to reiterate the development opportunities at each of the four sites previously identified, as well as proposing a further potential site at Rossendale Golf Club.

6.6 These sites can each provide a deliverable housing development site in sustainable locations adjoining existing settlements. Initial reviews of site constraints and opportunities, landscape and highways have indicated that there are no significant barriers to development. Further site appraisals are being undertaken to inform updated Development Frameworks which will be provided to the Council in due course.

6.7 The updated Development Frameworks will:

- Provide analysis of the site constraints and opportunities.
- Where relevant provide details of the findings of further technical assessment (such as highways, flood risk, ground conditions).
- Consider the key principles for development of the site.
- Present a proposed site layout plan illustrating development parcels, access, landscaping, etc.
- Comment on the economic benefits of development.
- Address comments / observations made within the recently published evidence base for the emerging Local Plan.

Proposed Development Opportunities

6.8 In advance of the full Development Frameworks, initial reviews of the development opportunities are submitted alongside this representation for each of the individual sites. Each Site Opportunity Representation includes:

- A description of the site and its location
- Details of the consideration of the site in the Strategic Housing Land Assessment (SHLAA)⁵⁴
- A review of the planning policy context including the Draft Local Plan
- A Green Belt appraisal, commenting on the findings of the Green Belt Review

6.9 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted here for residential development, these include:

- Land at Kirkhill Avenue and Moorland Rise, Haslingden
- Land at Haslam Farm, Rawtenstall
- and at Blackburn Road, Edenfield
- Land at Burnley Road, Edenfield
- Land at Rossendale Golf Course, Helmshore

⁵⁴ Strategic Housing Land Availability Assessment Stages 1 and 2, May 2017

7. Review of Development Management Policies

- 7.1 This chapter comments on other relevant policies of the Rossendale Draft Local Plan, particularly those which are pertinent to the Development Management process.

New Housing Requirements

- 7.2 Policy HS4 sets out requirements for provision of affordable housing within new developments at 30% where more than 10 units are proposed, subject to site and development considerations (such as financial viability) and at 100% on rural exception sites. The evidence base supporting the Local Plan includes an economic viability study of the Site Allocations and DM DPD⁵⁵ which concludes that this may be achievable in some higher value areas within the Borough, particularly for greenfield sites and where higher densities are appropriate, but will not be viable in other areas with a number of sites assessed only capable of achieving 10% affordable.
- 7.3 It is considered that this is not sufficient evidence upon which to apply a blanket 30% requirement for sites over 10 units, and is overly onerous on developers in terms of the detailed justification that would be needed where this is not viable. Our client requests that the policy should refer to a requirement determined on a site by site basis.
- 7.4 Policy HS6 requires at least 30% of any new housing development to be tailored to meet the needs of elderly or disabled residents, or be easily adaptable. The explanatory text refers to the SHMA showing ‘a high percentage of households containing one or more adults with some form of disability (15.8%)’, this is again not sufficiently evidenced. Whilst the policy states that this standard will be applied flexibly where necessary, considering site conditions, the expected percentage is unduly high. New development should not be required to meet the shortcomings of existing housing stock. Opportunities for improving and adapting existing stock should contribute to meeting the demand in the Borough. Our client requests that this policy is revised accordingly.

Green Belt

- 7.5 Policy SD2 states that development will be “*All new development in the Borough will take place within the Urban Boundaries...except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area...*”.
- 7.6 And that:
- “...Development in the countryside will be supported where it is for a use that needs to be located in this location. Examples would include farm diversification or certain types of tourism uses...”* (page 5)

⁵⁵ Economic Viability Study, Keppie Massie, February 2016

- 7.7 In some cases infrastructure projects need to be situated in a countryside location. We therefore suggest that the text referred to above is amended to make clear that “infrastructure” is amongst the examples of development which may be acceptable in a countryside location. Similarly, infrastructure projects are not always capable of enhancing rural character, but this does not mean that they are unsustainable. In this regard, the policy itself should be amended to state that “...*except where development specifically needs to be located within a countryside location and, **where possible**, enhances the rural character of the area...*”.

Open Space, Gardens and Playing Pitches

- 7.8 Public open space and private garden requirements for new housing developments are set out in policies HS8 and HS10 respectively.
- 7.9 HS8 sets out a requirement for provision of open space and recreation facilities, where there are identified local deficiencies in quantity accessibility and quality / value. The policy states that an updated SPD will set out minimum local standards, accessibility and qualitative assessments and appropriate financial contributions. Peel reserves the right to comment further when the SPD is under review. It is considered that the SPD update should take place as soon as possible to give clarity to development. A degree of flexibility is needed where standards are set in order to reflect site context, local provision and overall viability measures. Precise open space requirements should be capable of being agreed on a site by site basis.
- 7.10 Our client is supportive of the intentions of Policy HS10 to ensure that new developments include adequate private outdoor amenity space. It is considered however, that it is too specific and overly prescriptive to require the size of such spaces to be determined by ‘*garden sizes of nearby properties*’. The housing stock in Rossendale is significantly varied with some existing properties having overly large gardens and some having no garden areas. Local Plan Policy ENV1 sets out the need to take account of the local character and appearance, and sufficiently covers the appropriate design considerations that new development proposals will be required to address.
- 7.11 Policy HS9 requires financial contributions to be made from developments of over 10 dwellings to improvements in existing playing pitches in the Borough. An SPD will set out minimum local standards and appropriate contributions.
- 7.12 Peel objects to the inflexible application of a requirement for financial contributions in this respect. There are clear policy and legal tests for planning obligations and contributions should only be required where they are necessary to make the development acceptable in planning terms. As such, rather than establishing an upfront and one-size-fits-all expectation that new development will fund playing pitch improvements, the requirement for contributions should be determined on a site-by-site basis having regard to the relevant legal and policy parameters set out in the NPPF (paragraph 204) and The Community Infrastructure Levy Regulations 2010 (as amended). Policy HS9 should be updated accordingly in this respect.

- 7.13 As with open space requirements, it is considered that the SPD update should take place as soon as possible to give clarity to development. Our client reserves the right to comment further when the SPD is under review.

Design

- 7.14 Policy ENV1 sets out various expectations (items a-q) for design and layout of new development. Peel is committed to high quality design and has previously demonstrated this commitment through the Development Frameworks provided for the proposed development sites in Rossendale. These frameworks are in the process of being updated and will be provided to the Council in due course. In addition, Peel is committed to working with the other landowners to take forward a coordinated approach to design at Edenfield (in accordance with Policy HS3).
- 7.15 Peel considers that the following points in Policy ENV1 are unnecessarily prescriptive. Item m) requires a '*Development Brief or Design Code (as appropriate)*', item n) states that where appropriate applications shall be accompanied by an '*independent Design Stage Review*', and item j) requires public art. Whilst these tools will be appropriate in some circumstances, it is not considered necessary in all circumstances. These should not be included. Item p) requires consideration of sustainable construction '*including Sustainable Drainage Systems (SuDS)*'. The use of SuDs is adequately covered in policy ENV11, and is therefore considered an overly detailed point to include in this policy.
- 7.16 Criterion m) sets out a requirement for a design codes/development briefs in some cases. It is unclear what the reference to "size of development" means and therefore when a design code may be required. The policy should be redrafted such that it is precise and its requirements of developers are clear.

Heritage

- 7.17 It is considered that Policy ENV2 is unnecessarily prescriptive. It sets out a requirement for new development proposals to have regard to Conservation Area Appraisals and to the significance, appearance, character and setting of nearby heritage assets. It is considered unnecessary to include criteria i) to vii), which specify an unnecessary level of detail regarding the features which new development assess. The majority of the requirements of these criteria are already enshrined in national policy such that it is unnecessary to repeat them in the local plan. If necessary, the guidance they provide should be set out in the explanatory text rather than in the policy itself.
- 7.18 Policy ENV3 refers to the requirement to demonstrate "exceptional circumstances" to justify the loss of a heritage asset. This is unnecessarily prescriptive and is inconsistent with the NPPF, which sets out a requirement to demonstrate that the benefits outweigh the harms in such cases. The words "exceptional circumstances" should be removed from the policy.

Biodiversity and Trees

- 7.19 Protection of areas of biodiversity and ecological networks in development proposals is required by Policy ENV 5. Policy ENV6 relates to protection, management,

enhancement and connection of the green infrastructure network. ENV5 continues to require a net gain for biodiversity where adverse impacts are unavoidable and ENV6 requires a net gain of 20% in biodiversity to be replaced off site. The wording here is considered to be overly onerous and provision of net enhancements is not necessary to ensure that development is acceptable in planning terms.

- 7.20 Peel therefore requests that the policy is amended to omit the net gain requirements and is re-worded to state that new development should mitigate its adverse impacts on ecology and green infrastructure, with improvements or enhancements sought *where possible*, such that it is consistent with the approach of the NPPF.
- 7.21 Peel reserves the right to comment on the draft SPD proposed relating to Ecological Networks as it emerges.
- 7.22 Protection of trees in development proposals is the subject of ENV12. The policy sets out the requirements for justification of the loss of any trees and woodlands as part of an Arboricultural Implications Assessment to be submitted with the application. The policy further states a number of requirements (items a – e) for development proposals and sets out a requirement for compensatory planting at a ratio of 2:1, unless compensatory measures are proposed.
- 7.23 It is considered that this policy is inconsistent with the Framework (para 118) which is more explicit in stating that such losses may be acceptable in planning terms where “*the need for, and benefits of, the development in that location clearly outweigh the loss*”. A replacement ratio of 2:1 is excessive and an unrealistic expectation for on site replacement within development proposals. No methodology for defining ‘*compensatory measures*’ where the 2:1 replacement can’t be met is identified, but it is anticipated that this would take the form of a financial contribution. Peel therefore requests that this requirement is removed, in favour of a more balanced, appropriate and site specific expectation.
- 7.24 Furthermore, there is a lack of clarity in the policy, where it states that development proposals should “*a) not result in the loss of trees or woodland which are subject to a Tree Preservation Order or which are considered worthy of protection*”. The meaning of ‘worthy of protection’ is open to interpretation and should be removed from the policy. Proposals for the amendments of TPOs can be considered through the application process.
- 7.25 Peel questions the absence of any reference to ‘geodiversity’ (save for in the policy title) within the policy text itself and the absence of guidance within the accompanying Explanation to the policy. We understand ‘geodiversity’ to encompass the variety of rocks, minerals, fossils, landforms, sediments and soils, together with the natural processes which form and alter them as well as links that these establish with the local population and culture. It is suggested that either ‘geodiversity’ is removed from the policy title, or the policy text and accompanying Explanation is augmented to provide criteria and guidance relating to geodiversity interests.

Environmental Impacts

- 7.26 Policy ENV7 seeks to prevent adverse environmental impacts as a result of development. Peel is committed to assessing site conditions where sites are promoted for development, and to undertaking technical assessments of the impacts of development, in order to minimise and mitigate any impacts. It is requested that clarification is provided alongside this policy to identify thresholds where Air Quality Assessment is required.
- 7.27 The expectation for electric charging points to be provided on '*all new housing developments*' should be amended to allow for circumstances where this is not appropriate, practical or viable.
- 7.28 Policy ENV 11 sets out various requirements in relation to flood risk, drainage and water management. It is considered that in general terms the policy is broadly appropriate. However, it is noted that the requirement for applications for minor schemes to demonstrate that SuDS solutions have been considered is not consistent with the requirements of the Framework and the related ministerial statement⁵⁶. It is requested that the policy be amended accordingly so that demonstration of SuDS solutions considered is only required for major development (over 10 dwellings).

Wind Turbines

- 7.29 Policy ENV8 states that "*Wind energy developments would be required to address the detailed requirements of Policy ENV10 on Wind Farms and Individual Turbines*". Reference to Policy ENV10 is in error and should read Policy ENV9.
- 7.30 It also states that "The Written Ministerial Statement on Wind Energy Development (June 2015) indicates that all new Wind Energy development should have the backing of the public, and need to be located in "Areas of Search" shown in the Local Plan". This is not properly reflective of the content of the Written Ministerial Statement, which actually states:
- "...following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing..."*
- 7.31 This clearly and properly places the onus on RBC to determine in its role as decision-maker whether "*...impacts identified by affected local communities have been fully addressed...*". We therefore suggest that this part of the Explanation is re-written accordingly.
- 7.32 In relation to the specific requirements identified in Policy ENV9:
- The criterion stating "*...The perceived vertical height and horizontal expanse of the topography...*" should be amended to include reference to "actual" height, as it is important that judgements are made with reference to facts.

⁵⁶ Written Statement (HCWS161), The Secretary of State for Communities and Local Government (Mr Eric Pickles), 18th December 2014

- The criterion stating “*Shadow and Reflective Flicker impacts on buildings and Public Rights of Way are fully assessed with a precautionary approach taken to mitigation*” should be amended to exclude reference to PROWs. It is not possible to predict when a public right of way will be used and to what intensity. Moreover, use of such rights of way is transitory in nature and thus the impact – if any – will be short-lived as people move through the area. This is in contrast to buildings where occupation can be predicted and effects will not be transitory. Government and industry guidance is clear that shadow flicker is an issue for buildings, not open landscapes (see Paragraph: 020 Reference ID: 5-020-20140306, Revision date: 06 03 2014 of the online Planning Practice Guidance). In this respect, the policy criterion is not consistent with Government and industry guidance.
- The criterion stating “...*The proposal would not have an unacceptable impact on the setting of a settlement...*” should be deleted. Settlements do not have any statutory protection. The key issue is instead resident amenity, which is addressed by other criteria.

Parking

- 7.33 Policy TR4 requires all proposals for new development to meet the parking standards, included at Appendix 1 of the DLP, unless an evidence based approach for alternative provision is presented.
- 7.34 The flexibility included in the wording of the policy is welcomed. However, it is considered that the inclusion of parking standards as ‘maximum’ in the DLP does not adequately reflect the Framework or the ministerial statement abolishing national maximum parking standards⁵⁷. The ministerial statement states that ‘*Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network*’, alongside the Framework requirement for a contextual approach when setting local parking standards (NPPF, para 39).
- 7.35 It is therefore requested that the parking standards are revised to allow for a site specific approach to determining parking levels for new development.

⁵⁷ Written Statement, The Secretary of State for Communities and Local Government (Mr Eric Pickles), 25 March 2015

8. Summary and Conclusion

- 8.1 This representation has been prepared by Turley on behalf of our client Peel in respect of the Rossendale Draft Local Plan. The representation made is in the context of Peel's ongoing engagement in the Rossendale plan making process.

Draft Local Plan

- 8.2 The progress of the emerging Local Plan is welcomed and the allocation of Peel's land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield is strongly supported.
- 8.3 It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full identified development needs of the Borough. This will necessitate the allocation of additional land for residential development. It is also evident that additional work in respect of the evidence base will be required.
- 8.4 The representation considers the national policy context of the NPPF, Housing White Paper and Government consultation '*Planning for the right homes in the right places*' which includes a new draft methodological approach for calculating housing needs. Of particular relevance are the NPPF requirements to plan positively for growth through local plan making, and the considerations for alterations to Green Belt boundaries in order to meet development needs.
- 8.5 **Peel requests RBC develop aspects of the spatial vision, objectives and strategy in the DLP. A clearer approach to identify the key aspirations of the Borough during the plan period, objectives for delivery and the locations for achieving those objections would be welcomed.**

Housing Need and Supply

- 8.6 The representation looks at the scale of housing need in Rossendale, as evidenced in the Strategic Housing Market Assessment and set out in the DLP. The impact of the Government's recent consultation on draft methodology for calculating housing needs is reviewed. Peel considers that the Council has assembled a robust evidence of housing needs in Rossendale and should use this as the baseline for the figures in the DLP.
- 8.7 The growth plan option presented in the DLP provides for at least 265 dwellings per annum over the plan period. This aligns with the lower end of the range concluded within the SHMA, albeit covering a different period. It is considered that this would not provide for the higher levels of housing growth needed to grow the labour force and support future growth in the Borough's economy, given the SHMA's conclusion that 335 dwellings per annum will be needed to support a continuation of the Core Strategy's job target. In planning for housing need, and in the interest of supporting planned levels of job growth in the Borough, **Peel recommend that the Council plans to provide housing to accommodate its evidenced need for 335 homes per annum.**
- 8.8 In relation to housing types, Peel considers that in order to support the objective of diversifying the housing stock towards larger, better quality dwellings, it is imperative

that RBC directs allocations towards areas where this higher quality family housing can be viably delivered. A balanced spatial distribution is required which takes account of these qualitative factors and development viability, and delivering housing of the quality needed will likely require allocations in areas of higher market demand. **Peel requests that addition housing allocations are made in areas that can support viable provision of family housing that is in demand.**

- 8.9 Given the timescales for process and adoption of the Local Plan, **Peel recommends that the plan period be extended to 2036, to allow for a 15 year timescale post adoption. Housing delivery targets and allocations would need to be increased accordingly.**
- 8.10 The representation reviews in detail the DLP's presented development needs in the Borough against the extant housing land supply and proposed allocations. A significant 'gap' is identified of approximately 1,518 dwellings based on the housing requirements for the plan period (4,425 dwellings for the period to 2034) and the potential supply identified (2,907 dwellings).
- 8.11 The Draft Local Plan proposes areas for release from Green Belt, allowing for a delivery of a further 715 dwellings. It is therefore evident that the Green Belt releases proposed by the DLP need to be more than doubled if the emerging Local Plan is to be found sound. Releases for at least another 803 dwellings are required, before taking account of the requirement for flexibility and safeguarded land, as well as matters relating to the scale, location and type of development needed.
- 8.12 Peel strongly agrees with RBC that there are clear exceptional circumstances (as defined by NPPF para 83) to undertake targeted Green Belt release in order to make land available for development to meet the Borough's needs. Indeed, the release of such land is critical if the Borough is to grow sustainably and deliver its ambitions for growth.
- 8.13 **Peel supports the release of green belt land in the Borough to meet development need and requests that further land is proposed for release in order to provide the necessary supply to meet the anticipated economic and housing growth demands.**
- 8.14 It is noted that the DLP is overly reliant on small sites and has overestimated the potential housing delivery which can be secured from the extant land supply. The inclusion of reserve sites in the plan is recommended, to reflect the risk of non-delivery of sites in the supply, as is the identification of safeguarded land to take account of longer-term development requirements beyond the plan period.
- 8.15 **Peel requests that the DLP makes provision for additional housing allocations, including larger plots and reserve sites, in order address this.**
- 8.16 The critical need to develop an Infrastructure Delivery Plan is highlighted. Peel agrees that new development must contribute to infrastructure provision; as such, requirements must be in line with legal and policy parameters and with contributions proportionate to the scale and nature of the development proposed. The proposed introduction of a Community Infrastructure Levy is not supported as the most suitable vehicle for

delivering the infrastructure required in the Borough; the Government review of the CIL system should taken into account by RBC.

- 8.17 Peel welcomes the opportunity to comment on the Infrastructure Delivery Plan and Community Infrastructure Levy / developer contribution requirements as they emerge.**
- 8.18 Development viability is reviewed in detail at Appendix 1.

Proposed Development Opportunities

- 8.19 In relation to Peel's land interests in the Borough, this representation considers four sites which have been subject of previous Development Frameworks and representations in the context of the Local Plan development. Updates to these frameworks will be provided to RBC in due course, setting out a clear vision and proposals for the development of these sites.
- 8.20 'Site Opportunity' representations submitted alongside this report provide an initial review of the development opportunities, including details of the site and its location, consideration of the site in the Strategic Housing Land Assessment (SHLAA) and planning policy; and a Green Belt appraisal, commenting on the findings of the Green Belt Review which forms part of the evidence base to the DLP.
- 8.21 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted for residential development.**
- 8.22 **Land at Kirkhill Avenue and Moorland Rise, Haslingden:** Part of this site has been allocated for housing development in the DLP. Peel supports this allocation. The SHLAA identifies the remainder as having potential for development, but with landscape impact as the major constraint; the DLP proposes it remain within Green Belt. Peel considers that the site can be developed with sensitivity to landscape features, and together with the allocated site, there is potential for a logical extension to the west side of Haslingden. The updated Development Framework to follow this representation will further illustrate the opportunity for the development of this site and give comfort that it should reasonably be released for development.
- 8.23 **Peel requests the designation of Land at Kirkhill Avenue and Moorland Rise, Haslingden in its entirety as a housing allocation.**
- 8.24 **Land at Haslam Farm, Rawtenstall:** The northern part of this site has been allocated for housing development in the DLP. Peel supports this allocation. The SHLAA identifies the remainder as having potential for development in 6-10 years subject to addressing site constraints. The Green Belt Assessment has included this land within a far larger plot extending to the south. The land to the south has a greater value in Green Belt terms, and considering the Peel site in isolation, release for development would not have a significant impact on the Green Belt. Peel supports the SHLAA conclusion and considers that the site should be included as an allocation in the DLP to meet the Borough's housing needs. The updated Development Framework to follow this

representation will further illustrate the opportunity for a comprehensive development at Haslam Farm.

8.25 Peel requests the designation of Land at Haslam Farm in its entirety as a housing allocation.

8.26 Land at Blackburn Road, Edenfield: This site is within the HS3: Edenfield DLP housing allocation, proposed for release from Green Belt. Peel supports this allocation and is preparing an updated Development Framework to illustrate the development opportunity. Peel is committed to working with the other landowners within the allocation as required by the policy and in order to achieve quality in placemaking.

8.27 Peel supports the designation of Land at Blackburn Road as a housing allocation.

8.28 Land at Burnley Road, Edenfield: The SHLAA identifies the Site as having potential for development, subject to mitigating site constraints; the DLP proposes it remain within Green Belt. Peel considers that the site can be developed with sensitivity to landscape and heritage features, and together with the large scale allocation to the west (HS:3 Edenfield), there is potential for this site to form part of the extension to the village. The updated Development Framework to follow this representation will further illustrate the opportunity for development of this site and give comfort that it should reasonably be released for development.

8.29 Peel requests the designation of Land at Burnley Road as a housing allocation.

8.30 Rossendale Golf Course: This site is a more recent development opportunity being promoted by Peel, and has hence not been considered in the SHLAA or DLP. The site could reasonably for a discreet extension to the village of Helmshore. The Development Framework to follow this representation will further illustrate the opportunity for development of this site and give comfort that it could reasonably be released for development.

8.31 Peel welcomes further discussion on the land at Rossendale Golf Course as a housing allocation.

Development Management

8.32 The representation makes a number of comments on the proposed development management policies of the DLP. Of note, Peel requests:

- Affordable housing and open space / garden requirements should be considered on a site by site basis and reference viability measures.
- Requirements for contributions to playing pitch provision should be adequately flexible and relate to site context and viability
- Design policies should not be simplified and less prescriptive

- Policy relating to biodiversity should be amended to reflect NPPF
- Removal of the proposed 2:1 tree replacement policy
- Removal of the requirement for electric car charging points in all developments
- Removal of maximum parking standards, in line with NPPF

Appendix 1: Viability Assessment

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Turley

Rossendale Borough Council, Draft Local Plan Consultation

Comments on Keppie Massie/WYG
Updated Economic Viability Study in
Relation to Affordable Housing ('UEVS')

Representation prepared on behalf of:

Peel Holdings (Land and Property) Ltd

October 2017

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Steve Smith MRICS
Associate Director
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Turley

October 2017

1. Introduction

Purpose

- 1.1 On behalf of Peel Holdings (Land and Property) Ltd ('Peel'), Turley has prepared the following representations in respect of the Rossendale Draft Local Plan (July 2017) ('DLP').
- 1.2 The DLP document outlines the necessary housing and infrastructure need to support desired future growth within the Borough during the plan period (2019-2034). Peel has engaged with the plan-making process for Rossendale over the last few years. This has included the submission of detailed representations to the previous Core Strategy¹ and the emerging Lives and Landscapes DPD. The preparation of the Lives and Landscapes DPD was, however, abandoned by Rossendale Borough Council ('RBC') in December 2015 in favour of the preparation of a new full Local Plan. The current DLP is the first stage of consultation on the new Local Plan.
- 1.3 The Council has published a supporting evidence base for the DLP which is also being consulted upon as part of the DLP consultation. The supporting documentation includes the 'Updated Economic Viability Study in Relation to Affordable Housing' (June 2017) ('UEVS') prepared by Keppie Massie and WYG on behalf of RBC. This document forms an update to the previous Economic Viability Study (February 2016) ('EVS'.) which supported the Development Plan Document.
- 1.4 On the whole, methodology within the UEVS follows that adopted in the EVS and, therefore, this document responds to the UEVS and the EVS. These representations should be read alongside and in conjunction with the wider representations.
- 1.5 RBC will be aware that Peel is the owner and/or promoter of the following sites for residential development:
 - Land at Kirkhill Avenue and Moorlands Rise, Haslingden
 - Land at Haslam Farm, Rawtenstall
 - Land at Blackburn Road, Edenfield
 - Land at Burnley Road, Edenfield
 - Land at Rossendale Golf Course, Helmshore
- 1.6 The assessment of affordable housing requirements is of particular importance to Peel, as it has potential to impact on development viability. Peel recognises the need for affordable housing and supports appropriate provision, to be assessed on a site by site basis. The setting of target levels of affordable housing within the DLP must be based on appropriate, objective evidence and assumptions.

¹ *Core Strategy Development plan Document: The Way Forward (2011-2026)*, Rossendale Borough Council (November 2011)

- 1.7 The UEVS sets out to determine the extent to which affordable housing is deliverable within the DLP and directly informs policy HS4 'Affordable Housing'. Draft Policy HS4 sets a requirement of 30% onsite affordable housing provision, subject to viability.
- 1.8 In testing viable levels of affordable housing provision, the UEVS applies sales and land values on a zoned basis in which each typology is tested. The UEVS provides the following conclusions on the levels of affordable housing provided in each zone:
- Zone 1 (Bacup, Stocklands and Wier): all tested typologies are unlikely to support any affordable housing provision
 - Zone 2 (Whitworth, Britannia, Inner Rawtenstall, Newchurch and Waterfoot): tested typologies are largely unviable with marginal viability across the smallest and largest sites with low levels of affordable housing
 - Zone 3 (Crawshawbooth, Haslingden, Outer Ratenstall and New Hall Hey): All development on brownfield land is unviable at 30 dph. Greenfield sites are viable at 30% affordable housing contributions. Viability is greatest over the smallest and largest sites, the medium sized schemes are marginally viable
 - Zone 4 (Helmshore, Edenfield and affluent areas around Haslingden and Rawtenstall): Brownfield development is viable at 10% within the area. Greenfield sites are viable at 40% provision
- 1.9 Issues have been identified within the published viability assessment and supporting evidence base, which leads to a conclusion that the proposed level of affordable housing provision would unviablely burden the future development which is necessary for Local Plan deliverability.

2. Matters of Representation

- 2.1 This chapter elaborates on specific technical concerns within the DLP viability evidence to be utilised by RBC in the formation of their Local Plan to influence affordable housing requirements.
- 2.2 The following representations identify some concerns in respect of the viability testing presented in the UEVS and EVS, which risk compromising the deliverability of a future Local Plan. Comments are set out under relevant sub-headings.

Local Plan Testing

- 2.3 National policy underlines the requirement for Local Authorities to test their plan at various stages in order to ensure delivery. Paragraph 174 of the NPPF states the following:

“Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.”

- 2.4 The NPPF advocates that the combined financial impacts of local and national policy should not burden forthcoming developments essential to the delivery of the plan. Policy implications are tested during Local Plan preparation.
- 2.5 The PPG further states:

“Viability assessments should be proportionate, but reflect the range of different development, both residential and commercial, likely to come forward in an area and needed to deliver the vision of the plan.”

- 2.6 Plan testing should therefore respond to a local market and policy need. The testing undertaken within the UEVS is a direct update to the EVS and assesses “any necessary changes to account for current market conditions.” The original EVS was in support of the Council’s preparation of a Site Allocations and Development Management Policies DPD (‘the DPD’). The council has since decided to withdraw the DPD in order to pursue the adoption of a borough-wide Local Plan and resultantly, a number of new evidence based studies have been commissioned which include the Strategic Housing Market Assessment (2016) (‘the SHMA 2016’) which has informed housing requirements within the DLP.
- 2.7 The DLP outlines that a minimum of 4,000 new homes are required within Rossendale during the Plan period. The DLP also indicates that the SHMA has highlighted the need for larger aspirational family dwellings and quality housing which will cater for an ageing

population. There are concerns that an update to a previous viability assessment for the preparation of a DPD does not adequately reflect, or test the deliverability of current local needs as outlined in the DLP and supporting evidence.

Development Typologies

- 2.8 As indicated above, testing should be applied to development typologies likely to be brought forward in delivering the Local Plan. PPG states that:

“The sampling should reflect a selection of the different types of sites included in the relevant Plan, and should be consistent with viability assessment undertaken as part of plan-making.”

- 2.9 The UEVS states that the development typologies within the EVS are considered to be reasonable and appropriate within the testing of the DLP. The EVS provided two types of testing across residential development scenarios: ‘Generic Testing,’ which was to represent varying likely types of development to come forward within the Plan period; and ‘Site Specific Testing’ which tests viability across sites to be allocated based on the 2010 Strategic Housing Land Availability Assessment.
- 2.10 The UEVS provides only generic testing, and it is noted that the typologies tested within the UEVS do not fully cover the range of sites set out as Housing Site Allocations within the DLP, which includes a scheme of 273 units. A full range of appropriate testing should be provided.

Generic Testing

- 2.11 The EVS tests generic schemes with capacities of 10, 25, 50, 75 and 100 units. These capacities are tested across densities of 30dph and 40dph. Paragraph 3.27 of the EVS states that the forms of development in each typology, including unit size, density and housing mix, have been informed through analysis of previous planning permissions and presents seven schemes within Table 3.3. A direct reference to schemes with permission is regarded as appropriate and reasonable; however, details of the type of permission and date of grant must be stated to allow judgements on the appropriateness of each scheme.
- 2.12 It is noted that the average comparable scheme unit type provision calculation within Table 3.3 misrepresents the actual unit mixes, when compared against the total dwellings provided. The figures adopted in the EVS are, in effect, averages of averages. Applying the unit percentages as shown within Table 3.3 of the EVS to the total dwellings for each scheme it can be seen that 4 bed provision is higher, 5 bed provision is slightly lower, and 2 bed provision slightly higher than shown in the EVS. The corrected averages for the seven schemes are shown in the following table:

Table 2.1: Corrected Average Unit Type Delivery

	2 bed	3 bed	4 bed	5 bed	Total
EVS Unit Numbers	48	227	264	6	546
Units as % of total EVS delivery	9%	42%	48%	1%	100%
% proposed in EVS	7%	46%	44%	2%	100%

- 2.13 The EVS adopts a unit mix for both the 30dph and 40dph schemes which differs from the comparable schemes, and which appears to underprovide 4 bed units whilst over providing 3 bed and 5 bed units. Corrections to the unit typology mix are requested.
- 2.14 Certain assessed schemes have an irregular housing mix, and therefore skew the average mix. The 'Woodland Rise' scheme consists only of 17no 3 bed units whereas the other comparable sites have a more equated mix across different bedroom types. The inclusion of a 100% 3 bed scheme inappropriately raises the 3 bed average and lowers the average across all other unit types.
- 2.15 A truly representative mix should be adopted, reflecting anticipated development within the borough which would have a larger percentage of 4 bed dwelling houses, providing aspirational housing, satisfying the need as noted in the DLP.
- 2.16 It is also unclear whether the total number of units cited in Table 3.3 are inclusive of affordable housing. Table 3.11 displays the affordable mix across four of the comparable schemes and Table 3.12 presents an adopted affordable mix based on these comparables. The EVS states that that Registered Providers typically require smaller sized dwellings, and this is reflected in the larger proportion of 2 and 3 bed dwellings within the affordable mix.
- 2.17 In assessing adopting appropriate unit sizes, the EVS gives regard to the seven comparable schemes with planning permission. Table 3.6 includes an average unit size for each property type by number of bedrooms for each comparable scheme.
- 2.18 The total average size against each property type is summarised and used to inform the size assumptions adopted across the development typologies. Within its methodology Keppie Massie ('KM') has made a fundamental mathematical error by calculating the overall average unit size by, again, averaging an average. The correct approach to establish the average unit sizes delivered by the seven comparable schemes would be to total the sq ft delivered by each unit type across the seven schemes and divide the total area by the number of dwellings of that unit type in order to obtain a true average. It is requested that Keppie Massie's averages should be recalculated, and average sizes re-assessed. The adopted average sizes should be adjusted according to the correctly assessed comparables to ensure that the evidence base is appropriately modelled.
- 2.19 The EVS does not detail the source or the method of calculation of average unit sizes for each comparable scheme. It is not possible to consult on the data unless its source and methodology are stated and provided. Clarification is required to ensure that derivation of adopted unit sizes for each scheme is adequate and robust. The assessed

data is now somewhat historic, and it is expected that a current assessment of viability should make use of a current evidence base.

- 2.20 It is unclear whether any consideration has been given to the reasonable provision of garages within any of the assessed scenarios. Based on Peel's experience of working with national house builders across the region, it is anticipated that all 3+ bedroom open market detached dwellings would provide at least a single garage, with 4 bedroom and 5 bedroom dwellings more often being provided a double garage (or triple garages in limited cases). Considering the SHMA requirements and the average market housing mix, it is clear that the unit mix would lean considerably towards provision of units with garages.
- 2.21 Whilst garages will not attract a full £/m² house build cost, the costs of garage construction are substantial. Failure to accommodate and clearly set out these costs represents a shortcoming of the EVS, which follows to the UEVS.
- 2.22 Confirmation is requested as to whether any allowance has been made for the provision of garages within the viability assessment.
- 2.23 If not accounted for, this represents a major flaw within the viability evidence base. It will substantially underestimate construction costs and overstate the propensity of sites to accommodate infrastructure costs.

Site Specific Testing

- 2.24 The EVS tests 12 sites which range from 48-150 unit capacity, 11 of the 12 sites have a capacity of 100 units or less. The EVS states that a number of the sites to be allocated within the DPD fit within the framework of the generic testing, but 12 sites are selected for site specific testing.
- 2.25 The DLP presents proposed sites to be allocated as part of Policy HS2 'Housing Site Allocations,' which have been informed by the 2017 SHLAA, published as part of the evidence base for the emerging plan. The UEVS makes no reference to the DLP proposed site allocations, and no site specific testing is provided. Reasoning should be provided to justify the adopted approach to viability assessment.

Development Programme

- 2.26 UEVS paragraph 2.16 states that schemes of up to 150 units are proposed to be tested, but the Residential Development Programme shown at Table 2.3 only models up to 100 units. Clarification and correction is, therefore, required.
- 2.27 Paragraph 2.13 of the UEVS states that the appraisals assume that land is fully acquired on day 1 of the development and therefore the development is liable for full finance costs on the land receipt from the beginning of the development programme. This assumption is regarded to fairly represent the extent of costs occurred throughout the development period. KM then state that, in reality, developments over 50 units would be subject to a phased land acquisition and therefore will be subject to a lower finance cost. This statement is regarded as an over-generalisation and too site specific to have any relevance within a viability testing exercise.

- 2.28 The UEVS assumes a sales rate of between 0.5-2 dwellings per month within low value areas and 1-2.5 units per month within higher value areas. The sales rate is also assumed to vary with scheme size: Table 2.3 of the UEVS details the development programme by scheme size including sales rates and length of development programme in each of the value areas. The modelled sales rate assumptions are regarded as reasonable and appropriate across the Borough.
- 2.29 The UEVS allows for a 4 month period between commencement on site and the first sale. This is regarded as over optimistic across the larger sites, falling below market expectations of a six month build period prior to first unit sale in month 7.
- 2.30 There is no detail given regarding an assumed pre-construction period which would be expected to allow for site and staff preparation.
- 2.31 The adoption of a four month period prior to its first sale on all sites is regarded as over optimistic, and not in line with developer expectations. Also, it is rare for a developer to get on site immediately after completion of site purchase and a predevelopment period of at least two months should be adopted.
- 2.32 All assumptions adopted within the EVS and UEVS WYG Cost Reports should be justified with reference to appropriate evidence, but none is provided and this is regarded as a shortcut approach to build cost assessment which is inappropriate and insufficient to enable an appropriate level of scrutiny.

Development Costs

Construction Costs

- 2.33 The UEVS adopts base construction costs ranging from £1,109-1,210 psm for greenfield sites of 30-40 dph, and from £1,165-1,251 psm for brownfield sites of 30-40 dph. Build costs are stated as being *“inclusive of substructures, super structures, all external works, incoming services and drainage, preliminaries, fees and a contingency.”* The build costs are set out within a two page WYG Build Cost Report, as attached to the UEVS at Appendix 1.
- 2.34 The EUVS states that *“The construction costs adopted within the original report were prepared by White Young Green Quantity Surveyors (“WYG”). These costs were prepared in August 2015, and within the intervening period BCIS construction costs have increased by around 13.4%.”* From a brief review of the construction costs adopted in the UEVS, again produced by WYG, it is clear that the referenced BCIS construction cost increase has not been applied to the UEVS costs.
- 2.35 For example, 30dph schemes (10, 25, 50, 75 and 100 units) have only increased by 6.2-7.5%. No commentary is provided to indicate why the BCIS inflation figure has not been adopted, and no methodology is provided to justify, reason or evidence the level of adopted construction costs. The construction costs cannot, therefore be regarded as credible or robust.
- 2.36 It is regarded as essential that as much information as possible should be provided within the viability evidence in respect of the data which has been analysed to assess the base build costs. Such evidence or methodology is not provided either within the EVS or the UEVS.

- 2.37 From the information provided, there is no way to assess whether the proposed cost assessments are appropriate or based on reasonable methodology and justification should be provided for the reduction in costs which are applied to the larger schemes. It is regarded as highly unlikely that a scheme of say 50 units will generate costs which are measurably higher than a national house builder's scheme of say 100 units or greater.
- 2.38 The Cost Report provides costs for schemes up to 100 units, however, the UEVS does not include a 100 unit model, this having been replaced by a 150 unit scheme. Clarification and correction is, therefore, required.

Other Construction Cost

- 2.39 Paragraph 2.03 of the UEVS states that the WYG adopted construction costs are inclusive of preliminaries, fees and contingencies. Other relevant development costs are incorporated within the appraisals.

Preliminary Costs

- 2.40 The UEVS states that preliminary costs are included within the adopted build costs assumption; however Appendix 1, the WYG Build Cost Report 2017, gives no reference to these costs or to the basis upon which they have been applied.
- 2.41 The WYG Build Cost Report 2015 at Appendix 2 of the EVS states that in respect to general housing "*preliminaries are included on a cost per week for a period based on the sales rate.*" There is no further detail into the costing or application of preliminaries. Detailed clarification and evidential support to the adopted preliminary costs is requested.

Professional Fees

- 2.42 The WYG Build Cost Report appended to the UEVS states that 'fees' are variable depending on project size. There is no definition of these costs or explanation of the scale and basis of their application. It is to be assumed that 'fees' encompass industry recognised Professional Costs.
- 2.43 The WYG report that is appended to the EVS states that "*fees for design, planning etc are based on % of the construction costs*" however there is no direct reference to the percentage at which these fees are costed. Appendix A-C of the EVS 2015 WYG report provides summaries of costs for generic housing, flats and site specific schemes. There is no indication of the rate of professional fees adopted within generic scheme testing, however professional fees are applied across apartment schemes at 7-7.5% and across the site specific schemes between 6-7%.
- 2.44 A rate of 6-7.5% to cover professional fees is below industry expectations for residential development sites, where the Harman Guidance² advocates a range of 8–20%, citing costs appropriate across small/medium 'straight forward sites' as between 8-10%. It is regarded as reasonable to expect to see professional fees at 9% (including planning, surveying, NHBC etc.) on sites of less than 100 units, with higher costs for larger, more complex sites. This is clearly recognised as a realistic, necessary and appropriate order

² *Viability Testing Local Plans- Advice for Planning Practitioners* (June 2012).

of cost within the Harman Guidance. WYG should reattribute these costs appropriately to reflect the fee ranges set out above in line with industry standards.

Contingency

- 2.45 A separate 5% contingency rate has been applied to the construction costs within the WYG Build Cost Report appended to the UEVS. This rate is regarded as appropriate. The EVS 2015 WYG Build Cost Report indicates that contingency is applied to base build infrastructure and external works costs only, whereas standard practice is to apply a contingency allowance should also be applied to the professional fees to appropriately reflect the complexities and risks within the design and promotion of such sites.

Abnormal Costs

- 2.46 No clear consideration has been given within the EVS or UEVS in respect of the reasonable level of abnormal costs which will be encountered on greenfield and brownfield sites. Brownfield construction costs are higher than greenfield, but no clear reasoning is provided to determine whether the difference is due to an abnormal cost allowance, it merely being stated that *“Depending on the site typology costs for abnormal works will be included on the basis of cost/dwelling or cost/m² of the site. These could include allowance for poor ground conditions or similar works or costly site clearance.”*
- 2.47 Abnormal costs (costs which fall outside of standard expectations for base build, external works and prelims) must be anticipated to be encountered on all sites of any scale. Whilst it is usually difficult to evidence due to lack of site specific information, it would appear that Keppie Massie/WYG have access to a significant database of scheme specific viability data, and this should be assessed so that average levels of abnormal costs can be calculated and appropriate assumptions included within the Rossendale Affordable Housing Viability Study, with the evidenced threshold land value having reference to market land transactions which will take into account site specific abnormal costs.
- 2.48 The exclusion of abnormal cost allowances within the assessment is regarded as a major oversight. The reality is that abnormal costs can often reduce the RLV below the threshold land value which would incentivise development. Failure to incorporate an appropriate abnormal cost allowance puts the deliverability of sites at risk.

Developer’s Profit and Overhead

- 2.49 Paragraph 2.21 of the UEVS proposes a profit level based on 15% of GDV (inclusive of developer’s overheads) for smaller housing schemes of 25 units or less. This is not regarded as an appropriate approach and evidence must be provided to support such an assumption.
- 2.50 For all other sites the UEVS adopts a profit level of 20% GDV (inclusive of developer’s overheads), which is regarded as appropriate.

Section 106/Section 278 Costs

- 2.51 Paragraph 2.19 of the UEVS states that an amount of £1,000 per dwelling has been incorporated to reflect additional highways works and other Section 106 planning obligations required onsite. There is no evidence provided to support these costs or reference to appropriate policy documents that may have been assessed to determine

the appropriate S106 cost. No reference is made to DLP policies which may generate S106/S278 costs on new developments.

- 2.52 A clear breakdown of the S106 contributions received within the last three years must be provided for scrutiny to ensure that KM's assumption is in line with the levels of contributions sought by the Council, and this must be compared with revised policies within the DLP.

Revenues & Land Values

Revenues

- 2.53 Paragraph 2.07 of the UEVS states that average sales prices in Rossendale are at similar levels to those identified in the original evidence base and therefore the adopted sales values within the EVS, across zones 1, 2, 3 and 4, are deemed as reasonable and appropriate within the updated testing. This assumption is based on a limited update review of achieved sales since 2015 across three of the comparable schemes detailed within the previous EVS.
- 2.54 The EVS based its adopted sales values on the achieved sales across 12 residential sites marketed in a three year period before the publication of the EVS in February 2016. The EVS provides commentary on each development scheme, details the sample size and the average achieved sales, net of incentives, within section 4 and Appendix 1. Despite referencing a three year period of review, the accompanying commentary indicates that recorded sales from four of the comparable developments start from 2011. Peel regard these as historic and irrelevant for use within a viability study in 2017.
- 2.55 The EVS only summarises average comparable study results. No evidence is provided which would allow consultees to comment on the robustness of KM's analysis. The basis of calculating the achieved averages is not provided, and no details are provided in respect of the unit types and sizes of the "comparable" units across each development.
- 2.56 For the purpose of the UEVS KM carried out carried out an update of their residential sales value evidence base at the following developments:
- Pennine View, Bacup - Wainhomes
 - Dale Moor View, Rawtenstall - Taylor Wimpey
 - Healey Walk, Whitworth - Persimmon Homes
- 2.57 The updated evidence base is focused in three locations and therefore not representative of the whole borough or the four zonal value areas. The evidence base is regarded as too limited to support the base value assumptions which, in turn, inform policy across the whole Council area.

Threshold Land Values

- 2.58 Table 2.2 of the UEVS gives a summary of the residential land values adopted within the EVS, and is displayed below. The values adopted within the UEVS remain unchanged from those adopted in the EVS, with KM stating that they are satisfied that the EVS land values remain reasonable.

	Previously Developed		Greenfield	
	(£/net ha)	(£/net acre)	(£/net ha)	(£/net acre)
Zone 1	370,000	150,000	370,000	150,000
Zone 2	618,000	250,000	370,000	150,000
Zone 3	865,000	350,000	435,000	200,000
Zone 4	990,000	400,000	618,000	250,000

Figure 2.1: Table 2.2 of the UEVS

Source: Keppie Massie

- 2.59 Within the EVS it is reasoned that both brownfield and greenfield land owners will require an uplift in value from the existing use value if they are to consider releasing their land for development.
- 2.60 However, no explanation is provided in respect of the difference between the stated brownfield and greenfield land value requirements.
- 2.61 It is both our and Peels' experience and understanding that greenfield land owners will derive their land value expectations from the development market, rather than a subjective uplift over their existing use value. If it is deemed appropriate for their land to be released for residential development, a greenfield land owner will see no reason why they would achieve a lower price than would be achieved for a similar parcel of previously developed land where the residential development value exceeds both the existing greenfield and brownfield value.
- 2.62 The appropriate assessment of "threshold land value" requires detailed methodology and should have reference to values which have been achieved in the open market.
- 2.63 EVS Appendix 1 provides residential land comparable information in respect of seven sites, with one equating to £141,667 per acre and the remainder at circa £350,000-£599,000 per acre, as illustrated in the table above at Figure 2.1.
- 2.64 However, no explanation, commentary or reasoning is provided in respect of the comparable land sale data to justify the differential approach to greenfield and brownfield land value requirements. It is noted that the comparable site values are calculated on a gross area basis, and net values per acre will be significantly higher.
- 2.65 It is acknowledged that comparable site values will vary dependent upon the level of abnormal costs encountered on each site, but the provision and analysis of achieved land sale values would provide useful and important context to determine the validity, or otherwise, of any proposed differential between greenfield and brownfield threshold values.

- 2.66 The lack of rationale to support the proposed threshold land values is regarded as inappropriate, unreasonable, and a significant weakness in the EVS and UEVS methodology, as this assumption is the main driver behind the significantly higher affordable housing provision that is shown to be viable on greenfield sites. A reassessment of required land values is regarded as essential to ensure that the results of the Viability Study can be regarded as credible and robust.
- 2.67 We are of the opinion that the Council should request detailed reasoning from their advisors, including a breakdown of brownfield and greenfield land sale transactions within the Borough to provide the required context for the assessment of threshold land values and to ensure that the assumptions adopted are in line with real world expectations.
- 2.68 It is noted that no appraisals are provided with the UEVS, preventing appropriate critique and analysis, and reducing the ability to understand the adopted approach. The provision of appraisals for each modelled scheme is regarded as essential, especially when the supporting report provides limited information and reasoning.

Rossendale Draft Local Plan

Representations by The Peel Group

Development Opportunity: Land at Haslam Farm, Rawtenstall

October 2017



Turley

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Contact

Nick Graham

Client

Peel Holdings (Land and Property) Limited

Our reference

PEEM2067

9th October 2017

1. Introduction

- 1.1 This representation is prepared by Turley on behalf of our client Peel Holdings (Land & Property) Limited (hereafter “Peel” or “our client”). It provides comments to Rossendale Borough Council (RBC) in respect of the Rossendale Draft Local Plan¹ (July 2017) (‘DLP’) which is currently the subject of public consultation.
- 1.2 This document relates exclusively to the promotion of land at Haslam Farm, Rawtenstall, as a development opportunity. It should be considered in conjunction with the overarching representation submitted by Turley on behalf of Peel.

Draft Rossendale Local Plan

- 1.3 As set out in the overarching representation submitted, Peel has continuously and historically engaged with the plan-making process for Rossendale. This has included the submission of detailed representations to the previous Core Strategy and the draft Lives and Landscapes DPD (since withdrawn), including Development Frameworks that set out the development potential at four sites:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden (allocated in part)
 - Land at Haslam Farm, Rawtenstall (allocated in part)
 - Land at Blackburn Road, Edenfield (allocated)
 - Land at Burnley Road, Edenfield (not allocated)
- 1.4 Peel welcomes the progress which has been made on the emerging Local Plan and supports, in principle, the proposals for development within it. In particular, Peel strongly supports the allocation of land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield, which include some or all of three of the sites previously put forward (as above).
- 1.5 It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full development needs of the Borough. Additional land will need to be allocated for residential development, above that which has been identified in the DLP.
- 1.6 This opportunity is being taken to make representations in relation to the sites previously identified by Peel as capable of accommodating development in the Borough that have not been put forward in the DLP for allocation and/ or Green Belt release. Peel is preparing updated Development Frameworks which will promote and justify its landholdings within Rossendale. Matters addressed below and in the overarching representation which directly affect its landholdings will be discussed in detail in each Development Framework.

¹ *Rossendale Draft Local Plan: Regulation 18 Consultation*, Rossendale Borough Council (July 2017)

Additional Site Allocations

- 1.7 In the context of the need for the Rossendale DLP to allocate additional land for development, Peel wish to reiterate the development opportunities at each of the four sites previously identified, as well as proposing a further potential site at Rossendale Golf Club.
- 1.8 These sites can each provide a deliverable housing development site in sustainable locations adjoining existing settlements. Initial reviews of site constraints and opportunities, landscape and highways have indicated that there are no significant barriers to development.

Development Frameworks

- 1.9 Further site appraisals are being undertaken to inform updated Development Frameworks which will be provided to the Council in due course.
- 1.10 The updated Development Frameworks will:
- Provide analysis of the site constraints and opportunities.
 - Where relevant provide details of the findings of further technical assessment (such as highways, flood risk, ground conditions).
 - Consider the key principles for development of the site.
 - Present a proposed site layout plan illustrating development parcels, access, landscaping, etc.
 - Comment on the economic benefits of development.
 - Address comments / observations made within the recently published evidence base for the emerging Local Plan.

Proposed Development Opportunities

- 1.11 In advance of the full Development Frameworks, the individual site representations are submitted providing initial reviews of the development opportunities.
- 1.12 The Sites are represented as follows:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden
 - Land at Haslam Farm, Rawtenstall (**this document**)
 - Land at Blackburn Road, Edenfield
 - Land at Burnley Road, Edenfield
 - Land at Rossendale Golf Course, Helmshore

1.13 This representation relates to land at Haslam Farm and includes:

- Section 2: A description of the site and its location
- Section 3: Details of the consideration of the site in the Strategic Housing Land Assessment (SHLAA)² and a review of the planning policy context including the Draft Local Plan
- Section 4: A Green Belt appraisal, commenting on the findings of the Green Belt Review
- Section 5: Concluding comments

1.14 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted here for residential development.

² Strategic Housing Land Availability Assessment Stages 1 and 2, May 2017

2. Opportunity Site

Site Description

- 2.1 The land at Haslam Farm is located to the west of Bury Road and is surrounded by built development on three sides. An existing industrial estate forms the northern boundary of the site beyond which is an area of housing. Residential properties and a public house fronting Bury Road run along the eastern boundary with further housing to the east of Bury Road. The East Lancashire Railway line creates the western site boundary, with industrial buildings on the opposite side of the tracks.



Figure 2.1: Site Location – Land at Haslam Farm

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- 2.2 Duckworth Lane divides the two parts of the site. South of this lane is a detached residential property and an open field. The northern part of the site extends to 1.6 ha (3.95 acres); the southern part extends to 1.95 ha (4.82 acres).
- 2.3 The site is located in a river valley – the River Irwell lies west of the site, along the western boundary of the adjacent industrial site. In the wider context, land rises steeply to the north west and south east.

Local Facilities

- 2.4 The site is c. 1.5 km south west of the town centre of Rawtenstall which provides a number of traditional town centres uses including a supermarket, national banks and building societies, dental surgery, high street chemist and a number of restaurants and bars.
- 2.5 The Rawtenstall Balladen Community Primary School is the closest primary school to the site, located c. 0.75 km east of the site. All Saints Roman Catholic High School is c. 2.5 km west of the site.
- 2.6 There are a total of 5 secondary schools and 19 primary schools within 5 km of the site.
- 2.7 There are bus stops located on Bury Road, c. 150 m north and 150 m south of the site respectively. These stops are served by the half hourly 482 and 483 bus services, which connect the site with Bury in the south and Burnley and Bacup in the north. The nearest train station is located 12 km south of the site in Bury. The site is well placed to take advantage of the aspirational reintroduction of passenger services on the East Lancashire Railway line which passes the site.
- 2.8 The site is also well connected to both the local and national highway, with the A56 west of the site (connected via the A662, 1 km north of the site) which connects to the M66 (3.3 km) leading to the M62 and M60 (19 km).



3. Planning Policy Context

Consideration in SHLAA

- 3.1 The Draft Local Plan evidence base includes the 2017 Strategic Housing Land Availability Assessment (SHLAA), which aims to identify the land supply for housing within the administrative boundary of Rossendale within the next 15 years (2017 – 2032).
- 3.2 The northern part of the Site (North of Duckworth Lane) is promoted in the SHLAA (Site Ref 16248). The SHLAA Site Assessment confirmed that it is a viable and achievable site for up to 21 homes in the short term (1-5 years). Peel consider the site could accommodate 72 units. It is noted in the SHLAA that the site has a moderate gradient up to Bury Road and requires new vehicular access. An ecological impact assessment would be needed to assess the ecological function and biodiversity value of the site. The SHLAA yield has been reduced by 50% to allow protection of the habitat; although this has not been justified and the site could accommodate an increased number of units.
- 3.3 The southern part of the Site (South of Duckworth Lane) is also promoted in the SHLAA (Site Ref 16249) as viable and achievable site for up to 37 homes in the medium to long term (6-10 years, 10+ years), once the following site constraints have been addressed:
- the new vehicular access is provided with a limited felling of trees,
 - the ecological impact assessment concludes that the site suitable for a residential development with appropriate mitigation,
 - the land contamination report does not find any contamination or if it does that it can be adequately remediated
 - there is no land instability in relation to the presence of a tunnel on the site.

Local Plan Part 2: Site Allocations and Development Management DPD

- 3.4 The Draft LP Part 2 was withdrawn however, it is worth noting that the plan proposed to release and allocate the northern part of the site – comprising 1.6 ha of land north of Duckworth Lane, with an estimated yield of 45 dwellings – for residential development (site ref. H23). The southern part of the site was proposed to be retained within the Green Belt.

Saved Policies

- 3.5 As the Local Plan Part 2: Site Allocations and Development Management DPD” (LP Part 2) was not taken forward by Rossendale BC, in relation to site allocations and designations, the Proposals Map and Saved Policies³ remain relevant as part of the development plan.
- 3.6 The Proposals Map identifies the Site as outside the Urban Boundary (Policy DS1) and in the Green Belt (Policy DS3)
- 3.7 However, Policy 1 of the Core Strategy states that the Urban Boundary defined in Local Plan Saved Policy DS1 and the Green Belt boundary defined in Saved Policy DS3, will be reviewed and where necessary amended in the Site Allocations DPD. The reviews would take into account criteria set out in Policy 1 including:
- Where small scale selective rounding off of Green Belt boundaries would promote sustainable development opportunities.
 - An extension/amendment to the urban boundary would not adversely affect aspects of the natural environment.
- 3.8 Core Strategy Figure 15 identifies Rawtenstall as an area for Green Belt review.

Rossendale Draft Local Plan

- 3.9 As discussed in the overarching representation, the Draft Local Plan (DLP) recognises that some release of Green Belt land will be required to meet the housing requirements and the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites (DLP, page 12).
- 3.10 The evidence presented in the DLP indicates that 4,425 dwellings will need to be delivered over the period to 2034. Considering the under provision of 425 dwellings since the adoption of the Core Strategy and the potential land supply from non- Green Belt sources of 2,907 dwellings, there is a significant gap of approximately 1,518 dwellings.
- 3.11 The DLP proposes areas for release from Green Belt, allowing for a delivery of a further 715 dwellings. It is therefore evident that the Green Belt releases proposed by the DLP need to be more than doubled - to accommodate 1,518 dwellings - if the emerging Local Plan is to be found sound.
- 3.12 In relation to this Site specifically the DLP identifies the northern section of the site allocated for housing development under Policy HS2: Housing Site Allocations, identified as:
- Site HS2.60 ‘Haslam Farm, north of Duckworth Lane’, site size 0.71ha, 21 units, delivery in 1-5 years.

³ Continuation of Local Plan: Saved Policies through the Core Strategy DPD, December 2010.

- 3.13 This allocation would bring the northern part of the Site within the Urban Boundary and effectively remove it from Green Belt. Policy SD2: Urban Boundaries directs all development within such boundaries *'except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.'*
- 3.14 The southern part of the site remains within the Green Belt in the DLP. The DLP notes the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites that can meet housing needs. It recognises that some release of Green Belt land will be needed to meet this requirement (page 12) and a Green Belt review⁴ forms part of the evidence base for the DLP.
- 3.15 As above, it is clear that there is a significant gap between the housing land supply identified in the DLP and the demand, which cannot be met by non-Green Belt sites alone.
- 3.16 This housing allocation HS2.60 is wholly supported by Peel, but it is considered that the designation should be expanded to include the land to the south of Duckworth Lane. This would conclude a logical extension to the development plot which will offer the opportunity for a greater number of new dwellings in this sustainable location, without compromising the wider Green Belt to the south.
- 3.17 The following section considers this in greater detail.

⁴ Rossendale Green Belt Review, LUC, November 2016

4. Green Belt Appraisal

- 4.1 The Site is currently designated as Green Belt. A Green Belt review⁵ (GBR) forms part of the evidence base for the DLP which has informed the plan's proposed removal of the northern part of the Site from Green Belt (Site Ref. HS2.60). The DLP does not propose to release the southern part of the Site from Green Belt.
- 4.2 The strategic purpose of this area of Green Belt, is to provide separation between Haslingden and Rawtenstall in the north from Edenfield to the south.
- 4.3 The Site sits on the western side of the Green Belt to the south west of Rawtenstall. The northern part of the Site (north of Duckworth Lane) corresponds with GBR Parcel P21. The southern part of the Site forms the northern most tip of a linear parcel P25 that meets the settlement of Edenfield to the south.

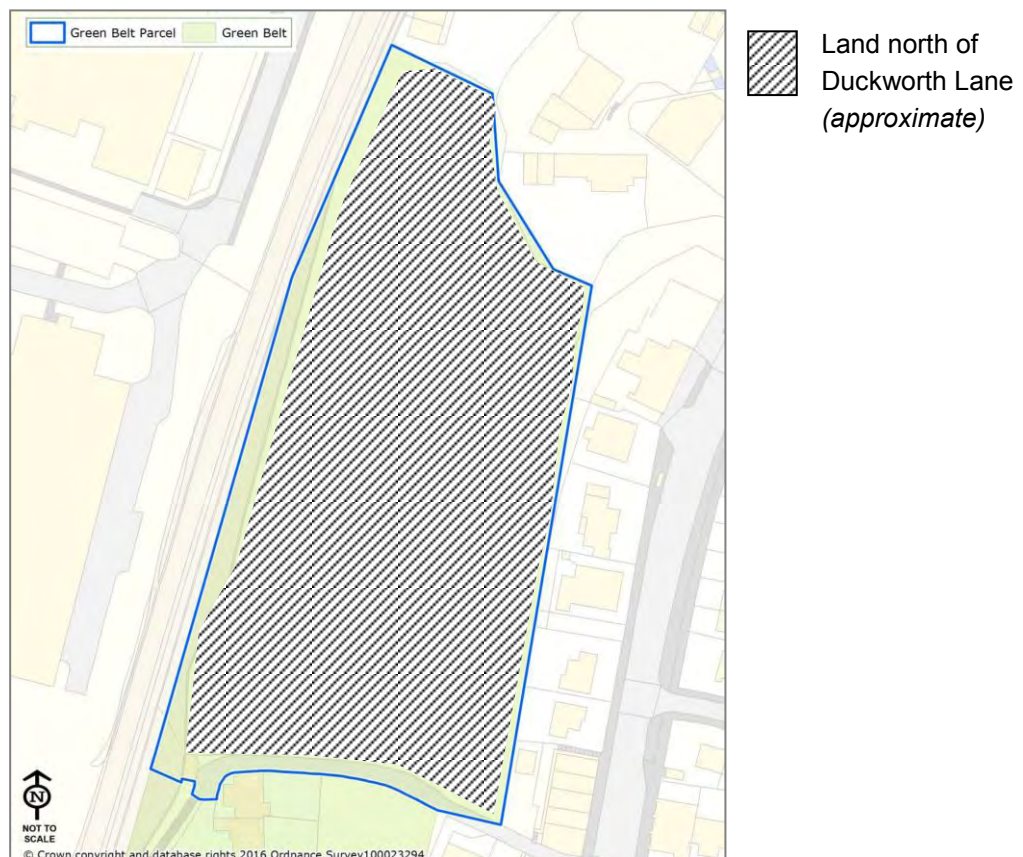


Figure 4.1: P21 (Land north of Duckworth Lane)

⁵ Rossendale Green Belt Review, LUC, November 2016

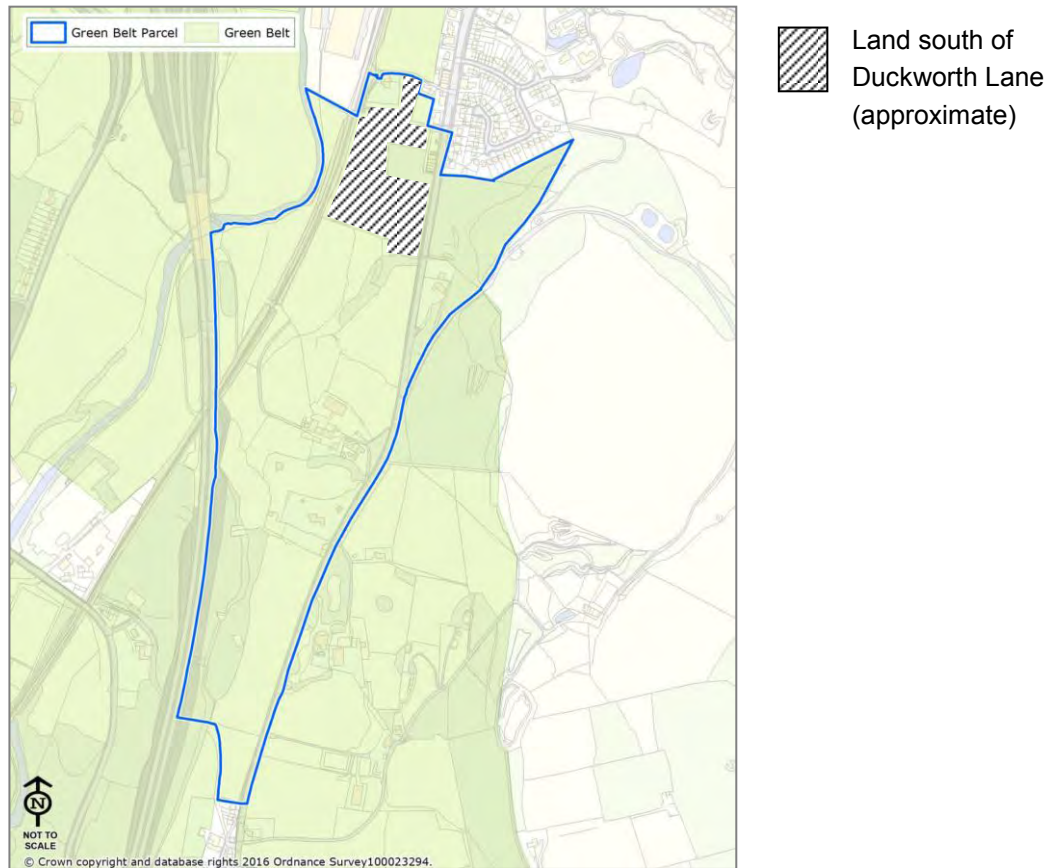


Figure 4.2: P25 (Land south of Duckworth Lane indicated)

- 4.4 The GBR rates the contribution of the land parcel to the five Green Belt purposes.
- 4.5 It is important to note at the outset that there are very clear and accepted exceptional circumstances which justify the release of significant amounts of land from the Green Belt to meet Rossendale’s housing and employment needs. All land within the current Green Belt, fulfils at least some aspects of Green Belt purposes. As such, it will not be possible to meet the identified housing needs of Rossendale without some impact on the Green Belt.
- 4.6 It is also important to note when considering what land to release from the Green Belt to be clear that the “golden thread” which runs through plan making and decision taking is the achievement of sustainable development. The NPPF confirms this at paragraph 84 when it states that “...when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...”. In considering the release of land from Green Belt it is therefore essential to consider what releases of land will achieve sustainable development while minimising the impacts on the purposes of Green Belt.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 4.7 The GBR identifies that this is not applicable to P21 as the parcel lies adjacent to Rawtenstall, which is not considered to be a ‘large built up area’.
- 4.8 In relation to P25, the GBR considers that the parcel as a whole plays a strong role in checking the unrestricted urban sprawl from Edenfield which is part of the large built up

area of Ramsbottom/ Bury to the south. It is noted that there are a limited number of urbanising features within the parcel; these include a small number of isolated detached houses. The influence of these urbanising features is very limited with the parcel displaying a strong sense of openness. However, the A56 dual-carriageway defines the western boundary and detracts from the sense of openness in parts.

- 4.9 It is considered that, in taking the northern section of the P25 parcel in isolation, this land is discrete from the wider Green Belt and could be released from Green Belt for development alongside the land to the north of Duckworth Lane without significant harm to this purpose. The site is contained to the east and west by the railway and Bury Road, and a landscape boundary to the south could form a new permanent and defensible edge to the Green Belt. The remainder of P25 would continue to check the unrestricted sprawl of the built up area to the south.

Purpose 2 - To prevent neighbouring towns merging into one another

- 4.10 The GBR considers that the role of P21 in this respect is weak. It notes that the parcel has a limited visual or physical relationship with the neighbouring settlement of Haslingden. Although it forms a gap between the settlement area of Wood Top and the Riverside Business Park; these are both of urban areas from part of Rawtenstall so not relevant.

- 4.11 Peel supports this assessment and is in agreement that the development of this land would fit within the settlement of Rawtenstall and would not merge this with Haslingden when considering P25. For P25 the contribution is classified as 'strong'. The GBR notes that the north of this parcel forms part of the settlement gap between Rawtenstall and Haslingden/ Helmshore, which are within close proximity (within 1km) at this point and have good intervisibility across the parcel.

- 4.12 For this reason it - along with neighbouring parcels to the west - is noted as being of '*critical importance and plays an essential role in preventing the erosion of the visual and physical gap between the two settlement areas*'. It is considered in the GBR that the parcel forms the majority of the gap between the settlements of Rawtenstall and Edenfield, where new urban development could lead to the perception of reducing the physical and visual gap between the neighbouring settlements.

- 4.13 Peel disagrees with this assessment. The release of the Site from the Green Belt, as part of a distinct and contained extension to Rawtenstall, would not result in significant harm to the contribution of remaining Green Belt land to this purpose. Remaining Green Belt land would sufficiently separate Rawtenstall from towns to the west and south. Separation from encroachment to the west would be maintained by the physical barrier of the East Lancs railway and the river beyond.

Purpose 3 - To assist in safeguarding the countryside from encroachment

- 4.14 The GBR found that there is a sense of encroachment within the P21 parcel (north of Duckworth Lane) as a result of the visual influence of urban development which bounds the parcel on three sides and therefore it is weak in respect of this Green Belt purpose. The parcel is a single agricultural field associated with Haslam Farm; it that contains no urban development, but lacks a strong rural character or characteristics of the open countryside.

- 4.15 Peel agrees with this assessment.
- 4.16 In relation to P25, the contribution was considered by the GBR as 'strong', although urbanising features of the A56 at the western boundary and residential properties in the north gave a limited sense of encroachment. Despite this, the parcel was identified as clearly displaying the characteristics of the open countryside; set within river valley landscape comprising pastoral farmland and is rural in character. The Green Belt designation in this parcel was considered to be making an important contribution to safeguarding of a large area of open countryside to the east from encroachment.
- 4.17 As above, there is logic to the release of the Peel site at the northern part of the P25 parcel in response to the GBR. Whilst it is accepted that a large proportion of parcel P25 does make a contribution to the open countryside, the northern part is where more urbanising features have the greater impact and have the opportunity to form part of the developed area of Rawtenstall, whilst leaving the more open countryside intact.

Purpose 4 - To preserve the setting and special character of historic towns

- 4.18 The GBR recognised that neither P21 nor P25 made any contribution to this purpose. As, in practice it would not be visible from the historic settlement area of Rawtenstall Town Centre (P21 and 25) or Ramsbottom (P25). The openness of the land within the parcels was not considered to be important to setting or historic significance.

- 4.19 Peel agrees with this assessment.

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 4.20 The GBR notes that all parcels make an equally significant contribution to this purpose.
- 4.21 The DLP proposes to optimise the re-use of brownfield sites to meet development needs and in doing so support ongoing urban regeneration.
- 4.22 As noted above, and in the overarching representation, the supply of deliverable brownfield land is insufficient to deliver the number and type of new homes and employment land required. As such, the extent of urban regeneration which can be achieved is not enough to meet Rossendale's sustainable growth needs and must be accompanied by development on Green Belt land. Exceptional circumstances to justify Green Belt release have been proven through the Greater Manchester Spatial Framework. The release of land from the Green Belt will not therefore undermine this purpose.

Green Belt Appraisal Conclusion

- 4.23 The strategic purpose of this area of Green Belt is to provide separation between Haslingden and Rawtenstall in the north from Edenfield to the south (with Ramsbottom/Bury urban area beyond).
- 4.24 Release of the entire site from Green Belt and allocation for housing would allow for a distinct and compact extension to Rawtenstall, which would not result in significant harm to the Green Belt. Green Belt land to the south, which has a greater value in maintaining

openness and land of countryside character and in separating Rawtenstall from the towns to the south, would remain. The site has no bearing on historic towns.

- 4.25 It is considered the Site is suitable for development and is in a highly sustainable location. Its release from Green Belt will therefore contribute to a sustainable pattern of development which makes the most of proximity to nearby highway infrastructure. There are therefore clear exceptional circumstances to justify its release from the Green Belt as shown, in part, within the DLP.
- 4.26 Peel strongly supports the allocation of the northern land and recommends the Council allocate the southern land to ensure sufficient land is allocated to support the housing needs of the borough.

5. Conclusion

- 5.1 In relation to Peel's land interests in the Borough, this document concerns one of four sites which have been subject of previous Development Frameworks and representations in the context of the Local Plan development. Updates to these frameworks will be provided to RBC in due course, setting out a clear vision and proposals for the development of these sites.
- 5.2 This representation provides an initial review of the development opportunity at Haslam Farm, including details of the site and its location, consideration of the site in the Strategic Housing Land Assessment (SHLAA) and planning policy; and a Green Belt appraisal, commenting on the findings of the Green Belt Review which forms part of the evidence base to the DLP
- 5.3 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted for residential development.
- 5.4 The northern part of the Haslam Farm site has been has been allocated for housing development in the DLP. **Peel strongly supports this allocation.**
- 5.5 The SHLAA identifies the remainder as having potential for development in 6-10 years subject to addressing site constraints. The Green Belt Assessment has included this land within a far larger plot extending to the south. The land to the south has a greater value in Green Belt terms, and considering the Peel site in isolation, release for development would not have a significant impact on the Green Belt. Peel supports the SHLAA conclusion and considers that the site should be included as an allocation in the DLP to meet the Borough's housing needs. The updated Development Framework to follow this representation will further illustrate the opportunity for a comprehensive development at Haslam Farm.
- 5.6 **Peel requests the designation of land at Haslam Farm in its entirety as a housing allocation.**

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Rossendale Draft Local Plan

Representations by The Peel Group

Development Opportunity: Land at Rossendale Golf Course, Helmshore

October 2017



Turley

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Contact

Nick Graham

Client

Peel Holdings (Land and Property) Limited

Our reference

PEEM2067

9th October 2017

1. Introduction

- 1.1 This representation is prepared by Turley on behalf of our client Peel Holdings (Land & Property) Limited (hereafter “Peel” or “our client”). It provides comments to Rossendale Borough Council (RBC) in respect of the Rossendale Draft Local Plan¹ (July 2017) (‘DLP’) which is currently the subject of public consultation.
- 1.2 This document relates exclusively to the promotion of land at Rossendale Golf Course, as a development opportunity. It should be considered in conjunction with the overarching representation submitted by Turley on behalf of Peel.

Draft Rossendale Local Plan

- 1.3 As set out in the overarching representation submitted, Peel has continuously and historically engaged with the plan-making process for Rossendale. This has included the submission of detailed representations to the previous Core Strategy and the draft Lives and Landscapes DPD (since withdrawn), including Development Frameworks that set out the development potential at four sites:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden (allocated in part)
 - Land at Haslam Farm, Rawtenstall (allocated in part)
 - Land at Blackburn Road, Edenfield (allocated)
 - Land at Burnley Road, Edenfield (not allocated)
- 1.4 Peel welcomes the progress which has been made on the emerging Local Plan and supports, in principle, the proposals for development within it. In particular, Peel strongly supports the allocation of land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield, which include some or all of three of the sites previously put forward (as above).
- 1.5 It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full development needs of the Borough. Additional land will need to be allocated for residential development, above that which has been identified in the DLP.
- 1.6 This opportunity is being taken to make representations in relation to the sites previously identified by Peel as capable of accommodating development in the Borough that have not been put forward in the DLP for allocation and/ or Green Belt release. Peel is preparing updated Development Frameworks which will promote and justify its landholdings within Rossendale. Matters addressed below and in the overarching representation which directly affect its landholdings will be discussed in detail in each Development Framework.

¹ *Rossendale Draft Local Plan: Regulation 18 Consultation*, Rossendale Borough Council (July 2017)

Additional Site Allocations

- 1.7 In the context of the need for the Rossendale DLP to allocate additional land for development, Peel wish to reiterate the development opportunities at each of the four sites previously identified, as well as proposing a further potential site at Rossendale Golf Club.
- 1.8 These sites can each provide a deliverable housing development site in sustainable locations adjoining existing settlements. Initial reviews of site constraints and opportunities, landscape and highways have indicated that there are no significant barriers to development.

Development Frameworks

- 1.9 Further site appraisals are being undertaken to inform updated Development Frameworks which will be provided to the Council in due course.
- 1.10 The updated Development Frameworks will:
- Provide analysis of the site constraints and opportunities.
 - Where relevant provide details of the findings of further technical assessment (such as highways, flood risk, ground conditions).
 - Consider the key principles for development of the site.
 - Present a proposed site layout plan illustrating development parcels, access, landscaping, etc.
 - Comment on the economic benefits of development.
 - Address comments / observations made within the recently published evidence base for the emerging Local Plan.

Proposed Development Opportunities

- 1.11 In advance of the full Development Frameworks, the individual site representations are submitted providing initial reviews of the development opportunities.
- 1.12 The Sites are represented as follows:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden
 - Land at Haslam Farm, Rawtenstall
 - Land at Blackburn Road, Edenfield
 - Land at Burnley Road, Edenfield
 - Land at Rossendale Golf Course, Helmshore **(this document)**

1.13 This representation relates to land at Rossendale Golf Course and includes:

- Section 2: A description of the site and its location
- Section 3: Details of the consideration of the site in the Strategic Housing Land Assessment (SHLAA)² and a review of the planning policy context including the Draft Local Plan
- Section 4: A Green Belt appraisal, commenting on the findings of the Green Belt Review
- Section 5: Concluding comments

1.14 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted here for residential development.

² Strategic Housing Land Availability Assessment Stages 1 and 2, May 2017

2. Opportunity Site

Site Description

- 2.1 Rossendale Golf Course is located immediately to the east of Helmshore. It extends to 97.13 ha in total, and the site for promotion by Peel is a c. 21.96 ha parcel of land at the north west corner of the golf course. The Site is an I-shaped plot of land adjoining Greens Lane to the north and to the rear of properties on East Street, Fair Hill and Cherry Tree Way to the west.
- 2.2 The site is surrounded by residential development to the west and north west, and is opposite Haslingden High School to the north. The golf course extends to the east and south, beyond which is Lower Cockham Farm.



Figure 2.1: Site Location – Land at Rossendale Golf Course

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Local Facilities

- 2.3 The site is located within easy walking distance (400m/ 5 minutes) of Helmshore village centre which has a small number of services and amenities including a Post Office, general store, barbers and pharmacy.
- 2.4 The town of Haslingden is 2 km north of the site and Rawtenstall is 3.5km to the east. These towns include a wide variety of traditional town centre uses including supermarkets, national banks and building societies, dentists, high street chemists and a number of restaurants and bars.
- 2.5 St. Veronica's RC Primary School is immediately adjoining the site at the north west boundary. Haslingden High School is immediately opposite the site on Greens Lane site.
- 2.6 There are bus stops located on Broadway, a few minutes' walk from the site. Services run north to Haslingden, Accrington and Blackburn, and east to Rawtenstall. Longer distance services also run south to Bury and Manchester.
- 2.7 The site is well connected to both the local and national highway, with the A56 less than 1km from the site which connects to the M66 (4.5km) and in turn the M62 and M60 (19km).

3. Planning Policy Context

Consideration in SHLAA

- 3.1 The Draft Local Plan evidence base includes the 2017 Strategic Housing Land Availability Assessment (SHLAA), which aims to identify the land supply for housing within the administrative boundary of Rossendale within the next 15 years (2017 – 2032).
- 3.2 The Site was not promoted by the SHLAA, it is noted as a potential site that was excluded after Stage 1 (Site Ref 16286) for the reason '*The site is currently in use as a golf course. The landowner has not expressed an interest to develop the site for another use.*'

Rossendale Draft Local Plan

- 3.3 As discussed earlier in the overarching representation, the Draft Local Plan (DLP) recognises that some release of Green Belt land will be required to meet the housing requirements and the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites (DLP, page 12).
- 3.4 The evidence presented in the DLP indicates that 4,425 dwellings will need to be delivered over the period to 2034. Considering the under provision of 425 dwellings since the adoption of the Core Strategy and the potential land supply from non- Green Belt sources of 2,907 dwellings, there is a significant gap of approximately 1,518 dwellings.
- 3.5 The Draft Local Plan proposes areas for release from Green Belt, allowing for a delivery of a further 715 dwellings. It is therefore evident that the Green Belt releases proposed by the DLP need to be more than doubled - to accommodate 1,518 dwellings - if the emerging Local Plan is to be found sound.
- 3.6 The DLP does not propose to include the majority of this land within the Urban Boundary and the site would remain designated Green Belt. Policy SD2: Urban Boundaries directs all development within such boundaries '*except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.*'
- 3.7 A small allocation has been identified in the DLP (HS2.79) which Peel are supportive of. However, as above, it is clear that there is a significant gap between the housing land supply identified in the DLP and the demand, which cannot be met by non-Green Belt sites alone. Peel therefore proposes that land at the golf course can make a greater contribution to meeting the housing needs of the borough.
- 3.8 Peel proposes that including this site as a housing allocation and its release from Green Belt would be in keeping with the NPPF and would assist in achieving the shortfall of land within the Borough for the necessary housing development to meet demand.

3.9 The following section considers the role of the land in terms of its contribution to Green Belt purposes in greater detail.

4. Green Belt Appraisal

- 4.1 The Site is currently designated as Green Belt. A Green Belt review³ (GBR) forms part of the evidence base for the DLP which has informed the plan's proposed retention of the Site as Green Belt.
- 4.2 The strategic purpose of the area of Green Belt which the Site forms part, is to provide separation between Haslingden and Rawtenstall in the north from Edenfield to the south.
- 4.3 The Site sits to the east of Helmshore village centre, and to the south east of Haslingden. It corresponds with the north western corner of GBR Parcel P27, see below.

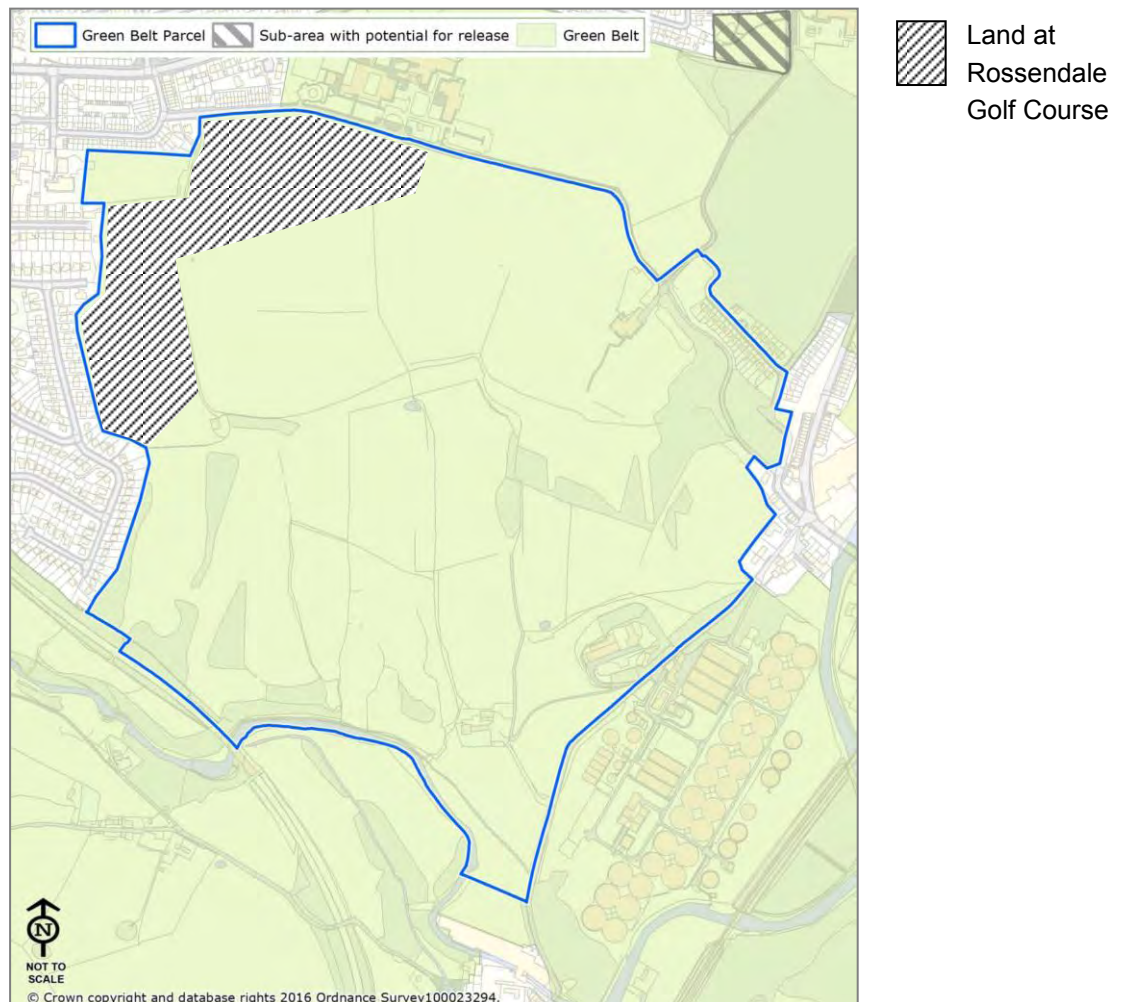


Figure 4.1: P27 (Site location indicated)

- 4.4 The GBR rates the contribution of the land parcel to the five Green Belt purposes.

³ Rossendale Green Belt Review, LUC, November 2016

4.5 It is important to note at the outset that there are very clear and accepted exceptional circumstances which justify the release of significant amounts of land from the Green Belt to meet Rossendale's needs. All land within the current Green Belt, fulfils at least some aspects of Green Belt purposes. As such, it will not be possible to meet the identified needs of Rossendale without some impact on the Green Belt and its purposes.

4.6 It is also important to note when considering what land to release from the Green Belt to be clear that the "golden thread" which runs through plan making and decision taking is the achievement of sustainable development. The NPPF confirms this at paragraph 84 when it states that "...when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...". In considering the release of land from Green Belt it is therefore essential to consider what releases of land will achieve sustainable development while minimising the impacts on the purposes of Green Belt.

Purpose 1: To check the unrestricted sprawl of large built-up areas

4.7 The GBR finds that this GB purpose is not applicable to the golf course because it lies adjacent to Helmshore, which is not considered to be a large built up area assessed against purpose 1. Therefore, the parcel is not considered to contribute towards checking the unrestricted sprawl of large built up areas.

4.8 Peel agrees with this assessment and would support an allocation of a proportion of the golf course, closest to the existing settlement, for housing development.

Purpose 2 - To prevent neighbouring towns merging into one another

4.9 The GBR considers that this parcel plays a 'moderate' role in respect of this purpose, forming part of the gap between Helmshore and Rawtenstall but it notes that the parcel does not lie directly between them and is not of critical importance to their separation.

4.10 Additionally, it is noted that the parcel lies directly between the settlements of Helmshore and Edenfield, and Helmshore and Stubbins which at this point are approximately 2.5km apart with limited intervisibility. The parcel forms a good proportion of the gap between these settlements, but it is not considered to be of critical importance to their separation. However, any new development and subsequent loss of openness within the parcel could lead to the perception of reducing the physical and visual gap between Helmshore and Rawtenstall, Helmshore and Edenfield, and Helmshore and Stubbins.

4.11 The release of a small part of the golf course for housing development would not compromise the role of the GB parcel as a whole in providing this separation. It is feasible that new homes could be accommodated on the west side of the golf course, immediately adjacent to existing development, forming a logical extension to the village of Helmshore. The remainder of the golf course would remain, continuing to provide a physical and visual gap between Helmshore and towns to the east and south.

Purpose 3 - To assist in safeguarding the countryside from encroachment

4.12 The GBR finds that there is a sense of encroachment within the parcel as a result of the visual influence of the Helmshore to the west. The parcel contains little built development apart from the Rossendale Golf Course Club House in the west and a small industrial unit in the south. However, the majority of the landcover to the north

comprises the Rossendale Golf Course and lacks rural character. The south of the parcel contains undulating farmland which displays characteristics of the open countryside and is typically rural in character. Overall the role is considered 'moderate' in respect of this purpose.

- 4.13 Peel agrees with this assessment, in that the golf course does not display the characteristics of open countryside and is not of rural character, and therefore has no role to play in achieving this purpose. The development of a small proportion of the golf course, adjoining the village, would have no consequence in respect of protecting open countryside.

Purpose 4 - To preserve the setting and special character of historic towns

- 4.14 The parcel was found to have no role in this respect as, in practice; it has very limited intervisibility with Ramsbottom only. The openness of the land within the parcel is not considered to be important to its setting or historic significance. Therefore, any new development that took place within the parcel is considered unlikely to affect the setting or special character of any historic settlements.

- 4.15 Peel agrees with and supports this assessment.

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 4.16 The GBR considers that all parcels make an equally significant contribution to this purpose.
- 4.17 The DLP proposes to optimise the re-use of brownfield sites to meet development needs and in doing so support ongoing urban regeneration.
- 4.18 As noted above, and in the overarching representation, the supply of deliverable brownfield land is insufficient to deliver the number and type of new homes and employment land required to meet the needs of the borough. As such, the extent of urban regeneration/ brown field development which can be achieved is not sufficient to meet Rossendale's sustainable growth needs and must be accompanied by development on Green Belt land. Exceptional circumstances to justify Green Belt release have been proven through the Greater Manchester Spatial Framework. The release of land from the Green Belt will not therefore undermine this purpose.

Green Belt Appraisal Conclusion

- 4.19 The GBR makes an assessment of the contribution that is made by a parcel of land golf course site together with agricultural land to the south east (Lower Cockham Farm). It is found that the parcel makes no contribution to the purposes of avoiding urban sprawl, nor preserving historic towns.
- 4.20 Whilst there is a moderate role played in preventing towns from merging, Peel asserts that development of a small area of the golf course, adjacent to the village of Helmshore, would be sensitive to this role and would not compromise the contribution of the larger parcel. Furthermore, the release of such an area would have no impact on the role of the wider parcel on protection of open countryside, as the golf course is not of rural character.

- 4.21 It is considered that this Site is suitable for development and is in a highly sustainable location. Its release from the Green Belt will therefore contribute to a sustainable pattern of development which makes the most of proximity to nearby highway infrastructure. There are therefore clear exceptional circumstances to justify its release from the Green Belt.
- 4.22 Peel strongly supports the allocation of this land and recommends the Council allocate it to ensure sufficient land is allocated to support the housing needs of the borough.

5. Conclusion

- 5.1 This representation provides an initial review of the development opportunity at Rossendale Golf Course, including details of the site and its location, consideration of the site in the Strategic Housing Land Assessment (SHLAA); and a Green Belt appraisal, commenting on the findings of the Green Belt Review which forms part of the evidence base to the DLP. A Development Framework will be provided to RBC in due course, setting out a clear vision and proposals for the development of the site.
- 5.2 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted for residential development.
- 5.3 This site is a more recent development opportunity being promoted by Peel, and has hence not been considered in the SHLAA or DLP. The site could reasonably for a discreet extension to the village of Helmshore. The Development Framework to follow this representation will further illustrate the opportunity for development of this site and give comfort that it could reasonably be released for development.
- 5.4 **Peel supports the allocation of HS2.79, but considers that the site could make a greater contribution to meeting the housing needs of the borough. Peel welcomes further discussion on the land at Rossendale Golf Course as a housing allocation.**

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Rossendale Draft Local Plan

Representations by The Peel Group

Development Opportunity: Land Blackburn Road, Edenfield

October 2017



Turley

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Contact

Nick Graham

Client

Peel Holdings (Land and Property) Limited

Our reference

PEEM2067

9th October 2017

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Draft Rossendale Local Plan

- 1.3 As set out in the overarching representation submitted, Peel has continuously and historically engaged with the plan-making process for Rossendale. This has included the submission of detailed representations to the previous Core Strategy and the draft Lives and Landscapes DPD (since withdrawn), including Development Frameworks that set out the development potential at four sites:
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- 1.4 Peel welcomes the progress which has been made on the emerging Local Plan and supports, in principle, the proposals for development within it. In particular, Peel strongly supports the allocation of land at Kirkhill Avenue in Haslingden, Haslam Farm in Rawtenstall, and Blackburn Road in Edenfield, which include some or all of three of the sites previously put forward (as above).
- 1.5 It is noted, however, that additional work is required to ensure that the emerging Local Plan is capable of meeting the full development needs of the Borough. Additional land will need to be allocated for residential development, above that which has been identified in the DLP.
- 1.6 This opportunity is being taken to make representations in relation to the sites previously identified by Peel as capable of accommodating development in the Borough that have not been put forward in the DLP for allocation and/ or Green Belt release. Peel is preparing updated Development Frameworks which will promote and justify its landholdings within Rossendale. Matters addressed below and in the overarching representation which directly affect its landholdings will be discussed in detail in each Development Framework.

¹ *Rossendale Draft Local Plan: Regulation 18 Consultation*, Rossendale Borough Council (July 2017)

Additional Site Allocations

- 1.7 In the context of the need for the Rossendale DLP to allocate additional land for development, Peel wish to reiterate the development opportunities at each of the four sites previously identified, as well as proposing a further potential site at Rossendale Golf Club.
- 1.8 These sites can each provide a deliverable housing development site in sustainable locations adjoining existing settlements. Initial reviews of site constraints and opportunities, landscape and highways have indicated that there are no significant barriers to development.

Development Frameworks

- 1.9 Further site appraisals are being undertaken to inform updated Development Frameworks which will be provided to the Council in due course.
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- Provide analysis of the site constraints and opportunities.
 - Where relevant provide details of the findings of further technical assessment (such as highways, flood risk, ground conditions).
 - Consider the key principles for development of the site.
 - Present a proposed site layout plan illustrating development parcels, access, landscaping, etc.
 - Comment on the economic benefits of development.
 - Address comments / observations made within the recently published evidence base for the emerging Local Plan.

Proposed Development Opportunities

- 1.11 In advance of the full Development Frameworks, the individual site representations are submitted providing initial reviews of the development opportunities.
- 1.12 The Sites are represented as follows:
- Land at Kirkhill Avenue and Moorland Rise, Haslingden
 - Land at Haslam Farm, Rawtenstall
 - Land at Blackburn Road, Edenfield (**this document**)
 - Land at Burnley Road, Edenfield
 - Land at Rossendale Golf Course, Helmshore

1.13 This representation relates to land at Blackburn Road and includes:

- Section 2: A description of the site and its location
- Section 3: Details of the consideration of the site in the Strategic Housing Land Assessment (SHLAA)² and a review of the planning policy context including the Draft Local Plan
- Section 4: A Green Belt appraisal, commenting on the findings of the Green Belt Review
- Section 5: Concluding comments

1.14 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted here for residential development.

² Strategic Housing Land Availability Assessment Stages 1 and 2, May 2017

2. Opportunity Site

Site Description

- 2.1 The land at Blackburn Road is located approximately 0.7 km miles north of Edenfield Village Centre (see below). It extends to around 2.2 ha (5.4 acres) and is broadly rectangular in shape, comprising an open field in the north and a mature wooded area in the southern part of the site.
- 2.2 The site is located to the west of Blackburn Road which forms part of the eastern site boundary along with existing residential properties. The A56 dual carriageway forms the western boundary to the site beyond which lies open fields.

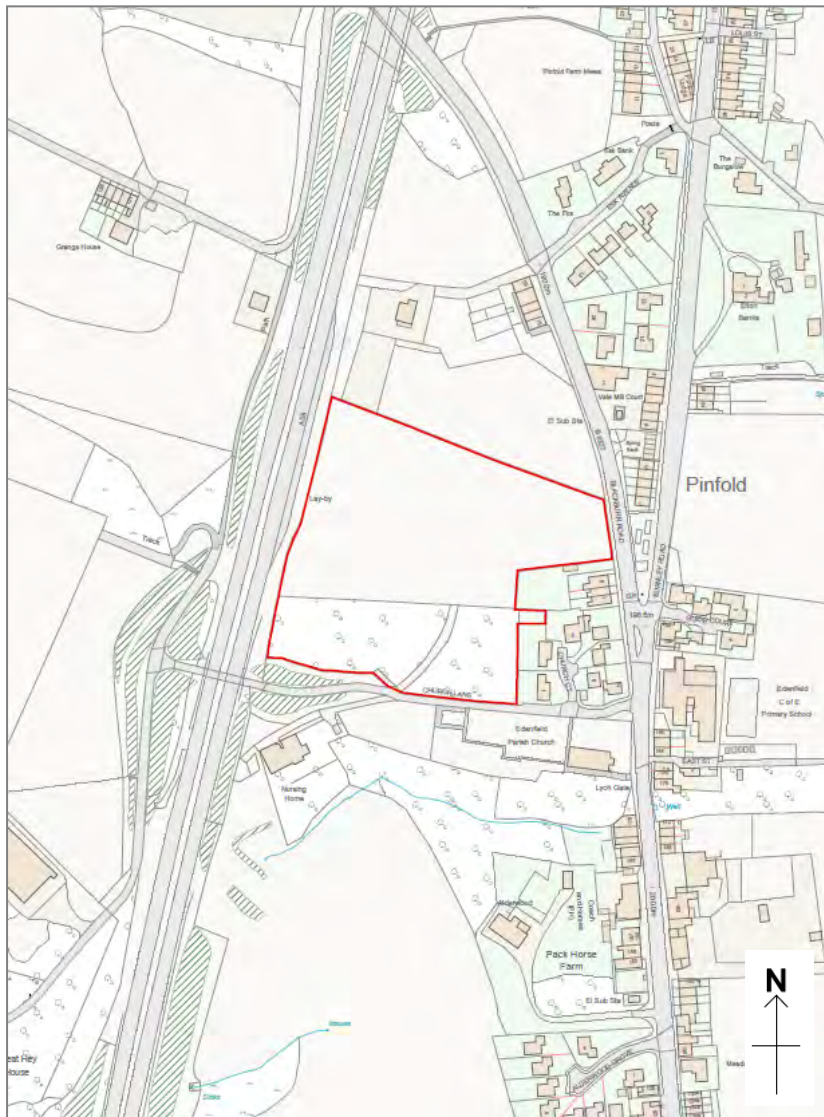


Figure 2.1: Site Location – Land at Blackburn Road

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- 2.3 A small group of houses are located to the immediate south east of the site, comprising a short row of terraced houses fronting Blackburn Road; and a small, inward facing cul-de-sac of modern houses.
- 2.4 Church Lane bounds the site to the south, with the Grade II* listed Edenfield Parish Church and graveyard located on the opposite side of the Lane. To the north the site is bound by an open field

Local Facilities

- 2.5 The site is located within easy walking distance of Edenfield Village Centre (approximately 8 minutes walk) which has a number of services and amenities including a butcher, bakery, chemist, post office and two public houses. The town of Rawtenstall is 3.5 km north east of the site and includes a wide variety of traditional town centre uses including supermarkets, national banks and building societies, dentist, high street chemist and a number of restaurants and bars.
- 2.6 Edenfield Church of England Primary School is located around 50m south west of the site on the opposite side of Blackburn Road. The closest High School to the site is Haslingden High School, located approximately 1.9 km; there are 4 other secondary schools within 5 km of the site.
- 2.7 There are bus stops located on Blackburn Road, c. 300 m north and 225m south of the site respectively. These stops are served by the half hourly 482 and 483 bus services, which connects Edenfield with Bury in the south and Burnley and Bacup in the north. There is a Metrolink station in Bury (c. 9 km south of the site) which connects to the wider Greater Manchester tram network. The site is also well connected to both the local and national highway, with the A56 0.5 km from the site which connects to the M66 (2 km) and in turn the M62 and M60 (15 km).

3. Planning Policy Context

Consideration in SHLAA

- 3.1 The Draft Local Plan evidence base includes the 2017 Strategic Housing Land Availability Assessment (SHLAA), which aims to identify the land supply for housing within the administrative boundary of Rossendale within the next 15 years (2017 – 2032).
- 3.2 The Site, along with adjoining land to the north, is promoted in the SHLAA (Site Ref 16256). The SHLAA Site Assessment confirmed that it is a viable and achievable site for up to 63 homes in the medium term (6-10 years). Peel consider the site could accommodate 65 dwellings.

Local Plan Part 2: Site Allocations and Development Management DPD

- 3.3 The Draft LP Part 2 was withdrawn. The plan did not propose to release this site from the Green Belt; representations made by Peel in response to that Plan challenged that proposal.

Saved Policies

- 3.4 As the Local Plan Part 2: Site Allocations and Development Management DPD” (LP Part 2) was not taken forward by Rossendale BC, in relation to site allocations and designations, the Proposals Map and Saved Policies³ remain relevant as part of the development plan.
- 3.5 The Proposals Map identifies the Site as outside the Urban Boundary (Policy DS1) and Site Context in the Green Belt (Policy DS3).
- 3.6 However, Policy 1 of the Core Strategy states that the Urban Boundary defined in Local Plan Saved Policy DS1 and the Green Belt boundary defined in Saved Policy DS3, will be reviewed and where necessary amended in the Site Allocations DPD. The reviews would take into account criteria set out in Policy 1 including:
- Where small scale selective rounding off of Green Belt boundaries would promote sustainable development opportunities.
 - An extension/amendment to the urban boundary would not adversely affect aspects of the natural environment.
- 3.7 Core Strategy Figure 15 identifies Edenfield as an area for Green Belt review.

³ Continuation of Local Plan: Saved Policies through the Core Strategy DPD, December 2010.

Rossendale Draft Local Plan

- 3.8 As discussed in the overarching representation, the Draft Local Plan (DLP) recognises that some release of Green Belt land will be required to meet the housing requirements and the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites (DLP, page 12).
- 3.9 The evidence presented in the DLP indicates that 4,425 dwellings will need to be delivered over the period to 2034. Considering the under provision of 425 dwellings since the adoption of the Core Strategy and the potential land supply from non- Green Belt sources of 2,907 dwellings, there is a significant gap of approximately 1,518 dwellings.
- 3.10 The DLP proposes areas for release from Green Belt, allowing for a delivery of a further 715 dwellings. It is therefore evident that the Green Belt releases proposed by the DLP need to be more than doubled - to accommodate 1,518 dwellings - if the emerging Local Plan is to be found sound.
- 3.11 In relation to this Site specifically the DLP identifies this as one of four parcels of a larger site allocation for housing development under Policy HS2: Housing Site Allocations, identified as:
- Site HS2.71 'Land between Blackburn Road and A56', site size 2.09ha, 63 units, delivery in 1-5 years.
- 3.12 The other three parcels identified under allocation HS2.71 would yield an additional 388 homes, bringing a total of 451 new homes that could be delivered as result of this allocation. All four sites are identified as having a 6-15 year delivery time frame.
- 3.13 This allocation would bring the Site within the Urban Boundary and effectively remove it from Green Belt. Policy SD2: Urban Boundaries directs all development within such boundaries '*except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.*'
- 3.14 The DLP notes the NPPF requirement for the Council to maintain a 5 year land supply of deliverable sites that can meet housing needs. It recognises that some release of Green Belt land will be needed to meet this requirement (page 12) and a Green Belt review⁴ forms part of the evidence base for the DLP.
- 3.15 As above, it is clear that there is a significant gap between the housing land supply identified in the DLP and the demand, which cannot be met by non-Green Belt sites alone.
- 3.16 This housing allocation HS2.71 is wholly supported by Peel. The following section considers this in greater detail.

⁴ Rossendale Green Belt Review, LUC, November 2016

Policy HS3: Edenfield

- 3.17 As above, the DLP identifies a 26ha (64 acre) parcel of land to the north and west of Edenfield for release from Green Belt and allocation for housing development. Policy HS3: Edenfield sets out the requirements for the development of this site which includes a comprehensive masterplan being developed for the entire site, implementation in accordance with an agreed Design Code, an agreed phasing and infrastructure delivery schedule, and a programme of implementation – all to be progressed as part of the evolving Local Plan process.
- 3.18 This Draft Land Allocation comprises a number of separate land ownerships. The major landowners collectively support the draft HS3 allocation and have put forward their individual sites (parcels of said allocation) for consideration as part of the preparation of the Draft Local Plan.
- 3.19 In compliance with the draft policy, the landowners are committed to working together to enable the entire HS3 allocation to be delivered. An initial meeting has been held and it is agreed that a joined up approach to development of a masterplan will be taken, in partnership with Rossendale Borough Council and other relevant stakeholders, including the local community in and around Edenfield.
- 3.20 A Constraints and Opportunities Plan for the entire allocation has been prepared jointly on behalf of the major landowners and is included at Appendix 1.
- 3.21 As infrastructure requirements are defined and specified for the allocation as a whole, the landowners with the Council and other relevant Stakeholders will work together to ensure that necessary requirements are incorporated into the masterplan and the phasing and delivery programme. Likewise, where technical assessments are needed, a joined up allocation wide approach will be sought. In particular, the following matters will be collectively addressed, so far as possible:
- Appropriate buffers adjacent to the A56 will be included to ensure that new homes are protected from unacceptable levels of noise
 - Key views across the site to the Rossendale Valley will be protected and maintained, where appropriate.
 - Design and layout will consider the setting of Edenfield Parish Church, Market Street/ Horse and Jockey, and the amenity of existing housing.
 - A movement framework will identify key access points and circulation within the site for vehicles, cycles and pedestrians.
 - Key principles will be developed for contextual design, architectural styles and materials.
 - Ecological and nature conservation, flood risk and drainage considerations will be investigated further and mitigation identified.
 - Requirements for open space and play areas will be identified together with a strategy for delivery.

- Transport implications of the cumulative development.

3.22 Individual representations have been produced and submitted to illustrate the suitability and deliverability of each specific parcel of land within the wider allocation as well as echoing support for the wider DLP allocation. This statement however, should be taken as reassurance that going forward the major landowners are committed to working together to deliver this strategically important development in Edenfield, in accordance with the aspirations of Policy HS:3 and will seek to engage with the Council and other relevant Stakeholders.

4. Green Belt Appraisal

- 4.1 The Site is currently designated as Green Belt. A Green Belt review⁵ (GBR) forms part of the evidence base for the DLP which has informed the plan's proposed removal of the Site from Green Belt along with land to the south (Site Ref. HS2.71).
- 4.2 The strategic purpose of this area of Green Belt is to provide separation between Haslingden and Rawtenstall in the north/ north west, from Edenfield to the south.
- 4.3 The Site sits to the north of Edenfield village centre, and to the west of development along Blackburn Road. It corresponds with the southern part of GBR Parcel 39, see below.

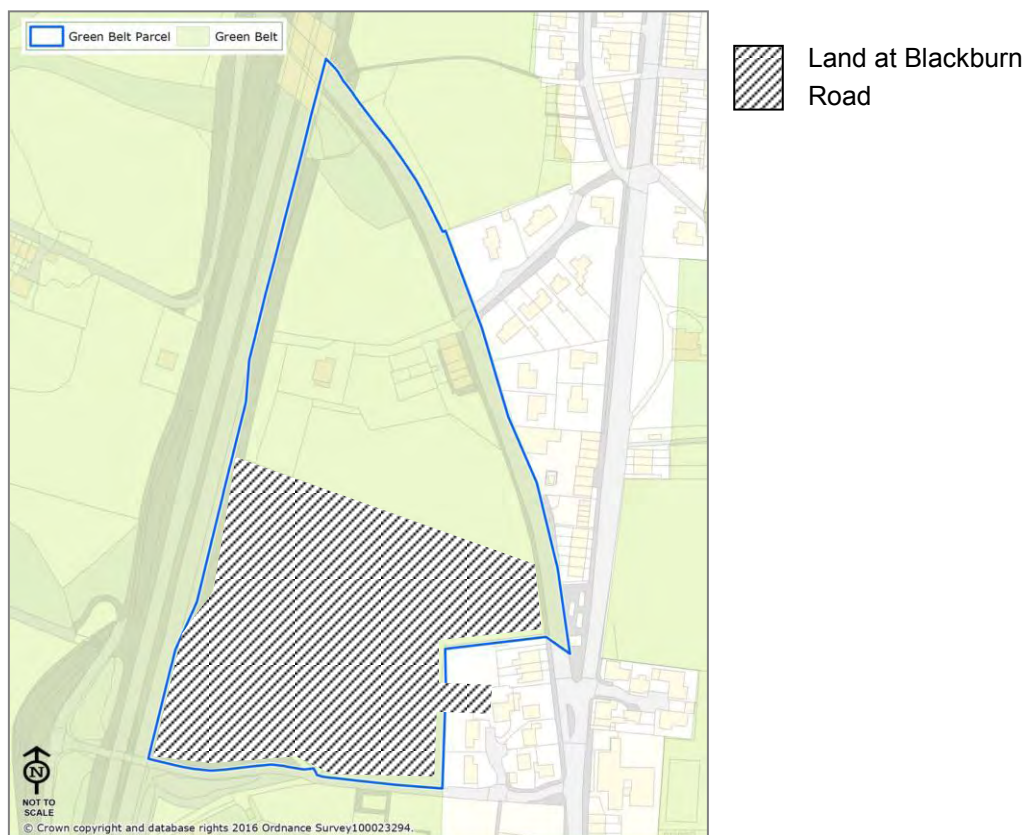


Figure 4.1: P39 (Site location indicated)

- 4.4 The GBR rates the contribution of the land parcel to the five Green Belt purposes.
- 4.5 It is important to note at the outset that there are very clear and accepted exceptional circumstances which justify the release of significant amounts of land from the Green Belt to meet Rossendale's housing and employment needs. All land within the current Green Belt, fulfils at least some aspects of Green Belt purposes. As such, it will not be possible to meet the identified housing needs of Rossendale without some impact on the Green Belt.

⁵ Rossendale Green Belt Review, LUC, November 2016

- 4.6 It is also important to note when considering what land to release from the Green Belt to be clear that the “golden thread” which runs through plan making and decision taking is the achievement of sustainable development. The NPPF confirms this at paragraph 84 when it states that “...when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...”. In considering the release of land from Green Belt it is therefore essential to consider what releases of land will achieve sustainable development while minimising the impacts on the purposes of Green Belt.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 4.7 The GBR identifies that the parcel plays a moderate role as, although urbanising features are limited and there is a sense of openness, the A56 dual-carriageway detracts from this openness in parts.
- 4.8 It is considered that the Site can be released from Green Belt for development without compromising this purpose. Parcel 39, along with the parcels P44 and P43 to the south respectively, would extend the developed area of Edenfield within the clearly defined boundary of the A56. Open countryside areas would remain surrounding the settlement to the west, north and east, checking unrestricted sprawl.

Purpose 2 - To prevent neighbouring towns merging into one another

- 4.9 The GBR considers that the role of P39 in this respect is weak. It notes that the settlements of Edenfield and Helmshore at this point are more than 2km apart with limited intervisibility. It notes that the parcel, along with neighbouring parcels, forms part of the settlement gap but it is not of critical importance and does not play an essential role in preventing the merging or erosion of the visual and physical gap between these settlements.
- 4.10 Peel supports this assessment and is in agreement that the development of this land does not have an important role in preventing towns from merging.

Purpose 3 - To assist in safeguarding the countryside from encroachment

- 4.11 The GBR found a sense of encroachment within the parcel as a result of the visual influence of the adjoining settlement edge to the east, and the presence of the A56 dual-carriageway which defines the western boundary, as well as a small row of terrace houses on the eastern boundary. The parcel contains areas of open agricultural land and displays some of the characteristics of the countryside. However, it is a narrow parcel located between the settlement edge and a large road; consequently it lacks a strong and intact rural character. For these reasons its contribution was considered moderate.
- 4.12 This assessment is supported by Peel; the Site itself sits between the development along Blackburn Road and the A56, in an area which is not of rural character.

Purpose 4 - To preserve the setting and special character of historic towns

- 4.13 The GBR recognised that P39 did not make any contribution to this purpose. As, in practice it would have little to no intervisibility with the historic settlements of Ramsbottom and Rawtenstall Town Centre. The openness of the land within the parcels was not considered to be important to setting or historic significance.

- 4.14 Peel agrees with this assessment.

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 4.15 The GBR notes that all parcels make an equally significant contribution to this purpose.
- 4.16 The DLP proposes to optimise the re-use of brownfield sites to meet development needs and in doing so support ongoing urban regeneration.
- 4.17 As noted above, and in the overarching representation, the supply of deliverable brownfield land is insufficient to deliver the number and type of new homes and employment land required. As such, the extent of urban regeneration which can be achieved is not enough to meet Rossendale's sustainable growth needs and must be accompanied by development on Green Belt land. Exceptional circumstances to justify Green Belt release have been proven through the Greater Manchester Spatial Framework. The release of land from the Green Belt will not therefore undermine this purpose.

Degree of Harm and Mitigation

- 4.18 The GBR concludes that in proposing the release of this parcel for development there would be a 'Medium' degree of harm to the Green Belt. It notes that its release *'would not relate well to the existing settlement form and would introduce an element of sprawl to the north-western edge of Edenfield and along the B6527 (Blackburn Road). However, it is considered that the strategic release of the neighbouring parcels P44 and P43 to the south, before parcel P39 may not be perceived as sprawl as the development would be contained by a strong boundary (the A56), which would limit the potential for future sprawl. The planned release of parcel P44, P43 and P39, in that order, could be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between the A56 and the linear settlement along Market Street. This could create a stronger Green belt boundary and settlement edge.'*
- 4.19 The intentions of this proposed mitigation are understood and it is noted that the DLP allocation requires a masterplan approach to be taken, which is discussed earlier in this document.

Green Belt Appraisal Conclusion

- 4.20 The strategic purpose of this area of Green Belt is to provide separation between Haslingden and Rawtenstall in the north/ north west from Edenfield to the south (with Ramsbottom/ Bury urban area beyond).
- 4.21 The site does not perform a strategic Green Belt function. Its development would not result in encroachment into the wider countryside which surrounds Edenfield. The A56 effectively separates the village from the more open countryside to the west and is a prominent urban feature.
- 4.22 It would not result in urban sprawl or lead to the merger of separate settlements and would not reduce the gap between existing settlements. It would not have a significant impact on ongoing urban regeneration. In fact by providing for good quality family housing including elements of aspirational housing the development of this land would

support the ongoing economic regeneration of Rossendale, and that the proposed boundary will provide a long term defensible Green Belt boundary – built development to the east; Church Lane to the south; the A56 to the west; and a field boundary to the north that can be strengthened with additional landscaping.

- 4.23 It is considered that this Site is suitable for development and is in a highly sustainable location. Its release from the Green Belt will therefore contribute to a sustainable pattern of development which makes the most of proximity to nearby highway infrastructure. There are therefore clear exceptional circumstances to justify its release from the Green Belt.
- 4.24 Peel strongly supports the allocation as proposed in the DLP.

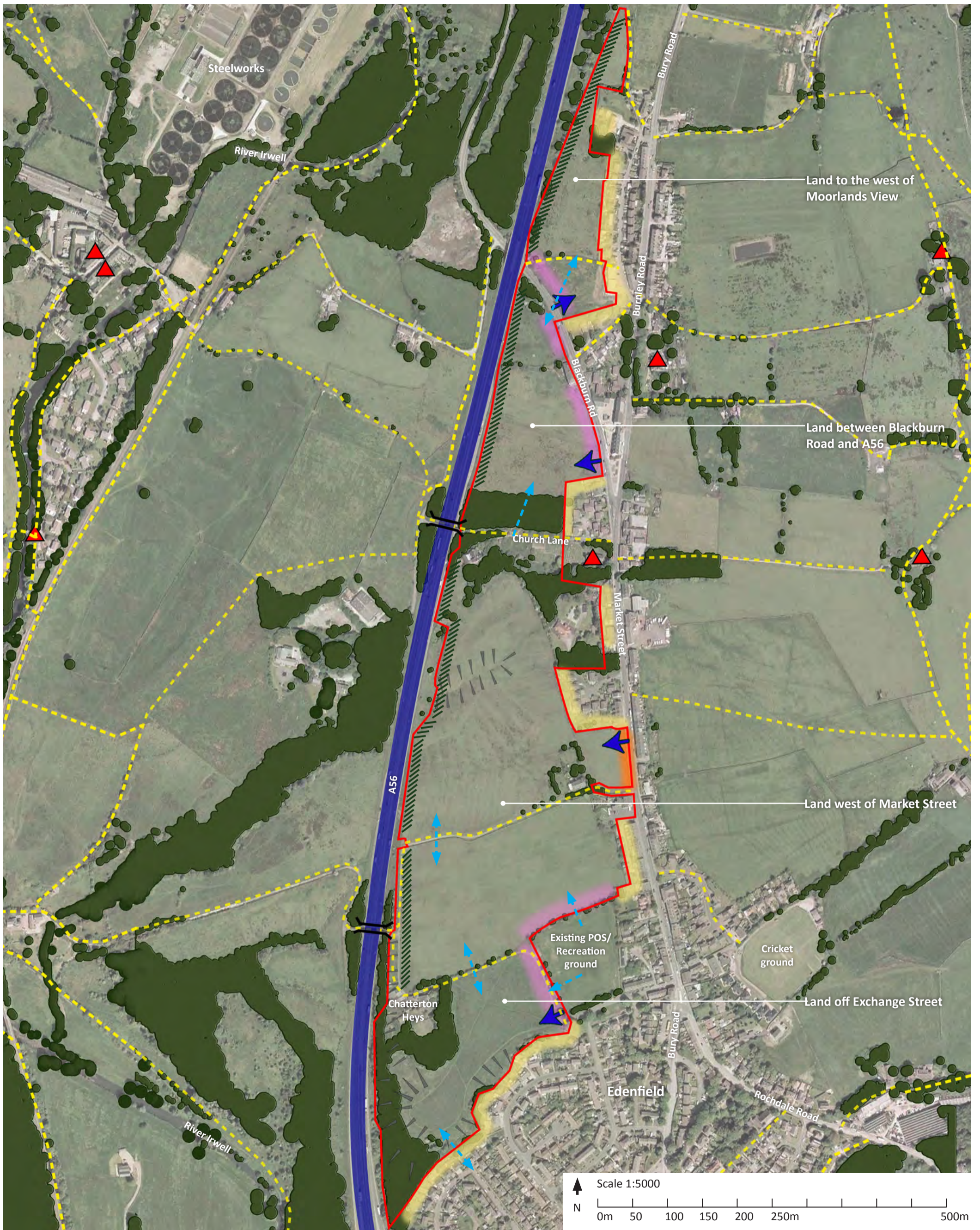
5. Conclusion

- 5.1 In relation to Peel's land interests in the Borough, this document concerns one of four sites which have been subject of previous Development Frameworks and representations in the context of the Local Plan development. Updates to these frameworks will be provided to RBC in due course, setting out a clear vision and proposals for the development of these sites.
- 5.2 This representation provides an initial review of the development opportunity at Blackburn Road, Edenfield, including details of the site and its location, consideration of the site in the Strategic Housing Land Assessment (SHLAA) and planning policy; and a Green Belt appraisal, commenting on the findings of the Green Belt Review which forms part of the evidence base to the DLP
- 5.3 Peel would welcome discussions with RBC and other stakeholders regarding the emerging Local Plan and the merits of the sites promoted for residential development.
- 5.4 The site is within the HS3: Edenfield DLP housing allocation, proposed for release from Green Belt. Peel is preparing an updated Development Framework to illustrate the development opportunity. Peel is committed to working with the other landowners within the allocation as required by the policy and in order to achieve quality in placemaking.
- 5.5 **Peel strongly supports the designation of land at Blackburn Road as a housing allocation.**

Appendix 1: Edenfield Allocation Constraints and Opportunities Plan

Turley
1 New York Street
Manchester
M1 4HD

Turley



KEY:

	Draft housing allocation boundary
	Existing Public Right of Way
	Existing vegetation
	Listed buildings
	Bridge
	Steep slopes
	A56 Source of noise

	Respect break in development and views to high land
	Housing backing on to site
	Positive frontage
	Noise buffer along A56 interface as required
	Potential highway access
	Potential footpath links

Date: 04.10.2017
 Drawn by: CD
 Checker: JF
 Rev by: CD
 Rev checker: JF
 QM Status: checked
 Product Status:
 Client Review

**North West
Edenfield Local Plan
Representations**

Opportunities and Constraints

Drwg No: 610C-01B Scale: 1: 5000 @ A3

Mr & Mrs B Scholes

Whitewell Bottom
Rossendale

Contact telephone number:

To whom it may concern,

We own the sites SHLAA 16144 and 16143, they form part of the garden of our home, , Whitewell Bottom

We would like consideration be given to have the easterly edge of area 16144 be included in to 16143 as to extend the westerly section of 16143 due to the edge of 144 being a flat area of land behind the tree covered westerly area of 143.

Enclosed are very rough drawings of the proposed alteration along with illustrations of the topography and the overlap of the two current areas.



Map of 16143 from planning document



Map of 16144 from planning document

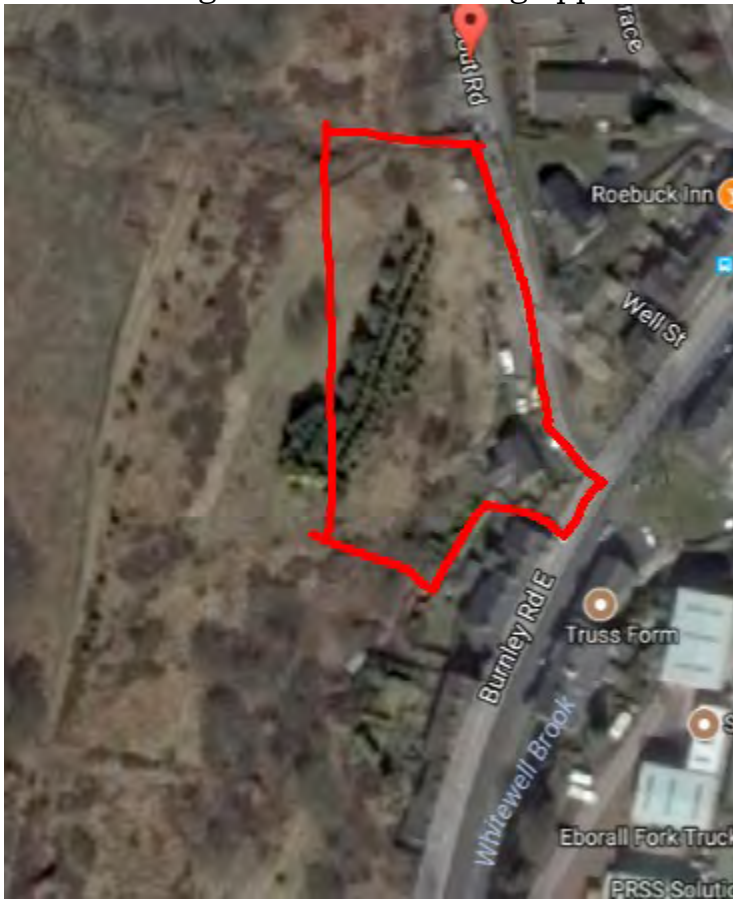


Overlap of the two areas.

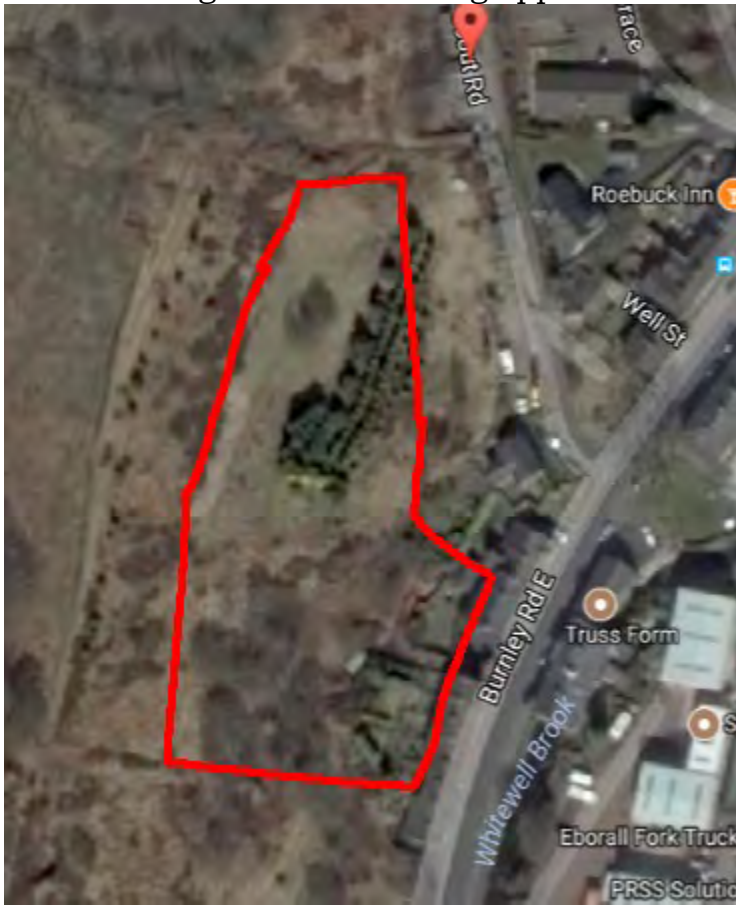
Illustration to show the location of flat land in the two areas.



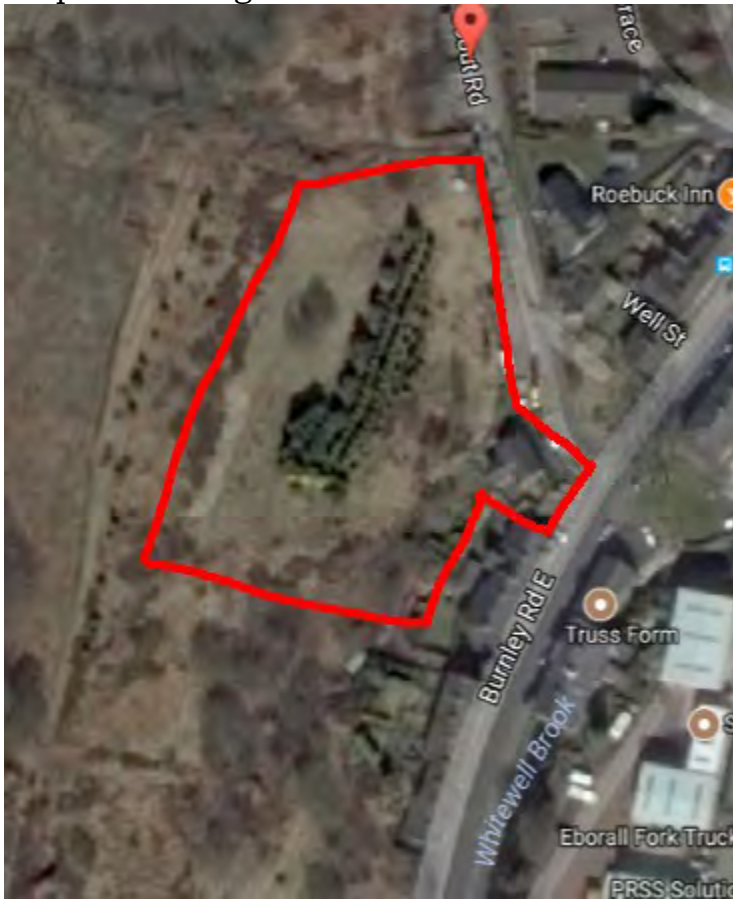
Satellite image with area showing approximate current SHLAA 16144



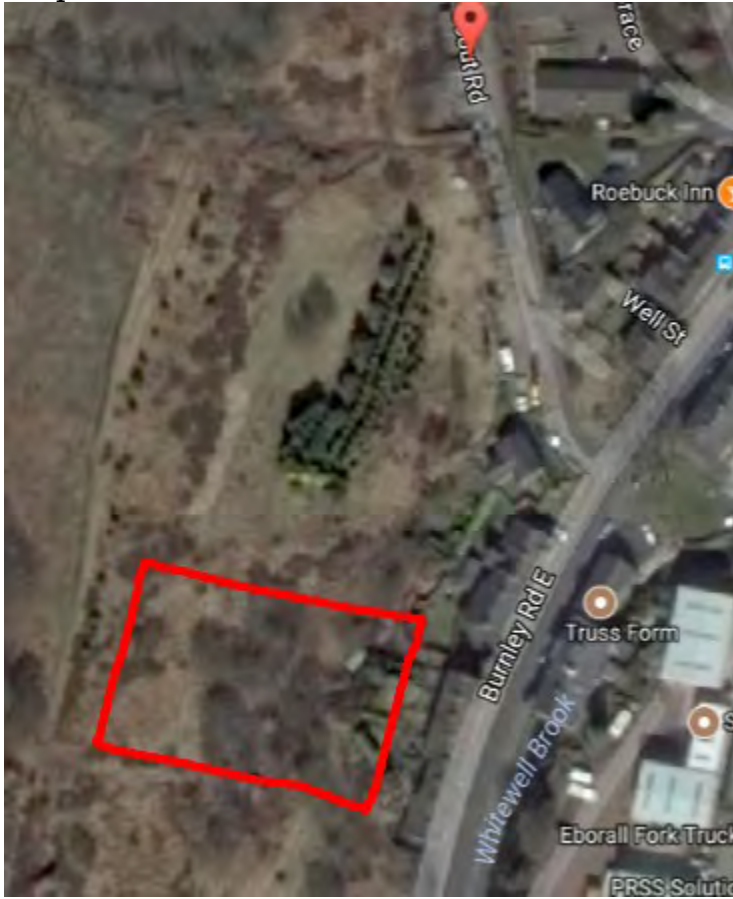
Satellite image of area showing approximate current SHLAA 16143



Proposed change to area 16144 to include flat area to the west.



Proposed new area for 16143



Land off Burnley Road, Loveclough

Flood Risk, Ground Conditions and Drainage Appraisal

Curtins Ref: 066277-CUR-00-XX-RP-001

Revision: 03

Issue Date: 06 October 2017

Client Name: Mr J Malik

Client Address:

Site Address: Land off Burnley Road, Loveclough BB4 8RY

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Rev	Description	Issued by	Reviewed	Date
00	Draft Issue	SB	RO	2/10/2017
01	Draft update following receipt of topo	SB	RO	3/10/2017
02	Update site area and final issue	SB	RO	6/10/2017
03	Further update	SB	RO	9/10/2017

This report has been prepared for the sole benefit, use, and information for the client. The liability of Curtins Consulting Limited with respect to the information contained in the report will not extend to any third party.

Author	Signature	Date
Stuart Baker Associate		9/10/2017

Reviewed	Signature	Date
Richard Osbond Technical Director		9/10/2017

Proposals contained or forming part of this report represent the outline design intent and may be subject to alteration or adjustment in completing the detailed design for this project. Where such adjustments are undertaken as part of the detailed design and are deemed a material derivation from the intent contained in this document, prior approval shall be obtained from the relevant authority in advance of commencing such works.

Where the proposed works, to which this report refers, are undertaken more than twelve months following the issue of this report Curtins shall reserve the right to re-validate the findings and conclusions by undertaking appropriate further investigations at no cost to Curtins.

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Figure 2 : Google Earth Aerial Photograph

Figure 3 : Environment Agency Flood Mapping for Planning (River & Sea)

Figure 4 : Environment Agency Flood Mapping Risk of Flooding from Surface Water

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Table 1 : NPPF Flood Zones

Table 2 : NPPF Flood Risk Vulnerability Classification

Table 3 : NPPF Flood Risk Vulnerability and Flood Zone 'Compatibility'

Appendix

SHLAA Appraisal

Land registry Plan Showing Site Extent and Watercourse Sinks and Issues Locations

Topographical Survey

United Utilities Sewer Mapping

Brewster Bye Architects Masterplan

Microdrainage Qbar and Attenuation Calculations

Outline Drainage Strategy Sketch 066277/SK01

1.0 Introduction

1.1 Project Background

1.11 Curtins have been appointed by Mr J Malik via his planning consultant Indigo Planning to undertake a high level Flood Risk, Ground Conditions and Drainage Appraisal of land of Burnley Road, Loveclough for representation of housing allocation through the emerging Rossendale Local Plan.

1.2 Scope of Flood Risk, Ground Conditions & Drainage Assessment

1.21 In order to support the land allocation for housing, the flood risk and drainage section of this report is generally prepared following the standing advice and requirements of the Environment Agency for Flood Risk Assessments as outlined in the Communities and Local Government National Planning Policy Framework (NPPF) in conjunction with the supporting Technical Guidance Document. This takes into account the new SuDS guidance as of 6th April 2015 and the formation of Lead Local Flood Authorities (LLFA's) of which Loveclough falls within Lancashire County Council LLFA control.

1.22 In addition, a desk top study of ground conditions has been carried out to determine the anticipated ground conditions of the site with respect to potential land contamination and ground stability hazards.

1.23 The matters assessed forming the basis of this report are:

- Identifying the NPPF flood risk zone classification from Environment Agency online flood mapping
- Identifying flood risk from other sources from Environment Agency online flood mapping
- Investigating and reviewing of additional flood information available, for example from Local Authority Strategic Flood Risk Assessments, Surface Water Management Plans
- In respect to the ground conditions a summary of the site history, underlying geology, hydrogeology, hydrology, ground gas and the consideration of the potential contamination and ground hazard risks.
- Investigating any other secondary flood risks associated with the type of development
- Considering risks with providing new drainage to the site
- Consider risks associated with ground works upon site
- Assess likely surface water discharge points and best areas for attenuation
- Assess availability of local public foul water sewers.

1.3 Land Allocation Proposal

1.31 The SHLAA appraisal (see copy in the Appendix) identifies the site area as more than 50% in flood zone 2 or affected by medium surface water flood risk , or more than 10% in flood zone 3 or affected by high surface water flood risk.

1.32 This report seeks to address the SHLAA assessed flood issues in order to demonstrate the suitability of the land off Burnley Road, Loveclough is suitable for residential development in terms of flood risk.

2.0 Existing Site Details

2.1 Site Location, History and Current Use

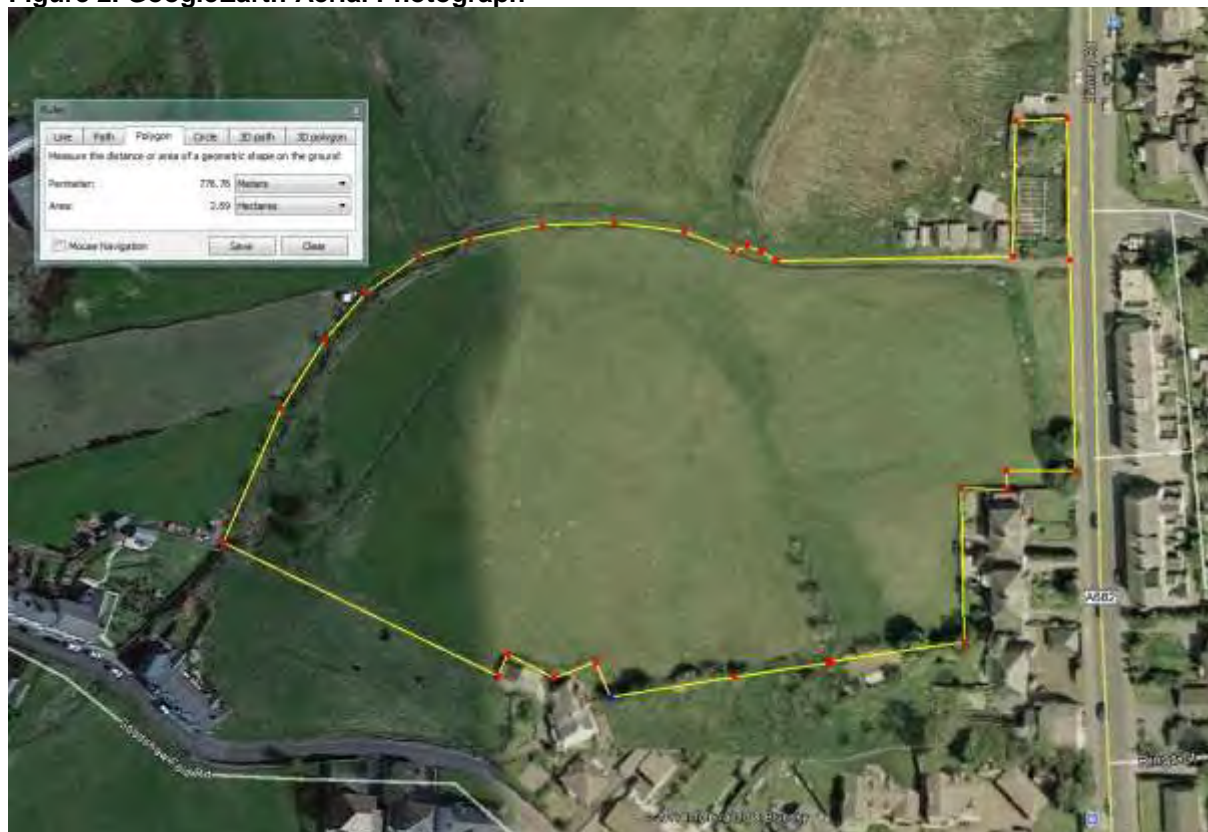
- 2.11 The site is located to the west of Burnley Road in Loveclough, approximately 4 km to the north of Rawtenstall, Rosendale, Lancashire.
- 2.12 The site has an approximate Ordnance Survey grid reference of SD8111526666 and an approximate postcode of BB4 8RY.
- 2.13 The site location is shown figure 1 shown approximately outlined **RED**:-

Figure 1. Location Plan



- 2.14 The site covers an area of approximately 2.7 hectares (measured using GoogleEarthPro).
- 2.15 The general site area is greenfield in nature consisting of grazing fields (observed 28th September 2017).
- 2.16 The following GoogleEarth imagery in figure 2 shows the site area in its current state with the site area measured:-.

Figure 2. GoogleEarth Aerial Photograph



2.2 Existing Watercourses

2.21 An existing shallow (circa 500 mm deep) watercourse is present on the site. It issues at the south east corner and routes along the southern boundary before running northwards into the centre of the site. At this point it 'sinks' as marked on the Ordnance Survey map contained in the Appendix. The topographical survey identifies a 225 mm diameter pipe at the 'sink' location.

2.22 The watercourse 'issues' again to the north of the site where the topographical survey records a 400 mm diameter pipe. It is assumed given the running water that there is connectivity between the 225 mm inlet pipe and the 400 mm outfall pipe. From here the watercourse is of relatively wide and deep section and flows around the north and west boundary of the site.

2.3 Topography

2.31 A full topographical survey has been completed of the site and land just outside of the surrounding boundaries.

2.32 A marked up copy of the topographical survey is contained in the Appendix showing the approximate site boundary, contour levels, extent of open watercourse and an approximation of the likely route of the pipe assumed to connect the 'sinks' and 'issues'.

3.0 Development and Flood Risk

3.01 Flood risk for allocation purposes will be assessed following the general requirements of the NPPF which are detailed below.

3.1 National Planning Policy Framework (NPPF)

3.11 In March 2012 the Department of Communities and Local Government superseded PPS 25 with the NPPF. A technical guidance report is provided covering flood risk and minerals policy. The NPPF has been revised as of April 2015 to promote the use of SuDS drainage within schemes.

3.12 The NPPF sets out inappropriate development in areas at risk of flooding be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. For these purposes:

- areas at risk of flooding' means land within flood zones 2 and 3; or land within flood zone 1 which has critical drainage problems and which has been notified to the local planning authority by the Environment Agency
- 'flood risk' means risk from all sources of flooding – including from rivers and the sea, directly from rainfall on the ground surface and rising ground water, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

3.13 The Sequential and Exception Test - The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. The flood zones are the starting point for the sequential approach. These flood zones refer to the probability of sea and river flooding only, ignoring the presence of existing defences.

3.14 Strategic Flood Risk Assessments (SFRA) refine information on the probability of flooding, taking sources of flooding and the impacts of climate change into account. These provide the basis for applying the Sequential Test on the basis of the flood zones in table 1. Where table 1 indicates the need to apply the Exception test, the scope of the SFRA will be widened to consider the impact of the flood risk management infrastructure on the frequency, impact, speed of onset, depth and velocity of flooding within flood zones considering a range of flood risk management maintenance scenarios. Where a SFRA is not available, the Sequential Test will be based on the Environment Agency flood zones.

3.15 The overall aim should be to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, local planning authorities allocating land in local plans or determining planning applications for development at any particular location should take into account the flood risk vulnerability of land uses (see table 2) and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required (see table 3). Only where there are no reasonably available sites in Flood Zones 1 and 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception test if required.

3.2 Table 1 Flood Zones (Extract from NPPF)

(NOTE: these flood zones refer to the probability of river and sea flooding ignoring the presence of defences)

Zone 1 Low Probability

Definition

This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1%)

Appropriate Uses

All uses of land are appropriate in this zone

Zone 2 Medium Probability

Definition

This zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year.

Appropriate uses

Essential infrastructure and the water-compatible, less vulnerable and more vulnerable uses of land as set out in table 2, are appropriate in this zone. The highly vulnerable uses are only appropriate in this zone if the Exception Test is passed.

Zone 3a High Probability

Definition

This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year

Appropriate uses

The water compatible and less vulnerable uses of land (table 2) are appropriate in this zone. The highly vulnerable uses should not be permitted in this zone.

The more vulnerable uses and essential infrastructure should only be permitted in this zone if the Exception Test is passed. Essential infrastructure permitted in this zone should be designed and constructed to remain operational and safe for users in times of flood.

Zone 3b The Functional Flood Plain

Definition

This zone comprises land where water has to flow or be stored in times of flood.

Local planning authorities should identify in their SFRA areas of functional flood plain and its boundaries accordingly, in agreement with the Environment Agency. The identification of functional flood plain should take account of local circumstances and not be defined solely on rigid probability parameters. But land which would flood with an annual probability of 1 in 20 (5%) or greater in any year, or is designed to flood in an extreme (0.1%) flood should provide a starting point for consideration and discussion to identify functional flood plain.

Appropriate uses

Only the water-compatible uses and essential infrastructure listed in table 2 that has to be there should be permitted in this zone. It should be designed and constructed to:

- remain operational and safe for users in times of flood
- result in no net loss of flood plain storage
- not impede water flows, and
- not increase flood risk elsewhere

Essential infrastructure in this zone should not pass the Exception Test.

3.3 Table 2 Flood Risk Vulnerability Classification (Extract from NPPF)

Essential Infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.
- Wind turbines.

Highly Vulnerable

- Police stations, Ambulance stations and Fire stations and command centres and telecommunications required during flooding.
- Emergency dispersal points.
- Basement dwellings,
- caravans, mobile homes and park homes intended for permanent residence.
- Installations requiring hazardous substance consent.

More Vulnerable

- Hospitals.
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.
- Buildings used for: **dwelling houses**; student halls of residence; drinking establishments; nightclubs; and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill and sites used for waste management facilities for hazardous waste
- Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

Less Vulnerable

- Police, ambulance and fire stations which are *not* required to be operational during flooding.
- Buildings used for: shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non-residential institutions not included in 'more vulnerable'; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).

Water-Compatible Development

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel workings.
- Docks, marinas and wharves.
- Navigation facilities.
- MOD defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to specific warning and evacuation plan.

Table 3 Flood Risk Vulnerability and Flood Zone ‘Compatibility’

	Flood Risk Vulnerability classification	Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception test Required	✓	✓
	Zone 3a	Exception test Required	✓	x	Exception Test Required	✓
	Zone 3b functional floodplain	Exception test Required	✓	x	x	x

✓ Development is appropriate x Development should not be permitted

3.4 Site Specific NPPF Flood Risk Categorisation

3.41 To assess the NPPF flood risk classification for the site, the first step is to inspect the Environment Agency web based flood mapping data. An extract shown in Figure 3 with the site area outlined **red**.

Figure 3. Extract of Environment Agency Flood Map for Planning (Rivers and Sea)



3.42 It can be seen from the mapping that the full area of the site is clear of any blue and turquoise shaded sections noted on the key as Flood Zone 2 and Flood Zone 3.

3.43 The dark blue line identified to the west where the flood risk areas are present relates to the Limy Water which is classified as main river under the control of the Environment Agency.

3.44 On the basis all of the site falls within the white (unshaded) areas, for the purposes of planning, this confirms the site to be classified as Flood Zone 1 Low Risk and suitable under NPPF classification for development and thus allocation for housing.

3.45 Referring to Table D1, Flood Zone Classifications from NPPF, this site comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%) and therefore all uses of land are appropriate in this zone.

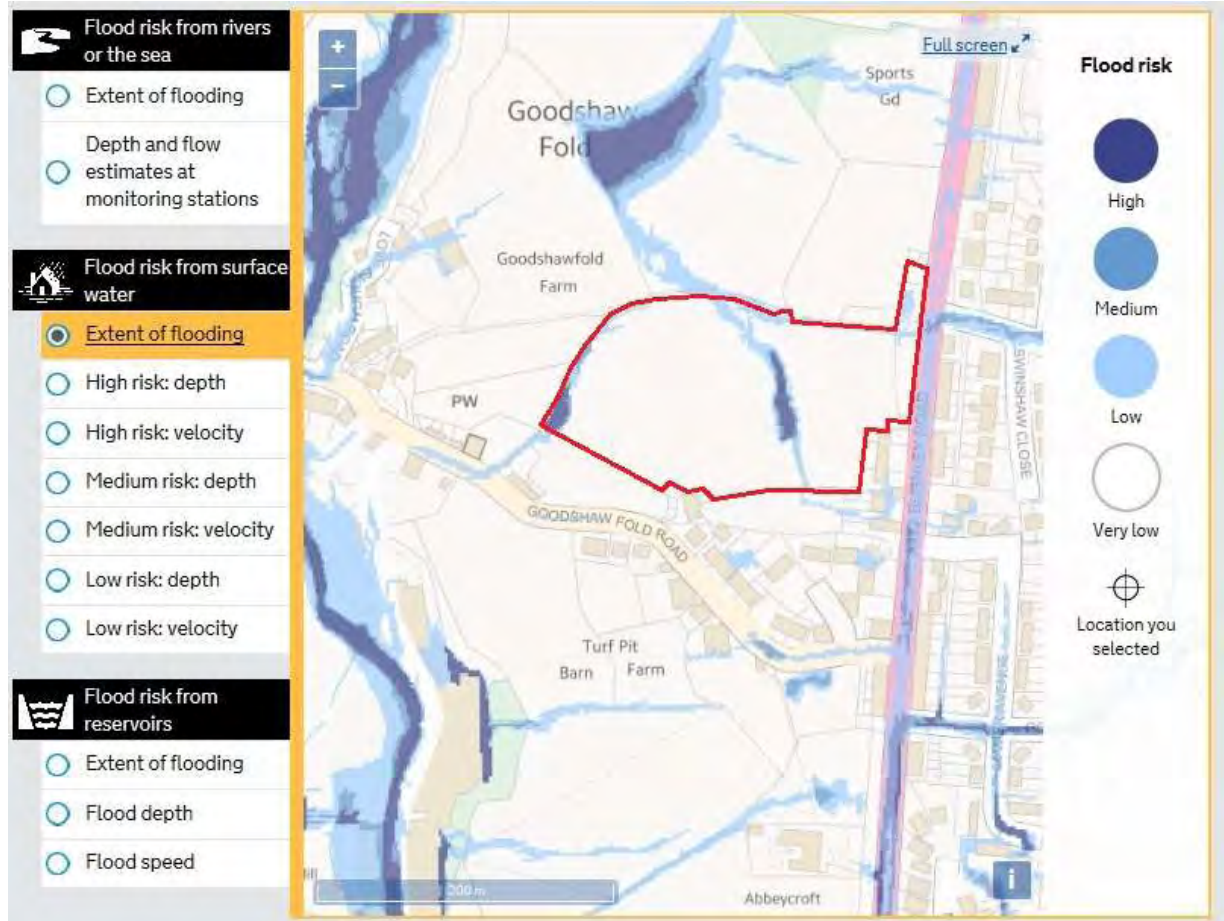
3.5 Sequential and Exception Tests

3.51 As the site area is located wholly within a Flood Zone 1 low risk area, the Sequential Test and Exception Tests should not be required to be undertaken if a planning application was to be progressed.

3.6 Flood Risk Environment Agency Surface Water Flood Risk Mapping

3.61 The Environment Agency provide additional flood risk mapping on their website to compliment the Flood Maps for Planning Maps with the primary one being surface water flood risk mapping. An extract of the surface water flood risk mapping showing the site outlined red follows in Figure 4.

Figure 4. Environment Agency Mapping – Flood risk from surface water – Extent of Flooding



- 3.62 Two tracks of surface water risk are identified by the mapping. The area of greater risk tracks along the route of the central watercourse with the higher risk being identified around the area of the 'sinks'. A second track of lower risk runs to the north and west boundary where the main watercourse is present, which can be regarded as surface water running off Burnley Road at the vehicle access point.
- 3.63 The proposed layout for the site will have to take account of these likely overland flow routes, in particular the one relating to the on-site watercourse (and assumed culvert).
- 3.64 Assuming mitigation methods are put in place to convey these surface water routes through new development and building levels are set accordingly so that they are safe should these flows occur, the overall risk is considered **LOW**.

3.7 Rossendale B. C. Level 1 - Strategic Flood Risk Assessment – May 2009

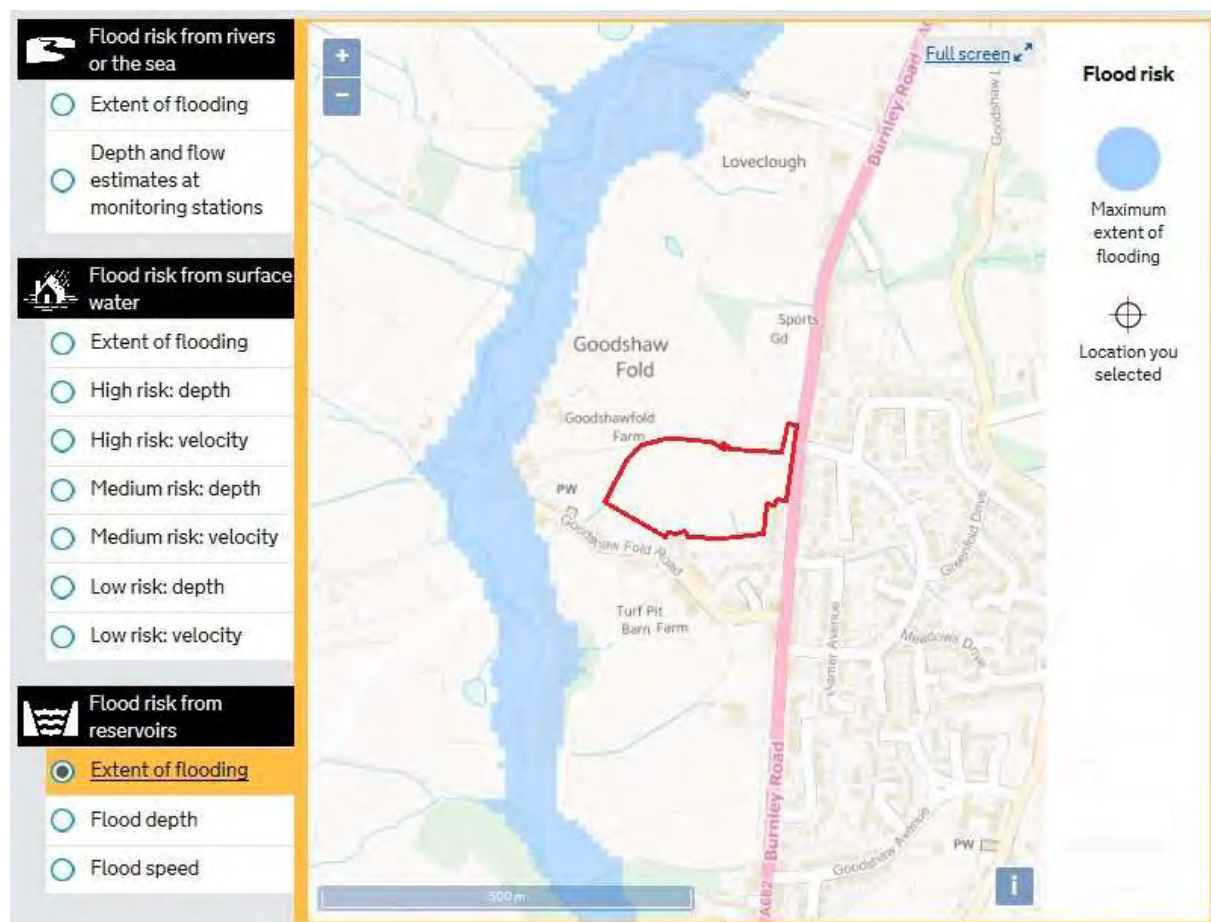
- 3.71 A review of Rossendale B. C. Level 1 - Strategic Flood Risk Assessment dated May 2009 has been carried out and nothing has been found to contradict the findings of the current Environment Agency data.
- 3.72 On the basis that the final issue of the SFRA was released in 2009 and that the Environment Agency have made significant advances in the level of detail and accuracy of their flood mapping, for the purpose of this initial assessment it is assumed that the current Environment Agency's online data takes precedence.

3.8 Secondary Flood Risks

- 3.81 It is an important part of a flood risk assessment to consider any other secondary flood risks not assessed in the preceding paragraphs.
- 3.82 Flooding from new residential drainage can present risk. This can be mitigated by design to modern standards (Sewers for Adoption, British Standards and Building Regulations) and utilising appropriate SuDS measure that will ensure new development proposals do not increase flood risk either to the site itself or others both upstream or downstream. The risk is therefore considered **LOW**
- 3.83 Surface water run off from adjacent areas can be another secondary flood risk issue. This has been considered in the preceding section regarding surface water flooding and is generally considered **LOW** as long as mitigation measures are put in place to deal with the existing routings identified to the central watercourse and the northern boundary.
- 3.85 Ground water can present a flood risk. For housing on steeply sloping sites with underlying impermeable or fractured rock, localised flood risk from water not being able to percolate into the ground and rising as springs and thus creating flows of water at surface level can be an issue. Assuming suitable land drainage is put in place to convey any such waters away from the proposed properties the risk is considered **LOW**.
- 3.86 Catastrophic failure of reservoirs can present flood risk to properties with downstream valleys. The Environment Agency provide mapping identifying areas at risk, albeit the risk is generally considered

extremely low. An extract of the mapping with the site outlined **red** is contained in Figure 5.

Figure 5. Environment Agency Mapping – Flood Risk from Reservoirs – Extent of Flooding



3.9 Flood Risk Summary

3.91 Primary, Surface Water and Secondary flood risks, are all considered to be **LOW** assuming suitable mitigation measures are designed and installed to reduce the risk from existing surface water flow routes and ground water.

4.0 Ground Conditions

4.01 Prior to assessing drainage strategy for the site, a desktop study of ground conditions has been undertaken, providing a geo-environmental overview for the site geology, hydrogeology, hydrology, and historical land use.

4.02 A Summary of Ground Conditions report sheet is contained in the Appendix of this report, with the main points presented below.

4.1 Historical Site and Surrounding Site Use

- 4.11 The site is occupied by fields from the earliest available mapping (1850s) with evidence of a water course that, on later mapping, is illustrated as the alignment of the issue. A small farm outbuilding is noted within the far south-eastern corner of the site in the late 1800s and no longer present from the early 1900s onwards.
- 4.12 The immediate surrounding area has historically been occupied by residential houses to the east, south and south-west and open fields to the west and north. A coal staith is noted immediately north of the site in the early 1900s. The surrounding site area has historically been occupied by agricultural land and disperse mills (Cotton) and small collieries. Significant expansion of Loveclough is noted in the post-WW2 era with extensive residential expansion to the east of the site.

4.2 Geology

- 4.21 Given the limited development on the subject site, the potential for Made Ground deposits are unlikely, with Topsoil considered to overlie the superficial deposits.
- 4.22 Superficial deposits consist of Till deposits comprising clay to sandy clay, unsorted with common gravel, cobbles and some boulders.
- 4.23 Bedrock deposits consist of Rough Rock Formation comprising a coarse grained feldspathic sandstone that is cross-bedded. Bedrock deposits are recorded dipping at around 3 degree north-west locally to the site. The Subcrenatum Marine Band is recorded cropping around 50 m east of the site that, on the Coal Authority Interactive Mapping, is recorded as a coal seam. With reference to the geological succession, the Six Inch Coal seam is indicated to underlie the site, potentially at shallow depths (within 40 m of the surface).
- 4.24 No evidence of mining activity is recorded on the historical mapping or Coal Authority Interactive Mapping website with the nearest evidence of mining noted east of Loveclough (mine entries and recorded workings). A coal staith is recorded immediately north of the site on historical mapping (early 1900s) however this is

4.3 Ground Gas

- 4.31 No recorded landfills within 250m of the site.
- 4.32 With reference to the UK Radon Atlas, between 3 and 5 % of properties are above the Radon action limit. The provision of basic radon protection measures may be necessary within the proposed development the exact classification of which should be verified through procurement of a BGS Radon report.

4.4 Hydrogeology and Hydrology

- 4.41 The superficial deposits are designated as a Secondary Aquifer – Undifferentiated whilst bedrock deposits

(Rough Rock) are designated as a Secondary A Aquifer. The subject site is not within a groundwater Source Protection Zone.

- 4.42 The site is located within the catchment of Limy Water (small river) that itself is located approximately 150 metres west of the site. Frequent surface water drainage channels (streams, issues, drains) are noted within the immediate surrounding area and on the site, an issue is recorded within the site's south-eastern corner. The issue drains due west before diverting in a north-westerly direction that is continued across the full width of the site. Mapping records record this channel as a surface water feature however during site reconnaissance it was noted that the channel flows underground along its middle portion (on site stretch) before re-surfacing as a separate below-ground issue (audible flowing water) and then sinking once again before traversing the site boundary. In general, the site surface was noted to be 'boggy' and damp underfoot with reed growth noted throughout the majority of the site, the exception being along the alignment of the water course. With reference to the available information, it is considered likely that the water course is natural and flowing within shallow bedrock deposits present beneath the site. The water course is serving to locally drain the site that is generally 'damp' and subject to shallow seepage flows arising from the higher elevations to the east (under Burnley Road, A682).

5.0 Drainage Impact Assessment

5.1 Existing Drainage

- 5.11 United Utilities sewer mapping shows a 375 mm diameter combined sewer running north to south below the carriageway of Burnley Road. Short lengths of connecting sewers are shown for the adjacent houses but no sewers are shown present upon the site.
- 5.12 A watercourse is evident to the south of Swinshaw Close east of Burnley road, and then the site watercourse is apparent from the rear of 968 Burnley Road in the south east corner of the site. The watercourse then routes through the site where it 'sink's and is suggested by the topographical survey to be culverted to where it 'issues' to the north west.

5.2 SuDS Surface Water Disposal Hierarchy

- 5.21 The NPPF and Building Regulations are specific on hierarchy for the disposal of surface water sewer from both new and re-development sites. Where ground conditions permit disposal should be via infiltration to the ground. Should this not be viable disposal should be to a watercourse or waterbody, and as a last resort to a sewer with preference over a surface water sewer rather than combined.
- 5.22 Site constraints of levels, ground conditions that do not suit infiltration and no available sewers mean that disposal of surface water will be to the watercourse (and assumed culvert) running through the site thus mimicking the existing scenario.

5.3 Options for Surface Water Drainage

5.31 The surface water collected from the new housing development as shown on Brewster Bye Architects masterplan (copy in Appendix) is likely to be made up of run-off from the following elements:-

- Roofs – Roof water will typically discharge from gutters to rain water pipes (RWP's) to a below ground piped surface water system, designed in accordance with BS EN 752:200
- Site access roads, roadside footways, driveways and other hard landscaping's - run-off from these paved areas shall be collected by road gullies and/or channel drains into the piped surface water system adopted under a Section 104 Water Industry Act agreement. Levels of water quality treatment, where possible using suitable SuDS methods, should be employed within the drainage system to reduce the risk from hydrocarbon pollution to the river.

5.32 NPPF and LLFA requirements stipulate that surface water run off will be required to mimic the existing scenario. In the case of this site run off rates from allocated housing development will be required to be controlled to as close to greenfield run off rates as practically possible.

5.33 It is assumed the watercourse running centrally through the site both in open channel (and assumed culvert) can be routed through the proposed housing layout and used as a disposal point for the site drainage. Details of how this can be achieved is shown upon the Brewster Bye Architects masterplan

5.4 Greenfield Run Off Rate (Qbar)

5.41 Microdrainage Source Control has been used to calculate the greenfield run off for the site. Microdrainage Source Control suggests a Qbar of 32 litre/second (l/s). Copies of the outputs are contained in the Appendix.

5.5 Typical Attenuation Requirements

5.51 As an estimate of attenuation requirements for the overall site area to mimic greenfield run off, the following has been assessed; -

- Site Area approximately = 2.7 hectares
- Assuming 50% developable area so 2.7 Ha x 0.5 = 1.35 Hectares
- Qbar from Microdrainage Output 32 l/s
- Attenuation requirements assessed using Microdrainage Quick Storage Estimate for 100 year plus 30% climate change events for 32 l/s:-
= 496 m³ to 822 m³ , therefore approximately **650m³** of attenuation required.

5.52 The topography of the site and the watercourse running through the site suggests that open attenuation basins distributed through the site to be most suited to both provide the volume of attenuation needed and also to provide the levels of SuDS treatment also required.

5.53 Curtins have worked with Brewster Bye Architects to develop a site masterplan which suits the topography and drainage constraints of the site. The outline drainage strategy sketch provided in the Appendix using

the masterplan as a base and gives an indication of how drainage could be networked around the site and the overall volume of attenuation required split around the site. At detailed design stage it may be possible to combine the attenuation into one area to the wets of the site at the lowest point.

5.6 Options for Foul Water Drainage

- 5.61 With site levels falling away from Burnley road, it is assumed pumping will be required from the lowest point of the site.
- 5.62 An adoptable pump station compound is shown on the Brewster Bye Architects masterplan and the outline drainage strategy sketch with a rising main routing through the site to the public combined sewer in Burnley Road.

6.0 Conclusion and Recommendations

6.1 Conclusion

- 6.11 An assessment of flood risk, ground conditions and drainage has been conducted to address the flood risk level identified in the SHLAA assessment. The FRA has been conducted in line with the requirements of the NPPF and LLFA.
- 6.12 The Environment Agency Planning Flood Map shows the site area to be located in Flood Zone 1 thus flood risk to the site can be considered **LOW** from all primary sources.
- 6.13 Secondary flood risks including surface water flooding have also been assessed and the site is considered to be at **LOW** risk from all sources assuming existing flow routes through the site are acknowledged in the detail design as they currently are shown on the Brewster Bye Architects masterplan and Curtins indicative site drainage layout.
- 6.14 The potential risk presented by contamination on the site is considered to be **Very Low** given the limited development historically on-site and its immediate surrounding area.
- 6.15 The potential risk presented by mining (coal and sandstone) is considered to be **Low** on the basis of the following lines of evidence:
1. No recorded coal mine workings beneath the site;
 2. Only thin coal seams (Six Inch or Subcrenatum Marine Band) being recorded at shallow depth beneath the site and;
 3. Prevailing 'damp' conditions existing on site that would result in unfavourable conditions for shallow mining operations, e.g. day or bell pits.
- 6.16 Surface water and foul water drainage can be achieved without increasing flood risk to the site or others.

6.2 Recommendations

- 6.21 It is recommended that a ground investigation is undertaken across the site to: a) determine shallow ground conditions across the site; b) inform the civil and structural design and; c) investigate the nature

and condition of the distinct surface and underground water course present on site and potential design options for onward development.

- 6.22 In accordance with standard practice, detailed drainage design for both foul, surface water and the existing watercourse routing should be carried out to all British Standards, Building Regulations and Sewers for Adoption standards.. This should include liaison with United Utilities via the Developer Enquiry process with regards foul water drainage and the LLFA with regards to surface water and land drainage.

Appendix

SHLAA Appraisal

Land registry Plan Showing Site Extent and Watercourse Sinks and Issues Locations

Topographical Survey


United Utilities Sewer Mapping

Brewster Bye Architects Masterplan

Microdrainage Qbar and Attenuation Calculations

Outline Drainage Strategy Sketch 066277/SK01

GENERAL INFORMATION

Site Ref	SHLAA16216	Most Recent Source	Officer Suggestion	Site Gross Area (ha)	1.13	Map	
Site Name	Land off Burnley Road, Loveclough						
Greenfield versus Brownfield	Greenfield	Designations	None				
Site Location - Urban Area, Countryside or Green Belt	Countryside adjoining the urban area						
Current Land Use	Grazing land						
Characteristics of the site reducing the development area	High risk of surface water flooding						
Area available for development	1.03	Net Development Area (ha)	0.92	Density	30 dwellings per hectare		Crown Copyright. Licence no.: 100023294
Yield calculated	28	Yield proposed by applicant					

AVAILABILITY

Land ownership	multiple ownership
Comments	Private ownerships (3 Land Titles with various owners)
Intentions of landowner	intentions unknown or not willing to release the site
Comments	One of the landowner expressed an interest in releasing the site for residential development (phone call received 09.12.2016)
Legal constraints / ownership issues	no legal or ownership constraints known
Comments	

SUITABILITY

Topography	flat site or very gentle slope
Comments	The site slopes gently westward.
Vehicular access	good access or adjacent to road
Comments	Access off Burnley Road
Distance to strategic road network	greater than 5.5km (approximately 3.5 miles)
Comments	6.1km / 3.7 miles to A56/A682 junction
Access by public transport	high frequency bus service (half hourly or more frequent) within 400m (0.24 miles)
Comments	Within 100m of a bus stop with a half-hourly service (X43)
Access to primary school	access within 1.5km (approximately 1 mile)

Comments	870m to Crawshawbooth Primary School
Access to secondary school	access within 5km (approximately 3 miles)
Comments	3500m to Alder Grange Technology and Community School
Access to GP surgery	no access within 3km (1.8 miles)
Comments	3305m to nearest GP
Access to a local centre or convenience shop	access within 1.5km (approximately 1 mile)
Comments	800m to Pleasant View local store
Access to a park or play area	access within 300m (0.18 miles)
Comments	160m to nearest play area
Flood risk	more than 50% in flood zone 2 or affected by medium surface water flood risk, or more than 10% in flood zone 3 or affected by high surface water flood risk
Comments	About 10% of the site is at high risk of surface water flooding and less than 50% is at medium and low risk of surface water flooding
Ecological value	not located in or adjacent to a Biological Heritage Site, Local Geodiversity Site or Core Area or Stepping Stone areas
Comments	
Recreational value	no recreational value
Recreational value comment	Public right of way along the lane leading to Badgercote Allotment (not within the site)
Heritage assets	site does not contain or adjoin a Listed Building and site is not within or adjoins a Conservation Area
Comments	130m to Goodshawfold Conservation Area and 255m to Barn to the north east of Goodshawfold Farm
Landscape value	low landscape impact
Comments	
Land contamination	no known issues
Comments	
Mineral sterilisation	within low risk development area
Comments	
Land instability	no known issues
Comments	
Proximity to dangerous structures	not within any HSE consultation zones
Comments	

Bad neighbour **site in residential or retail area**

Comments

Constraints due to utilities **no known utilities infrastructure on site**

Comments

ACHIEVABILITY

Extra costs of development **if some extra costs required**

Comments Flood risk assessment.

Market are **high value market area (£190 to £210/sqm)**

Comments

CONCLUSION

Availability summary **Available in medium to long term**

Justification One of the land owner expressed an interest to release the site for development during a phone conversation, however the intentions of the remaining landowners are unknown. The site is considered available in the long term.

Suitability summary **Suitable now**

Justification The site slopes gently westward and is accessible via Burnley Road. It is situated 4.1 miles to a strategic road but has good access to a half-hourly bus service. Loveclough playing field and a convenience store are situated within walking distance. Other local services such as the primary school, secondary school, and GP surgery are situated further away but can be accessed by bus. The area at high and medium risk of surface water flooding (situated to the west near the Sinks identified on the OS map) has been excluded from the area available for development. However adequate drainage system is needed as the site contains a stream and a sink area as identified on the OS map. No other constraints have been identified, therefore the site is considered suitable for residential use.

Viability and achievability summary **Achievable in medium to long term**

Justification The site is situated within a high value market area. Extra costs have been identified (e.g. flood risk assessment) but the development is still considered viable. No developer has expressed an interest to develop the site therefore the deliverability is likely to be within the medium to long term.

Conclusion **Developable in the medium to long term (within 6 to 10 years, or after 10 years)**

Justification The site is not considered available now as not all the landowners have expressed an interest. The site is considered suitable and the development viable. The delivery is likely to be within the medium to long term as no developer has yet expressed an interest. Overall, the site is considered to be developable in the long term.

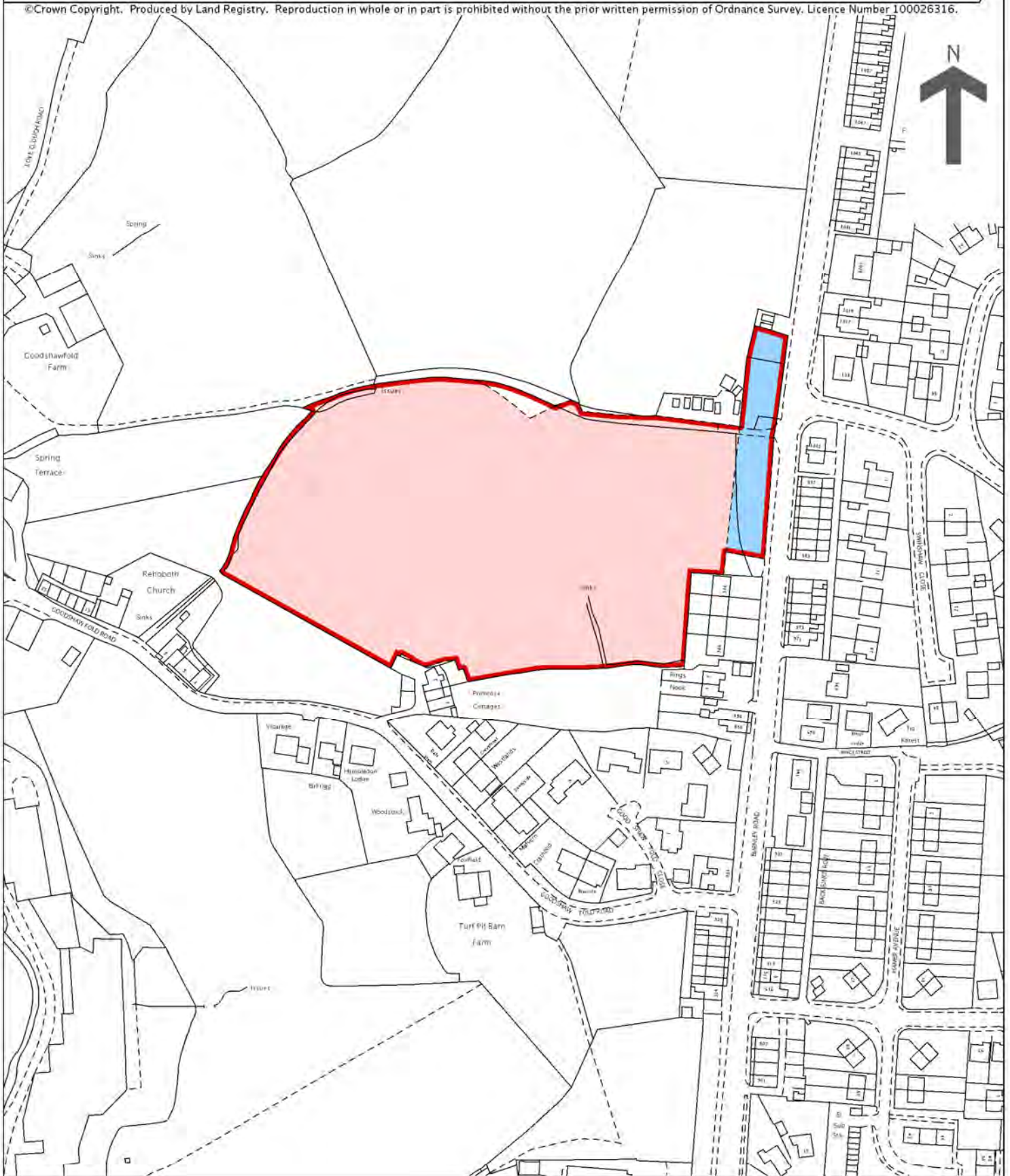
Delivery (next 5 years) Delivery (6 to 10 years) Delivery (11 to 15 years)

Land Registry Official copy of title plan

Title number **LAN54600**
Ordnance Survey map reference **SD8126NW**
Scale **1:2500**
Administrative area **Lancashire : Rossendale**



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Rev	Date	Drawn	Description	Check

Grid OS National Grid
 Using the OS GPS Network and applying OSTN02 transformation and then removing the scale factor for true distances with a one-step transformation centred on T1

Datum OS Level Datum
 Using the OS GPS Network and applying OSGM02 National Geoid Model to obtain local area corrections.



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 Leeds E: admin@metgeoenvironmental.com
 West Yorkshire W: www.metgeoenvironmental.com
 LS10 1SW

Station Listing

Station	Easting	Northing	Level
J1	381112.581	426651.728	257.847
J2	381025.759	426672.745	256.901
J3	380938.653	426666.960	248.085
T1	381162.346	426690.481	261.565
T2	381158.774	426632.730	260.182
T3	381155.223	426592.421	259.639
T1A	381168.927	426743.608	262.554
J1	381112.581	426651.728	257.847
J2	381025.759	426672.745	256.901
J3	380938.653	426666.960	248.085

Client
BREWSTER BYE ARCHITECTS LTD

Site
**LAND OFF BURNLEY ROAD,
 ROSSENDALE BB4 8QN**

Title
**TOPOGRAPHICAL
 SURVEY**

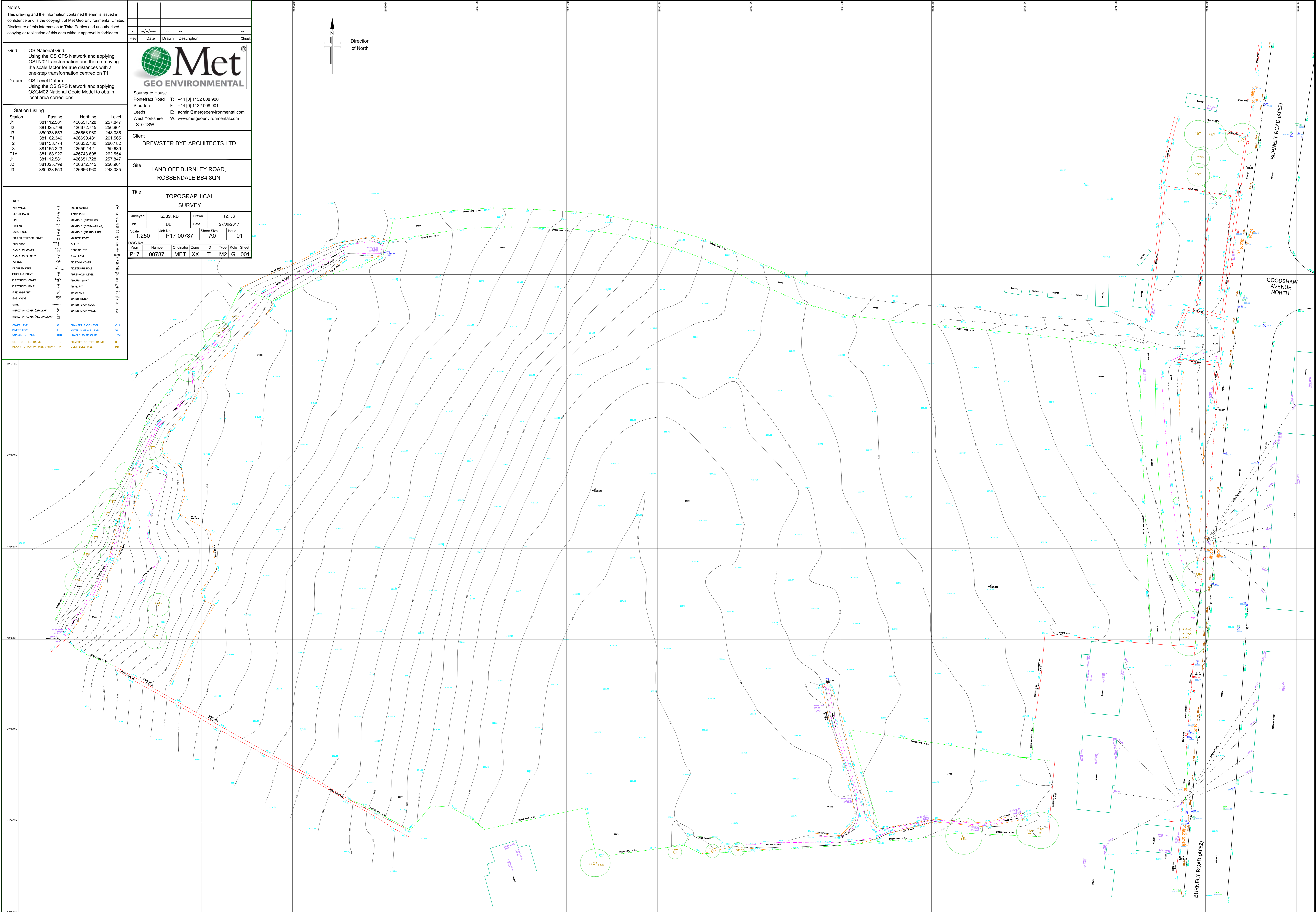
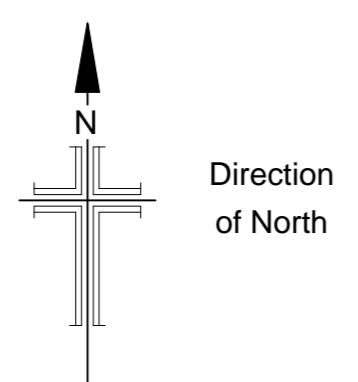
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Crk	DB	Date	27/09/2017

Scale	1:250	Job No	P17-00787	Sheet Size	A0	Issue	01
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DWG Ref	Year	Number	Originator	Zone	ID	Type	Role	Sheet
P17	00787	MET	XX	T	M2	G	001	

KEY

AIR VALVE	AV	KEEP OUTLET	KO
BENCH MARK	BM	LAMP POST	LP
BN	BN	MANHOLE (CIRCULAR)	MC
BOLLARD	BO	MANHOLE (RECTANGULAR)	MR
BONE HOLE	BH	MANHOLE (TRIANGULAR)	MT
BRUSH TELECOM COVER	BT	MANHOLE POST	MP
BUS STOP	BS	GILLY	GI
CABLE TV COVER	CT	RODDING EYE	RE
CABLE TV SUPPLY	CS	SIGN POST	SP
COLUMN	CO	TELECOM ORDER	TO
DROPPED WIRE	DW	TELEGRAPH POLE	TP
EARTHING POINT	EP	TRUNKING LEVEL	TL
ELECTRICITY COVER	EC	TRAFFIC LIGHT	TR
ELECTRICITY POLE	EP	TRIAL PIT	TP
FIRE HYDRANT	FH	WASH OUT	WO
GAS VALVE	GV	WATER METER	WM
GATE	GA	WATER STOP COOK	WSC
INSPECTOR COVER (CIRCULAR)	IC	WATER STOP VALVE	WSV
INSPECTOR COVER (RECTANGULAR)	IR		
COVER LEVEL	CL	CHAMBER BASE LEVEL	CB
INVERT LEVEL	IL	WATER SURFACE LEVEL	WS
UNABLE TO MEASURE	UTM		
DEPTH OF TREE TRUNK	DT	DIAMETER OF TREE TRUNK	DT
HEIGHT TO TOP OF TREE CANOPY	HT	WALK BOLE TREE	WB



United Utilities Water Limited

Property Searches
Ground Floor Grasmere House
Lingley Mere Business Park
Great Sankey
Warrington
WA5 3LP

**Curtins
Rose Wharf
East Street**

**Leeds
LS9 8EE**

FAO: Stuart Baker

Your Ref: LOVECLOUGH
Our Ref: 1329671
Date: 2/10/2017

Dear Sirs

Location: Burnley Road Loveclough BB4 8RY

I acknowledge with thanks your request dated 28/09/17 for information on the location of our services.

Please find enclosed plans showing the approximate position of our apparatus known to be in the vicinity of this site.

The enclosed plans are being provided to you subject to the United Utilities terms and conditions for both the wastewater and water distribution plans which are shown attached.

If you are planning works anywhere in the North West, please read our access statement before you start work to check how it will affect our network.

<http://www.unitedutilities.com/work-near-asset.aspx>

I trust the above meets with you requirements and look forward to hearing from you should you need anything further.

If you have any queries regarding this matter please telephone us on

Yours Faithfully,



Karen McCormack
Property Searches Manager

TERMS AND CONDITIONS - WASTERWATER & WATER DISTRIBUTION PLANS

These provisions apply to the public sewerage, water distribution and telemetry systems (including sewers which are the subject of an agreement under Section 104 of the Water Industry Act 1991 and mains installed in accordance with the agreement for the self-construction of water mains) (UUWL apparatus) of United Utilities Water Limited "(UUWL)".

TERMS AND CONDITIONS:

1. This Map and any information supplied with it is issued subject to the provisions contained below, to the exclusion of all others and no party relies upon any representation, warranty, collateral contract or other assurance of any person (whether party to this agreement or not) that is not set out in this agreement or the documents referred to in it.
2. This Map and any information supplied with it is provided for general guidance only and no representation, undertaking or warranty as to its accuracy, completeness or being up to date is given or implied.
3. In particular, the position and depth of any UUWL apparatus shown on the Map are approximate only and given in accordance with the best information available. The nature of the relevant system and/or its actual position may be different from that shown on the plan and UUWL is not liable for any damage caused by incorrect information provided save as stated in section 199 of the Water Industry Act 1991. UUWL strongly recommends that a comprehensive survey is undertaken in addition to reviewing this Map to determine and ensure the precise location of any UUWL apparatus. The exact location, positions and depths should be obtained by excavation trial holes.
4. The location and position of private drains, private sewers and service pipes to properties are not normally shown on this Map but their presence must be anticipated and accounted for and you are strongly advised to carry out your own further enquiries and investigations in order to locate the same.
5. The position and depth of UUWL apparatus is subject to change and therefore this Map is issued subject to any removal or change in location of the same. The onus is entirely upon you to confirm whether any changes to the Map have been made subsequent to issue and prior to any works being carried out.
6. This Map and any information shown on it or provided with it must not be relied upon in the event of any development, construction or other works (including but not limited to any excavations) in the vicinity of UUWL apparatus or for the purpose of determining the suitability of a point of connection to the sewerage or other distribution systems.
7. No person or legal entity, including any company shall be relieved from any liability howsoever and whensoever arising for any damage caused to UUWL apparatus by reason of the actual position and/or depths of UUWL apparatus being different from those shown on the Map and any information supplied with it.
8. If any provision contained herein is or becomes legally invalid or unenforceable, it will be taken to be severed from the remaining provisions which shall be unaffected and continue in full force and affect.
9. This agreement shall be governed by English law and all parties submit to the exclusive jurisdiction of the English courts, save that nothing will prevent UUWL from bringing proceedings in any other competent jurisdiction, whether concurrently or otherwise.

Extract from Map of Public Sewers

The position of the underground apparatus shown on this plan is approximate only and is given in accordance with the best information currently available.

The actual positions may be different from those shown on the plan and private pipes, sewers or drains may not be recorded.

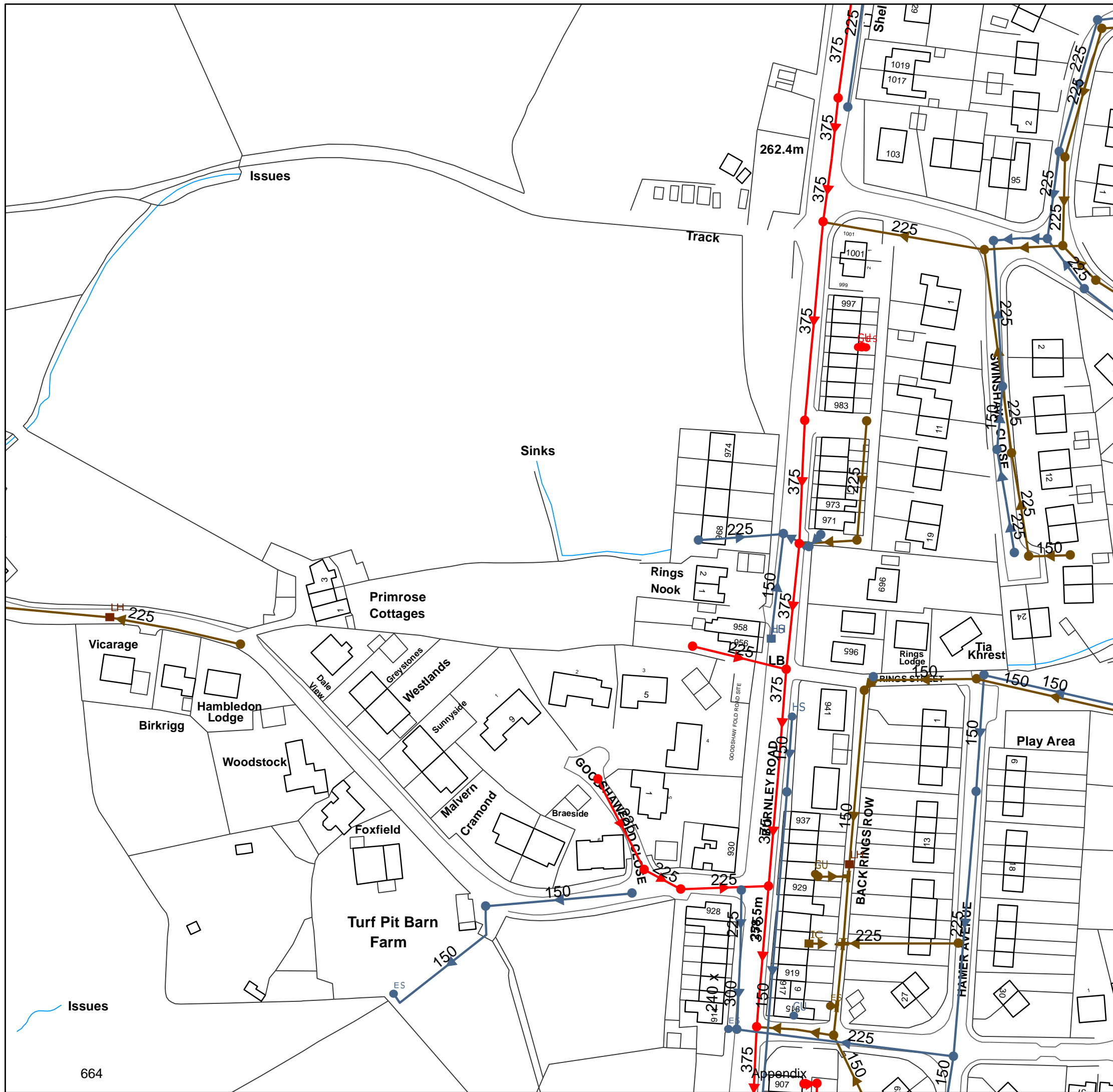
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**Burnley Road
Loveclough
BB4 8RY**

Printed By: Property Searches Date: 02/10/2017

DO NOT SCALE
Approximate Scale: 1:1250



Wastewater Symbolology

Combined	Foul	Surface	Overflow	
				Manhole
				Manhole, side entry
				Public sewer
				Private sewer
				S104 sewer
				Rising main, public
				Rising main, private
				Rising main, S104
				Highway drain, private
				Screen chamber
				Discharge point
				Outfall
				Control kiosk
				Sludge main

Abandoned pipe	
	Public sewer
	Rising main
	Private sewer
	Sludge main

Manhole function	
FO	Foul
SW	Surface Water
CO	Combined
OV	Overflow

Sewer shape			
CI	Circular	U	Unspecified
EG	Egg	SQ	Square
OV	Oval	TR	Trapezoidal
FT	Flat top	AR	Arch
RE	Rectangular	BA	Barrel
		HO	Horse shoe

Sewer material			
AC	Asbestos cement	DI	Ductile iron
BR	Brick	VC	Vitrified clay
CO	Concrete	PP	Polypropylene
CSB	Concrete segment	PF	Pitched fibre
CSU	Concrete segment	MA	Masonry, coursed
CC	Concrete box culverted	MA	Masonry, random
PSC	Plastic	RP	Reinforced plastic
GR	Glass reinforced	CI	Cast iron
GRP	Glass reinforced	SI	Spun iron
PVC	Polyvinyl chloride	ST	Steel
PE	Polyethelene	U	Unspecified

			WW pumping station
			Inspection chamber
			Extent of survey
			Head of system
			Soakaway
			Rodding eye
			Lamp hole
			T junction/saddle
			Gulley
			Air valve
			Non return valve
			Sewer overflow
			Cascade
			Flow meter
			Hatch box
			Hydrobrake
			Inlet
			Bifurcation
			Catchpit
			Oil interceptor
			Penstock
			Summit
			Valve
			Valve chamber
			Washout chamber
			Drop shaft
			WW treatment works
			Septic tank
			Vent column
			Network storage tank
			Orifice plate
			Vortex chamber
			Penstock chamber



Microdrainage Qbar Calculation

The screenshot shows the 'Rural Runoff Calculator' software interface. The 'ICP SUDS' section is active, displaying input parameters for the FSR Method. The 'Partly Urbanised Catchment (QBAR)' section shows 'Urban' as 0.000 and 'Region' as 'Region 10'. The 'Results' panel shows 'QBAR rural (l/s)' as 32.0 and 'QBAR urban (l/s)' as 32.0. Below this is a 'Return Period Flood' table with columns for Region, QBAR (l/s), Q (1 yrs) (l/s), Q (1 yrs) (l/s), Q (30 yrs) (l/s), and Q (100 yrs) (l/s). The table lists various regions and Ireland National/Regional values. The 'ICP SUDS' method is highlighted in the left-hand menu.

Region	QBAR (l/s)	Q (1 yrs) (l/s)	Q (1 yrs) (l/s)	Q (30 yrs) (l/s)	Q (100 yrs) (l/s)
Region 1	32.0	27.2	27.2	60.5	79.5
Region 2	32.0	27.9	27.9	60.8	84.3
Region 3	32.0	27.6	27.6	56.3	66.6
Region 4	32.0	26.6	26.6	62.8	82.3
Region 5	32.0	27.9	27.9	77.0	114.1
Region 6/Region 7	32.0	27.2	27.2	72.6	102.2
Region 8	32.0	25.0	25.0	61.1	77.5
Region 9	32.0	28.2	28.2	56.5	69.8
Region 10	32.0	27.9	27.9	54.3	66.6
Ireland National	32.0	27.2	27.2	50.9	58.9
Ireland East	32.0	27.2	27.2	52.2	60.9
Ireland South	32.0	27.2	27.2	50.9	58.9
Ireland West	32.0	27.2	27.2	49.5	57.0
Ireland Greater Dublin	32.0	27.2	27.2	68.0	83.6

Microdrainage Quick Storage Estimate (Attenuation) Calculation



The screenshot shows the 'Quick Storage Estimate' window in the Micro Drainage software. The interface is divided into two main sections: 'Variables' and 'Results'.

Variables Section:

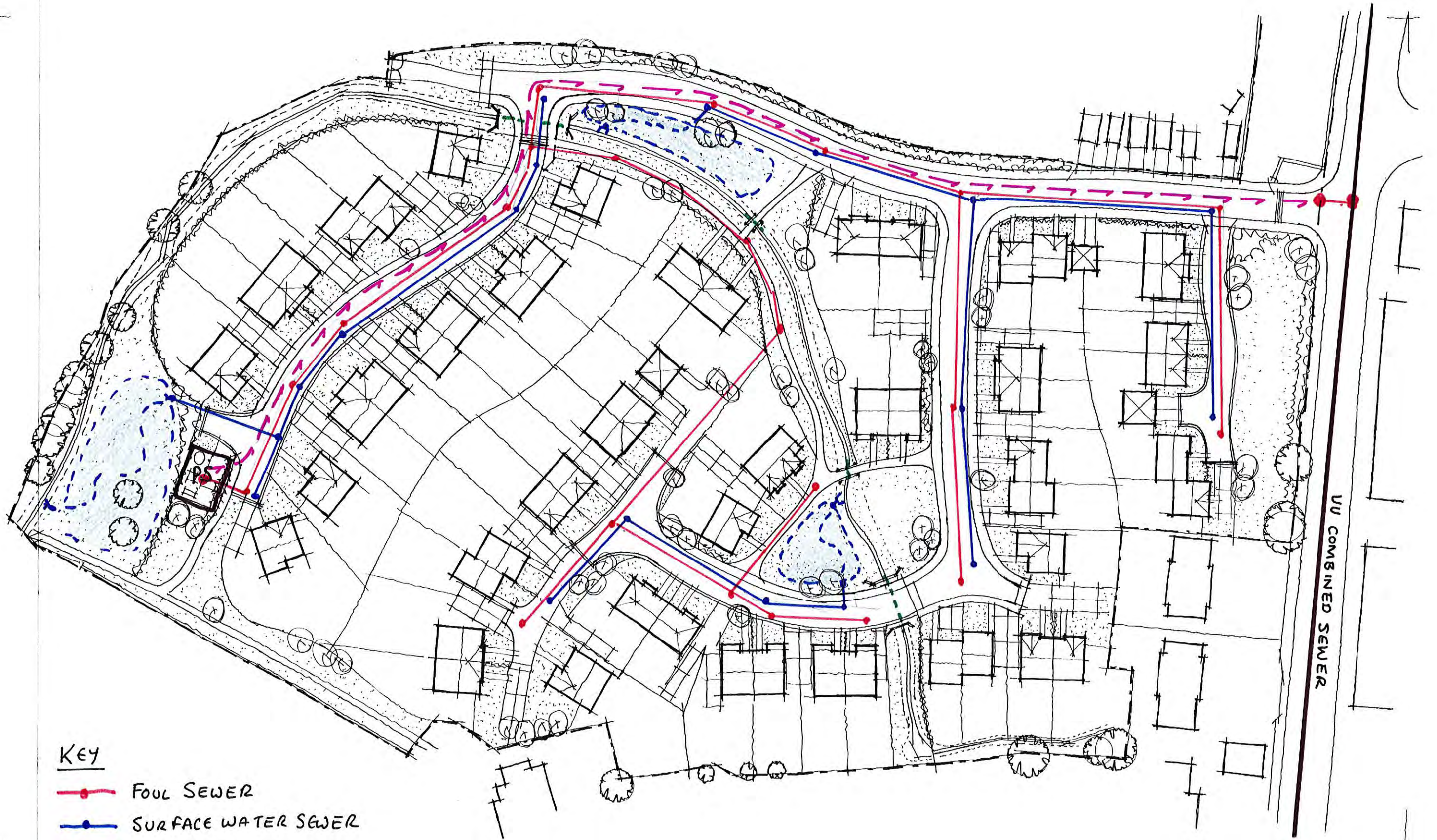
- FSR Rainfall:** (Dropdown menu)
- Return Period (years):** 100
- Region:** England and Wales (with a 'Map' button)
- M5-60 (mm):** 18.800
- Ratio R:** 0.282
- Cv (Summer):** 0.750
- Cv (Winter):** 0.840
- Impemeable Area (ha):** 1.350
- Maximum Allowable Discharge (l/s):** 32.0
- Infiltration Coefficient (m/hr):** 0.00000
- Safety Factor:** 2.0
- Climate Change (%):** 30

Results Section:

Global Variables require approximate storage of between 496 m³ and 822 m³.

These values are estimates only and should not be used for design purposes.

The left-hand navigation pane includes buttons for 'Variables', 'Results', 'Design', 'Overview 2D', 'Overview 3D', and 'Vt'. The 'Results' button is currently selected and highlighted in orange.



KEY

- FOUL SEWER
- SURFACE WATER SEWER
- - - RISING MAIN
- PS PUMP STATION
- - - SUDS AREA
- - - WATER COURSE CULVERT.

OUTLINE DRAINAGE STRATEGY
 CURTINS 066277/SK01 SB
 OCT 17

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Planning Manager
Rossendale Borough Council
Room 120
The Business Centre
Futures Park
BACUP
OL13 0BB

Phone:
Email:
Your ref:
Our ref: MH/MA/KM
Date: 9 October 2017

Dear Ms Hopkins

ROSSENDALE DRAFT LOCAL PLAN REGULATION 18 CONSULTATION

Thank you for consulting Lancashire County Council on the Rossendale Draft Local Plan Regulation 18; please find the comments below.

1 Comments Relating to Estates

The county council has previously proposed the designation of its land holding off Industrial Street and Gladstone Street in Bacup for residential development purposes. This area of land was subsequently assessed as part of the SHLAA Stages 1 & 2 Assessment of 2017. The Borough Council now proposes to designate a smaller area of land for housing development; specifically excluding the site of the former Bacup Nursery and land immediately to the south of Gladstone Crescent. It is the view of the County Council that there is no overriding land use planning reason why this land should not be included in the proposed housing site HS2.23. The former pens and allotment uses of the land to the south of Gladstone Crescent have declined to a point where they are of negligible value for that purpose. The site of the former Bacup Nursery is demonstrably brownfield and, whilst it sits at a slightly lower level from the adjoining proposed housing site HS2.23, the difference is not considered to be so adverse as to preclude an appropriate engineered solution to connect with the proposed housing land immediately to the east. This would facilitate its co-joining with the proposed housing site, (similarly accessed from the higher point on the Gladstone Street frontage). The County Council therefore requests that these two areas of land be included within the housing site allocation HS2.23.

2 Comments Relating to Education

Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. Some children have Special Educational Needs for which

they access school provision outside of Lancashire. Special Educational Needs provision is managed by LCC's SEND Team and is not covered by this response. The [Strategy for the provision of school places and school's capital investment 2015/16 to 2017/18](#) provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and its local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.

Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.

In a letter from the DfE to all Chief Executives, the Minister of State for Housing and the Parliamentary Under Secretary of State for Schools jointly stated that 'where major new housing developments create an additional need for school places, then the local authority should expect a substantial contribution from the developer towards the cost of meeting this requirement'.

The SPT produces an [Education Contribution Methodology document](#) which outlines the Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.

In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy.

Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:

- Already over-subscribed,
- Projected to become over-subscribed within 5 years, or
- A development results in demand for a school site to be provided.

This latest consultation follows on from information provided to Rossendale Borough Council planning officers by the School Planning Team, to be included in the Infrastructure Delivery Plan (IDP) July 2017. In the response SPT set out the challenges facing school provision across the district of Rossendale and the spatial area it covers.

To enable further understanding of the challenges ahead, Lancashire County Council recently met with Rossendale Borough Council planning officers to discuss the issues and the location of strategic and non-strategic housing developments and the demand of new housing developments on the current infrastructure.

The purpose of the liaison meetings is to understand the overall scale of housing, and the phasing across the life of the local plan from planning officers at Rossendale Borough

Council. In return SPT provide the current provision across the mainstream schools, primary and secondary. The latest meeting took place on 11 September 2017; at the meeting it was highlighted the need for additional primary education places across the district. The situation across Rossendale and across East Lancashire where hot spots have emerged due to a combination of circumstances and now there is an urgent need to create additional places. Achieving additional places can be created through the expansion, or unlocking potential within existing space, and/or the potential need for a new school to meet the demand.

The meeting was also attended by a representative from LCC Pupil Access Team who provided an overview of the issues of school placement across the district. The current situation is that many of the primary schools are at capacity with only a selected few with some capacity. The situation has been further compounded by additional children migrating in to the area who have not been in the Lancashire education system previously. Pupil Access are concerned an increased number of children are not obtaining their first choice of school and have to make key decisions over the intake criteria.

The main areas of concern are close to the strategic site at Edenfield and developments in Whitworth, Waterfoot and Crawshawbooth and Bacup, however the majority of primary schools across the district are currently at capacity with new housing coming forward that will impact on the current and long term provision of schools located close to the developments.

Currently there are 31 primary schools across the district, 28 of them are classed as outstanding or good by Ofsted, with three requiring improvement or inadequate. Lancashire County Council's policy would be to only expand schools good or outstanding schools and require schools falling below this to be classified as good before any expansion options would be considered.

The situation in secondary schools follows the same pattern with most of the schools at capacity with only Fearn's showing to have capacity, however the school currently has an inadequate Ofsted rating. Parental choice may result in the remaining schools to be at or over capacity. Lancashire County Council continue to work closely with Fearn's to resolve the situation, however this can take time.

The shortfall across the district is based on the 5 year Housing Land Supply supplied by Rossendale Borough Council annually and inputted in to the housing forecast; this assumes all of the housing will be delivered, applying a worst case scenario of all dwellings to be 4 bedroom until additional information is received at reserved matters stage. School Planning are able to forecast with some confidence up to 5 years, beyond this certain assumptions are applied.

The forecasting information provides Rossendale Borough Council with the information there will be the requirement for additional school sites or expansions to existing schools, and the need of developer contributions through Section 106 agreement or Community Infrastructure Levy CIL to fund infrastructure projects. In particular the development at Edenfield which is subject to master planning and identifies a need for a suitable school site within or close to the development and look to planning officers at Rossendale to negotiate this matter with developers of the site and ensure the site meets the needs to develop a new school.

The situation across the district of Rossendale requires a detailed review based on the understanding of the Rossendale Borough Council housing site allocations 2017 – 2032. The issue of capacity within mainstream schools is becoming an issue within Rossendale and across East Lancashire with several hot spots emerging based on the housing to be brought forward, impacting on the education infrastructure. Housing developments remains the main contributor, however, inward migration from bordering districts and the migration of foreign nationals to fulfil employment gaps has resulted in additional impact not taken into account as part of the SPT housing forecast.

Lancashire County Council continue to liaise with the district council to understand and address the situation and on would like to thank Rossendale planning officers for the continued engagement.

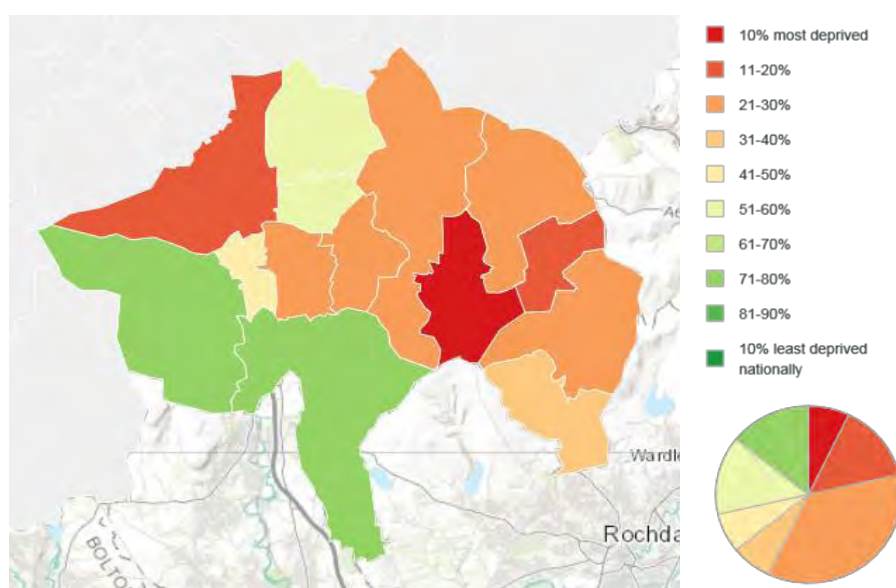
3 Comments Relating to Health

Rossendale Borough Council has requested input from the Public Health Wider Determinants Team at Lancashire County Council into the development of Rossendale's *Emerging Local Plan*. This briefing is in response to this request for Public Health advice.

The comments have been drafted using evidence available at the time of writing and seek to examine how the planning policies can maximise their potential to improve health and wellbeing and reduce health inequalities in Rossendale.

This document will make numerous references to the Index of Multiple Deprivation (IMD). The 2015 IMD also allows us to view deprivation by electoral ward and this can assist us in understanding the geographic areas affected by deprivation. 1 ward in Rossendale, Stacksteads ward, sits in national decile 1 which puts it in the 10% most deprived nationally. National decile 2 includes wards that are in the 20% most deprived nationally. 2 wards in Rossendale feature in decile 2. These are Irwell ward and Worsley ward.

Figure 1ⁱ: Rossendale Index of Multiple Deprivation 2015 by ward and decile



The IMD 2015 provides us with subdomains of deprivation, several of which are considered in more detail within this document. The seven domains that contribute to the IMD are:

- Income
- Employment
- Health Deprivation and Disability
- Education, Skills and Training
- Barriers to Housing and Services
- Crime
- Living Environment

Built and natural environments are key environmental determinants of health and wellbeing and the National Planning Policy Frameworkⁱⁱ recognises that "the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities".

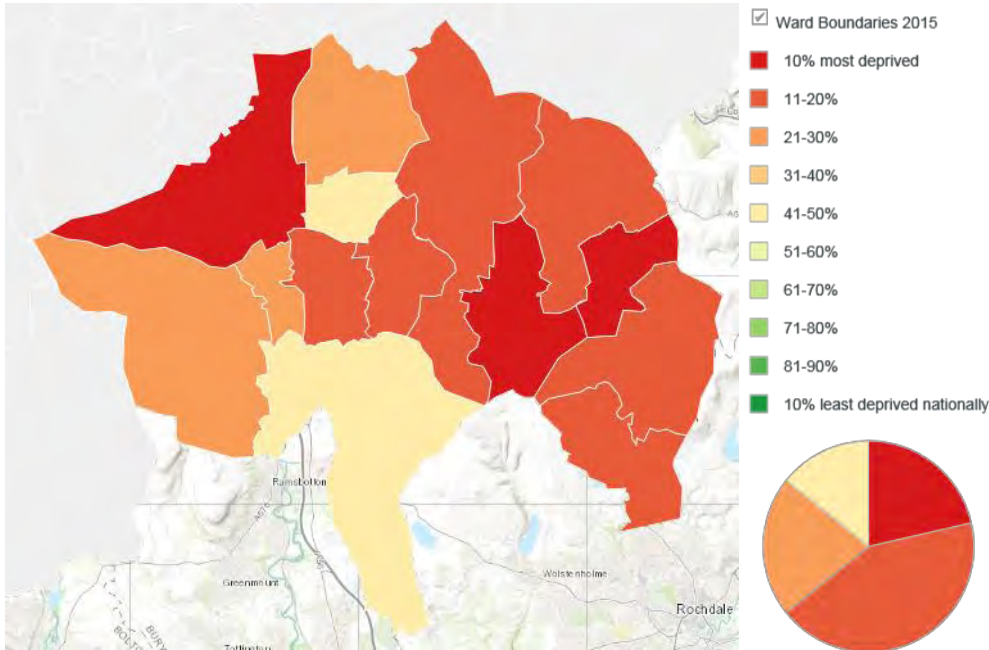
The document 'Rossendale Draft Local Plan' includes a range of policies that have the potential to contribute to improvements in health and wellbeing and reductions in health inequalities. For this potential to be maximised it is important that the proposed policies are adopted universally across Rossendale but also delivered proportionately dependent on need.

The document 'The Marmot Review: implications for Spatial Planning'ⁱⁱⁱ explains that 'in order to reduce the steepness of the social gradient in health, actions must be universal, but with a scale and intensity that is proportionate to the level of disadvantage. This is called proportionate universalism.

Greater intensity of action is likely to be needed for those with greater social and economic disadvantage, but focusing solely on the most disadvantaged will not reduce the health gradient, and will only tackle a small part of the problem. Action is needed to improve health for all, but must be focussed proportionately more for those lower down the gradient, with the aim that all have the health Outcomes of the most advantaged - this is called "levelling-up."

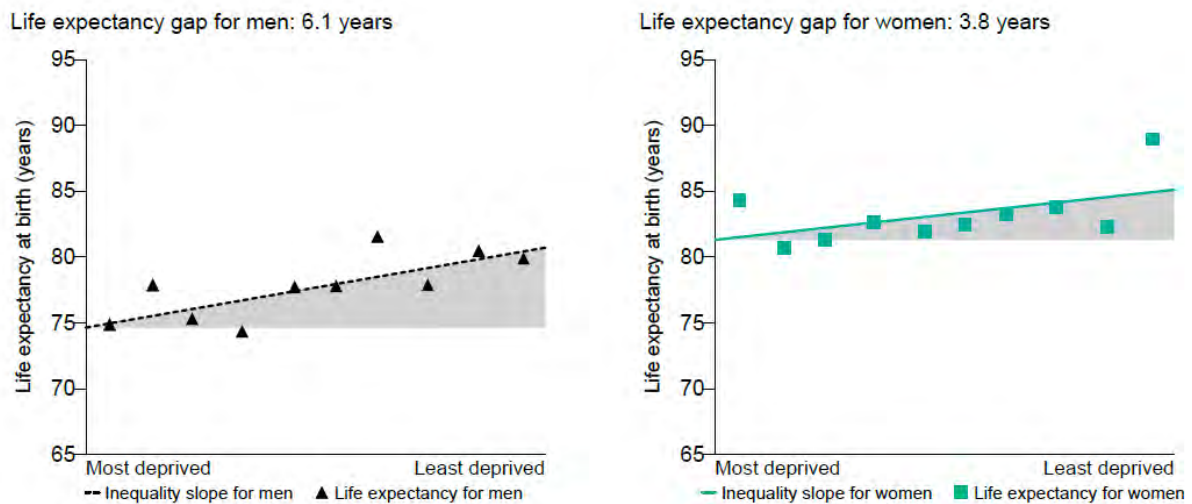
As we can see in Figure 2, the majority of Rossendale's electoral wards sit within deciles 1 and 2 in the Health and Disability domain of the Index of Multiple Deprivation – this places most of the borough within the bottom 20% nationally.

Figure 2^{iv}: Index of Multiple Deprivation, Health and Disability Domain by ward and decile



PHE: "The charts below show life expectancy for men and women in this local authority for 2011-2013. Each chart is divided into deciles (tenths) by deprivation, from the most deprived decile on the left of the chart to the least deprived decile on the right. The steepness of the slope represents the inequality in life expectancy that is related to deprivation in this local area. If there were no inequality in life expectancy as a result of deprivation, the line would be horizontal".

Figure 3^v: Life expectancy: inequalities in Rossendale



In order for the Rossendale Local Plan to achieve its potential in improving health and wellbeing and tackling health inequalities it is important that the policies it proposes reflect

a commitment to this approach. 'The Marmot Review: implications for Spatial Planning' recommend this with a specific focus across the social gradient on the policy areas of:

- Improving active travel
- Improving good quality open and green spaces
- Improving the quality of food in local areas
- Improving the energy efficiency of housing
- Support locally developed and evidence-based community regeneration programmes

Recommendations:

As a general principle, policies that relate to the 5 areas above should be written with the aim of improving health outcomes for the whole population, with a particular emphasis on the areas of highest need (as evidenced by the Index of Multiple Deprivation and overarching health indicators). We recommend that this principle is embedded in the review process as the Local Plan is revised and updated.

Public Health and JSNA data and intelligence should be used to further inform the local plan evidence base for health and wellbeing. Planners and public health practitioners should work in partnership with regard to the outcomes of increasing life expectancy and reducing health inequalities.

Rossendale Draft Local Plan, Regulation 18 Consultation, July 2017		
Page Number/ Paragraph Number	Section Name	Comments from Lancashire County Council Public Health service
Page 6 - 29	Chapter 1: Housing	<p>Housing is a significant determinant of health and poor housing conditions contribute to many preventable diseases and injuries, including respiratory, nervous system and cardiovascular diseases and cancer.</p> <p>Housing types and standards</p> <p>Rossendale has an oversupply of high density terraced housing and this can be an issue for older residents and those with a disability, as terraced properties can be difficult to adapt to suit changing needs. In order to maintain independent living, adaptations such as creating ground floor bathrooms and bedrooms are frequently necessary but this type of housing does not often offer scope for such changes.</p> <p>Figure 5 below shows the Index of Multiple Deprivation, Living Environment domain of deprivation, by ward and decile. It illustrates that all but one of Rossendale's wards fall within the bottom 50% nationally for this domain. When separating the domain into its separate indoor and</p>

outdoor subdomains, it is clear that Rossendale rates poorly in the indoor domain. The indoor domain is concerned with housing quality, the information for which comes from Census data and the English Housing Survey. As shown in Figure 6 below, around half of the borough sits within the bottom 30% nationally.

Figure 5^{vi}: Index of Multiple Deprivation, Living Environment Domain by ward and decile

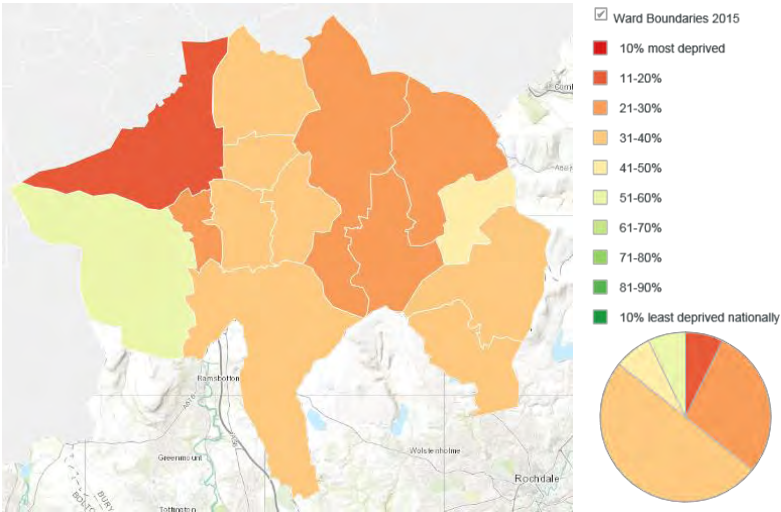


Figure 6^{vii}: Index of Multiple Deprivation, Indoor Living Environment Subdomain by ward and decile

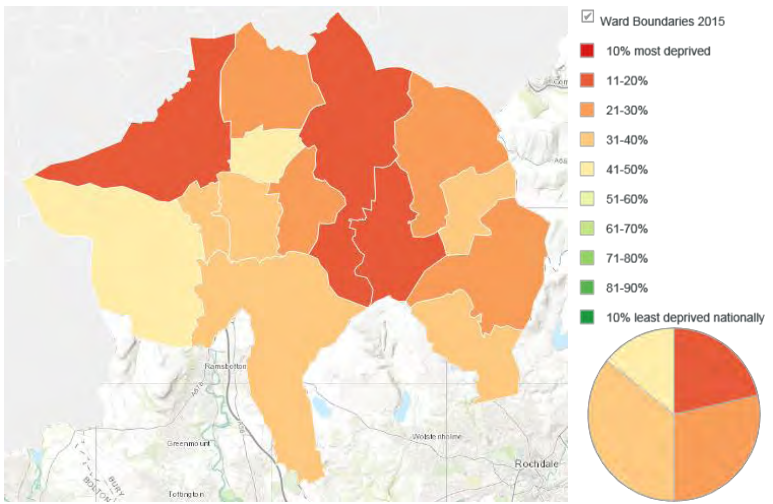


Figure 7 below shows Age Structure and 2025 Population Projections (Office for National Statistics (ONS)). The projected shift in the sizes of age groups as a proportion of the population is common throughout Lancashire and England.

Figure 7: Age Structure and 2025 Population Projections

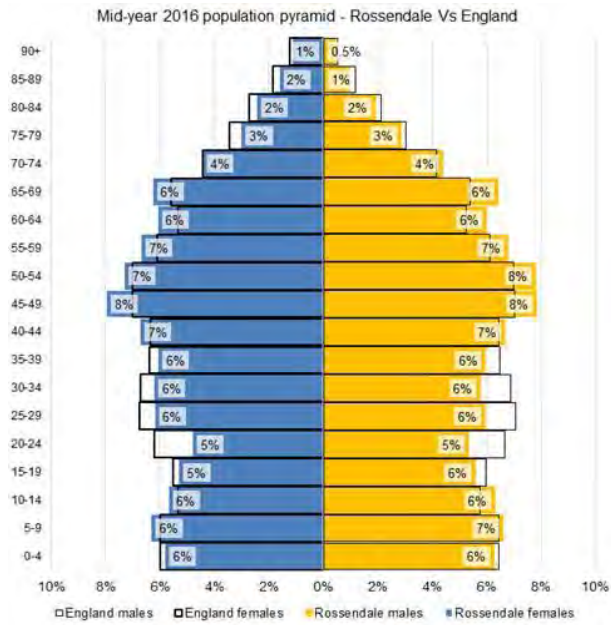
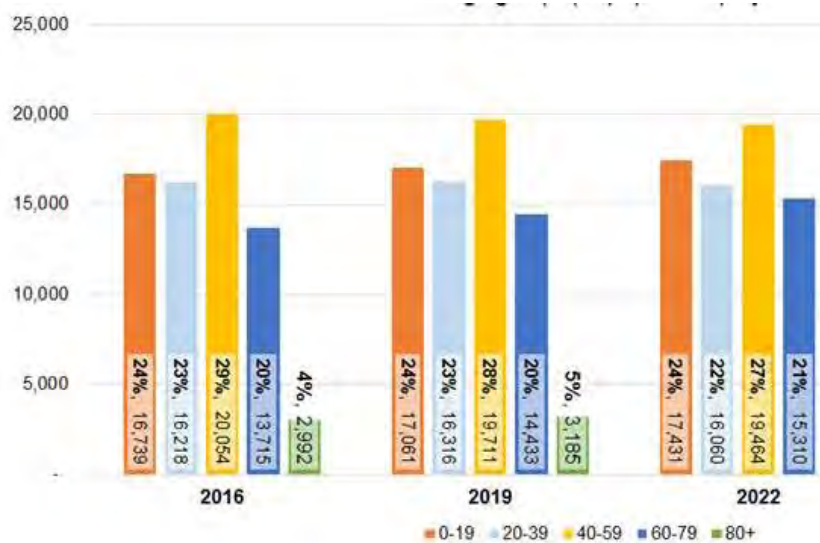


Figure 8: Age Group Split Population Projections 2016-2025 (ONS) demonstrates, between now and 2025 in Rossendale, the 60-79 age group (as a proportion over the overall population) is only projected to increase by 2% and the 80+ age group is projected to increase by 1%.

Figure 8: Age Group Split Population Projections 2016-2025

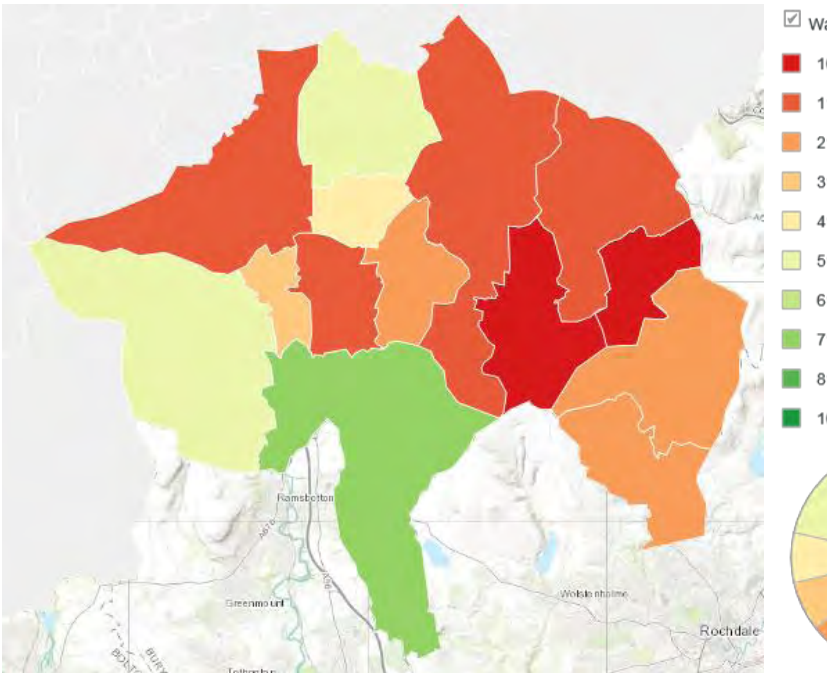


	<p>These population projects provide an alternative age forecast, using a different population project time period (2016-2025) to those presented in the Rossendale Strategic Housing Market Assessment (SHMA) report, which projects to 2034.</p> <p>In the HS17: Specialist Accommodation policy explanation, it is stated that "In relation to supported housing for older people, the SHMA indicates that the number of residents aged over 65 in Rossendale is projected to increase by 6,336 (52.9%) by 2034, in contrast to the overall growth in population of just 5,915 residents (8.6%)".</p> <p>The SHMA population projects to 2034 therefore predict a different age range split to the current ONS projections to 2025. It is recommended that longer term projections (as given in the SHMA) should be treated with a degree of caution, as they can be viewed to be less reliable estimates of future trends.</p> <p>However, whichever population projection timeframe is used, the projections demonstrate that there will be growth in the 65+ and 80+ age groups. It is important to take account of the expected growth and to plan for the provision of specialist housing accordingly. The Rossendale draft plan has two housing policies of interest Policy HS6: Housing Standards and Policy HS17: Specialist accommodation.</p> <p>Policy HS6: Housing Standards, addresses the national regime of optional technical standards for housing which are to be adopted for new housing developments. Policy HS6 requires for Access, that at least 30% of new housing provided on sites should be specifically tailored to meet the needs of elderly and disabled residents, or be easily adaptable, unless evidence is provided on specific factors that could affect a developer's ability to provide this provision. In terms of Internal space the nationally described spaces standards should be the minimum provision.</p> <p>The inclusion of Policy HS6 in the local plan is welcomed. Some clarification is required as to how the 30% adaptable housing requirement, will exceed the minimum requirements as set out in the access requirements of Building Regulations M4 (2) Category 2 Acceptable and adaptable dwellings. The policy could be enhanced further by requiring the design of new housing</p>
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		<p>development to conform to the Design Council's Building for Life 12 industry standard.</p> <p>Policy HS17: Specialist Accommodation is also welcomed. The policy supports the provision of specialist housing, including retirement accommodation, extra care accommodation and supported accommodation services, subject to criteria relating to location, accessibility and amenity being provided. The policy also allocates 3 specific sites for specialist housing accommodation, in the 3 localities of Bacup (HS2.19), Waterfoot (HS2.90) and Whitworth (HS2.103). These sites are expected to provide 70 specialist housing units. There is no explanation as to why these sites have been allocated and why no further sites are allocated in the other main urban areas of the local plan area. It is also unclear if 70 specialist housing units will meet the expected needs for this type of housing provision for the whole local plan period, taking account of the population and age range projections previously referred to above.</p> <p>Site Allocations</p> <p>Policy HS3 Edenfield identifies the 4 allocated housing sites as per Policy HS2 Housing Allocations, (sites HS2.71) as a large housing site which will require a masterplan to be prepared. The overall site is expected to provide 451 housing units. The masterplan is to be prepared to a design code and is to be accompanied by an Infrastructure Delivery Schedule and other assessments including a transport assessment and travel plan.</p> <p>The Edenfield housing sites will cover a 15ha area of existing greenfield, within the ward of Eden. Policy HS3 identifies the overall Edenfield site gross area as 26ha. Given that this is significant strategic housing site area for Rossendale, which is expected to have a strategic impact on the local area, it has the potential to have positive and negative health impacts, to the immediate locality and also to neighbouring wards. The design code principles listed in the policy do not include reference to cycling and walking provision, air quality or road safety considerations, although we would expect that these aspects would be considered in a transport assessment and travel plan for the site. Given the size of the overall site area, no reference is given either to the provision of any of the site for specialist housing accommodation.</p>
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	<p>Affordable Housing</p> <p>The provision of affordable housing is plays an important role in enabling people, including those on lower incomes, to access a range of housing tenures and localities.</p> <p>Policy HS4: Affordable Housing, requires new housing developments of 10 or more dwellings (or 0.35 hectares or part thereof) to provide on-site affordable housing in line with stated criteria. There is a requirement for 30% on-site affordable housing to be provided on market housing schemes and 100% on-site affordable housing provision on rural exception sites. In the policy explanation reference is made to the Council's SHMA which recommends that at least 158 affordable dwellings to be provided in the district per year, and potentially 321 affordable dwellings per year.</p> <p>Policy HS2: Housing Site Allocations calculates a potential housing unit yield of 3622 for the local plan period, even if 30% of this total yield was provided as on-site affordable housing that would result in an affordable housing provision of 1086, which is 1,284 less that the 15 year local plan period amount of 2,370, if the minimum recommended amount of 158units were provided per year. Given that not all of the allocated sites are over 10 units and other housing sites may be subject to constraints, it appears that the SHMA recommended level may not be achievable.</p> <p>Open Space Provision</p> <p>The provision of, and access to, greenspace for recreational, fitness and mental wellbeing plays an important role in enabling people to be physically active and sociable.</p> <p>Policy HS8: Playing Pitch Requirements in New Housing Developments, requires that housing sites of 10 or more new units (0.35 hectares or part thereof) will be required to pay a financial contribution towards improvements to existing playing pitches in the Borough. This is in line with the Council's Playing Pitch Strategy (2016) which identifies a number of deficiencies in provision in Rossendale against Sport England's requirements.</p> <p>Policy HS8 is only focused on the provision of playing pitches and does not represent a general requirement for public open space provision. No reference is given to housing sites of 10 or more units being required to provide</p>
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		<p>public open space in accordance with Fields in Trust standards, whereby 2.4hectares of public open space per 1,000 population is recommended to be provided.</p> <p>Recommendations:</p> <p>Due to Rossendale's deprivation in the area of indoor living environments, housing quality should be a key concern for Rossendale. Any options to upgrade the existing housing stock should be explored.</p> <p>Future housing developments will need to cater for Rossendale's aging population and provide appropriate facilities for Rossendale residents across the age groups. Consideration should be given to allocating other housing sites (as listed in Policy HS2: Housing Site Allocations), under Policy HS17 as specialist housing, subject to evidence of a defined need for specialist housing, in other urban areas located within the local plan area, in addition to the 3 allocated sites.</p> <p>Revise Policy HS6: Housing Standards, to clarify that 30% of new housing will be required to be adaptable with access requirements exceeding those of the Building Regulation M4 (2) Category 2. The policy should also require that all new developments to take account of Building for Life 12 industry code.</p> <p>Revise Policy HS3: Edenfield, to require a Health Impact Assessment to be prepared as part of the policy criteria. In addition the design code principles should be reviewed to require the incorporation of good quality and accessible cycling and walking provision within the development and a requirement for electric vehicle charging points. Design and layout considerations should also consider road safety, particularly for the most vulnerable people (i.e. children, elderly and the disabled). Consideration should also be given to the inclusion for a percentage requirement for the provision of specialised housing if a need is identified, with the site correspondingly allocated in Policy HS17: Specialised Housing.</p> <p>Review Policy HS4: Affordable Housing, to consider how the SHMA recommended annual amount of on-site affordable housing provision can be realistically achieved during the local plan period and whether a higher level of provision should be required on larger housing site allocations.</p>
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		<p>Clarification should be given on whether Policy HS8: Playing Pitch Requirement in New Housing Developments is intended to only meet the requirements of the Council's Playing Pitch Strategy. If it is also the mechanism for delivering the recommended public open space provision as per the Fields in Trust standard, the policy needs to be amended to reflect this. If not it is important that the provision of public open space by new housing developments is also addressed through local plan policy. All forms of public open space including amenity open space and children's play areas also need to be provided (or existing facilities enhanced) as appropriate provided either on or off site (depending on site thresholds), to enable all residents to have access to greenspace to aid health and wellbeing.</p>
<p>Page 30 - 40</p>	<p>Chapter 2: Employment Growth and Employment</p>	<p>There is strong evidence that work is good for health and unemployment is bad for it^{viii}. Work and health is central to the story of people and place and helping people with health issues to obtain or retain work and be productive at work is a crucial part of economic success and wellbeing of every community.</p> <p>Figure 9 below illustrates that the majority of wards in Rossendale are within the 30% most deprived wards nationally for employment deprivation, with two wards Bacup and Stacksteads within the 10% most deprived wards.</p> <p>Figure 9^{ix}: Index of Multiple Deprivation, Employment Deprivation Domain by ward and decile</p> 

Employment Site Allocations

Policy EM2: Employment Site Allocations identifies a total potential employment allocation of 193.64 hectares gross area and 29.17 hectares area available for development. The sites appear to be located throughout the borough. The allocated sites include 7 new site allocations and range in gross site size from 2.76 to 5.67 hectares. The new allocations are located primarily in the Worsley and Longholme wards. Worsley ward is ranked with the top 20 most deprived wards in England as per the Index of Multiple Deprivation.

Of the new site allocations only 2 sites EMP2.26 and EMP2.34, with a combined site area of 6 hectares, are subject to a separate policy – Policy EMP7: New Hall Hey. Policy EMP7 requires a site masterplan, an agreed development design code and a phasing and infrastructure delivery schedule. These requirements will also be supported by the provision of a transport assessment and travel plan. The design code provided for Policy EMP7 does include a requirement for the provision of cycling and footpath routes but could be strengthened further by requirements to consider air quality impacts and road safety impacts. We would expect these aspects to also be considered in a transport assessment and travel plan for the EMP7 site.

It is unclear why the other new site allocations, EMP2.12, EMP2.15, EMP2.23, EMP2.35 and EMP2.38 are not subject to similar policies and requirements. It is also noted that Policy EMP6: Futures Park also requires a masterplan, phasing and infrastructure delivery schedule and agreed programme of implementation. No reference is given to requiring an agreed design code for the site. It is also unclear why the other mixed use site allocations of EMP2.22, EMP2.28 and EMP2.52 are also not subject to specific policy requirements similar to Policy EMP6.

In addition, like new major housing sites, new employment sites (and mixed use sites) have the potential for both positive and negative health impacts, which could affect the immediate locality and neighbouring areas. It is important that any potential health impacts are taken into account during masterplan preparation and through the agreement of a site design code.

		<p>Recommendation:</p> <p>Consideration should be given in the local plan to how planning policy can be used to create accessible and meaningful employment for the resident populations of Stacksteads (decile 1), Irwell (decile 2) and Worsley (decile 2) wards.</p> <p>We would also recommend the inclusion in the Employment chapter of a specific reference that economic growth can be used as a means of helping to address deprivation and inequalities in income and health outcomes.</p> <p>Revise Policy EMP7: New Hall Hey, to require a Health Impact Assessment to be prepared as part of the policy criteria. In addition the design code principles should be reviewed to consider additional requirements for electric vehicle charging points. Design and layout considerations should also consider road safety, particularly for the most vulnerable people (i.e. children, elderly and the disabled).</p> <p>Consider the provision of detailed guidance/requirements for all new employment site allocations and mixed use allocations, similar to those provided in Policies EMP7 and EMP6.</p>
<p>Page 43 - 50</p>	<p>Chapter 3: Retail</p>	<p>Healthy weight and Hot Food Takeaways</p> <p>Policy R5: Hot Food Takeaways makes reference in the policy criteria to a percentage rate for Year 6 pupils that are classified by Public Health England as obese. It is also important to consider the data for the reception year pupils, as this data can give an indication of the current and future healthy weight levels for young children.</p> <p>Figures 10 and 11 below provide detail on the prevalence of overweight (including obese) children in for Rossendale when compared to the national average and also obesity levels for reception year children within Rossendale at ward level.</p> <p>Figure 10 shows that the number of reception children with excess weight (including obese) in Rossendale is significantly worse than the England average. Figure 11 shows that Rossendale has 4 wards in the top Quintile (10.8% to 20.1%) for obesity in reception year children, with Worsley at 13.0%, Irwell at 12.9%, Greensclough at 12.1% and Greenfield at 11.7%.</p>

Figure 10^x: Prevalence of overweight (including obese) children in Reception year

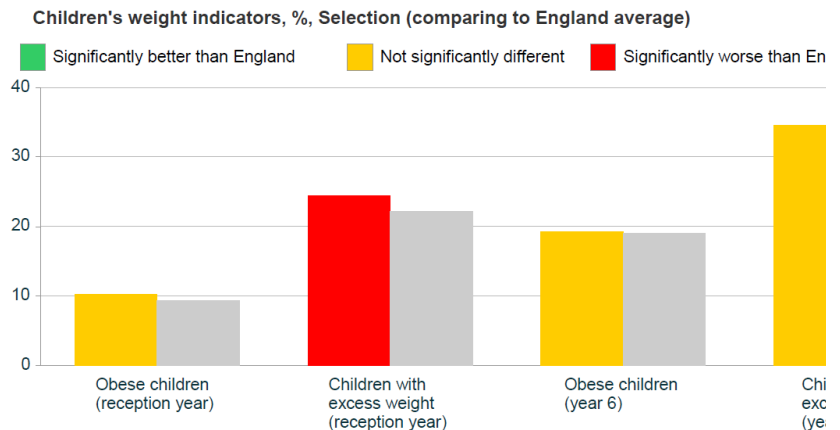
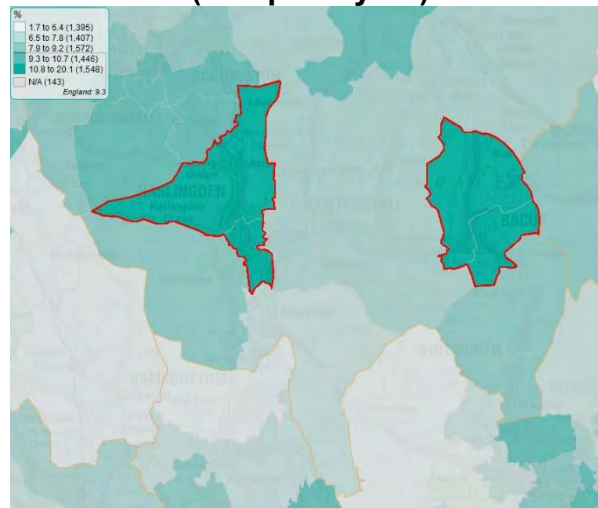


Figure 11^{xi}: Rossendale wards by Children's Obesity (reception year)



Whilst we commend many elements of Policy R5: Hot Food Takeaways. Figures 10 and 11 display that Rossendale has a particular issue with obesity in reception year children, whereas the policy is based on obesity in year 6 children.

Public Health England has determined that Rossendale has seen a 27% increase in fast food outlets (which includes the A3 use) between 2012 and 2016 and has a fast food takeaway density that is now significantly above the England average^{xii}.

Recommendation:

Consider reviewing Policy R5 to include a criteria regarding the obesity in wards where more than 22% of

		the reception year pupils are classified by Public Health England as obese.
Page 52 - 72	Chapter 4: Environment	<p>Design</p> <p>Policy ENV1: High Quality Development in the Borough, requires that all new development takes account of the character and appearance of the local plan area and provides criteria to be considered, including aspects relating to urban design, public realm, amenity, movement patterns, sustainable travel, crime, landscaping, flood risk and design codes. The requirements of the policy are welcomed but could be strengthened further by requiring development proposals ensure that there is no adverse health impacts with regard to air quality and road safety, and where possible the developments should help address existing hotspots.</p> <p>Consideration should also be given to requiring Health Impact Assessments to be required where appropriate for major planning applications and to consider the use of Section 106 agreements or Community Infrastructure Levy (CIL) to deliver measures to improve the health impacts of development.</p> <p>Outdoor Living Environment and Crime</p> <p>The Index of Multiple Deprivation, Living Environment domain, has an Outdoor Living Environment subdomain, which measures air quality and traffic accidents. Figure 12 below shows that for the Outdoor Living Environment subdomain, that for Rossendale, the Greenfield ward is one of the 10% most deprived wards nationally and that a number of other wards in the borough are within the 30% most deprived category, with no wards classified as least deprived.</p>

Figure 12: Index of Multiple Deprivation, Outdoor Living Environment Subdomain by ward and decile

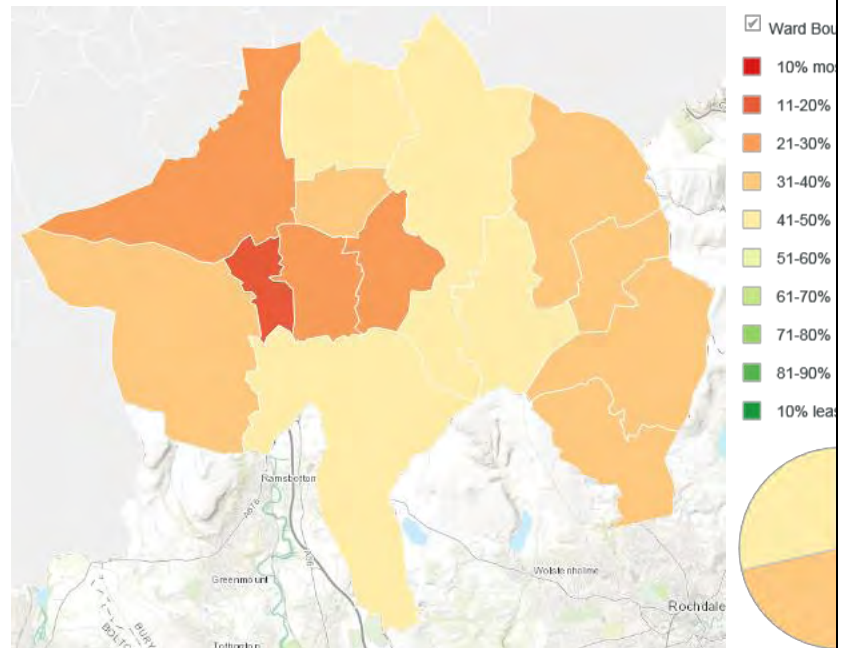
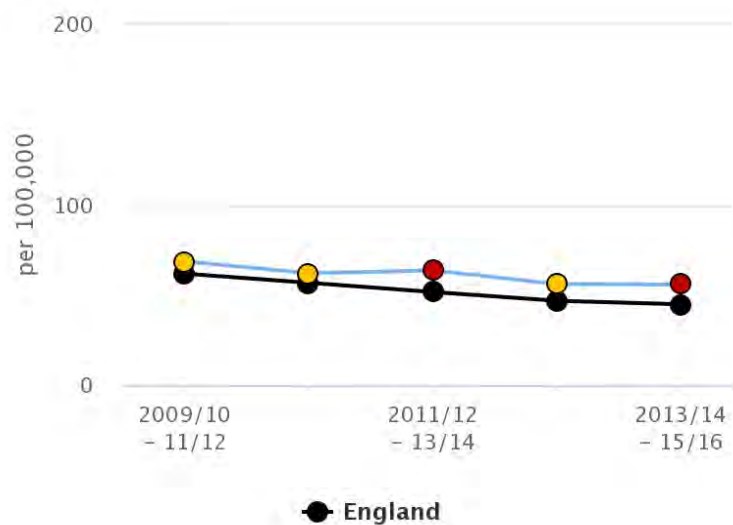


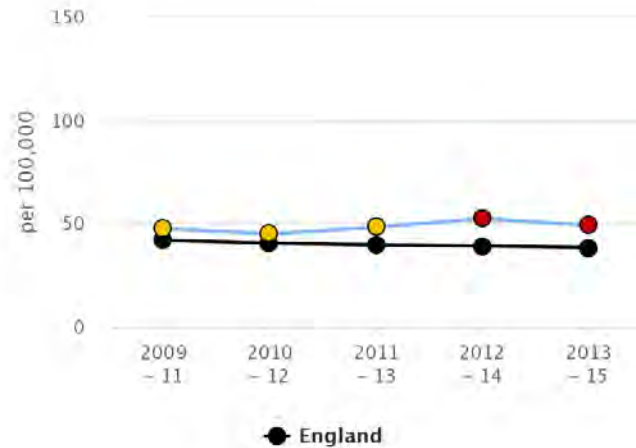
Figure 13 below shows that from the most recent available data Rossendale is significantly above the national average for violent crime (including sexual violence). We therefore commend that Policy ENV1: High Quality Development in the Borough states the aim of "Minimising opportunity for crime, and maximising natural surveillance."

Figure 13^{xiii}: Violent crime (including sexual violence) hospital admissions for violence



		<p>Recommendations:</p> <p>Policy ENV1 should be revised to include criteria requiring that requires development proposals ensure that there is no adverse health impacts with regard to air quality and road safety, and where possible development should help to alleviate existing poor air quality and road accident hotspots. This will help to address the relatively high levels of outdoor environment, living environment deprivation in the Borough.</p> <p>Consideration should also be given to requiring Health Impact Assessments to be required where appropriate for major planning applications and to consider the use of Section 106 agreements or Community Infrastructure Levy (CIL) to deliver measures to improve the health impacts of development. This requirement could be stated within an amended Policy ENV1 or through the provision of a stand-alone Health and Wellbeing Policy.</p> <p>Consideration should be given to whether Policy LT2: Community Facilities and Policy ENV6: Green Infrastructure will provide access to parks and green space across all social gradients and life stages in a way that is equitable.</p> <p>Proposed new developments should demonstrate that adequate social capital is accessible to individuals and that consideration is given to promoting a sense of safety as individuals of all ages live, work and socialise in the area.</p> <p>Policy ENV6 wording could also be strengthened by stating that "Development proposals <i>should</i> support the protection, management, enhancement and connection of the green infrastructure network, as identified on the Policies Map".</p>
<p>Page 84 - 88</p>	<p>Chapter 6: Transport</p>	<p>Road Safety</p> <p>Figure 14 illustrates the rate of Killed and Seriously Injured (KSI) casualties and shows that Rossendale KSI indicator has been significantly worse than the England average for 2012-2014 and 2013-2015.</p>

Figure 14^{xiv}: 1.10 Killed and Seriously Injured (KSI) on England's roads



Recommendations:

Future developments in Rossendale should support a reduction in the current rate of people killed or seriously injured on roads whilst also promoting active travel in a way that is safe and sustainable and it is commendable that so many policies stipulate consideration of "highway safety".

We recommend further work is undertaken with Lancashire County Council's Safe and Healthy Travel team to understand Rossendale road safety data in more depth and any steps that can be taken to address this public health indicator.

We recommend that new developments in or around accident hot spots should demonstrate consideration and practical measures aimed at reducing KSIs and improving general road safety.

Policy TR1: Strategic Transport, could be amended to include reference to a requirement for development proposals to have no adverse impact on road safety and to also where appropriate help to address existing accident hot spots. With regard to air quality, the policy could also require that development proposals include the provision of electric charging points.

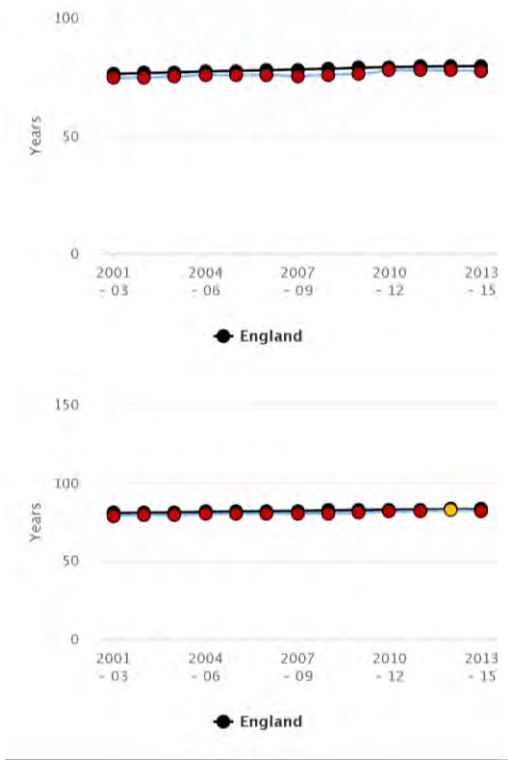
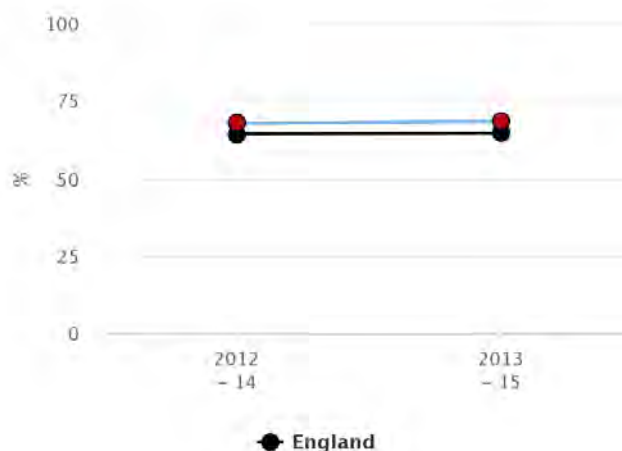
<p>Sustainability Appraisal (SA) of the Rossendale Local Plan - SA Framework</p>	<p align="center">Comments from Lancashire County Council Public Health Service</p>
<p>Human health: To improve physical and mental health and well-being of people and reduce health inequalities in Rossendale</p>	<p>The indicators included for monitoring within the SA Framework are to be commended.</p> <p>Life Expectancy</p> <p>As can be seen in Figures 15 and 16, within Rossendale life expectancy for males and females has generally been significantly below the England average since 2001.</p> <p align="center"> Figure 15^{xv}: Life expectancy at birth (Male) Figure 16^{xvi}: Life expectancy at birth (Female) </p>  <p>Physical Activity/Physical Inactivity</p> <p>Public Health England has an indicator for measuring physical activity and inactivity in the adult population. Figure 17 shows that the rate of physically inactive adults in Rossendale is significantly above the England average and Figure 18 shows that excess weight in adults in Rossendale is also above the national average.</p>

Figure 17^{xvii}: Percentage of physically inactivity adult – current method – Rossendale



Figure 18^{xviii}: Excess weight in Adults – Rossendale



Recommendations:

In addition to these health indicators, we would recommend inclusion of the following:

Excess weight in Adults (figure 18), and as mentioned earlier, excess weight and obesity in children (reception and year 6) in order to track the progress of policies such as the Hot Food Takeaway policy, which are partially aimed at addressing excess weight within the population.

Indicators are available from the Public Health Outcomes Framework: <http://www.phoutcomes.info/>

**Transport:
Improve the choice and use of sustainable transport in Rossendale and reduce the need to travel**

Killed and Seriously Injured (KSI) indicator

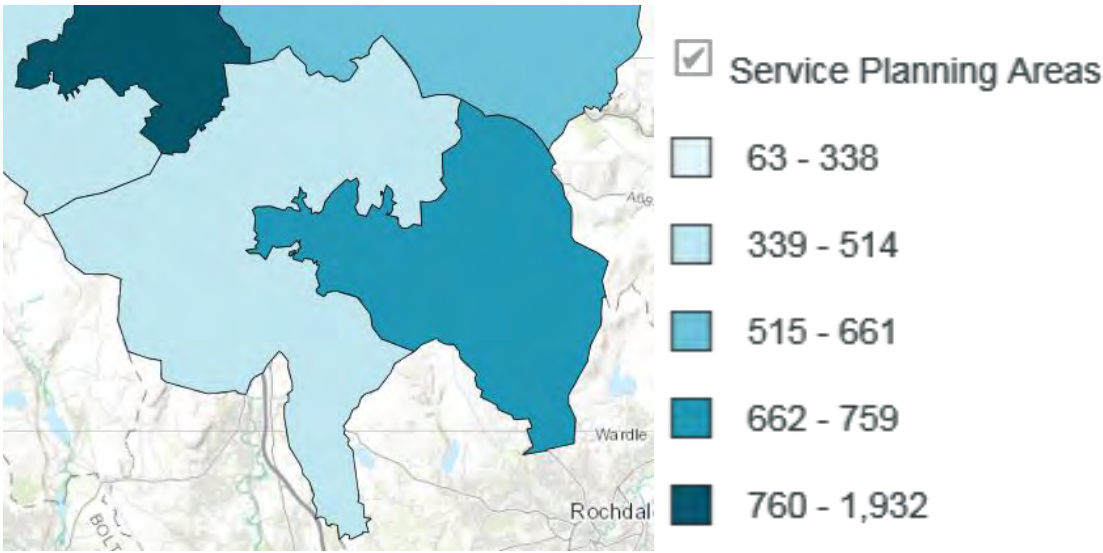
As has already been stated in our comments on the Local Plan, Transport policy section, Rossendale has had KSI figures higher than the national average for 2012-2014 and 2013-2015.

	<p>Recommendation:</p> <p>We recommend the inclusion of Public Health England's KSI indicator^{xix} within the transport section of the SA Framework. This indicator is also available from the Public Health Outcomes Framework: http://www.phoutcomes.info/</p>
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Further Relevant Data and Intelligence: Social Isolation

With changing family and community structures and an ageing population, increasing numbers of people, especially older adults, are becoming socially isolated or lonely. Chronic social isolation can reduce life expectancy by an equivalent amount to smoking, with chronic loneliness increasingly recognised as having far reaching consequences for the health and wellbeing of both individuals and wider communities.

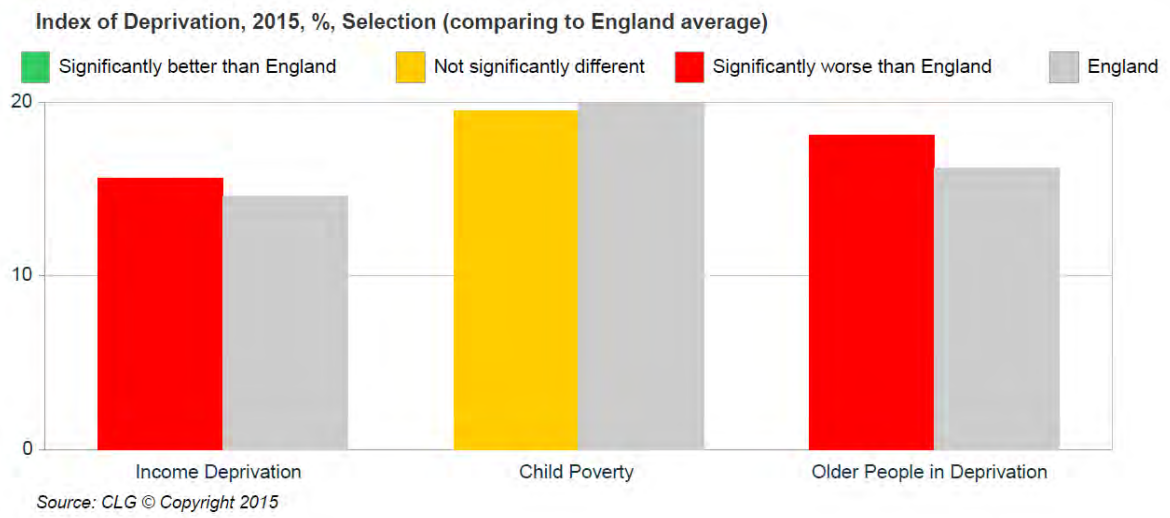
Figure 19^{xx}: Households in Rossendale at risk of Social Isolation by Quintile



Using Mosaic to model social isolation Lancashire County Council estimates that currently there are approximately 1,100 socially isolated households in Rossendale.

As the map illustrates, these households are concentrated around Rawtenstall and Bacup. Furthermore, figure shows that Rossendale has a significantly higher than average proportion of older residents living in deprivation.

Figure 20^{xxi}: Index of Deprivation for Rossendale by Income, Child Poverty and Older People



Future developments in Rossendale should give consideration to how the design of environments promotes physical activity in older people and reduces isolation.

Yours sincerely

Marcus Hudson
 Planning Manager

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<http://dashboards.instantatlas.com/viewer/report?appid=f0a67bbccd9c41349a53cb6e3f1c038c&authid=6ZAJsrc5Wqcblfj>

(Accessed 26 September 2017)

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

(Accessed 26 September 2017)

¹<https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf>

(Accessed 26 September 2017)

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<http://dashboards.instantatlas.com/viewer/report?appid=f0a67bbccd9c41349a53cb6e3f1c038c&authid=6ZAJsrc5Wqcblfj>

(Accessed 26 September 2017)

¹ <http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000125.pdf>

(Accessed 26 September 2017)

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<http://dashboards.instantatlas.com/viewer/report?appid=f0a67bbccd9c41349a53cb6e3f1c038c&authid=6ZAJsrc5Wqcblfj>

(Accessed 26 September 2017)

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<http://dashboards.instantatlas.com/viewer/report?appid=f0a67bbccd9c41349a53cb6e3f1c038c&authid=6ZAJsrc5Wqcblfj>

(Accessed 26 September 2017)

¹M. Marmot, J. Allen J, P.Goldblatt, T.Boyce, D.McNeish, M.Grady, et al. Fair society, healthy lives: strategic review of health inequalities in England post 2010. London: The Marmot Review;2010

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<http://dashboards.instantatlas.com/viewer/report?appid=f0a67bbccd9c41349a53cb6e3f1c038c&authid=6ZAJsrc5Wqcblfj>

(Accessed 26 September 2017)

¹http://localhealth.org.uk/GC_preport.php?lang=en&s=160&view=map8&id_rep=r01&sell_d0=153&nivgeo=ialt_2013

(Accessed 26 September 2017)

¹http://localhealth.org.uk/#v=map11;i=t2.obese_child_year_r;l=en;z=364742,435870,38031,23272

(Accessed 26 September 2017)

¹ <https://www.gov.uk/government/publications/obesity-and-the-environment-briefing-regulating-the-growth-of-fast-food-outlets>

(Accessed 26 September 2017)

¹<http://www.phoutcomes.info/public-health-outcomes-framework#page/4/gid/1000041/pat/6/par/E12000002/ati/101/are/E07000125/iid/11201/age/1/sex/4>

(Accessed 26 September 2017)

¹<http://www.phoutcomes.info/public-health-outcomes-framework#page/4/gid/1000041/pat/6/par/E12000002/ati/101/are/E07000125/iid/11001/age/1/sex/4>

(Accessed 26 September 2017)

¹<http://www.phoutcomes.info/public-health-outcomes-framework#page/4/gid/1000049/pat/6/par/E12000002/ati/101/are/E07000125>

(Accessed 26 September 2017)

¹<http://www.phoutcomes.info/public-health-outcomes-framework#page/4/gid/1000049/pat/6/par/E12000002/ati/101/are/E07000125/iid/90366/age/1/sex/2>

(Accessed 26 September 2017)

¹<http://www.phoutcomes.info/public-health-outcomes-framework#page/4/gid/1000042/pat/6/par/E12000002/ati/101/are/E07000125/iid/93015/age/298/sex/4>

(Accessed 26 September 2017)

¹<http://www.phoutcomes.info/public-health-outcomes-framework#page/4/gid/1000042/pat/6/par/E12000002/ati/101/are/E07000125/iid/90640/age/164/sex/4>

(Accessed 26 September 2017)

¹<http://www.phoutcomes.info/public-health-outcomes-framework#page/4/gid/1000041/pat/6/par/E12000002/ati/101/are/E07000125/iid/11001/age/1/sex/4>

(Accessed 26 September 2017)

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<http://dashboards.instantatlas.com/viewer/report?appid=e9bcb8c9de844337a4b494a9974ff0ff&authid=0q3FrYe08MRGuwL>

(Accessed 26 September 2017)

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http://localhealth.org.uk/GC_preport.php?lang=en&s=160&view=map8&id_rep=r01&sell_d0=153&nivgeo=lalt_2013

(Accessed 26 September 2017)

Representation on the Rossendale Local Plan with regard to Wind Turbines.

The Rossendale Borough Council covers a large area of the Rossendale Valley.

The purpose of this representation is to show the devastating effect on the vistas enjoyed by local people and visitors to the area and the setting of heritage assets and that no further turbines can be accommodated in the Rossendale Valley and surrounding areas.

This representation is by no means complete and there are an incalculable number of vistas and heritage assets which have not been included.

In less than eight short years the Rossendale Valley has gone from having no wind farms to seeing the construction of Scout Moor Wind Farm, Haslingden Moor Wind Farm (now with planning permission for additional four turbines), Crook Hill Wind Farm, Reaps Moss Wind Farm, Todmorden Moor, Crown Point Wind Farm, Hameldon Hill Wind Farm, Cliviger Wind Farm, Four smaller turbines near Deer Play plus a large number of singletons dotted haphazardly around the valley.

The Rossendale Valley was given the name of 'The Golden Valley' during the Industrial Revolution. My photographic website the-golden-valley.uk is my humble attempt to capture and communicate the beauty of 'The Valley'.

In terms of the long history of the valley, almost overnight the numbers of turbines have gone way beyond saturation and the landscape and its character cannot accommodate anymore turbines.

The photographs in this presentation are all stills with no movement. What they do not capture and communicate is the effect of turbines known as 'flicker'. For myself, when I walk up to the moors, the continuous movement of the turbines attracts my eye, it is unrestful, distracting and makes me feel unwell. I find now when I walk up the moors I have to look in a different direction to how I am walking due to the turbines flicker, or look down at the ground, removing my natural experience of the moors which I had always enjoyed since early childhood, walking the very paths my ancestors have walked and sharing in their experiences.

For myself and many other locals, the moors are our place of solitude, our place for quiet contemplation, rest and relaxation. We love the views and dramatic landscape and are very proud of our native valley. To see it being ruined by all these turbines is causing great suffering and depression.



Looking across to Scout Moor from Cribden. This picture was taken in November 2007, less than nine years ago when there was no wind farms at all in and around the Rossendale Valley.



Scout Moor Wind Farm from Holcombe Moor with the town of Ramsbottom in the valley bottom.





Views of Scout Moor Wind Farm, Crook Hill Wind Farm and Reaps Moss Wind Farm from The Grane as you leave Haslingden Moor Wind Farm



Haslingden Moor Wind Farm from Cribden



Crown Point Wind Farm from Cowpe



Crook Hill Wind Farm from Cribden



Wind Farm above Irwell Springs, Deer Play? There are also some smaller wind farms as well in this area not photographed.



Photographed from Deer Play



Photographed from Burnley Road, Bacup near Deer Play. 4 smaller turbines in foreground, possibly 3 Reaps Moss turbines in background.



Turbines viewed from Burnley Road, Bacup.



Sheephouse Farm Wind Turbines above Stacksteads



One of two singletons in foreground with Hameldon Hill Wind Farm in the background.



Cliviger Wind Farm photographed from Crown Point.



Crook Hill Wind Farm?

Photographs showing how wind turbines interact with the landscape and heritage

Both Rawtenstall and Bacup town centres have been placed on Historic England's Heritage at Risk Register due to risk of inappropriate development. The proposed Scout Moor extension will cause significant harm to the setting of both these town centres and their many heritage assets.



Entrance to the Borough of Rossendale at Deer Play.

As soon as you enter Rossendale, you are now greeted with wind turbines sticking out of buildings.



Entrance to the Borough of Rossendale near Todmorden Moor.



Entrance to the Borough of Rossendale at Haslingden Moor



How existing Scout Moor Wind Farm effects the setting of Grade II Peel Monument.



How Crook Hill effects the setting of Grade II Ilex Mill and Grade II Hall Carr Mill (both in foreground)



Grade II St Saviours Bacup with turbine blades from Scout Moor Wind Farm.



Grade II St Saviours with turbine from Reaps Moss Wind Farm



Grade II Rawtenstall Library and Grade II St Mary's Church Rawtenstall with turbine blades from Crown Point Wind Farm.



Approach to Haslingden from the Grane with Scout Moor in background.



Edenfield with two turbines from existing Scout Moor Wind Farm.



Existing Scout Moor wind turbines above Balladen village.



Turbines from Reaps Moss Wind Farm dominate skyline above Bacup and Grade II St Saviours Church



Turbines from Haslingden Moor Wind Farm.



More turbines from Haslingden Moor Wind Farm



Reaps Moss Wind Farm turbine from Bacup Cemetery.



SheepHouse Farm wind turbine above Farholme Mill Stacksteads.



Scout Moor Wind Farm viewed from Manchester Road, Haslingden.



Existing turbines from Booth Road



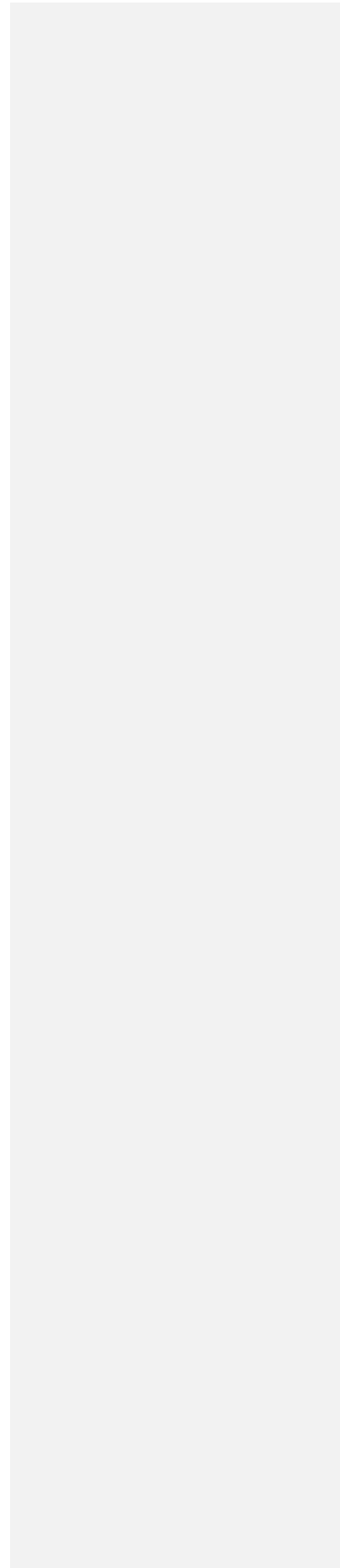
Crown Point Wind Farm turbine affecting the setting of Grade II Rams Head, Rawtenstall.



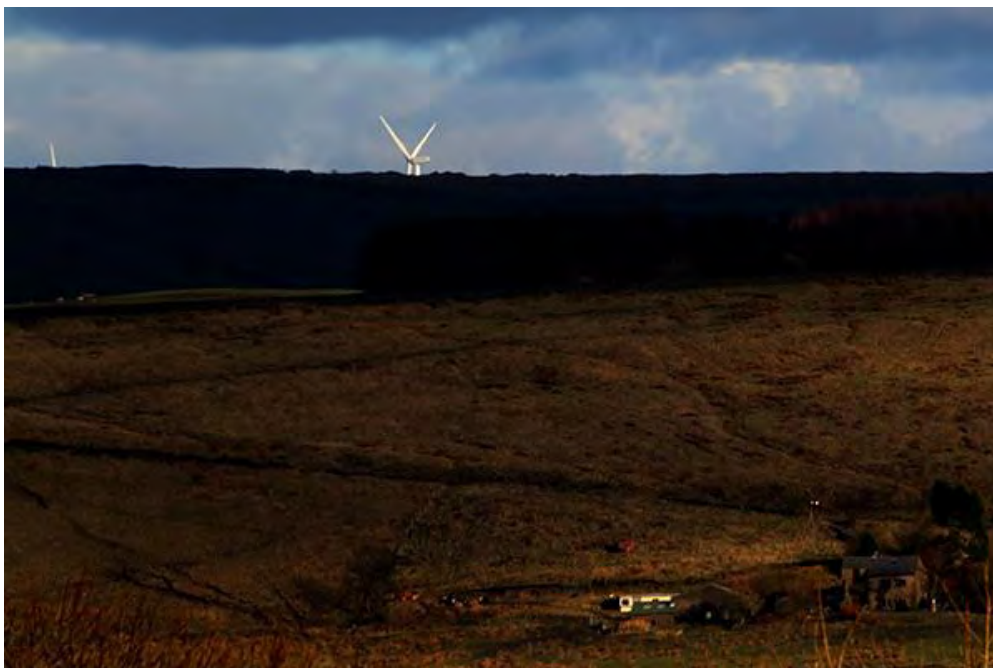
From Booth Road



Wind Farm Protest Walk Cowpe with Scout Moor Turbine protruding from the horizon.



Some more general photographs of wind farms from the Rossendale Valley



From Newchurch Road/Booth Road



Photographed from Ski Rossendale



Size of turbines completely out of scale with the rest of the built environment.



Haslingden Moor Wind Farm photographed from Haslingden Road. A further 4 turbines have been given planning permission.



Haslingden Moor Wind Farm from Bury Road. A further 4 turbines have been given planning permission.

Protest walk 29th May 2016 against the proposed expansion of Scout Moor Wind Farm.



Local people gather in Waterfoot to walk up to Waugh's well.









Four turbines at Crown Point Wind Farm viewed from above Cowpe



Three Turbines from Todmorden Wind Farm dominate skyline above Bacup and Grade II St Saviours Church. lewed from above Cowpe



Turbines above Bacup. Viewed from above Cowpe



Scout Moor Wind Farm as experienced by approaching walkers to Scout Moor.





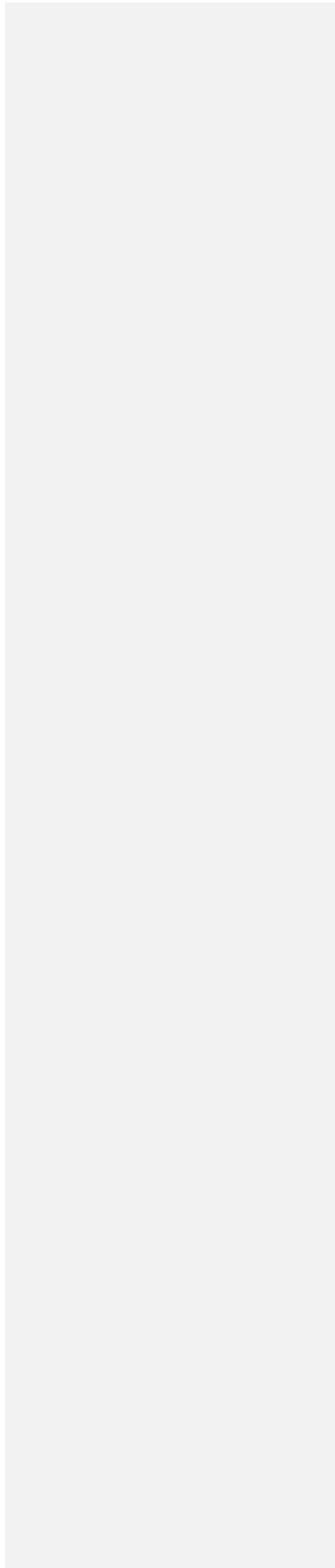
Inhuman scale of existing Scout Moor Wind Farm turbines above Waugh's Well.



Local protesters at waugh's well



This is what for generations Waugh's Well is about, a quiet place of solitude for people to spend quality time. A place for visual, written and spoken artists to produce their work.







Turbine from existing Scout Moor Wind Farm dominates the cross on top of Whittle Pike.

The cross was erected by a local scout group in memory of one of their founding members, Flying Officer Geoffrey Molyneux, who was one of eighteen men killed while on a RAF flying exercise over the Irish Sea on 11th January 1955.



View from Scout Moor of Haslingden Moor Wind Farm.

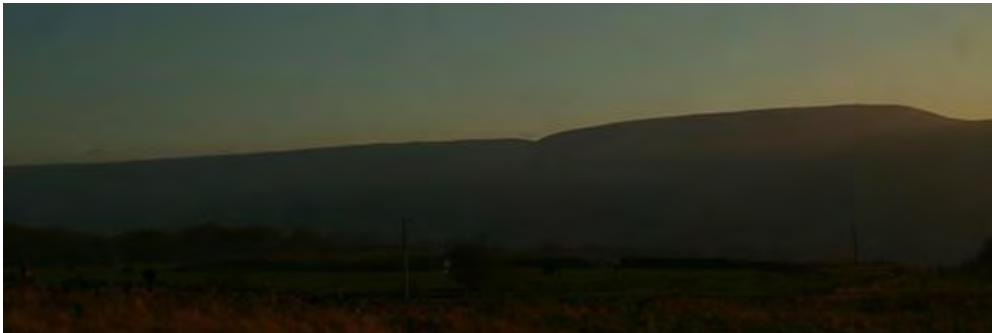
Planning Permission has now been given for a further 4 turbines by Hyndburn Council.

Rossendale Borough Council, objected to the application on the following grounds: “The principal effect of the scheme on Rossendale will be landscape impact.

“Of the two areas most affected visually by the current proposal one is located in Rossendale on the south side of Haslingden Grane, one of the most popular locations in Rossendale for recreational users. Rossendale Way, a locally significant long distance footpath, is particularly affected. While this is largely not a new impact it does intensify the effect on users that are sensitive receptors.”

<http://www.rossendalefreepress.co.uk/news/local-news/rossendale-council-objects-plans-expand-9501917>

Waugh’s well is also one of the most popular locations in Rossendale for recreational users and is also on the Rossendale way.



View of Cowpe Lowe from Edge Lane with existing Scout Moor Wind Warm Turbines protruding .



Scout Moor Wind Farm viewed from public footpath in the Metropolitan Borough of Bury,



Scout Moor Wind Farm from public footpath.



View of Scout Moor Wind Farm from Ramsbottom Conservation Area and Ramsbottom Station part of the heritage East Lancashire Railway.



How existing Scout Moor Wind Farm effects the setting of Grade II St Paul's and war memorial.



View of Scout Moor Wind Farm from A56



Existing view from St Nicholas Church graveyard.



Grade II* St Nicholas Church with existing turbines sticking up out of the horizon.



View from Clough Fold Conservation Area. Sheephouse farm turbine seen here to far left.



View of existing Scout Moor Wind Farm from the ancient Rooley Moor Road.



Sheephouse Farm Turbines to far left. Proposed Scout Moor Wind Farm expansion would see turbines all the way along the hillside. Photographed from above Newchurch.



Photographed from top of Cats Steps, Booth Road. This is the view experienced by residents all along this section of Booth Road.



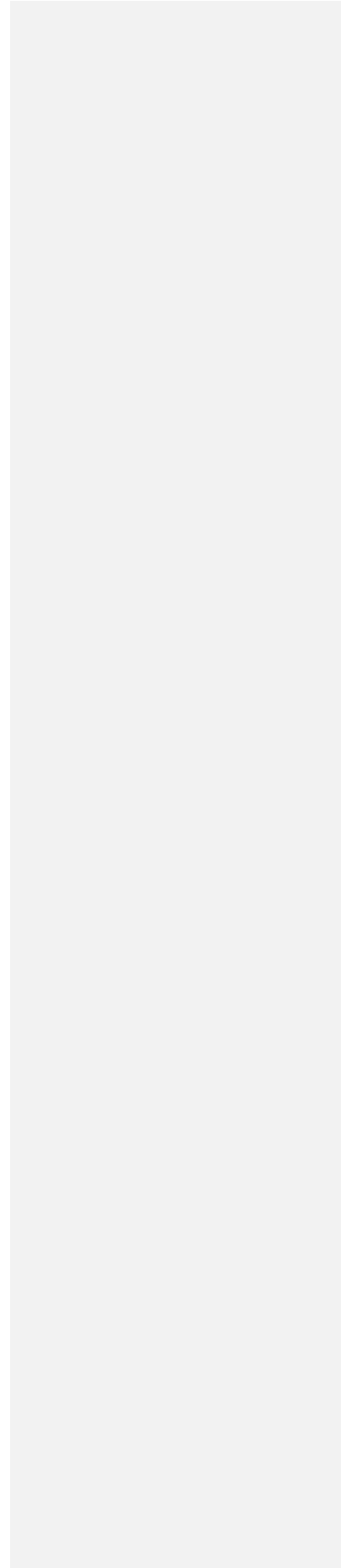
Existing Scout Moor Wind Farm turbine sticking up above the horizon. Cowpe



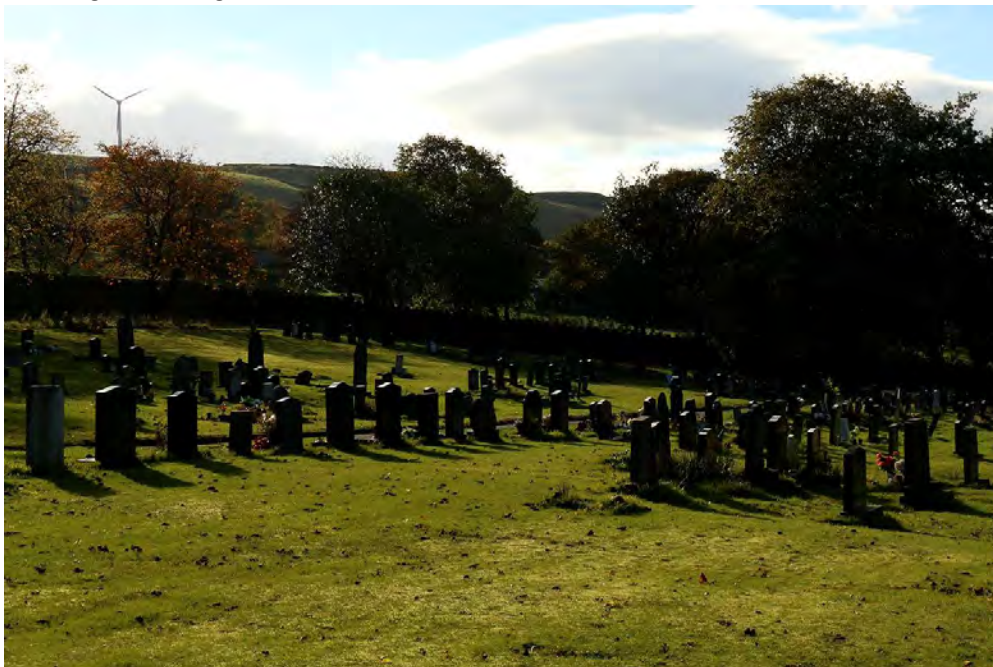
Existing Scout Moor Wind Farm turbine sticking up above the horizon. Photographed from Bacup.



Bacup Cemetery with Reaps Moss turbines causing significant harm to its setting.



The Great War Memorial Cross, Bacup Cemetery with one of the Sheephouse Farm turbines harming its setting in the background.



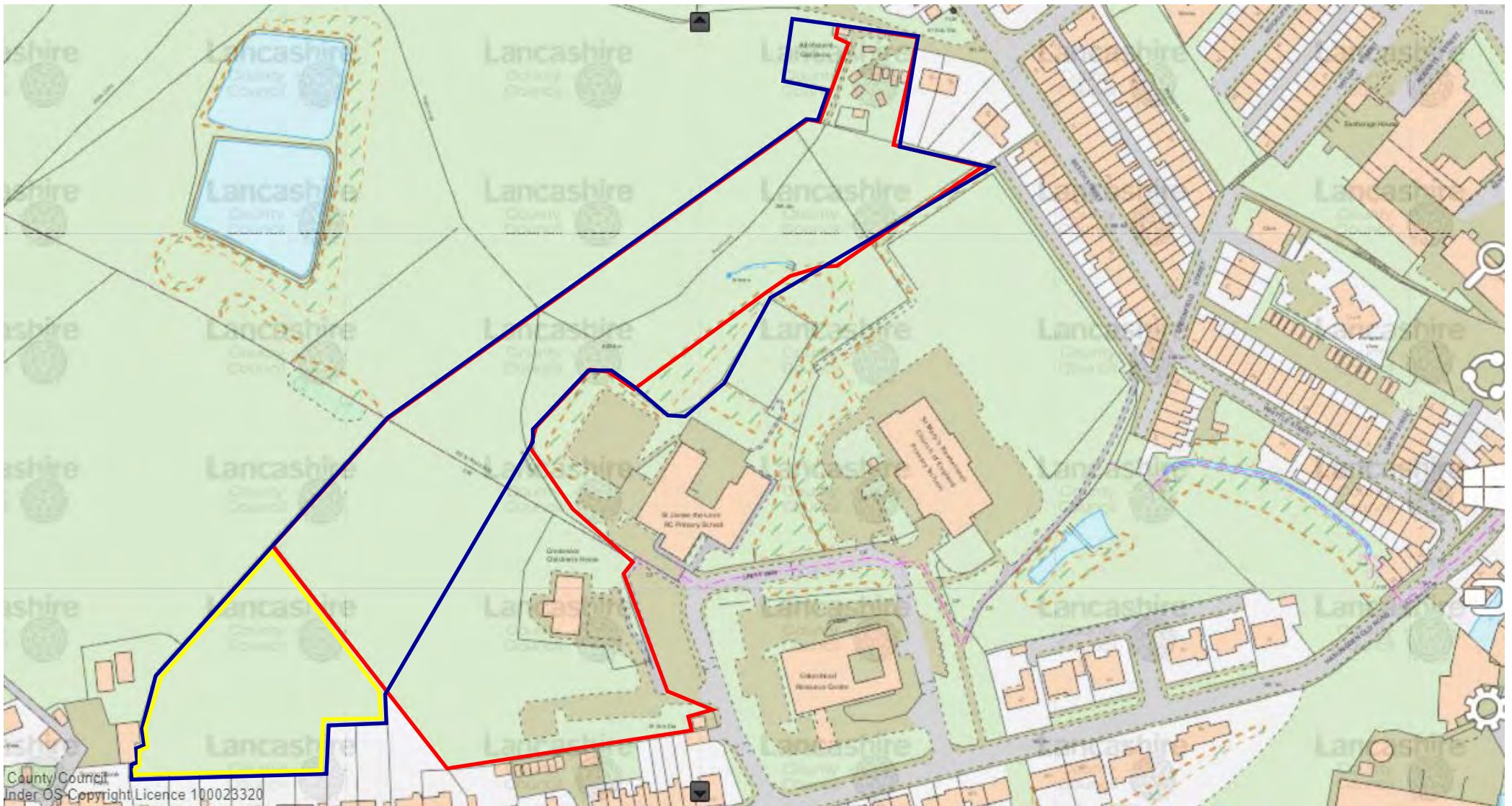
Existing view from Bacup Cemetery. The turbine seen here is one of the Sheephouse Farm turbines.



The first photograph in this report of Scout Moor from Cribden taken in November 2007, less than nine years ago when there was no wind farms at all in and around the Rossendale Valley.

Peter Wood

02/10/17



- Site Ref: RCGL61 proposed by RBC in the 2015 assessment
- Actual site subject of the landscape assessment conducted by Penny Bennett (Landscape Architects) on behalf of RBC for Site Ref RCGL61
- Site Ref: SHLAA16227 proposed by RBC in June 2017, justified by reference to the above erroneous landscape assessment

Bacup
Lancashire

07/10/17

Rossendale Borough Council
Business Centre
Futures Park
Bacup
OL13 0BB

Forward Planning Department

Re. Rossendale Draft Local Plan, Regulation 18 Consultation, July 2017, Resident Comments.

Dear Sir, Madam

I appreciate the opportunity to comment on the July 2017 Local Plan Written Statement (Regulation 18 Draft) and submit the following for consideration.

Although the draft plan encompasses the entire borough I have limited my comments to the proposals I consider will affect our immediate locality in and around the Bacup and Stacksteads area.

I have several areas of concern about the proposals within the draft but will focus on those I consider most important for the future.

Policy SD1: Presumption in Favour of Sustainable Development

I understand sustainable development means: Development that meets present needs without compromising the ability of future generations to meet their needs.

With consideration to some recent planning decisions made by the council I have serious concerns about the statement on page 4 of the draft:

“Planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise.”

and page 5

“approve development proposals that accord with the Local Plan without delay; and
Where the Local Plan is absent, silent, or relevant policies are out-of-date, grant permission unless:

any adverse impacts of doing so would significantly and demonstrably
outweigh the benefits, when assessed against the policies in the Framework

taken as a whole; or
specific policies in the Framework indicate the development should be restricted.”

My interpretation of the presumption in favour of sustainable development is; a small group of elected, lay person, representatives make decisions which will have a long reaching effect on future generations with regard to the local environment, finances and their future wellbeing.

As with this exercise I appreciate planning notifications are issued and consultation events are organised. However, I believe a large proportion of the populace are too busy living their daily lives to take note of some of the proposals which could affect them; other than those highlighted in the media.

Recent claims that some individuals were too scared to voice an opinion on the £2 million Bacup Town Heritage Initiative and comments that a majority of people are in favour of the first, now rejected, public realm initiative scheme are examples of the manner in which some major decisions are managed.

If no objections are raised the presumption is then made in favour of the proposal. This concerns me.

The fact that some individuals are not aware, are too busy to respond to what is happening around them, or consider there is no point in objecting because; it won't make any difference to the decision, frustrates me greatly. Hence my responses to the Local Plan draft consultation.

Bacup Townscape Heritage Initiative.

From the Bacup Public Realm Proposals Update 25/08/2017 – Councillor

"The existing scheme is then stopped. Whilst this decision may be popular with those who have opposed change I believe that the great majority of people in Bacup will be deeply disappointed that our chance to deliver transformational change to the town centre has been lost because of this opposition."

"County officers will now work closely with our THI team to develop a new public realm plan that can be delivered within the THI timescales."

Although unable to attend the public meeting in July to voice my opinion on the, thankfully now defunct, twin island, shared space proposal I was in opposition to the scheme. Not because I "oppose change" but because I considered it was a badly conceived plan which would have caused severe traffic disruption to the town with, I believe, no benefit to residents or businesses.

Bacup town centre is fundamentally a complex, offset junction at the crossing point of the A681 and A671 combined with Lane Head Lane emerging as a blind exit in respect of traffic from the Todmorden Road direction.

Ignoring the heritage, retained fountain, discussion completely, I believe the current road layout scheme in place is the best functioning solution for the junction. The traffic flows well in all directions; unless a driver accidentally, or deliberately decides to block the single car space entry point to the island from the Todmorden Road. Traffic flow around the island is also restricted if a large vehicle enters the island from the Todmorden Road.

Other than under those circumstances the existing traffic system works, as can be seen daily and should remain unaltered. There are adequate street signs and road markings to direct the traffic properly. Two lanes from the Burnley Road direction for left and right turns. Three lanes from Rochdale for turn left to Rawtenstall, straight ahead for Burnley and turn right for Todmorden.

The twin roundabout with five pedestrian crossings scheme was nonsensical in the extreme and would have resulted in considerable traffic build up at this junction. Eight pedestrian crossings in close proximity and traffic flow restricted to one lane only in all directions would not be a suitable, or efficient "transformational change" for Bacup in my opinion.

The aerial CGI provided in support of the scheme was laughable and not real world Bacup. Bicycles, pedestrians, street furniture, widened pavements, two food vendor vans and only six cars visible. Not a bus or lorry of any description in sight.

See recent images. Friday 06/10/17 12:00



Tourist - Todmorden to Rawtenstall



Rawtenstall to Rochdale



Todmorden to Rochdale



Todmorden to Burnley



Todmorden to Burnley using left lane



Negotiating the island with the bus to Accrington

Shared space, for events, centred at the junction of two busy A roads is a complete nonsense.

Bacup evolved without a town or market square. Why try now to make something more pedestrian friendly and create, yet another, Rossendale traffic pinch point.

Comparing Bacup with Poynton in Cheshire is ridiculous. Two A roads A5149 and A523 T junction with Park Lane. Totally different demographics with a different road layout, different weather in Cheshire so more scope for Al Fresco cafe scene. There is more disposable income in Poynton. I regularly experienced traffic delays travelling from Macclesfield to negotiate this constricting junction road scheme. There are no clearly defined pedestrian crossings visible.

Ben Hamilton-Baillie's design to create a village centre with informal "pedestrian desire lines" and repaving to the areas in front of the shops to "enhance the pedestrian environment" cost circa £3 million.

The shared space concept being; to slow traffic, using gateways demarking the transition from highway to village centre. From personal experience the scheme is badly lit at night, pedestrian desire lines and highway boundary lines are difficult to identify in the dark and rain and become invisible in snow. Ignoring the cost aspect the road layout is a confusing mess and free for all with the traffic. Pedestrians rely on the goodwill, awareness and due care and attention required from drivers to safely cross the roads.

26000 vehicles per day through Poynton!

The gateways channel traffic into single lanes resulting in long, slow moving queues in all directions which arrive at two "circles" defined in the roadway using different coloured blocks and then negotiate the junction with no clearly defined right of way other than the instructions in the Highway Code. I understand the instruction for roundabouts is they are to be driven around, not over.

Independent assessment of the Poynton junction at the following link.

<https://aseasyasridingabike.wordpress.com/2014/06/16/poynton/>

Accidents by Design: The Holmes Report on "shared space" in the United Kingdom

Lord Holmes of Richmond MBE – July 2015

<http://www.theihe.org/wp-content/uploads/2013/08/Holmes-Report-on-Shared-Space-.pdf>

Executive Summary

Shared Space described by users as:

"Lethally dangerous" (Pedestrian)

"Absolute nightmare that I avoid if I can." (Driver)

"Shared space is a false promise with poor delivery" (Cyclist)

Key findings:

- People's experiences of shared space schemes are overwhelmingly negative.
- Overzealous councils are risking public safety with fashionable 'simplified' street design.
- Over a third of people actively avoid shared space schemes.
- 63 per cent of people who have used shared space schemes rated their experience as poor.
- Significant under-reporting of accidents in shared space.

Key recommendations:

- Immediate moratorium on shared space schemes while impact assessments are conducted.
- Urgent need for accessibility audits of all shared space schemes and a central record of accident data including "courtesy crossings", which must be defined and monitored.
- Department for Transport must update their guidance so that Local Authorities better understand their responsibilities under the Equalities Act.

Bacup is a crossroads town which people, other than residents, pass through on their way to somewhere else. This is something a shared space scheme will not rectify, particularly if the scheme creates the issues noted in the Holmes Report.

Most residents already travel elsewhere to work and shop.

Bacup is not a bad place to live but is not, nor is it likely to be, a tourist destination.

No canal, no railway, no real attractions or restaurants; just a few bike trails in a couple of redundant quarries.

Nothing of interest for “tourists”. I can’t see the street cafe scene working in the town.

Irwell Terrace is the closest to a town centre public space. If more public space is considered necessary; maybe relocate the bus stands. Exchange a couple of car parking spaces in front of the shops for the Accrington bus stop.

More public realm “shared space” will give the local idiots more places to play at night perhaps?

Forgot; no police station in Bacup or Stacksteads!

Maybe combine the police and fire service facilities at Bacup fire station for more efficient use by both services. This will give a faster police response time, instead of the current, blue light and siren charge up the valley from Waterfoot, Rawtenstall, or across from Burnley.

It will be very interesting to see what the next Bacup THI proposal for consultation looks like.

Changes should only be made to the current road layout if they make improvements.

I don’t think the retention of a heritage fountain is the main reason Bacup residents opposed the shared space scheme so strongly. The reports I read of the public meeting in July suggests the majority of those attending considered it is neither a practical or beneficial solution for the town.

Changes to the road layout purely made to secure the heritage grant aid should not be pursued. Leave the junction as it is now.

It is already difficult enough to turn right from Bankside Lane towards Rawtenstall. Why make it worse?

I am not opposed to change. I have witnessed the enormous changes to Bacup since we came to live here in December 1980. Many shops and businesses have disappeared. A sad situation reflected in other towns across the country.

Housing

Policy HS1: Meeting Rossendale’s Housing Requirement.

Providing at least 4000 additional dwellings over the plan period equating to 265 dwellings per year.

This number may have been correct when the draft was released but; from the Rossendale Free Press article of 22/09/17 I understand this number, though still to be confirmed is now likely to be reduced to 212 dwellings per year following the “Keep Rossendale Green” campaign taken to Whitehall by Councillor Alyson Barnes and Jake Berry MP to protect our green spaces.

With consideration to the protection of our “green spaces” I now raise my concerns about the housing proposals related to Bankside Lane Bacup.

Policy HS2: Housing site Allocations.

Using the table beginning on page 7 of the Draft in conjunction with the adopted Policies Map there are several sites earmarked for housing development where access is noted via Bankside Lane.

The majority of which are “Greenfield” with some designated “Greenlands”

Councillor Barnes stated in January 2017

“By making sure we get our local plan right, we can now look these Government changes and see if they deliver on the promise of fewer homes for Rossendale. Protecting our green spaces and promoting business are key priorities for our council.”

Unless I have completely misunderstood the information sources I have used to research the proposed housing development sites for Bankside Lane there is conflicting information given in the Draft Local Plan and the detailed site analysis information contained in Appendix E – Site Assessments.

The development area proposals shown on the adopted Policies Map are at odds with the information given in Appendix E – Site Assessments. – Dated June 2017

Areas shown as “proposed greenbelt” on the Policies Map have Appendix E – Site Assessments for housing development.

SHLAA16074 - Land to the rear of Highfield Bacup.

Greenfield site. Countryside adjoining the urban area. Currently Grassland and private/storage garden area. Yield calculated **48 units**. Access off Maden Road, is poor and will require the felling of mature trees. Access via Meadow Way is better but situated in a different ownership. **It is to be noted that Bankside Lane which is a mandatory access point is narrow and steep.**

The above proposed development is not shown on the Policies Map or listed in Table 1 Housing site Allocations.

SHLAA16075 - Land at Huttock Farm Bacup. HS2.11

Split Greenfield and Brownfield site. Countryside adjoining the urban area. Currently Farm storage yard, ménage and grassland. Yield calculated **22 units**. Access off Bankside Lane will require improvements. **Bankside Lane is narrow and steep towards Bacup town centre.**

SHLAA16076 - Huttock Top Bacup. HS2.12

Greenfield Designated Greenlands. Urban Boundary. Currently Farmland, grassland, wooded area ,ménage and stables. Yield calculated **66 units**. Access off Bankside Lane. **Bankside Lane which is narrow and steep towards Bacup District Centre.**

The above proposed development has conflicting information about the calculated yield, site area and designation. The Policies Map shows the area marked HS2.12 with a yield calculated at 30 units with the balance of the site shown as proposed green infrastructure. This suggests the green infrastructure forms part of the flexible approach for the future maybe?

SHLAA16077- Land south of Huttock Top Farm Bacup. HS2.13

Greenfield. Countryside adjoining the urban area. Currently Grassland and private garden, small area of storage for the farm. Yield calculated **40 units**. Access off Bankside Lane via Newchurch (Old) Road which is a narrow lane.

The proposed development access is identified incorrectly as Newchurch Road in Appendix E.

SHLAA16079 - Land off Newchurch Old Road Bacup. HS2.32

Greenfield. Designated Greenlands. Countryside adjoining the urban area. Currently Grazing Land in part (horse related activities) woodland area and shrubland area. Yield calculated **93 units**. Access via Sow Clough Road or Bankside Lane.

The above proposed development access has conflicting information about the calculated yield, site area and access. The Policies Map shows the area marked HS2.32 with a yield calculated at 47 units. Appendix E notes "the steep slope to the south of the site has been excluded from the area available for development." This area is shown as green infrastructure on the Policies Map. This precludes access via Sow Clough Lane and restricts the site access to Bankside Lane.

Whilst I understand the thought processes for each of the above proposed developments due to the connectivity with adjacent urban areas it is interesting to note that all but one of the sites with access via Bankside Lane are Greenfield sites with two sites designated Greenlands. The one variance on the list being SHLAA16075 HS2.11 Land at Huttock Fam Bacup which is predominately Greenfield.

Councillor Barnes stated in January 2017

*"By making sure we get our local plan right, we can now look these Government changes and see if they deliver on the promise of fewer homes for Rossendale. **Protecting our green spaces and promoting business are key priorities for our council.**"*

Appendix E Calculated Yield Numbers with land accessed via Bankside Lane is: **269 units**

Policies Map Calculated Yield Numbers with land accessed via Bankside Lane is **139 units**

The difference between the two numbers is due to:

SHLAA16074 - Land to the rear of Highfield Bacup. Greenfield Greenlands 48 units

Above proposed development not shown on the Policies Map.

SHLAA16076 - Huttock Top Bacup. HS2.12 Greenfield Greenlands. 30 units

Above proposed development unit number difference with Appendix E

SHLAA16079 - Land off Newchurch Old Road Bacup. HS2.32

Greenfield. Designated Greenlands. 47 units

Above proposed development unit number difference with Appendix E

Assuming two vehicles per unit.

Potential additional vehicles using Bankside Lane: Appendix E **538 vehicles**

Potential additional vehicles using Bankside Lane: Policies Map **278 vehicles**

Safe to assume the number of vehicles is likely to fall somewhere between these two figures which will increase proportionally by the anticipated number of visitors to the new properties.

As clearly mentioned in the Appendix E- Site Assessment June 2017

"It is to be noted that Bankside Lane which is a mandatory access point is narrow and steep."

Having lived on Bankside Lane Bacup now for almost 37 years, ignoring the deterioration to the road surface, we have seen the decline in the gritting service operated by Lancashire County Council during the winter. With particular regard to the frequency and amount of salt applied to the road surface when snow and ice occurs.

The reduced coverage means Bankside Lane like many other roads in the area becomes a very dangerous place for residents in the winter.

Parts of Bankside Lane are very steep and narrow; particularly at two, single lane width, pinch points with the higher, narrow section having restricted views for motorists climbing and descending the steep hill section at this point.

The junction with Maden Way / Maden Road is also steep and has a restricted sightline to the right for motorists descending to join Bankside Lane.

There is also a restricted vision point on the bend where Bankside Lane climbs again to Bankside close and Rooley View.

All this combined with car parking issues for the length of the lane, particularly from The Square to Cuckoo Hall where residents frequently double park, effectively reducing the road to a truck width means Bankside Lane is already a busy and congested roadway.

The double parking issues give me cause for concern for the problems created for emergency vehicles, particularly the Fire and Ambulance services with potential life threatening delays to access further up the lane.

Notices have been fixed to street signs highlighting problems for access by the gritting teams.

I have great difficulty in understanding why Rossendale Borough Council considers Bankside Lane a suitable, safe access route to the number and scale of the proposed developments.

The road access and parking position for the full length of Bankside Lane combined with the very steep and narrow pinch points creates problems in normal weather. The winter period, with greatly reduced gritting, means there is serious risk of accident damage to vehicles and injury to pedestrians in these areas already.

The construction of more houses on the proposed developments with access to Bankside Lane and generation of additional traffic should not be allowed to proceed.

All the proposed development areas listed should be removed from the Draft Local Plan.

Greenfields and Greenlands should be preserved, particularly the areas planted with trees to mitigate flood risk at lower levels.

The large number of empty homes across Rossendale should be offset against the proposed number of houses required.

Why build on Greenfield sites when houses remain unsold?

The focus of new development in the Borough should be weighted toward brownfield sites not the disproportionately high number of Greenfield sites as proposed for Bankside Lane.

The development reference SHLAA16709 HS2.32 is proposed for a Greenfield and Greenlands site where trees were planted as whips on rough moorland circa 25 years ago. The proposal for 47 units on this site will destroy the woodland area, removing the habitat for the groups of Roe deer we sometimes see from our living room window; a beautiful sight. The badgers, foxes and birdlife to be found in this open access green space will be lost to more housing.

“Protecting our green spaces and promoting business are key priorities for our council.”

“Keep Rossendale Green”



Greenfield, Greenlands woodland habitat proposed for development SHLAA16079 HS2.32.

Land off Newchurch Old Road. Access via Bankside Lane.

Green infrastructure. Mitigating CO₂ and flood potential to the valley floor.

Natural wildlife corridor, a stepping stone habitat for biodiversity.

This site should be protected not developed for housing.



Proposed entrance SHLAA16077 HS2.13
Land south of Huttock Top Farm Bacup

Proposed entrance SHLAA16075 HS2.11
Land at Huttock Farm Bacup.



Examples of parking on Friday 06/10/17 11.30 Cars are frequently double parked on the pavement here.



Friday 06/10/17 11.40 Narrow section above Maden Way / Maden Road Junction restricted vision exit.



Higher pinch point above garage colony. Steep, narrow section, restricted vision for descending drivers.



Higher pinch point above garage colony. Steep, narrow section, restricted vision for descending drivers.



Lower pinch point below garage colony. Steep, narrow section, restricted vision for ascending drivers.



Lower pinch point Dale Street junction. Steep, narrow section, restricted vision for ascending drivers. Restricted vision to right for drivers emerging from Dale Street creates issues for vehicles climbing narrow section below Dale Street.



Lower pinch point below Dale Street junction. Steep, narrow section, I have experienced frequent occasions where some drivers continue their descent when faced by oncoming vehicles climbing this steep section.

The images provided to illustrate the pinch points and hazards already present with the existing volume of traffic on Bankside Lane.

Winter conditions make these sections of Bankside Lane even more hazardous.

More houses means more associated traffic for residents, visitors, large delivery vehicles, refuse vehicles, emergency services vehicles. More traffic joining Market Street at a difficult junction.

All the development proposals with connections to Bankside Lane should be abandoned on the grounds of public highways safety.

Access is also required by vehicles to and from Animal Quackers, Maden Recreation Ground and Bacup Golf Club.

Why generate more traffic by the proposed developments with access via Bankside Lane?

SHLAA16068 **Bacup Leisure Centre Bacup**

Brownfield. Urban Boundary. Currently Bacup Leisure Centre. Yield calculated **14 units**. Excellent existing access off A671.

I understood Euro Garages had purchased this site for use as a garage and drive thru retail outlet?

This would be a good example of a sustainable development and would certainly benefit Bacup by introducing competition for the one other outlet near the town.

It would also be very useful as a brownfield residential development if permission is not granted for the anticipated garage forecourt operation.

Policy ENV4: Landscape Character and Quality.

More consideration needs to be given to this policy in future before approval is granted for more wind turbines. Particularly the unacceptable impact on skylines and roofscapes.

As the first paragraph in the Explanation of Policy ENV4.

Development needs to conserve and enhance Rossendale’s dramatic and attractive natural environment and its built environment. The Borough’s landscape is significant in terms of its local identity, cultural value, tourism and general contribution to quality of life and it is essential that it is protected.

The Council’s planning decision to grant permission for the Scout Moor Wind Farm Expansion neither conserved nor enhanced the dramatic and attractive natural environment. Thankfully the Planning Inspector’s recommendations and Secretary of State overturned the decision to preserve the landscape for the future.

Similarly the Council’s decision to grant permission for the erection of the two turbines at Sheephouse Farm Stacksteads was also flawed. Though smaller size turbines they do give the appearance of overspill from the Scout Moor wind farm group into the moorland fringe.

Despite rejection by Councillors the skyline above Bacup is now dominated by the large scale turbines at Reaps Moss and Todmorden Moor.

No more wind turbines of similar scale should be allowed to pollute “Rossendale’s dramatic and attractive natural environment.”

“To ensure Rossendale’s landscape is protected for future generations.....”Policy ENV4

Policy ENV5: Biodiversity, Geodiversity and Ecological Networks.

“Rossendale’s ecological network comprises areas between sites that although not designated, also need to be protected to allow plants and animals to move between sites.”

SHLAA16079 - Land off Newchurch Old Road Bacup. HS2.32 Greenfield. Designated Greenlands.

Although built to improved, current standards, the above proposed development and other Greenfield developments will still impact Policies ENV5 and ENV6 **resulting in a net loss of green infrastructure.**

Policy ENV6: Green Infrastructure

From Explanation

Green Infrastructure..... **“which provide multiple social, economic and environmental benefits, support sustainable development and enhance quality of life.”**

The Council will apply a mitigation hierarchy to the loss of green infrastructure. Wherever possible development proposals should avoid damaging the existing assets within the site.

This includes protecting Rossendale’s Public Right of Way network..... but also one which is generally in poor state of repair.

The above extract applies to all the Public Rights of Way connecting to Bankside Lane.

Policy ENV8: Wind Turbine Areas of Search.

“Areas of Search for Wind Turbines have been identified on the Policies Map. Single and exceptionally, small groups of Turbines of up to 59m may be suitable in the “Enclosed Uplands Wind Turbine Area of Search” shown on the Policies Map. Larger turbines of up to 125m may be considered on the “High Moorland Plateau Wind Turbine Area of Search” shown on the Policies Map. Development of new wind turbines would not be supported outside these areas.

All areas of the Borough are considered to be potentially suitable for single turbines of up to 25m in height.

The areas of search for Wind Turbines identified on the Policies Map should now be redrawn following the Secretary of State’s decision on 06/07/17 to refuse permission for the Scout Moor Wind Farm Expansion plan within the Rossendale Borough Council Boundary on the grounds of “the harm identified to the character and appearance of the area”

Extract from the Secretary of State’s final decision letter of 06/07/17

17.Application A: The Secretary of State has carefully considered the Inspector’s analysis and conclusions at IR351-372 and IR376-377. He agrees with the Inspector that the proposal includes an area that is a valued landscape because of its openness, tranquillity and attractive views into the lower valleys. He notes that the proposal would extend the footprint of the existing wind farm and would introduce prominent views of turbines where none currently exist of the existing Scout Moor Farm. He considers that the proposed layout would not integrate well with the existing turbines. Overall, he agrees with the Inspector that the proposed turbines sited near to the edge of the moor would have a significant adverse effect on the landscape character and visual amenity

The Secretary of State agreed with the Inspector’s that the proposed turbines sited near to the edge of the moor would have a significant adverse effect on the landscape character and visual amenity.

The boundary line of the “High Moorland Plateau Wind Turbine Area of Search” should be redrawn, omitting the area earmarked for Scout Moor Expansion Wind Turbine development, to avoid any potential future conflict with the Secretary of State’s final decision on the proposal.

The High Moorland Plateau Wind Turbine Area of Search boundary line should also be modified to remove the area included for the proposed 12 turbine wind farm application submitted by Coronation Power for Rooley Moor to avoid any future applications for other wind farms or a small group of turbines in the same area.

The Reaps Moss and Todmorden Moor turbines are referred to as small groups!

Small in number; but enormous, overbearing structures on the skyline above Bacup.

Similar consideration should also be given to the boundary transitions from the High Moorland Plateau to The Enclosed Uplands area of search with full attention given to avoiding more impact on landscape character and visual amenity from other viewpoints; both within Rossendale and from surrounding areas.

I appreciate the last line of paragraph 5 page 66 “.....but not along the Heald Moor ridge.”

This statement is in line with the recommendations contained in Julie Martin Associates January 2013 report to Calderdale Borough Council for the proposed Gorpley Wind Farm – Assessment of Landscape and Visual Impacts.

However Rossendale Borough Council should not regard any future wind farm applications as a potential revenue stream.

Great care should be taken in future to avoid the cumulative impacts of more wind turbines on; “our stunning hills and beautiful countryside are a major part of the quality of life for the people in our valley. If you force us to go ahead with these plans it will change the face of the valley forever”

Extract from Councillor Alyson Barnes letter to David Cameron – Keep Rossendale Valley Green 03/03/16

125m high wind turbines on the moors in the Borough have changed the valley.

I also appreciate paragraph 1 page 69 of the Draft if “addressed” means dealt with correctly.

“.....Community concerns need to particularly taken into account and addressed.

Following the Public Inquiry in October 2016 the Council must now be fully aware there is considerable resistance to the erection of more wind turbines on the hills in the Borough.

“To ensure Rossendale’s landscape is protected for future generations.....” Policy ENV4.

Policy ENV10: Other forms of Renewable Energy Generation

It is good to see the Council are considering the energy mix for the future. The anticipated growth in demand for electricity to power the growing number of electric vehicles needs to be based on a stable supply platform.

Wind turbines contribute but the industry has recently conceded the numbers given for reduction in CO₂ have been inaccurate. Future supply stability needs a flexible approach to generation and energy storage. This mix to exclude coal but will include; Nuclear (Internationally contentious) Wind (on and offshore) with the balance for me leaning toward offshore. Gas, Solar, Biomass, Hydro, Energy from Waste. Fracking (contentious)

Good to see the Borough Council is already using solar panels and more are appearing locally on industrial and domestic roofing. I think all new houses should be constructed with solar heating of some description.

Gas will be necessary for some time to come and is an efficient way of generating electricity quickly as load demand fluctuates.

Small scale Hydro Electric schemes will be a useful contribution in the future. A line of small scale turbines in the Irwell and other rivers would be a clean and sustainable generation source. There is an opportunity close to the Council offices at Futures Park where the Irwell passes under the road bridge. A deep channel with one or two turbines in place could form the basis of a generating station owned and operated by the Borough.

With the numerous redundant quarries in the Borough there is an opportunity to create a pumped storage supply network which could help mitigate the flood risk. The large 2.7million gallon capacity storm water attenuation tank facility installed by United Utilities in Stacksteads in 2013 to reduce pollution to the river Irwell being an example of the type of structure which when connected to a moorland top quarry lake, or reservoir could be used for a pumped storage generating station. The Deerplay Mine Water Treatment facility, though used to clean the pumped mine water which polluted the Irwell, is another example of easily constructed water storage pounds which could be used as for pumped storage electricity generation. The Borough and or Lancashire could be self sufficient with electricity generation using a network of similar stations using the local hills and rivers.

The Secretary of State for Business, Energy and Industrial Strategy, Greg Clark launched the Faraday Challenge on 24/07/17 with £246 million investment in battery technology. There are opportunities here for the future also to maintain stability of electricity supply and power vehicles. The UK has hundreds of tons of radioactive, nuclear waste in storage ponds. Scientists have already demonstrated that this material has the potential to store considerable amounts of electrically generated power.

Hydraulic fracturing for gas should be allowed to proceed with the safeguards noted in the Draft in place. It has already been used in the offshore wells around the UK to fully exploit reserves and is already a proven technology. Liquid natural gas, extracted using this method, is being imported from the US. We should be using our available resources efficiently to ensure continuity of strategic supply avoiding the possibility of the taps being turned off elsewhere.

Biomass already implemented is good news and should be developed further.

An Energy from waste station could be located within a large scale, redundant quarry which would be better than filling it with domestic waste. The roadways already set up for the transportation of extracted stone could enable the plant construction and waste delivery vehicles. Connection to the National Grid infrastructure would also be straightforward using the same route.

Methane extraction boreholes into the coal seams of the redundant mines in the Borough?

Natural Gas extraction may not be considered sustainable development but it is naturally occurring, strategic, resource that should be exploited while the country makes the transition to its clean energy goals.

Policy ENV12: Trees and Hedgerows

SHLAA16079 - Land off Newchurch Old Road Bacup. HS2.32

This development will have an impact on the Policies ENV11 and ENV12.

Can we keep the established woodland and not develop this site please?

Policy LT3: Tourism

I fully support the promotion of tourism to enjoy the Rossendale Hills. It is a wonderful environment to live and should be maintained. I like the “Adrenaline Valley” concept.

Good to see the recent spend on Ski Rossendale.

Policy TR1: Strategic Transport

Fortunately I no longer need to join the queues heading out of and then back home to the Valley.

The traffic from Bacup down to Rawtenstall to access the Motorway network was always an issue necessitating an early start and late return to miss the congestion.

Unfortunately I don't see a solution to the traffic issues on the roads in the valley.

We are victims of the 1960's decision to move away from rail to road before sustainable development was created.

The valley would be a completely different place if the railway connection had been left intact. Considered inefficient in 1963 but what a benefit it would be to the valley now.

Good to see the continuing support for the East Lancashire Railway. It could be useful link in the future.

Policy TR2: Footpaths, Cycleways and Bridleways

Good to see the work underway on the strategic routes but a lot of work required on the smaller, but important, public rights of way. Many of which need repair and maintenance to ensure they continue. Land owners with public rights of way across their property should be made to keep the paths and access points to ensure the safety of users.

Could the Council please consider not wasting any more money, grant aided or not, on “artworks” like the Weave in the Glen and the Birds outside Bacup?



David L Trivett

Rossendale Draft Local Plan Regulation 18 Consultation July 2017

Representations

on behalf of The Methodist Church

October 2017

Contact

Nexus Planning
Eastgate,
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Manchester, M3 4LZ

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Appendix A: Land at Exchange Street, Edenfield – Development Statement October 2017

Appendix B: Highways Note prepared by CBO Transport

Appendix C: Joint Statement prepared by The Methodist Church, Taylor Wimpey and Peel Holdings in
respect of Policy HS3 and associated Opportunities and Constraints Plan

1.0 Introduction

- 1.1 We are pleased to submit, on behalf of our client The Methodist Church, representations in relation to the Rossendale Draft Local Plan Regulation 18 Consultation (July 2017).
- 1.2 The Methodist Church are promoting land off Exchange Street in Edenfield for residential development. The Development Statement now provided at Appendix A demonstrates how land off Exchange Street represents an available, suitable, achievable and deliverable site for housing. Reference is also made to the fact that this site, along with land to the immediate north, has been identified as a Draft Housing Allocation in the Draft Local Plan.
- 1.3 These representations relate to the Council's calculation of development needs and associated land requirements, and set out The Methodist Church's views on the Council's preferred spatial strategy, with reference made to relevant evidence base documents where appropriate.

2.0 Response to Individual Policies

2.1 We set out below our comments in relation to some of the draft Policies contained within the Draft Local Plan.

Policy SD2: Urban Boundary and Green Belt

2.2 The Policies Map 2017 (Regulation 18) confirms the intended Urban Boundaries following the proposed revisions to the Green Belt boundary. It is clear that Green Belt release is necessary of Rossendale is to be able to fulfil its development requirements during the plan period and The Methodist Church are fully supportive of the new boundary as it relates to the settlement of Edenfield.

2.3 From a Green Belt release perspective, the A56 represents a clear and logical Green Belt boundary preventing further encroachment. With reference to the Green Belt Review, this parcel of land has also been identified as making a weak contribution towards the purposes of including land within the Green Belt and is the only parcel considered suitable for release around the perimeter of Edenfield.

2.4 Other elements of the Evidence Base also support the release of Green Belt land in Edenfield, in particular the Strategic Housing Market Assessment (SHMA) prepared by Lichfields (December 2016). The SHMA clearly points towards the need to accommodate housing growth in the south of the borough and specifically in Edenfield. Affordable Housing needs are also particularly acute in this area of the borough, with Tables 8.2 and 8.3 of the SHMA confirming that the Helmshore & Edenfield sub area has the highest proportion of both existing and newly formed households unable to purchase market housing.

2.5 There is insufficient land available within the existing settlement boundary of Edenfield to accommodate this affordable housing need and indeed there is a lack of available and deliverable brownfield opportunity sites across the borough as a whole to meet the overall housing requirement during the plan period. Exceptional Circumstances therefore exist, in line with paragraph 83 of the NPPF, to justify the release of Green Belt in the Borough for development.

2.6 The Urban Boundary now proposed around Edenfield is therefore considered to be eminently logical and soundly based as it is fully supported by and responds to the findings of the evidence base, in particular the Green Belt Review and SHMA.

Policy HS1: Meeting Rossendale's Housing Requirement

- 2.7 A net housing requirement of 4,000 dwellings, or 265 dwellings per annum (dpa), is established under this policy. Having reviewed the Strategic Housing Market Assessment prepared by Lichfields (December 2016) it is noted that the intended housing requirement is at the bottom end of the recommended range of 265-335 dpa. The figure of 265 dpa should therefore be treated as an absolute minimum and should not in any way be suppressed following the consideration of the revised OAN Methodology that is currently being consulted upon.
- 2.8 The figure of 265 dpa, although at the bottom end of the SHMA recommendation, does to an extent take into account economic growth and employment led aspirations and the Duty-to-Cooperate requirements given the south of the borough's undeniable relationship with the Bury and Rochdale housing market areas (as confirmed in the SHMA). These factors should continue to be taken into account when establishing the correct housing requirement and a failure to do so would deviate from the tests of soundness when examining Local Plans as set out at paragraph 182 of the Framework.

Policy HS2: Housing Site Allocations

- 2.9 The Methodist Church fully support the inclusion of Land off Exchange Street as a Housing Allocation under Policy HS2 (Ref: HS2.71). The identification of this site, along with the land to the north, responds to the need to deliver additional housing in the south of the borough and in Edenfield in particular as identified within the evidence base. However it is considered that this parcel of land is capable of accommodating around 90 dwellings, rather than the 70 dwellings identified in Table 1 and an amendment is requested accordingly.
- 2.10 Footnote 11 to Paragraph 47 of the National Planning Policy Framework confirms that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing can be delivered within the next 5 years. Land at Exchange Street can be considered deliverable in this context and the reasoned justification for this is now provided.

Available

- 2.11 The Exchange Street site is under single ownership. This Statement confirms that the landowner is supportive of development of the site for residential dwellings. The land is not subject to any ransom strips or any covenants that would restrict its development for new housing.
- 2.12 As such, these representations confirm that the site is available.

Suitable

- 2.13 The settlement benefits from a range of local facilities and services, as well as frequent public transport connections to nearby higher order settlements. New housing development in the village would help to sustain the existing local community and facilities.
- 2.14 What is more, the site is considered the most suitable site on the edge of Edenfield to deliver new housing. Its close proximity to the village centre means it is within a more sustainable location than other potential housing sites in the south or east of the village, maximising opportunities for new residents to use existing village facilities and provide a boost to the local community. The site is also located in a less sensitive location in terms of landscape impact and the future durability of the Green Belt, as confirmed in the Green Belt Review.

Achievable

- 2.15 The site is not covered by any statutory biodiversity or landscape designations, nor are there any technical factors that would automatically prevent development of the site.
- 2.16 To further confirm the deliverability of the site, a Development Statement has been produced that justifies the inclusion of Land at Exchange Street as a Housing Allocation under Policy HS2 (as part of the wider Housing Allocation ref: HS2.71) and this is provided at Appendix A to this representation.
- 2.17 In addition, CBO Transport have provided specialist highways advice relating to the development of the site for housing and this concludes that the local highway network is capable of accommodating the intended level of housing. This note can be found at Appendix B to this representation and it relates to land at Exchange Street only.

Policy HS3: Edenfield

- 2.18 The Methodist Church are fully supportive of this policy and the requirements as they relate to Housing Allocation HS2.71, within which Land at Exchange Street sits. A Joint Statement has been produced by the landowners that make up this allocation, namely The Methodist Church, Taylor Wimpey and Peel Holdings, which confirms their commitment to work together and ensure that a combined approach is taken in respect of this wider allocation. This Statement, along with an initial Opportunities and Constraints Plan, is provided at Appendix C to this representation and should be read as our response to this policy.

3.0 Land at Exchange Street, Edenfield

- 3.1 The Methodist Church are promoting land off Exchange Street for residential development. Further details relating to the site are provided in the Development Statement at Appendix A.
- 3.2 The Development Statement confirms that the site has the capacity to deliver around 90 dwellings. It provides confirmation that the site is available, suitable, achievable and deliverable.
- 3.3 The site forms part of a wider Housing Allocation and The Methodist Church have already begun to work with the other landowners, Taylor Wimpey and Peel Holdings, to ensure that the whole allocation is brought forward in a comprehensive manner. The Methodist Church fully intend to continue working closely with the adjoining landowners, Rossendale Council and other key stakeholders to ensure that the wider allocation is brought forward in the correct manner.
- 3.4 The site is therefore well placed to make a contribution towards the need for additional housing identified Edenfield and Rossendale as a whole. Accordingly, The Methodist Church submit that land off Exchange Street, and indeed the wider parcel of land identified under Draft Policy HS3, is fully justified to be released from the Green Belt and should remain as a Housing Allocation in the Local Plan.

Appendix A: Exchange Street, Edenfield – Development Statement October 2017

LAND OFF EXCHANGE STREET, EDENFIELD



DEVELOPMENT STATEMENT

October 2017

This Development Statement has been prepared by:-



CONTACT:

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1. INTRODUCTION

This Development Statement has been prepared by Nexus Planning on behalf of The Methodist Church in relation to a parcel of land off Exchange Street in Edenfield. It is submitted to inform the preparation of the emerging Rossendale Local Plan (2019-2034). It demonstrates that the site is in an appropriate location for housing, is deliverable and should be released from the Green Belt and identified as a residential allocation in the emerging Local Plan.

The site comprises predominantly greenfield land, with the buildings and grounds of Chatterton Hey care home in its north west corner. The site lies to the immediate north west of the settlement of Edenfield and is surrounded by man-made features on all sides. It is in close proximity to the services and facilities in the centre of the village and would represent a sustainable and logical extension to the existing settlement.

Purpose of this Document

This document provides an overview of the technical constraints and opportunities presented by the site and demonstrates that the site is available, suitable, achievable and can therefore be considered deliverable and well placed to contribute towards meeting future housing needs in Rossendale.

It demonstrates how with regard to relevant technical and design considerations, the site is able to accommodate approximately 90 dwellings.

The remainder of this document is structured as follows:

- Site Location and Description
- Planning Context
- Green Belt Assessment
- Sustainable Location
- Deliverable Site
- Design Principles
- Summary and Conclusions

2. SITE LOCATION AND DESCRIPTION

The Site

Land off Exchange Street ("the site") lies to the immediate north west of the village of Edenfield. The site comprises part brownfield/part greenfield land and extends to approximately 5.3 hectares. In the north west corner of the site is a complex of approximately 4 buildings which make up the Chatterton Hey care homes which are managed by the Langley House Trust. A belt of dense woodland surrounds the Chatterton Hey complex. The rest of the site comprises approximately 4.4 hectares of un-used greenfield land.

The site is accessed via Exchange Street to the east, which connects to Market Street in the centre of the village. A single lane road extends from the end of Exchange Street providing access to Chatterton Hey care home and this forms the north eastern and northern boundaries of the site. A designated public right of way also runs along this road.

To the east of the site, on the other side of the access road, is Edenfield Recreation Ground, east of which is built development comprising a mix of commercial and residential properties fronting onto Exchange Street and Market Street. To the north of the site are pastoral fields and beyond these the A56 dual carriageway.

The western boundary of the site is formed by a belt of established woodland, beyond which runs the A56 dual carriageway in a north-south direction.

To the south east and south, the site abuts existing residential properties along Eden Avenue, Oaklands Road and Woodland

Road. A wooded ditch runs along the southern boundary of the site, to the rear of the adjacent houses and gardens.

The site is predominantly grassland, with existing trees and hedgerows mostly limited to the southern boundary around the watercourse, the woodland in the westernmost part of the site and the woodland around the care home.

The main part of the site forms a relatively flat plateau before dropping away in the west towards the care home and the A56.



Plan 1: Site location

Surrounding Area

Edenfield is located in the south of the Borough. It is approximately 2 kilometres to the north east of Ramsbottom, and approximately 4 kilometres to the south of the built up area of Helmshore, Haslingden and Rawtenstall. It lies to the east of the M66 which ends at the village and continues northwards as the A56 dual carriageway.

The village lies within the Rossendale Valley, with the land rising in the east up to Scout Moor and in the west up to Holcombe Moor. The main built up area of Edenfield lies to the immediate south of the site. The A56 dual carriageway lies to the west of the site, beyond which are further agricultural fields and the River Irwell. To the north of the site are pastoral fields and ribbon development along Market Street leading north out of the village.

The Chatterton and Strongstry Conservation Area is located on the other side of the A56 from the site. It is wholly screened from the site by virtue of the dual carriageway and the dense woodland along the site's western boundary. There are no listed buildings or other designated heritage assets on or adjacent to the site.

The site lies only approximately 200 metres from the centre of the village. It is therefore easily accessible to the range of local shops and services within Edenfield. This includes several pubs and takeaways, a bakery, a butchers, a barbers, a pharmacy, a newsagents, Parish Church and cricket club. Edenfield Church of England Primary School is located

approximately 750 metres walking distance from the site on Market Street. An equipped children's play area and recreational open space (including football pitches) are located adjacent to the site on Exchange Street, both within 200 metres walking distance. Further detail about the proximity of the site to local services and facilities is contained in Section 5.

The dwellings adjacent to the site to the south, along Eden Avenue, Oaklands Road and Woodlands Road are a mix of detached, semi-detached and mews properties. These are predominantly two storeys, although there are some bungalows along Eden Avenue. The existing dwellings are a mix of materials including red brick, stone and clay tile roofs.

Photos of the site and surrounding area



3. POLICY CONTEXT

Adopted Development Plan

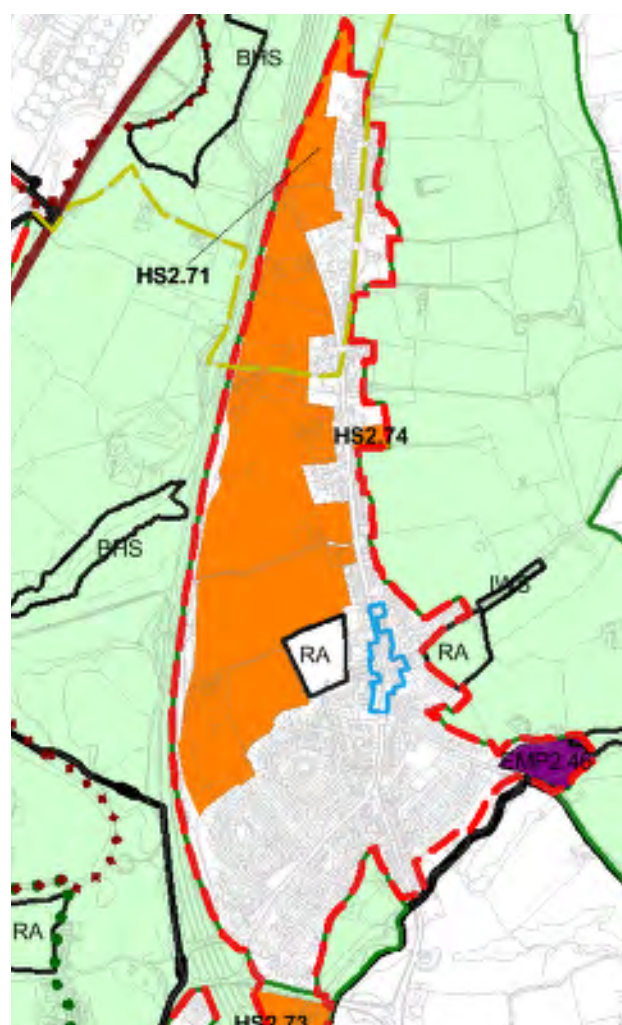
The currently adopted Development Plan for the area comprises the Rossendale Core Strategy (2011-2026) which was adopted in November 2011. The site is located within the designated Green Belt which tightly surrounds the existing settlement of Edenfield.

Emerging Rossendale Local Plan (2019-2034)

The Council are currently progressing a new Local Plan (2019-2034) in order to take account of up-to-date evidence on the Borough's growth needs as required by the National Planning Policy Framework ('the Framework').

The Council recently published several evidence base documents prepared to inform the emerging Local Plan. Those of most relevance to the site are considered further below.

The regulation 18 consultation of the Draft Local Plan identifies land off Exchange Street as part of a wider housing allocation under Policy HS3. This policy sets out that the site, as part of a wider 26-hectare parcel, has the potential to deliver residential development within the plan period. The accompanying Policies Map 2017 identifies the site, as part of a wider parcel under Housing Allocation HS27.1, capable of delivering 451 homes, of which 70 and be delivered on land at Exchange Street.



Extracts from Policies Map 2017

Evidence Base

Strategic Housing Market Assessment (SHMA) December 2016

A Strategic Housing Market Assessment (SHMA) has been produced to provide up-to-date evidence on housing need in the Borough. The SHMA December 2016 was published in June 2017. It recommends that the objectively assessed housing need (OAN) for Rossendale over the upcoming plan period 2014 – 2034 is between 265 to 335 dwellings per annum (dpa).

Strategic Housing Land Availability Assessment (SHLAA)

The Council also published an updated SHLAA (May 2017) in June 2017. Land off Exchange Street (the site) is identified in the SHLAA under reference SHLAA 16263, having been promoted by the landowner through the Call for Sites exercise. The SHLAA anticipates the site as having capacity for 70 dwellings. The site is identified as being available with no known legal or ownership constraints and both suitable and achievable for housing development.

The overall conclusion of the SHLAA was that the site is developable in the medium to long term (within 6 to 10 years, or after 10 years) with the following justification:

"The site is available now and can become suitable for development provided that the vehicular access is improved, the potential landscape impacts are mitigated, the woodland area is preserved and the character of the local area is maintained or

enhanced. The development is considered viable and considered achievable in the medium to long term."

The SHLAA considers the potential constraints to development on the site. The rest of this Statement goes on to provide further detail of these constraints and confirms the achievability of the site, thereby demonstrating there is nothing that would preclude development of the site in the short

Green Belt Review

A review of the Green Belt within the Borough has also been undertaken. The site is assessed as part of wider parcel of land (identified under Parcel ref: 44) which includes the recreation ground to the east, and extends further south than the site to include a wooded strip of land between the A56 and the properties on Oaklands Road.

Crucially, the Green Belt Review (GBR) assesses the site as having the potential for release from the Green Belt. It is assessed as making the following contribution towards the five purposes of the Green Belt as set out in paragraph 80 of the Framework.

The findings of the GBR are considered in more detail in Section 4.

4. GREEN BELT ASSESSMENT

The site is currently within the Green Belt which tightly surrounds the existing settlement of Edenfield. A Green Belt review, undertaken in July 2017 to inform the emerging Local Plan, concluded that the site is potentially suitable for release from the Green Belt. The Rossendale Draft Local Plan has gone on to identify a 26 hectare parcel of land, including the Exchange Street site, to the north west of Edenfield, for release from the Green Belt. This section considers the findings of the Green Belt Review in more detail and demonstrates that the site makes an overall limited contribution towards the purposes of the Green Belt such that it represents a suitable release for residential development.

Paragraph 79 of the Framework establishes that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

Paragraph 80 states that Green Belt serves five purposes:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbourhood towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Green Belt Assessment of the Site

As set out above, the Green Belt Review (GBR) assesses the site along with the recreational ground to the immediate east together - under the reference 'Parcel 44'. It provides the following overall assessment of the Parcel's contribution towards the five purposes of the Green Belt set out in paragraph 80 of the Framework.

Table 4.1: Overall Assessment of Parcel 44 in GBR.

Parcel Ref.	Purpose 1: To check unrestricted sprawl of large built-up areas	Purpose 2: To prevent neighbouring towns merging into one another	Purpose 3: To assist in safeguarding the countryside from encroachment	Purpose 4: To preserve the setting and special character of historic towns	Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Overall Assessment
44	Moderate	Weak	Weak	No Contribution	n/a*	Medium

*all parcels are assessed as making the same contribution towards this purpose

The GBR states:

“This parcel is adjacent to Edenfield which forms part of the large built up area of Ramsbottom/ Bury...The A56 dual-carriageway defines the western boundary forms a strong barrier feature to prevent the possible outward sprawl of development. The northern boundary of the parcel comprises an access road and dry stone wall and does not form a strong defensible barrier to prevent the outward sprawl of development. The parcel contains little urban development, although the presence of the

A56 and adjacent urban edge has weakened the rural character. Its release is unlikely to have substantial negative effect on the function of neighbouring parcels under purpose 3. Releasing this parcel is unlikely to have a substantial negative effect on the integrity of the wider Green Belt.”

In Appendix 4.1, the GBR provides the following more detailed commentary of the assessment of the Parcel against each purpose. Having reviewed the GBR, we strongly support its conclusions in respect of the site.

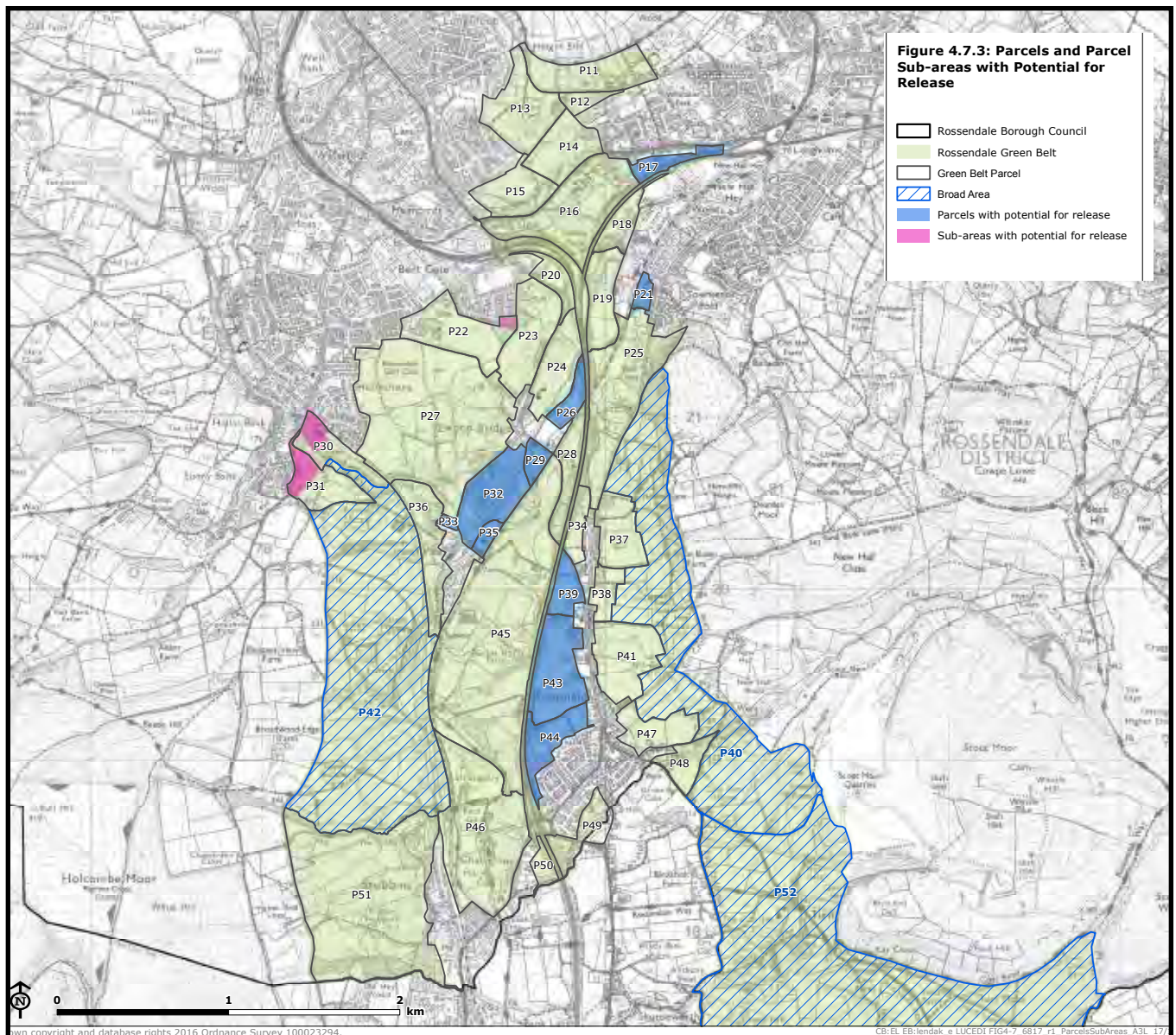
Purpose 1: To check the unrestricted sprawl of large built-up areas	
GBR Assessment of Parcel 44	<p>This parcel is adjacent to Edenfield which forms part of the large built up area of Ramsbottom/ Bury. There are few urbanising features within the parcel apart from a small cluster of residencies in the north-west. The influence of these urbanising features is limited with the parcel displaying a sense of openness. However, the A56 dual-carriageway defines the western boundary and detracts from the sense of openness in parts.</p> <p>Rating: Moderate Contribution</p>
Purpose 2: To prevent neighbouring towns merging into one another	
GBR Assessment of Parcel 44	<p>This parcel is adjacent to Edenfield and lies directly between Edenfield and Helmshore. At this point the settlements are more than 2km apart with limited intervisibility. The parcel, along with neighbouring parcels forms part of the settlement gap but it is not of critical importance and does not play an essential role in preventing the merging or erosion of the visual and physical gap between these settlements.</p> <p>Rating: Weak Contribution</p>

Purpose 3: To assist in safeguarding the countryside from encroachment	
GBR Assessment of Parcel 44	<p>There is a sense of encroachment within the parcel as a result of the visual influence the adjoining settlement edge to the east and south and the A56 dual-carriageway which defines the western boundary. The majority of the parcel comprises open farmland and a recreational grounds, it displays some of the characteristics of the open countryside but lacks a strong and intact rural character.</p> <p>Rating: Weak Contribution</p>
Purpose 4: To Preserve the Setting and Special Character of Historic Towns	
GBR Assessment of Parcel 44	<p>Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement of Ramsbottom. In practice, this parcel has little to no intervisibility with this historic settlement. The openness of the land within the parcel is not considered to be important to its setting or historic significance. Therefore, any new development that took place within the parcel is considered unlikely to affect the special character of this historic settlement.</p> <p>Rating: No Contribution</p>
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	
GBR Assessment of Parcel 44	All parcels make an equally significant contribution to this purpose.

The following extract of the GBR demonstrates that Parcel 44 is one of only three sites in Edenfield that are assessed as having the potential for release, all of which lie to the east of the settlement between the existing development and the A56 dual-carriageway.

The subsequent identification of this parcel of land as a Housing Allocation can therefore be fully justified.

Plan 2: Extract from Green Belt Review showing Parcel 44 having the potential for release.



The GBR identifies how, in contrast to Parcel 44, land to the east of Edenfield makes a strong contribution towards Purpose 1 of the Green Belt (to check the unrestricted sprawl of large built-up areas) due to limited urbanising features and a strong sense of openness in this area. Several of the parcels to the east of Edenfield were also assessed as having a greater role to play than Parcel 44 in safeguarding the countryside from encroachment (Purpose 3). This is in view of their relationship with the large area of rising open countryside of Scout Moor and Dearden Moor to the east which have distinctive moorland landscape characteristics.

The other two parcels identified as having the potential for release (Parcel 43 and 39) lie to the immediate north of the site, and comprise the wider area of land between the built development along Market Street to the east and the A56 dual-carriageway to the west.

The GBR then describes how:

"The planned release of parcel P44, P43 and P39, in that order, could be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between A56 and the linear settlement along Market Street. This could create a stronger Green Belt boundary and settlement edge."

Mitigation Measures

For those parcels identified as being potentially suitable for release in Green Belt terms, the GBR also provides an overview of some potential mitigation measures which could be incorporated into development to minimise effects on the wider Green Belt. For Parcel 44, the following potential mitigation measures are

suggested:

- Development within the parcel should be restricted to appropriate and attractive small scale and low-density housing.
- New properties should be a maximum of two storeys to minimise the negative impact on the openness of the adjacent Green Belt land.
- The belt of mature woodland along the western boundary of the parcel should be retained and enhanced to preserve the visual screen of the A56 and to help screen any new development from Green Belt land to the west.
- The existing line of trees should be retained and a framework of new planting along the northern boundary should be developed to soften the appearance of any development from the adjacent Green Belt land to the north.
- A new dry stone wall should be built along the minor road which defines part of the northern boundary of the parcel.

The Green Belt Review demonstrates that the site makes the most limited contribution towards the purposes of the Green Belt when compared with all other Parcels assessed around Edenfield. From a review of the evidence base, it is apparent that Parcel 44 represents the most immediately suitable and sensible site for release from the Green Belt in the short term and therefore its identification for release in the Draft Local Plan is fully justified.

5. SUSTAINABLE LOCATION

A wide variety of services and facilities are available within a short walking and cycling distance of the site and as a result it is considered to be an entirely sustainable location for new housing.

Shops and Services

The site is within an easy walking distance of a range of local shops and services being only 200 metres from the centre of the village. Here, a number of amenities are available at the Exchange Street/ Market Street/ Bury Road junction.

The site is approximately 1500 metres away from facilities within nearby Stubbins, including The Village Chippy and Stubbins Tandoori. It is approximately 3 kilometres from the centre of Ramsbottom which provides a greater range of facilities including a Morrisons supermarket and Tesco Superstore. The centres of the larger settlements of Haslingden and Rawenstall are both approximately 5 kilometres away, just a 20 minute journey via a frequent bus service from the village.

Ref:	Name of Facility	Distance from Site (metres)
1	Rostron Arms (Public House)	200
2	Valentines Butchers	200
3	The Village Barbers	200
4	Sixsmith Bakery	200
5	My Plaice Fish and Chips	200
6	Golden Kitchen Chinese Take Away	220
7	The Drop Off Café	300
8	Edenfield Mini Market Convenience Store	500
9	The Coach at Edenfield	700
10	Morrisons Supermarket, Ramsbottom	3000
11	Tesco Superstore, Ramsbottom (including ATM)	3000

Community Facilities

There are a number of community facilities within Edenfield village, including opportunities for outdoor recreation.

Further facilities are available in Rawtenstall and Ramsbottom which are within 5 kilometres of the site.

Ref:	Name of Facility	Distance from Site (metres)
1	Edenfield Recreation Ground	200
2	Children's Play Area	200
3	Community Centre	200
4	Edenfield Cricket Club	350
5	Edenfield Parish Church	800
6	Rosendale Golf Club	2500
7	Ramsbottom Pool & Fitness Centre	2400

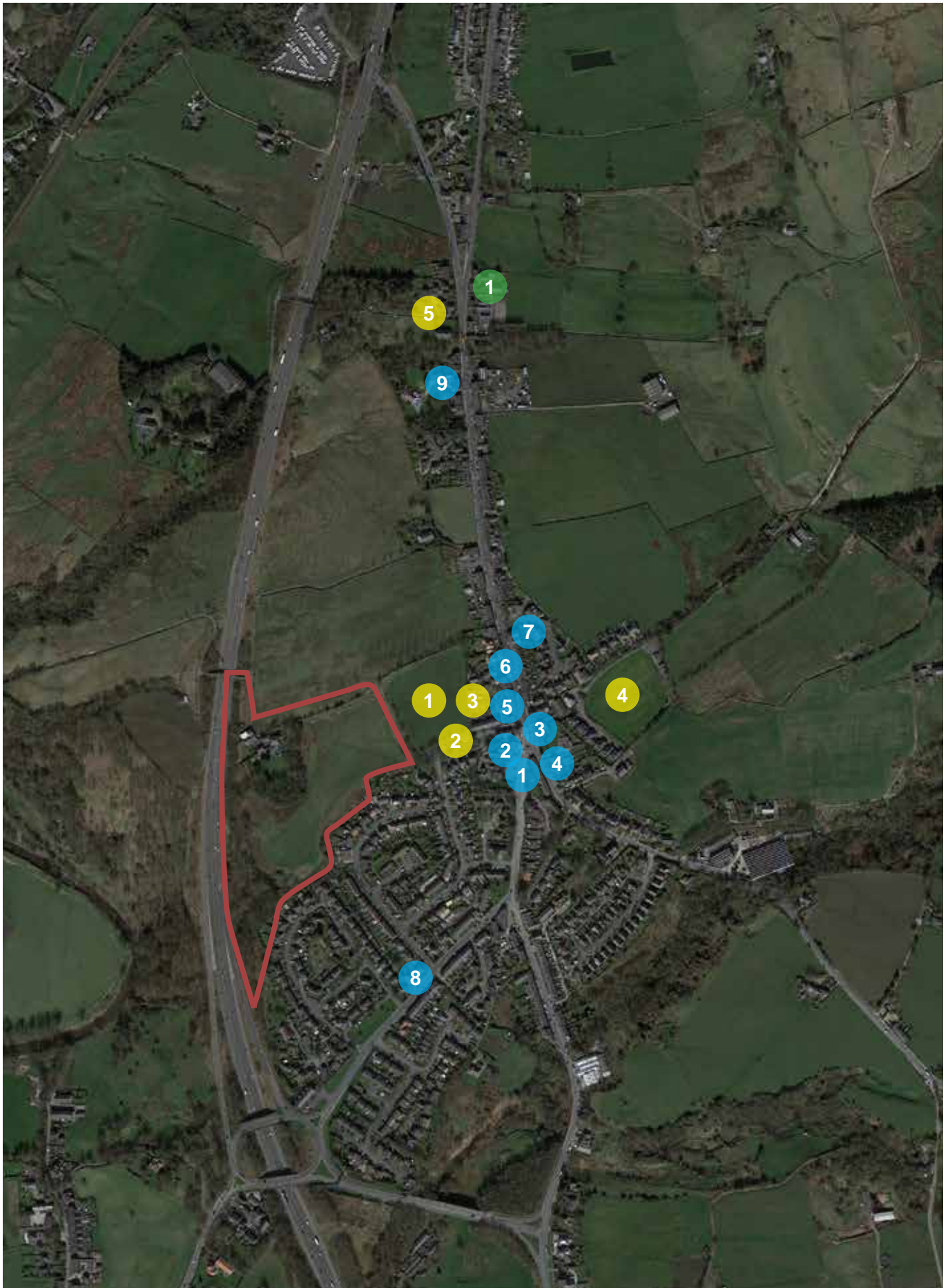
Education

The site is well located in relation to Edenfield Church of England Primary School which is approximately 800 m away on Market Street.

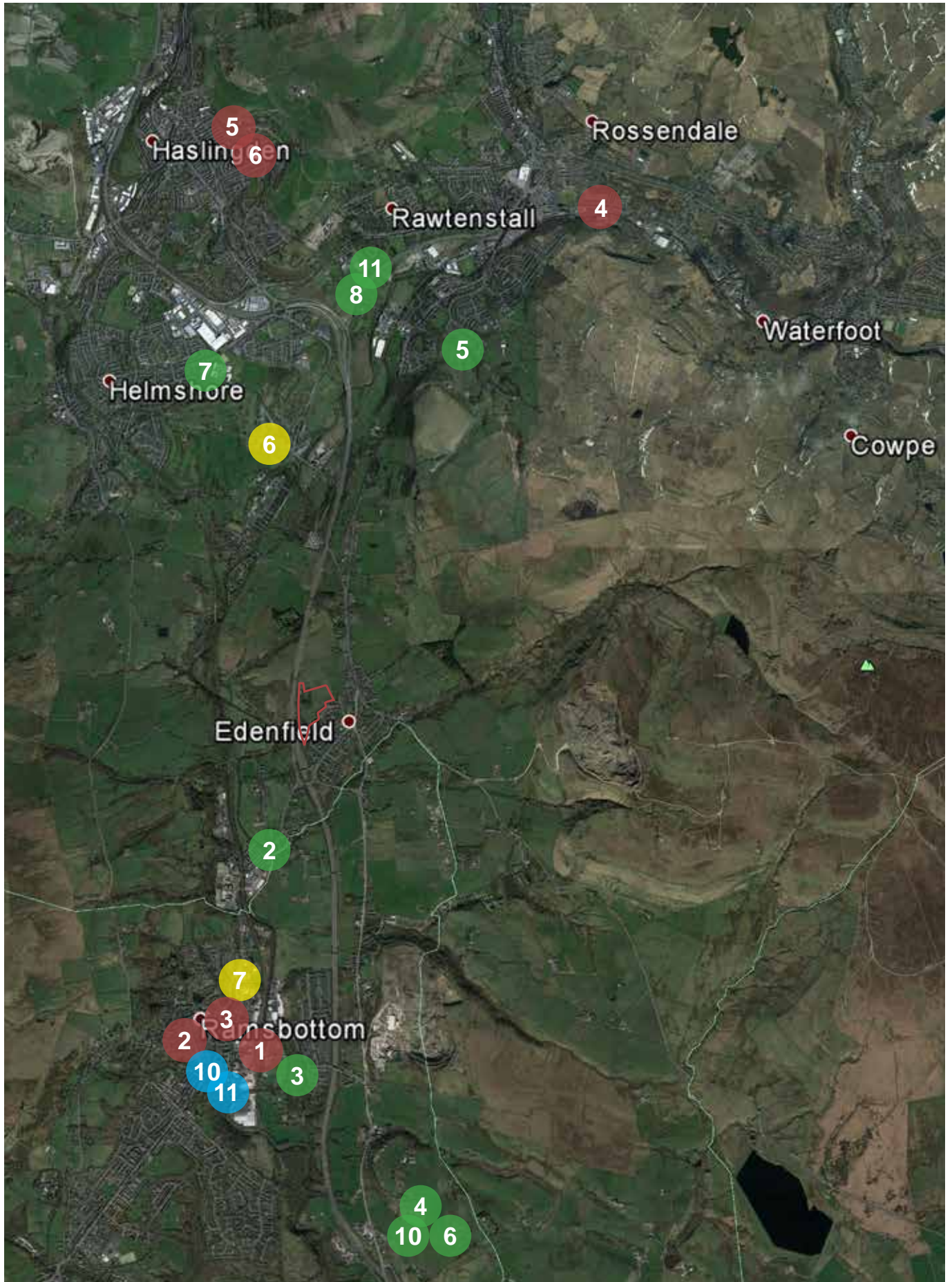
Secondary School provision is available in either nearby Haslingden or Ramsbottom.

Ref:	Name of Facility	Distance from Site (metres)
	Primary Schools	
1	Edenfield Church of England Primary School	800
2	Ramsbottom Stubbin Primary School	1100
3	Peel Brow School, Ramsbottom	3000
4	Rosendale School, Ramsbottom	3200
5	Rawtenstall Balladen Community Primary School	3500
	Secondary Schools	
6	Rosendale School, Ramsbottom	3200
7	Haslingden High School and Sixth Form	3000
8	All Saint's Roman Catholic High School, Rawtenstall	4500
	Post-16 Education	
9	Haslingden High School and Sixth Form	3000
10	Rosendale School, Ramsbottom	3200
11	All Saint's Roman Catholic High School, Rawtenstall	4500

Plan 3: Local Facilities in Edenfield



Plan 4: Local Facilities further afield



Healthcare Provision

There are a number of doctors and dentist surgeries in the local area.

Ref:	Name of Facility	Distance from Site (metres)
1	Parkhouse Dental Practice, Ramsbottom	2600
2	Ramsbottom Health Centre, Ramsbottom	2700
3	Bolton Street Dental Practice, Ramsbottom	2800
4	Ramsbottom Dental Surgery, Ramsbottom	3000
5	Fairmore Medical Practice, Rawtenstall	4600
6	Haslingden Health Centre, Haslingden	4700
7	Dr F W Moujaes & Partner, Haslingden	4800
8	Rossendale Valley Medical Practice, Haslingden	4800

Public Transport

The site is within 400 metres of bus stops on Market Street that are served by the 482/483 service providing multiple services each hour to nearby Rawtenstall, Bacup and further afield to Burnley and Bury. The stops are also served by the 273 which provides services to Rawtenstall, Ramsbottom and Bolton and the 892 which goes to Rawtenstall, Ramsbottom, Greenmount and Tottington.

The site is well located within walking distance of a range of local services and facilities and with access to good public transport links. It is therefore in a suitable and sustainable location for new housing.



6. DELIVERABLE SITE

Footnote 11 to Paragraph 47 of the National Planning Policy Framework confirms that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing can be delivered within the next 5 years.

Land at Exchange Street can be considered deliverable in this context and the reasoned justification for this is now provided.

Available

The entire site is under single ownership. This Statement confirms that the landowner is supportive of development of the site for residential dwellings. The land is not subject to any ransom strips or any covenants that would restrict its development for new housing.

As such, these representations confirm that the site is available.

Suitable

The settlement benefits from a range of local facilities and services, as well as frequent public transport connections to nearby higher order settlements. New housing development in the village would help to sustain the existing local community and facilities. The sustainable location of the site, within close walking distance to the centre of the village has been considered in Section 5.

The suitability of the site for residential development in terms of relevant physical characteristics and constraints is set out below.

What is more, the site is considered the most suitable site on the edge of Edenfield to deliver

new housing. Its close proximity to the village centre means it is within a more sustainable location than other potential housing sites, maximising opportunities for new residents to use existing village facilities and provide a boost to the local community. As described in Section 5, the Green Belt Review identifies how the site is also located in a less sensitive location in terms of landscape impact and the future durability of the Green Belt.

Land to the east of Edenfield has a strong sense of openness and a greater role to play in checking urban sprawl and safeguarding from encroachment.

Achievable

The following is a summary of the technical factors associated with development of the site. It can be confirmed that there are no physical constraints which would prevent the site from coming forward for housing in a manner which would respond appropriately to the site's constraints and context.

Access and Highways

CBO Transport Consultants have been commissioned to advise on the potential for residential development at the site. The existing access to the site is currently via Exchange Street. Lancashire County Council (LCC) Highways records show Exchange Street is adopted meaning that the public highway can be extended into the site without constraint from third party ownerships.

The existing carriageway width on Exchange Street is 5.5 metres which is a standard width for a residential road and would pose no constraint to the proposed development of the site. There is an existing footway along the south side of Exchange Street which provides pedestrian connectivity between the site and the village centre. This existing footway is 1.3 metres in width which is considered sufficient to serve the proposed development.

The assessment undertaken by CBO Transport Consultants has found that a safe and suitable access can be achieved to the site to serve the proposed development of 90 dwellings.

Ecology

Given the vegetation on the main part of the site is limited to grassland, the majority

of habitats to be found here are likely to be common and of limited value. The existing trees and woodland do however provide opportunities for wildlife. The SHLAA states that about 1 hectare of the woodland is identified as Stepping Stone Habitat for woodland. The woodland and the majority of trees will be retained and incorporated as part of any future development.

The site lies within the Impact Risk Zones of the Hodge Clough SSSI (approximately 1000 metres to the north west) and the Lower Red Lees (approximately 2 kilometres to the south west). These SSSI's are separated from the site by the River Irwell and the M66/A56 such that there is very limited connectivity between the site and these habitats.

Overall, given the nature and location of the site, there are not anticipated to be any overriding constraints to its development in terms of ecology and development on the site can come forward in a manner which provides appropriate mitigation and biodiversity enhancements in line with local and national policy.

Arboriculture

Existing vegetation on the site is limited predominantly to the boundaries – with several mature trees lining the southern boundary of the site along the stream. An area of dense woodland surrounds the buildings and grounds of Chatterton Hey in the north western corner of the site.

It is anticipated that existing trees and woodland will be retained and incorporated into the scheme and will play an important role in screening the new development

from the surrounding existing properties and softening its visual impact in the surrounding area. Opportunities to enhance the green infrastructure on site will also be provided through a careful landscape led approach to design such that there will be an overall net gain in vegetation on the site.

Landscape Character Impact

In order to inform the preparation of the Site Allocations and Development Management Plan (Local Plan Part 2), the Council commissioned the 'Lives and Landscapes Assessment' (July 2015) to appraise the landscape sensitivity of sites within the Borough. Whilst the Local Plan Part 2 was subsequently withdrawn in February 2016 to focus efforts on producing the New Local Plan, it is still considered relevant to have some regard to the findings of this Assessment as the Council's latest evidence on landscape impact.

The 'Lives and Landscapes Assessment' (July 2015) assesses the site as part of a much wider parcel which comprises all the land between the north western edge of the existing settlement and the A56 dual-carriageway. The parcel is identified as being within the 8b Irwell Valley south Settled Valley Landscape Character Area. The Assessment divides it into 4 areas – A to D, with the site identified as 'Area D'.

The Assessment recognises that Area D is less visible than the more open land to the north by reason of the existing vegetation. It describes how the site could be 'developed sensitively and incorporated successfully into the village boundary', concluding that the site is suitable for development with mitigation.

The site was one of the few sites in the village to be assessed as being 'developable with

mitigation', with the majority of other potential housing land considered to be 'undevelopable' with regard to landscape character impact.

Flood Risk and Drainage

The entire site is located within Flood Risk Zone 1 with reference to the Environment Agency flood maps. Residential development would therefore be entirely acceptable in line with national guidance on flood risk. There is a watercourse running along the southern boundary of the site but this does not present a flood risk. It is anticipated that adequate drainage for the site could be designed in a manner which utilises the natural topography of the site.

Utilities

There are no power lines or public sewers crossing the site to act as a constraint to development. It is anticipated that residential development on the site will be able to connect to the existing utilities networks which serve the area. Further investigations and enquiries would reveal any improvement works or on site provision deemed necessary.

A review of technical considerations has confirmed that there are no physical characteristics or other constraints that would prevent the delivery of housing at the site. Overall, it is demonstrated that the site is available, suitable, achievable and therefore deliverable.

7. DESIGN PRINCIPLES

An Indicative Masterplan has been produced by Broadway Malyan on behalf of The Methodist Church to demonstrate how the site could be delivered for residential development in a manner which responds appropriately to the specific opportunities and constraints of the site and integrates itself into the surrounding area.

Context of the Surrounding Area

The site is located to the immediate north west of the existing settlement of Edenfield. The boundaries of the site are clearly defined by the access road along the northern and eastern boundaries, and the established woodland and strong boundary of the A56 to the west. Along the southern boundary, separated from the site by a watercourse and belt of trees, are the rear gardens of properties along Eden Avenue, Woodlands Road and Oaklands Road.

Whilst responding to the architecture of the adjacent existing development, it is important that development of the site respects the rural character of Edenfield and the edge of settlement location of the site.

The dwellings adjacent to the site to the south, along Eden Avenue, Oaklands Road and Woodlands Road are a mix of detached, semi-detached and mews properties. These are predominantly two storeys, although there are some bungalows along Eden Avenue. The existing dwellings are a mix of materials including red brick, stone and clay tile roofs. Older stone properties are located along Exchange Street and Market Street.



Semi-detached Houses on Eden Avenue



Terraced houses on Exchange Street

Plan 5: Site characteristics



Site Considerations

Architects Broadway Malyan have undertaken an analysis of the physical characteristics of the site and identified the opportunities and constraints which will be important considerations in the design of the development. These are shown on the Site Analysis Plan below.

The following physical features will be important considerations when establishing the design

principles for the development:

- **Trees and Hedgerows.** There are existing areas of woodland around the buildings of the Chatterton Hey care home and in a belt along the western and southern boundaries of the site. These trees offer important buffers to visually screen the development from the adjacent A56, the existing Chatterton Hey care home and the residential properties to the south. The woodland will also mitigate against noise from the A56. Accordingly, the existing trees on site should be retained as

far as possible and integrated into a green infrastructure network.

- **Ecology.** The trees on and adjacent to the site could provide habitats for some species, including birds and bats. The watercourse along the southern boundary could also provide some value for wildlife. These features should be retained and enhanced where possible.
- **Relationship with adjacent properties.** The development must be carefully designed to respect the adjacent residential properties and ensure the amenity of existing neighbours is preserved.
- **Topography.** The main part of the site forms a plateau which falls away towards the southern and western boundaries of the site. Development should be designed to work with the natural topography of the site.
- **Connectivity to village centre.** The site is located in close proximity to the local facilities in the centre of Edenfield and good pedestrian connectivity is crucial to maximise this sustainable location. The site also presents the opportunity to relate positively to the adjacent Recreation Ground.
- **Relationship with Chatterton Hey care home.** The development must be designed to ensure compatibility with the adjacent care home.
- **Relationship with wider countryside.** Development needs to respect and preserve the rural character of the village and minimise any landscape visual or character impact ensuring strong and durable Green Belt boundaries for the future.

Indicative Masterplan

The design principles shown on the Indicative Masterplan and how they respond positively to the context of the site and surrounding area can be described as follows:

- Existing trees and areas of woodland are retained and new landscaped greenspace is proposed to soften the development ensuring a rural feel, and bolster the buffer between the new housing and existing residents to the south and the care home in the north west. This is in line with the suggested mitigation measures for the site in the 'Lives and Landscapes Assessment' (July 2015).
- As well as providing character and visual screening, these areas of landscaping will also provide opportunities for ecological mitigation and enhancement and for Sustainable Urban Drainage systems including swales and ponds.
- At a density of approximately 25 dwellings per hectare, the proposals are for a relatively low-density development of two-storey dwellings. This is in line with the suggested mitigation measures in the Green Belt Review (November 2016) and will soften the visual impact on the adjacent Green Belt land.
- The primary access to the site forms a continuation of Exchange Street and leads into a primary route which loops through the site. This design approach helps achieve permeability in the layout.
- Opportunities to maximise pedestrian connectivity are also shown on the Masterplan, with an improved pedestrian link suggested to Woodland Road helping to

integrate the development with the rest of the village.

- The existing access road to Chatterton Hey is retained providing a clearly defined edge to the new development and a new durable Green Belt boundary. This can be reinforced by careful boundary treatment, in line with the recommended mitigation measures of the Green Belt Review (November 2016) which envisages a dry stone wall along this boundary.
- Development of approximately 90 dwellings is arranged in parcels with important frontages identified. Careful design will be essential to ensure a development which is legible, has an attractive sense of place and most of all is in keeping with and adds to the existing character of Edenfield.

The Indicative Masterplan demonstrates how appropriate mitigation measures can be incorporated to achieve a sensitive development which would be experienced as a natural extension to the existing settlement with limited harm caused to the wider landscape character or purposes of the Green Belt.

Emerging Masterplan for the wider allocation

Following the identification of the wider parcel of land to the north as a Draft Housing Allocation under policy HS3, a comprehensive masterplan for the whole allocation is to be produced that builds upon the principles established here.

Pedestrian and cycle connections are to be provided to the immediate north and into the recreation area to the east in order that development of the site fully integrates itself into the proposed wider allocation.

Plan 6: Proposed indicative masterplan



8. SUMMARY AND CONCLUSIONS

Land off Exchange Street represents a sustainable, logical opportunity for housing development on the edge of Edenfield. It is ideally placed to contribute towards meeting local housing needs in the village and across Rossendale as a whole. The site is being actively promoted by the landowners and is considered capable of delivering around 90 new homes in a manner which responds positively to the context of the site and surrounding area.

This Development Statement has demonstrated the following:

- Land off Exchange Street is well related to the existing settlement of Edenfield and its development will form a natural extension to the village.
- The site is in a highly sustainable location, within 800 metres walking distance to the majority of local facilities in the village centre including Edenfield Primary School, a convenience store, several pubs and a butchers and bakers.
- Frequent public transport to the nearby larger settlements of Ramsbottom, Helmshore and Rawtenstall is also accessible from the site.
- The Council's Green Belt Review (November 2016) has found that the site makes a relatively limited contribution towards the five purposes for including land within the Green Belt set out in paragraph 80 of the Framework. From a review of the evidence base, it is apparent this is a suitable and sensible site for release from the Green Belt.
- The Council's Draft Local Plan (July 2017) has identified the site for potential release from the Green Belt (Policy HS3) and has allocated the site, as part of a wider Housing Allocation (ref HS2.71).
- There are no physical or other technical constraints which would prevent the development of the site for housing.
- The Indicative Masterplan establishes key design principles which would ensure the development responds positively to its context – preserving the existing woodland on site, protecting the amenity of neighbouring residents and achieving a durable new boundary to the surrounding Green Belt. The emerging masterplan for the wider housing allocation will enforce that this site is fully integrated into the development proposed to the north, building upon these key principles.

It has been demonstrated that the site is eminently suitable for release from the Green Belt and should be allocated for housing in the new Local Plan. The site is available, suitable, achievable and therefore a deliverable site, capable of facilitating new homes in the short term.

Land off Exchange Street, Edenfield Development Statement

Appendix B: Highways Note prepared by CBO Transport

1 Introduction

- 1.1 CBO Transport (CBO) has been commissioned to advise on the potential for residential development on land at Exchange Street, Edenfield. The location of the site is shown in **Figure 1** and the Title Plan is shown in **Appendix A**. We have been to site to inspect the local road network and the access arrangements to the site.
- 1.2 The land appears to have been undeveloped and forms the grounds of a large house which we understand is owned and used by the Methodist Church. We understand the site has the potential to accommodate about 90 dwellings.
- 1.3 Access to the site is currently from a continuation of Exchange Street as shown on the Title Plan. Exchange Street is a residential road and forms part of an area of residential development located to the south west of Edenfield village centre. The area of residential development has two points of access to the wider highway network, via Exchange Street on the B6527 Market Street and via Eden Avenue on the A680 Bolton Road North.
- 1.4 The A680 Bolton Road North links with the A56 at the junction at the north end of the M66. There is no access to the motorway heading southbound but most traffic from Edenfield heading south to Greater Manchester would use this junction. Similarly traffic heading north to Rawtenstall and the East Lancashire towns would use this junction.

2 Accessibility of the Site

- 2.1 The site is located to the west of Edenfield village centre. There are local services in the village centre which would be about a 400m walk distance to the western most parts of the site and closer to the eastern sections. There is a primary school to the north of the village.
- 2.2 There are bus stops in the village centre which provide services every 15 minutes to Bury and Ramsbottom to the south and Rawtenstall and Backup to the north.
- 2.3 In the context of a large village location the site is in an accessible location and suitable in transport terms for residential development.

3 The Local Road Network

- 3.1 Exchange Street runs east west from the village centre to the site access. It is a residential street with a relatively high level of on street parking. Most of this parking is associated with frontage property but it appears to be also used for parking for the village centre. **Photo 1** shows Exchange Street looking west towards the site from close to the junction with Market Street. **Photo 2** shows Exchange Street looking east from the site access.
- 3.2 There are no waiting at any time (double yellow lines) in the vicinity of the junction between Exchange Street and Market Street meaning the on street parking does not impede traffic at the junction. The junction corner radii at the junction are relatively small and visibility onto Market Street is limited. That said the junction is consistent with the village centre environment and there have been no injury accidents at the junction in the past five years.
- 3.3 At the eastern end there are footways on both sides of Exchange Street but at the western end there is only a footway on its southern side.
- 3.4 **Photo 2** shows the junction between Exchange Street and Highfield Road which is some 30m to the east of the site access. Highfield Road is also a residential road and provides a link to Eden Avenue which in turn provides access to the A680. **Photo 3** also shows the junction between Exchange Street and Highfield Road looking south along Highfield Road. There is less on street parking on the northern section of Highfield Road but closer to the junction with Eden Avenue the level of on street parking intensifies.

- 3.5 Eden Avenue is also a residential road with some on street parking. Both Highfield Road and Eden Avenue have footways on both sides of the road.
- 3.6 The junction between Eden Avenue and the A680 also has tight corner radii and visibility is restricted to a degree by frontage walls and on street parking. There have however been no injury accidents at the junction in the past 5 years. There have also been no injury accidents within the residential area formed by Exchange Street, Highfield Road and Eden Avenue.
- 3.7 The 30m section of Exchange Street between the Highfield Road junction and the site access only provides access to the site – there is no access to any other property from this section of road. As such this section of road has been somewhat neglected and there appears to be no footway on either side of the road and the carriageway appears to narrow as it approaches the boundary wall of the site. **Photo 4** shows the site access and the access road narrowing as it passes through the boundary wall of the site.
- 3.8 On close inspection however there is evidence of a former footway on the south side of the road as shown in **Photo 5**, where there is an old back of footway edging kerb just visible.
- 3.9 This is an unusual section of road which could potentially be not or only partially adopted. To understand to what degree this could effect a future residential access to the site it was necessary to understand the extent of adoption. In this context the adopted highway details have been obtained from Lancashire County Council and these are shown in **Appendix B**.
- 3.10 The plan shows that this section of road is adopted and that the unmaintained footway on the southern side of the road is included within the adopted highway. The line of adoption extends to the boundary wall of the site and therefore includes the section of unmaintained carriageway in front of the wall.
- 3.11 The existing site access runs through a gap in the boundary wall and serves the existing buildings on the northwest corner of the site. The access track is not adopted but it does form a public footpath which runs along the eastern and northern boundaries of the site. The track and public footway extend to the north of the buildings and cross the A56 on a narrow bridge. The road over the bridge is not adopted and therefore the access via Exchange Street is the only existing connection to the public highway.

4 Access Opportunities

- 4.1 The extent of adoption on Exchange Street means that the public highway can be extended into the site without constraint from third party ownerships.
- 4.2 The existing carriageway width of Exchange Street is some 5.5m wide (as measured on site) which is standard width for a residential road and would pose no constraint to the development capacity of the site. The normal assumption is that at least 100 units can be served from a residential road of this width without an emergency access (many authorities would accept a lot more than 100) and that with an emergency connection a 5.5m wide road can serve a lot more.
- 4.3 There is only a footway on the south side of Exchange Street. This is not considered to represent a constraint to the capacity of the site. Even with 90 units on the site this would be a very lightly trafficked section of road and therefore requiring some pedestrians to cross the road to use the footway would not be a material road safety concern.
- 4.4 The Plan in **Appendix C** shows the principle of extending Exchange Street into the site to provide access to a potential residential development. Footways could be provided on both sides of the road within the site with a crossing point provided in the vicinity of the site boundary to access the exiting footway on the southern side of Exchange Street.
- 4.5 As there are no other points of contact with the adopted highway the use of the existing access represents the most straight forward approach to providing access to the site and based on the above would not represent a constraint to the capacity of the site. The only other option would be acquire frontage property on Eden Avenue on the southern boundary of the site and provide an access to Eden Avenue although based on the above analysis this is clearly not necessary.
- 4.6 It would of course not be possible to provide an access to the A56 even if the western boundary of the site was contiguous with the highway boundary.
- 4.7 A development of 90 units would generate about 35 trips in the peak direction during the busiest hours (out from the site in the morning and returning in the evening). There are some constraints in the local network as referenced above, including the level of on street parking on parts of the local road network and the visibility constraints at the Exchange Street / Market Street junction and the Eden Avenue / A680 junction.

-
- 4.8 However these roads and junctions provide access to a notable area of residential development already without an identified road safety issue - there are no recorded accidents on the local roads or at the two junctions – and the level of trip generation from 90 houses is unlikely to materially change this.
- 4.9 In terms of restricted visibility at the junctions is also worth noting that research presented in Manual for Streets 2 did not find a direct link between visibility provision at priority junctions and safety. It questions the view that visibility levels below current guidance levels are immediately a safety concern and notes that the where drivers and cyclists on the main road have good forward visibility to vehicles using the side road (as is the case at both these junctions) they can adjust accordingly.

5 Photos



Photo 1: Exchange Street Looking West towards Site



Photo 2: Exchange Street Looking East from Site



Photo 3: Looking South along Highfield Road from Exchange Street



Photo 4: Existing Site Access

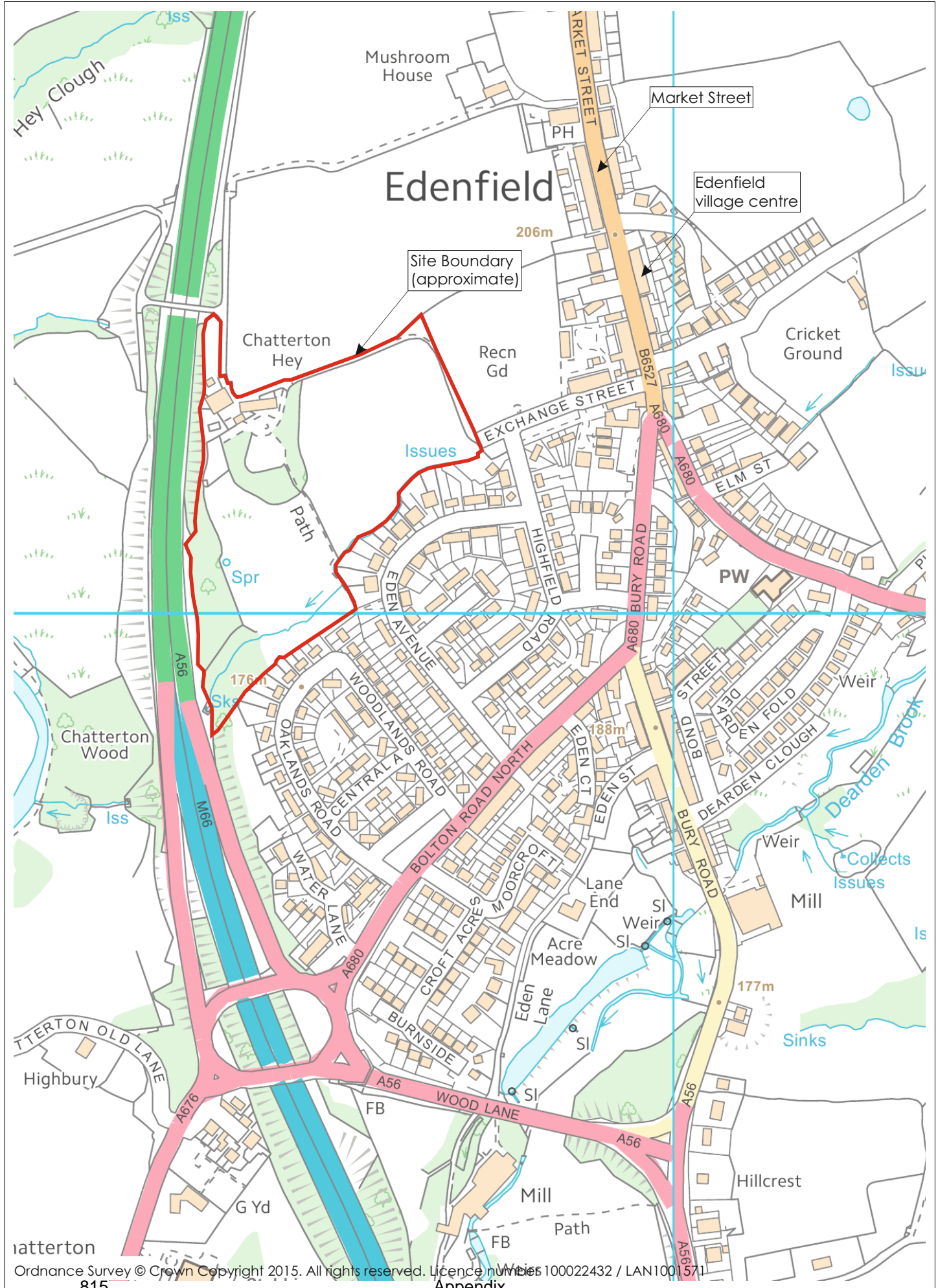


Photo 5: Evidence of Footway on southern side of Exchange Street. LCC Records show this footway area is adopted

6 Summary

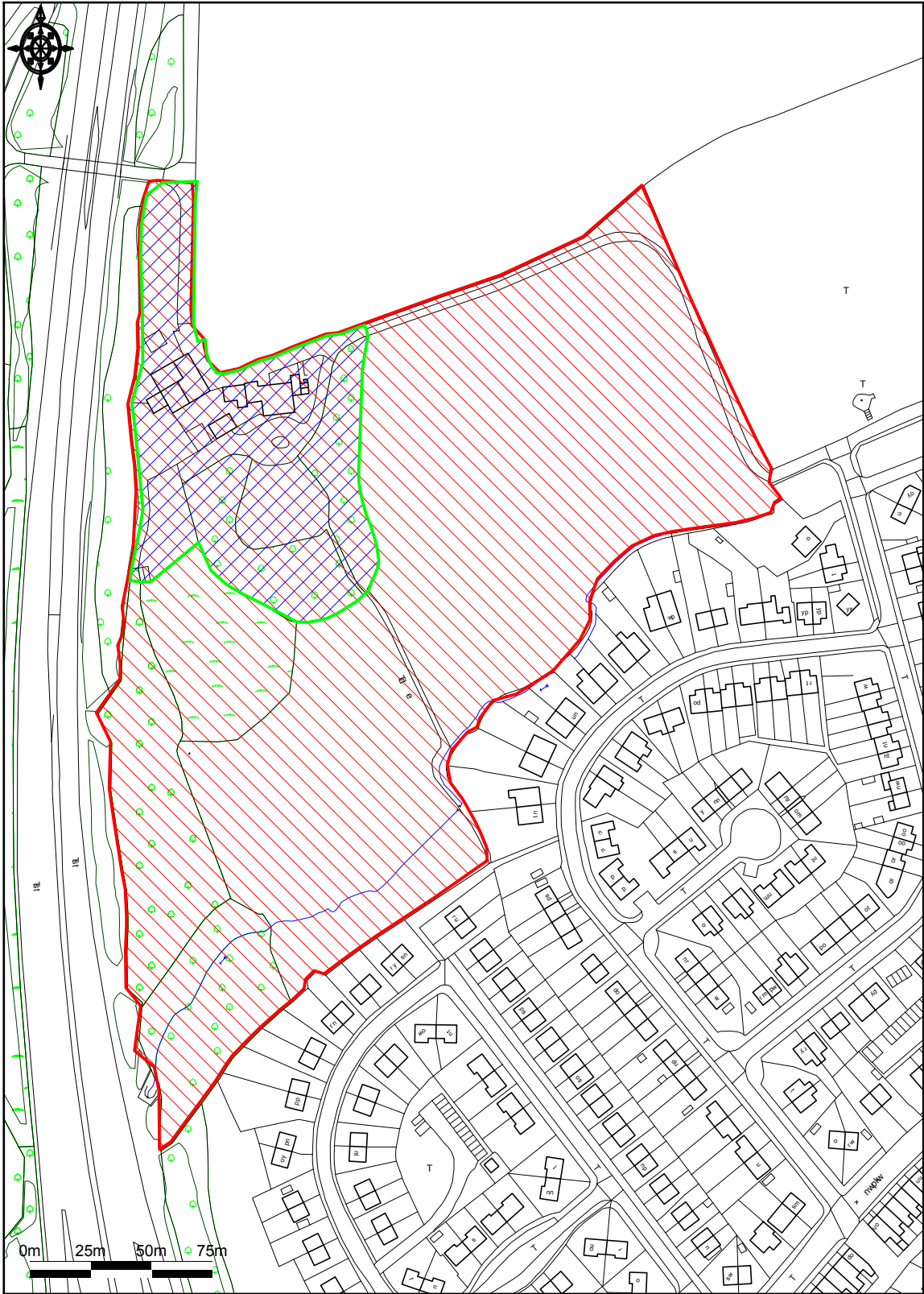
- 6.1 CBO Transport (CBO) has been commissioned to advise on the potential for residential development on land at Exchange Street, Edenfield. The site has capacity for 90 units.
- 6.2 In the context of a large village location the site is in an accessible location and suitable in transport terms for residential development.
- 6.3 Access to the site is currently from a continuation of Exchange Street. This section of road has been somewhat neglected and there appears to be no footway on either side of the road and the carriageway appears to narrow as it approaches the boundary wall of the site. There is however evidence of a former footway on the south side of the road.
- 6.4 LCC records show this section of road is adopted including the unmaintained footway on the southern side of the road and section of unmaintained carriageway in front of the boundary wall.
- 6.5 The extent of adoption on Exchange Street means that the public highway can be extended into the site without constraint from third party ownerships.
- 6.6 The existing carriageway width on Exchange Street is 5.5m. This would not present a constraint to the development capacity of the site.
- 6.7 The single sided footway on Exchange Street is not considered to represent a constraint to development. Even with 90 units on the site this would be a very lightly trafficked section of road and requiring some pedestrians to cross the road to use the footway would not be a material road safety concern.
- 6.8 There are no other points of contact with the adopted highway. Other than the extension of Exchange Street into the site the only other realistic access option would be to acquire frontage property on Eden Avenue on the southern boundary of the site and provide an access to Eden Avenue. On the basis of the above analysis this is clearly not necessary. It would of course not be possible to provide an access to the A56 even if the western boundary of the site was contiguous with the highway boundary.
- 6.9 A development of 90 units would generate about 35 trips in the peak direction during the busiest hours (out from the site in the morning and returning in the evening). There are some constraints in the local network but with a trip generation of this level these are unlikely to restrict the development capacity of the site.

Figure 1 Site Location





Appendix A: Title Plan



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Appendix B: LCC Adoption Plan

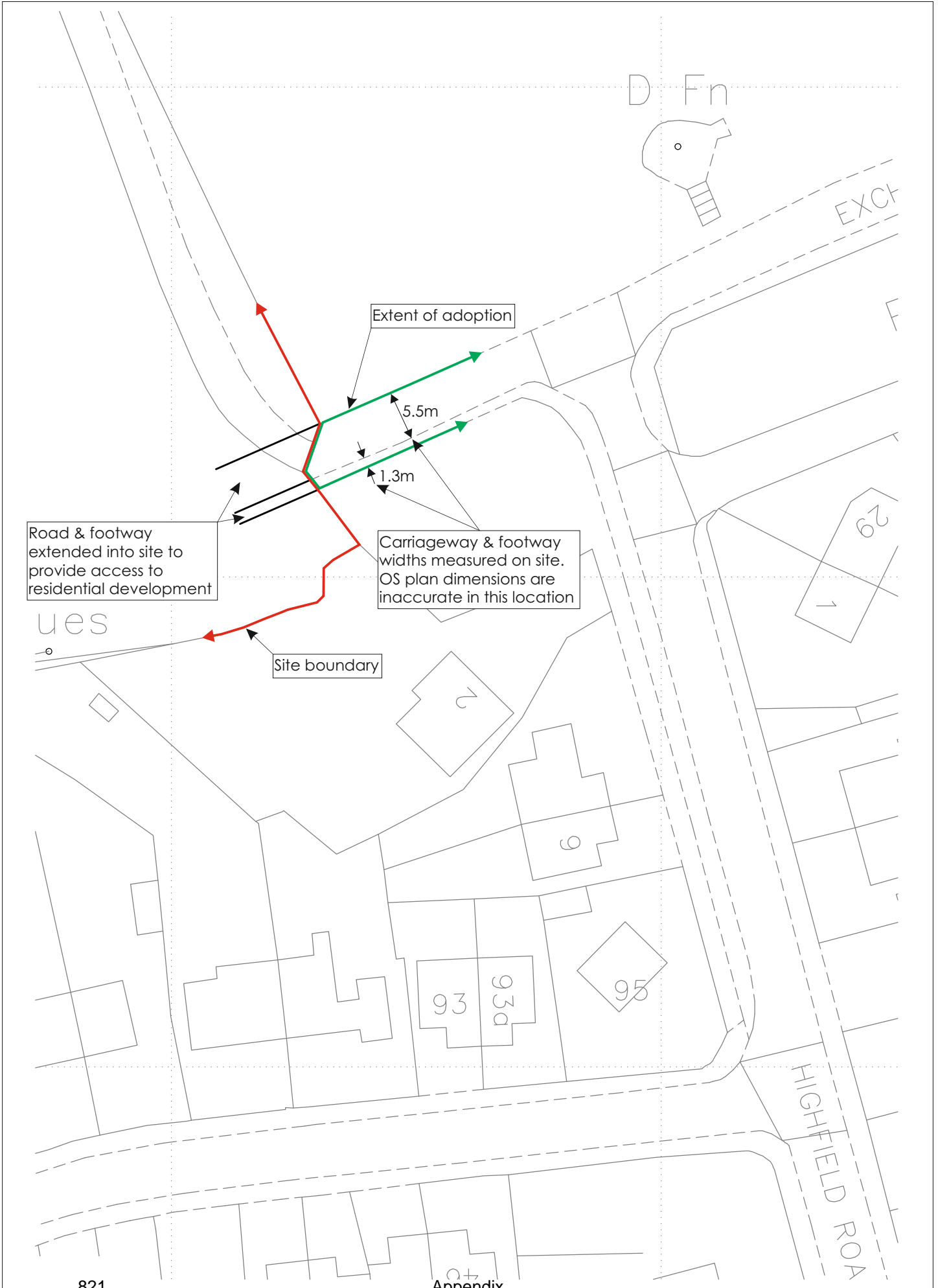


- Adoptions**
- Adopted
 - Stopped
- Districts**
- Other District/Unitary Authority
 - Lancashire Districts

Exchange Street and Highfield Road in Edenfield



Appendix C: In Principle Access Arrangement



Appendix C: Joint Statement prepared by The Methodist Church, Taylor Wimpey and Peel Holdings in respect of Policy HS3 and associated Opportunities and Constraints Plan

Joint Statement prepared by The Methodist Church, Taylor Wimpey and Peel Holdings in respect of Policy HS3

Draft Local Plan Policy HS3: Edenfield

Housing Allocation

The Rossendale Draft Local Plan identifies a 26ha (64 acre) parcel of land to the north and west of Edenfield for release from Green Belt and allocation for housing development. Policy HS3: Edenfield sets out the requirements for the development of this site which includes a comprehensive masterplan being developed for the entire site, implementation in accordance with an agreed Design Code, an agreed phasing and infrastructure delivery schedule, and a programme of implementation – all to be progressed as part of the evolving Local Plan process.

This Draft Land Allocation comprises a number of separate land ownerships. The major landowners collectively support the draft HS3 allocation and have put forward their individual sites (parcels of said allocation) for consideration as part of the preparation of the Draft Local Plan .

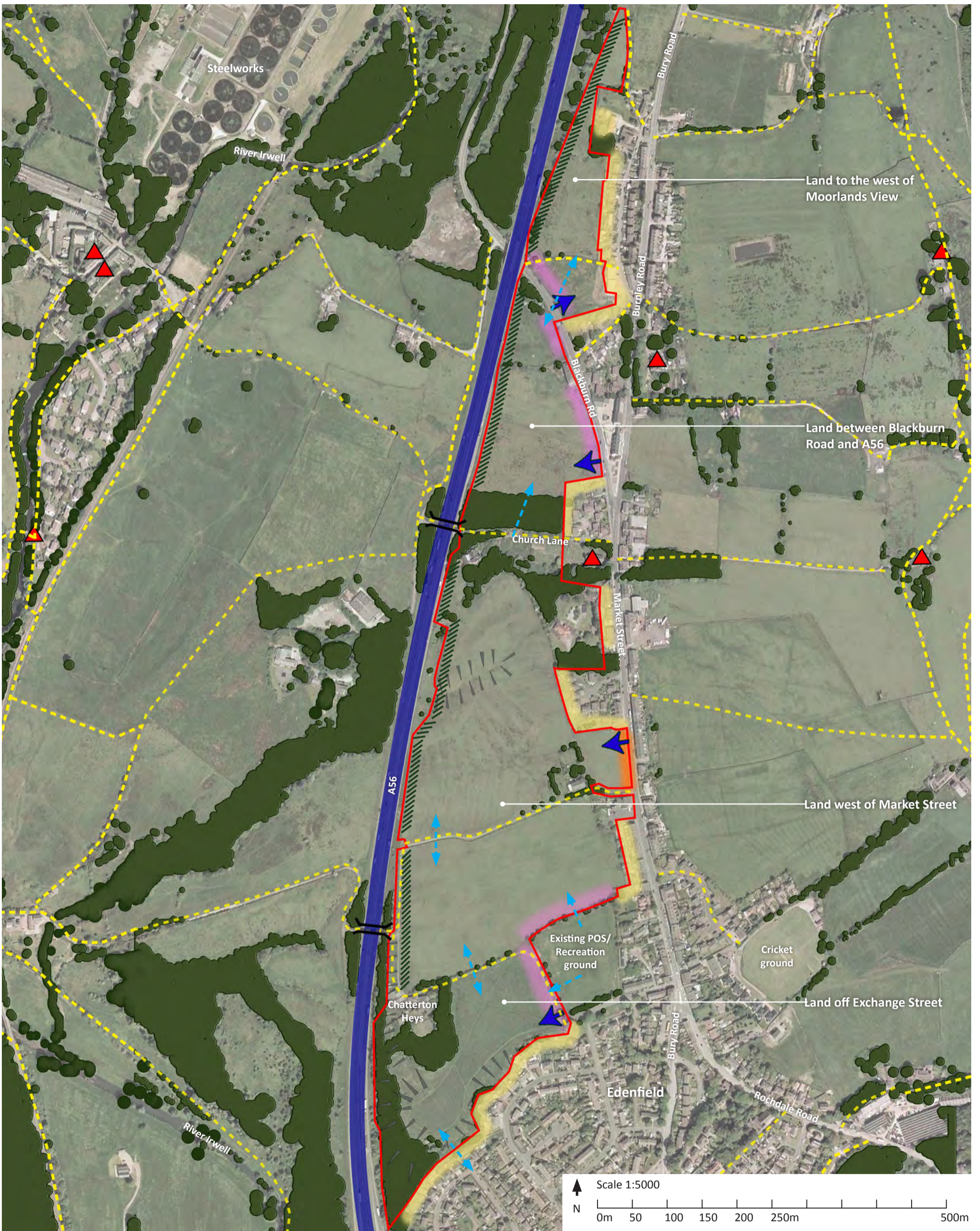
In compliance with the draft policy, the landowners are committed to working together to enable the entire HS3 allocation to be delivered. An initial meeting has been held and it is agreed that a joined up approach to development of a masterplan will be taken, in partnership with Rossendale Borough Council and other relevant stakeholders, including the local community in and around Edenfield.

As infrastructure requirements are defined and specified for the allocation as a whole, the landowners with the Council and other relevant Stakeholders will work together to ensure that necessary requirements are incorporated into the masterplan and the phasing and delivery programme. Likewise, where technical assessments are needed, a joined up allocation wide approach will be sought. In particular, the following matters will be collectively addressed, so far as possible:

- Appropriate buffers adjacent to the A56 will be included to ensure that new homes are protected from unacceptable levels of noise
- Key views across the site to the Rossendale Valley will be protected and maintained, where appropriate.
- Design and layout will consider the setting of [Edenfield](#) Parish Church, Market Street/ Horse and Jockey, and the amenity of existing housing.
- A movement framework will identify key access points and circulation within the site for vehicles, cycles and pedestrians.
- Key principles will be developed for contextual design, architectural styles and materials.
- Ecological and nature conservation, flood risk and drainage considerations will be investigated further and mitigation identified.
- Requirements for open space and play areas will be identified together with a strategy for delivery.

- Transport implications of the cumulative development.

Individual representations have been produced and submitted to illustrate the suitability and deliverability of each specific parcel of land within the wider allocation as well as echoing support for the wider DLP allocation. This statement however, should be taken as reassurance that going forward the major landowners are committed to working together to deliver this strategically important development in Edenfield, in accordance with the aspirations of Policy HS:3 and will seek to engage with the Council and other relevant Stakeholders.



RANDALL THORP

LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN

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- KEY:**
- Draft housing allocation boundary
 - Existing Public Right of Way
 - Existing vegetation
 - ▲ Listed buildings
 - Bridge
 - Steep slopes
 - A56 Source of noise

- Respect break in development and views to high land
- Housing backing on to site
- Positive frontage
- Noise buffer along A56 interface as required
- ← Potential highway access
- - - Potential footpath links

Appendix

Date: 04.10.2017
Drawn by: CD
Checker: JF
Rev by: CD
Rev checker: JF
QM Status: checked
Product Status:
Client Review

North West Edenfield Local Plan Representations

Opportunities and Constraints

Drwg No: 610C-01B Scale: 1: 5000 @ A3



Rossendale Draft Local Plan
Regulation 18 Consultation (July 2017)
Representations
on behalf of The Methodist Church
October 2017

London

Birmingham

Manchester

Thames Valley



Nathaniel Lichfield
and Partners

Planning Design Economics

**ROSSENDALE EMPLOYMENT LAND
STUDY – FINAL REPORT**

MA40579/MS/JMc

December 2009

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A56/M66 Corridor

8.18 The A56 and M66 corridor is the most favoured and buoyant business location in Rossendale Borough, benefitting from good road links. This area contains a number of existing employment areas, many of which, in contrast to eastern parts of the Borough, are modern and generally of good quality.

8.19 Nevertheless, from the site assessment undertaken to inform Section 6.0, it is apparent that several of the existing employment sites do not meet modern needs for employment space and which scored particularly poorly in the site appraisal process as a consequence. Specifically:

Site E30, Musbury Fabrics, Helmshore (4.6ha): which includes a large vacant area to the east of Holcombe Road with limited employment potential (the former Airtours site);

Site E31, Mayfield Chicks, Helmshore (3.3ha): a site featuring a number of partially derelict farm buildings with a very low quality environment and a substantial area used for open storage;

Site E33, Croft End Mill, Edenfield (0.6ha): a vacant mill that does not meet modern needs.

Table 5.4 A56/M66 Corridor Existing Sites/Areas

Ref.	Site/Area	Area	Score (out of 50)	Overall Rank
E25	St Crispin Way Industrial Estate	8.64	41	Good Quality
E5	Knowsley Road Industrial Estate Site B	3.29	40	
E6	Broadway, Haslingden	0.5	40	
E21	Rosendale Plastics Ltd	2.76	40	
E24	The Courtyard, Grane Road	0.65	39	
E53	Knowsley Road Industrial Estate Site C	6.96	38	
E26	Todd Hall Road Industrial Estate	4.51	38	
E19	Hollands Pies & Puddings	5.76	37	
E29	Knowsley Road Industrial Estate Site A	6.96	37	
E3	Reel Vision, Commerce Street, Haslingden	0.49	37	
E4	Holden Vale, Helmshore	3.7	36	
E1	Land adjacent to Baxenden Chemicals, Haslingden	5.63	36	
E27	Waterside Business Park	4.51	36	
E81	Land adjacent to Rising Bridge Inn, Blackburn Road	0.57	35	
E23	Prinny Hill/Elekem, Haslingden	0.31	34	
E22	Warton	0.94	33	
E34	Georgia Pacific	4.37	32	
E32	Voith Paper Fabrics/TNT Deliveries	4.18	32	
E35	Cuba Industrial Estate	2.43	32	
E2	Newlock, Heslingden	3.43	31	
E20	Hud Hey Industrial Park	2.2	30	
E30	Musbury Fabrics, Helmshore	4.62	26	
E36	Industrial estate, Edenfield	0.91	25	Poor Quality
E31	Mayfield Chicks, Helmshore	3.27	25	
E33	Croft End Mill, Edenfield	0.59	25	

5.20

Helmshore/Haslingden: sites in this area include E31 (Mayfield Chicks), which although benefiting from good road access is a fairly rural site which is isolated from public transport links, services and labour. Part of the site is a reasonably successful employment area, but the majority comprises a collection of partially derelict farm buildings with a very low quality environment and a large cleared area in use for open storage. As a result, the site scores poorly and its development potential is limited due to its isolated location.

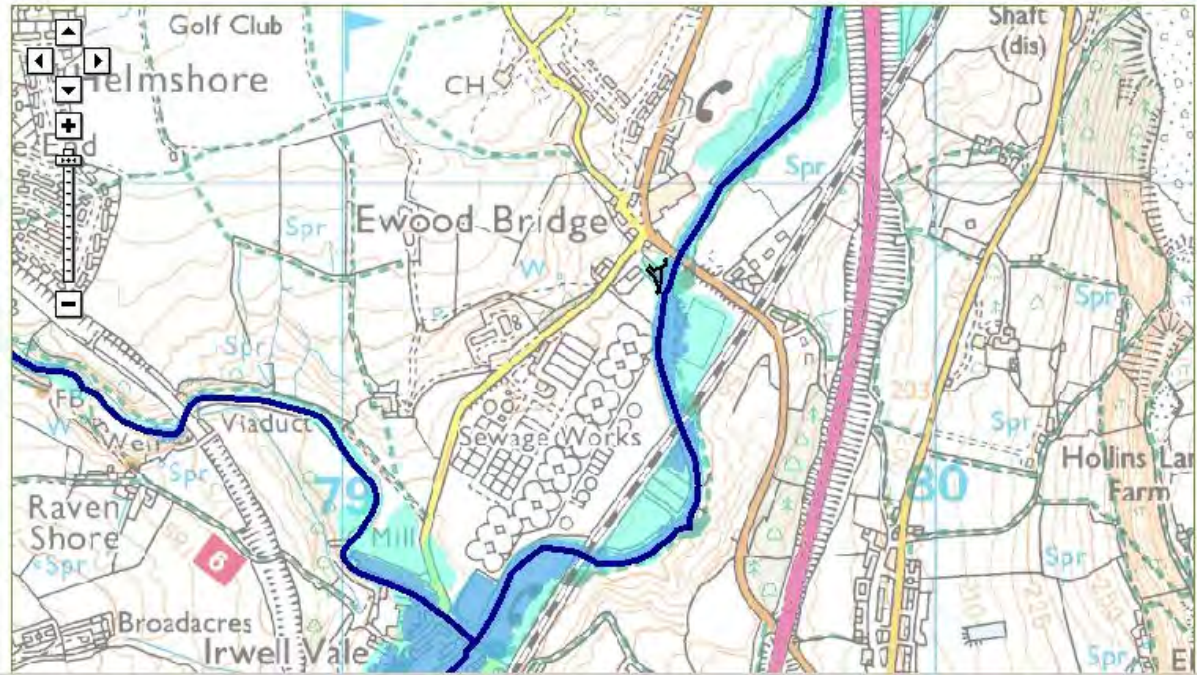
Nevertheless, from the site assessment undertaken to inform Section 6.0, it is apparent that several of the existing employment sites do not meet modern needs for employment space and which scored particularly poorly in the site appraisal process as a consequence. Specifically:


- **Site E30**, Musbury Fabrics, Helmshore (4.6ha): which includes a large vacant area to the east of Holcombe Road with limited employment potential (the former Airtours site);
- **Site E31**, Mayfield Chicks, Helmshore (3.3ha): a site featuring a number of partially derelict farm buildings with a very low quality environment and a substantial area used for open storage;
- **Site E33**, Croft End Mill, Edenfield (0.6ha): a vacant mill that does not meet modern needs.

Flood risk map

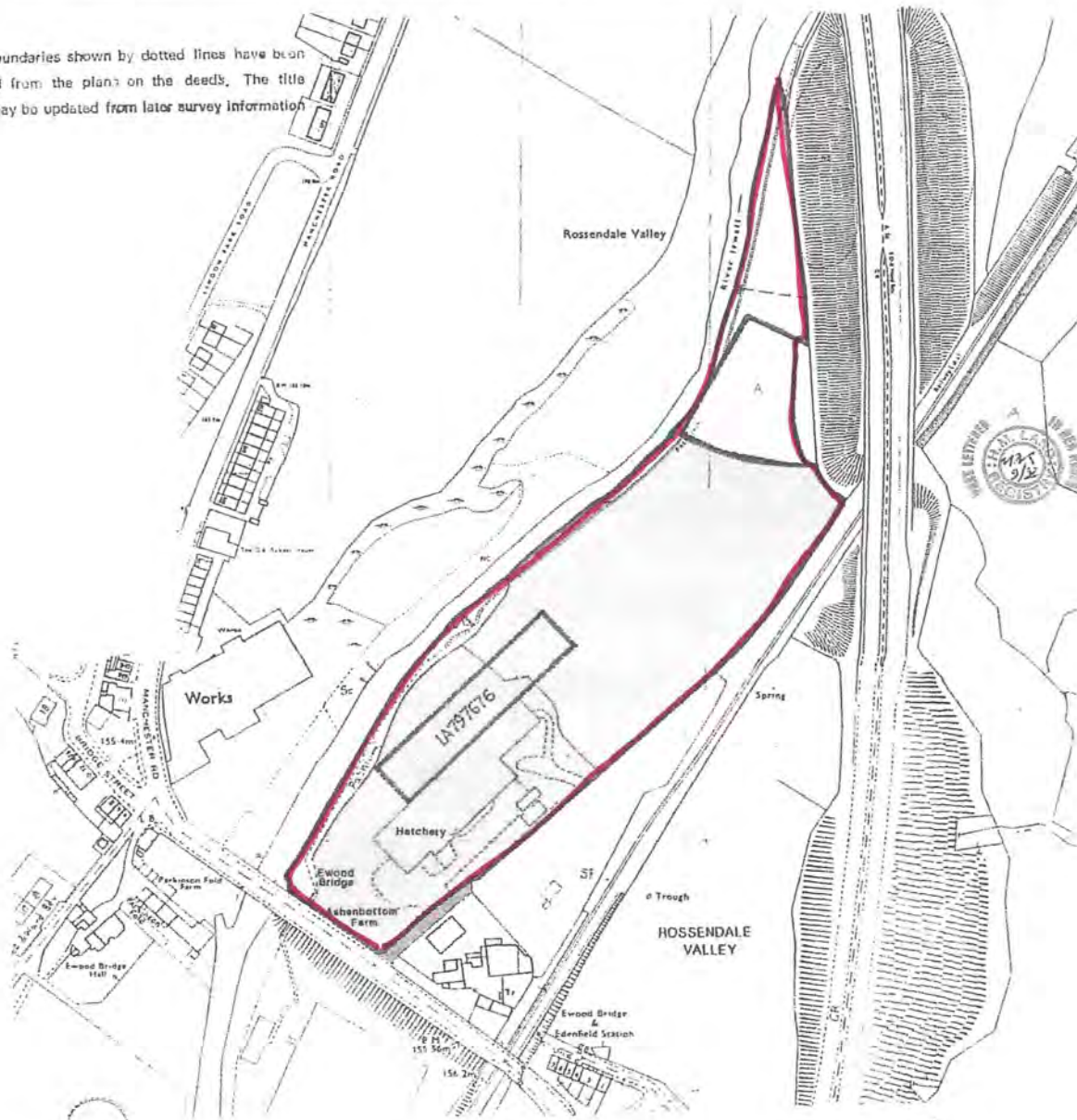
X: 379,442;Y: 420,635 at scale 1:10,000

Data search  Text only version 



H.M. LAND REGISTRY		TITLE NUMBER	
		LA642965	
ORDNANCE SURVEY PLAN REFERENCE	SD 7920/SD7920SE	Scale 1/ 2500	
COUNTY LANCASHIRE	ROSSENDALE DISTRICT	© Crown Copyright	

The boundaries shown by dotted lines have been plotted from the plans on the deeds. The title plan may be updated from later survey information



This official copy is incomplete without the preceding notes page.

18 JUL 2014

Received



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Subject to contract

Dear Sir / Madam

**FORMER MAYFIELD CHICKS SITE, MANCHESTER ROAD, EWOOD BRIDGE, LANCASHIRE
- Redevelopment Site For Sale**

We are pleased to enclose details of the former Mayfield Chicks site which we have been instructed to sell on a freehold basis.

The site extends to approximately 3.9 hectares (9.6 acres). The former building has been demolished and the site is now a cleared development site incorporating extensive areas of hard standing.

The site would be suitable for open storage requirements or redevelopment subject to planning.

Further information can be found at www.dtzewood.com or please call for further information.

Yours sincerely

ANTHONY O'KEEFE
Director

Enc.



100% recycled paper

FOR SALE

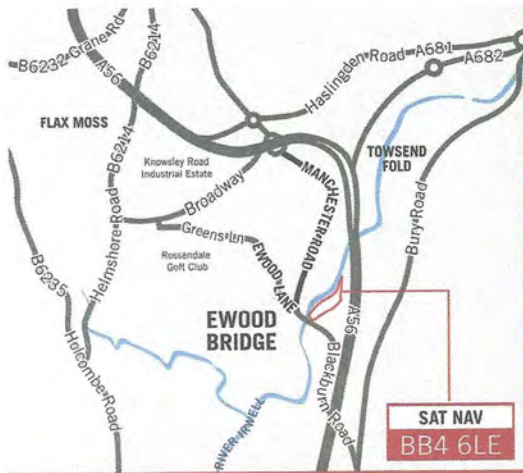
3.9 Hectares (9.6 Acres) Site

- Employment use
- Suitable for re-development

MAYFIELD

MANCHESTER ROAD, EWOOD BRIDGE, LANCASHIRE, BB4 6LE





Location

The site is situated within the Borough of Rossendale, approximately 3km (2 miles) south of Haslingden and Rawtenstall.

It is accessed directly from the B6527 Blackburn Road, approximately 1.3km (0.8 miles) south of the Haslingden junction of the A56 link road.

Description

The site extends to approx 3.9 hectare (9.6 acre) and was formerly a chicken hatchery operated by Mayfield Chicks Ltd.

Following demolition the site now provides a broadly level site, bounded by the River Irwell, A56 and the East Lancashire Rail Line. The site is predominantly cleared, incorporating extensive areas of hardstanding and made ground which could be suitable for open storage requirements. The site is physically suited for a range of end users subject to planning.

Members of the Act 1967, Unfair Contract Terms Act 1977, The Property Misdescriptions Act 1991. These particulars are issued without any responsibility on the part of the agent and are not to be construed as constituting any recommendation or fait accompli which any person is entitled to rely on. Notices the agent and any person in their employ has any authority to make or give any representation or warranty whatsoever in relation to the property. June 2014. RB&N 0161 833 0555 - richard@rbn.co.uk

Terms

The site is offered for sale on a freehold basis.

Planning

The southern part of the site which includes the majority of the hard standing and previously developed land currently benefits from an extant planning permission for the Re-instatement of the former poultry hatchery building (Application No: 2002/420).

Due to the site being an existing employment site, B2 and B8 uses would be appropriate on the site subject to planning.

The northern, predominantly Greenfield, portion of the site falls outside of the urban boundary of Ewood Bridge and is allocated as Green Belt.

Interested parties are advised to make their own enquiries by contacting Rossendale Borough Council.

Enquiries

Please contact sole selling agents:

peter.briggs@dtz.com

0161 455 3784

tony.o'keefe@dtz.com

0161 455 3715



Rossendale Borough Council

Town and Country Planning Act 1990

Planning Permission

Applicants Name : Mayfield Chicks Ltd

PLA7436

Name & Address of Applicant / Agent : Mr D Nurse
Stonegarth
Godminster Lane
Bruton
Somerset
BA10 0NB

Part 1 - Particulars of Application

Date Received : 15 August 2002

Application No : 2002/420

Proposed works : Re-instatement of former poultry hatchery destroyed by fire. The development may affect the setting of footpath no 309

Location : MAYFIELD CHICKS LTD ASHEN BOTTOM EWODD BRIDGE
ROSSENDALE BB4 6JY

Grid Reference : (E)37969810(N)42096380

Part 2 - Particulars of Decision

The Rossendale Borough Council hereby give notice that **planning permission has been granted** for the execution of works referred to in Part I hereof in accordance with the application and plans submitted **subject to the following conditions:**

- 1 The development permitted shall be begun before the expiration of five years from the date of this permission.

Reason : The condition is deemed attached by virtue of Section 91 of the Town and Country Planning Act 1990.

- 2 No development shall be commenced until full details, including representative samples, of the external materials of construction to be used on the roof and walls of the development have been submitted to and first approved in writing by the Local Planning Authority and shall thereafter be carried out in accordance with details approved.

Reason : To ensure a satisfactory appearance to the development.

Date: 18 September 2002

Stubblee Hall, Bacup
Lancs OL13 0DE

J.B. Haines
Development Services Manager

Rossendale Borough Council
Planning Policy
Futures Park
BACUP
Lancashire
OL13 0BB

Our ref: NO/2012/104518/PO-
03/IS1-L01

Your ref:

Date: 27 October 2017

Dear Sir/Madam

**ROSSENDALE DRAFT LOCAL PLAN
REGULATION 18 CONSULTATION**

Thank you for consulting us on the draft Local Plan for Rossendale. I apologise for the delay it has taken to submit our response to the consultation.

We have reviewed the draft plan is so far as it relates to our remit and we would offer the following comments:-

Policy HS2

Issue Several of the proposed residential allocations are subject to constraints that may impact on compliance with the National Planning Policy Framework (NPPF), delivery and yield.

Impact Proposed allocations for residential development may be non-complaint with NPPF and National Planning Practice Guidance (NPPG) requirements.

Suggested solution Demonstrate that relevant environmental constraints have been taken into account when allocating residential sites.

Commentary

Table 1 at Appendix 1 identifies where proposed residential allocations are adjacent to or partly within a Flood Zone (2 or 3), within 8 metres of a designated Main River watercourse or located on top of a historic landfill site (so may have contamination issues).

1. Flood Zones: In relation to sites within a Flood Zone as defined on the EA Flood Map for Planning, it will be for the Council to demonstrate that any site allocated for development in a Flood Zone satisfies the requirements of the Sequential Test and, where necessary, the Exception test. We have identified all those sites where flood risk may be an issue (including sites that border an area considered to be at risk). We understand that you have completed your Strategic Flood Risk Assessment

(SFRA) and that this may provide sufficient evidence for these sites to come forward. Evidence to demonstrate that the Sequential Test and Exception Test have been satisfied for allocations in Flood Zones should be clearly cross-referenced in the Local Plan. Where site specific mitigation measures are necessary to make a development safe in planning terms, these should be specified at an appropriate point in the local plan, possibly as part of Policy ENV11. This may be in the form of excluding parts of the site from inappropriate development or identifying site specific measures that would be necessary to make residential development safe in that Flood Zone.

2. Main Rivers: Development within 8 metres of the top of the bank or edge of the retaining wall of a designated Main River watercourse (or culverted watercourse) will require consent from the Environment Agency. Development that restricts access to a Main River watercourse and / or presents a risk of harm to the aquatic environment may not be acceptable. It is essential to ensure that any sites with Main River watercourses in an open channel or a culvert within the development site or within 8 metres of the site boundary take this into account. Where small sites require an easement on either side of a Main River watercourse that may be within the site, this could impact on the density of development that could be achieved. Development over culverted Main River watercourses will not be permitted.

3. Historic Landfill sites: Proposals for development of historic landfill sites will need to be supported by sufficient information to demonstrate that the site is suitable for the proposed use without posing a risk to controlled waters. We have no evidence to suggest that these sites cannot be re-developed, but there may be a need for some remediation of contaminated sites.

It is also noted that several of the proposed allocations on historic landfill sites are identified as Greenfield sites. Given the previous use, these may be more appropriately designated as Brownfield.

<p>Policy HS3</p>	<p>We support the requirement for a phasing and infrastructure delivery schedule. From a strategic perspective, the management of surface and foul water should ideally be designed for the site as a whole rather than individual development plots. The cumulative impacts of multiple foul and surface water discharges from different sites will be more effectively managed when considered as a whole.</p>
<p>Policy HS14</p>	<p>Issue Development proposals to convert and re-use rural buildings in the countryside are often in locations with limited sewerage infrastructure.</p>

Impact Development in areas with little or no sewerage infrastructure can increase the risk of pollution to controlled waters without a suitable method of foul drainage.

Suggested solution Expand the policy to ensure that development schemes include sewerage infrastructure proposals that will not increase the risk of pollution to controlled waters

Commentary

Government guidance on non-mains drainage in NPPF paragraphs 109 and 120, and national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) stresses that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where having taken into account the cost and / or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered. When considering non-mains drainage systems, the first presumption should be for the use of a package treatment plant and only where this is demonstrated not to be feasible should septic tanks be considered. Making reference to the use of an appropriate system of foul drainage in Policy HS14 adds weight to need for developers to identify an appropriate solution in these instances.

Policy HS17

Issue Sites HS2.19 & HS2.90 are allocated for specialist housing but are located within Flood Zones and are constrained by the presence of Main River watercourses.

Impact These constraints may affect the suitability of these sites for specialist housing as proposed.

Suggested solution Review the suitability of these sites for specialist housing and consider whether or not the proposed densities take account of the site constraints to demonstrate why they are suitable as proposed.

Commentary

There is no evidence presented to show that these sites are sequentially appropriate in relation to flood risk. The presence of Main Rivers through and adjacent to the sites may also impact upon the proposed density of development, particularly in relation to HS2.19 as development over a culverted Main River watercourse will not be permitted.

Policy EMP2

Issue Several of the proposed new employment allocations are subject to constraints that may impact on compliance with the NPPF, delivery and yield.

Impact Proposed allocations for employment development are non-compliant with NPPF and NPPG requirements.

Suggested solution Demonstrate that relevant environmental constraints have been taken into account when allocating residential sites.

Commentary

Table 2 at Appendix 1 identifies where proposed employment allocations are adjacent to or partly within a Flood Zone (2 or 3), within 8 metres of a designated Main River watercourse or located on top of a historic landfill site (so may have contamination issues).

1. **Flood Zones:** In relation to sites within a Flood Zone as defined on the EA Flood Map for Planning, it will be for the Council to demonstrate that any site allocated for development in a Flood Zone satisfies the requirements of the Sequential Test and, where necessary, the Exception test. We have identified all those sites where flood risk may be an issue (including sites that border an area considered to be at risk). We understand that you have completed your Strategic Flood Risk Assessment (SFRA) and that this may provide sufficient evidence for these sites to come forward. Evidence to demonstrate that the Sequential Test and Exception Test have been satisfied for allocations in Flood Zones should be clearly cross-referenced in the Local Plan. Where site specific mitigation measures are necessary to make a development safe in planning terms, these should be specified at an appropriate point in the local plan, possibly as part of Policy ENV11. This may be in the form of excluding parts of the site from inappropriate or unacceptable development or identifying site specific measures that would be necessary for specific allocated sites to make the development safe in a Flood Zone without increasing risk elsewhere.
2. **Main Rivers:** Development within 8 metres of the top of the bank or edge of the retaining wall of a designated Main River watercourse (or culverted watercourse) will require consent from the Environment Agency. Development that restricts access to a Main River watercourse and / or presents a risk of harm to the aquatic environment may not be acceptable. It is essential to ensure that any sites with Main River watercourses in an open channel or a culvert within the development site or within 8 metres of the site boundary take this into account. Where small sites require an easement on either side of a Main River watercourse that may be within the site, this could impact on the density of development that could be achieved. Development over culverted Main River watercourses will not be permitted.
3. **Historic Landfill sites:** Proposals for development of historic landfill sites will need to be supported by sufficient information to demonstrate that the site is suitable for the proposed use without posing a risk to controlled waters. We have no evidence

	to suggest that these sites cannot be re-developed, but there may be a need for some remediation of contaminated sites.
Policy EMP6	We support the requirement for a Masterplan for the site given the presence of the River Irwell and the need to incorporate it in to the development as a positive feature while still ensuring protections from the development as proposed.
Policy EMP7	We support the requirement for a Masterplan for the site given the presence of the River Irwell and the need to incorporate it in to the development as a positive feature while still ensuring protections from the development as proposed.
Policy ENV1	<p>Issue While the draft policy wording seeks to protect existing landscape features and natural assets, there is no support for seeking any enhancement to existing features.</p> <p>Impact Opportunities to improve existing natural assets as a result of proposed development may be lost.</p> <p>Suggested solution Revise the wording of the proposed policy as follows:-</p> <p style="padding-left: 40px;"><i>i) Providing landscaping as an integral part of the development, protecting <u>and enhancing</u> existing landscape features and natural assets, habitat creation, providing open space, appropriate boundary treatments and enhancing the public realm</i></p> <p>Commentary</p> <p>In addition to protecting landscapes and natural assets, paragraph 109 and 118 of the NPPF seeks to ensure the planning system enhances such features. This should be reflected in the proposed policy to ensure that high quality development includes an expectation that existing features of value will be improved.</p>
Policy ENV1	<p>Issue There is no reference to the need to ensure high quality development must not increase risks of pollution to the environment.</p> <p>Impact High quality development proposals are assessed against a policy that does not take account of the risks of pollution to air, land or water leading to harm to the environment.</p> <p>Suggested solution Revise the wording of the proposed policy as follows:-</p> <p style="padding-left: 40px;"><i>r) The scheme will not have an unacceptable adverse impact on the environment by virtue of pollution to water, land or air</i></p>

	<p>Commentary</p> <p>Paragraph 120 of the NPPF seeks to ensure that planning policies and decisions avoid unacceptable risks of pollution by ensuring that development is in an appropriate location. This should be reflected in the proposed policy to ensure that high quality development includes an expectation that it will not contribute to an increased risk of pollution to water, land or air.</p>
<p>Policy ENV5</p>	<p>We support the proposed preparation of a Supplementary Planning Document to provide further details on the ecological networks in Rossendale. Given the significance of river corridors and networks in contributing the value of the biodiversity assets in the borough, we look forward to being involved in the preparation of the SPD.</p>
<p>Policy ENV7</p>	<p>Issue In relation to the impacts of new development on surface water and groundwater, a successful way of reducing the risk of pollution to the water environment is to ensure that foul drainage discharges to a public sewer unless it can be demonstrated why this is not feasible.</p> <p>Impact By not requiring new development to connect to the public sewer where feasible, there is a risk that development may seek to use inappropriate methods of foul drainage in publicly sewered areas.</p> <p>Suggested solution Revise the wording of the policy to include reference to the expectation that foul drainage from new development in publicly sewered areas will be expected to discharge to the public sewer to reduce the risk of pollution to controlled waters.</p> <p>Commentary</p> <p>Government guidance on non-mains drainage in NPPF paragraphs 109 and 120, and national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) stresses that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where having taken into account the cost and / or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered. Making reference to the need to connect foul drainage to the public sewer where practicable will reduce the risk of developers pursuing less-sustainable alternatives.</p>
<p>Policy ENV10</p>	<p>Issue The Environment Agency would have a regulatory role in relation to hydropower schemes, but this is not referenced in the policy or supporting statement.</p> <p>Impact Those proposing hydropower schemes through the planning system may not be aware of the need to ensure that their scheme will also have to comply with several Environment Agency regulatory regimes.</p>

	<p>Solution Revise the policy or supporting statement to make it clear that hydropower schemes will also need to comply with legislation governed by the Environment Agency. Developers should be advised to speak to the Environment Agency before submitting any planning application for a hydropower scheme.</p> <p>Commentary</p> <p>To ensure that any hydropower schemes that emerge are compliant in relation to both planning and permitting regimes, it is strongly recommended that developers speak with the Environment Agency to discuss their proposals at an early stage.</p>
<p>Policy ENV11</p>	<p>Issue The policy states that '<i>planning permission will only be granted for proposals which would not be subject to unacceptable flood risk or materially increase the risks elsewhere</i>'. This does not take account of the fact that some development types are inappropriate in flood zones and should not be permitted regardless of whether or not the risks can be managed.</p> <p>Impact The wording of the policy does not comply with the requirements of Paragraph 100 of the NPPF and the associated Flood Risk Tables included in the Flood Risk and Coastal Change section of the NPPG</p> <p>Solution Reword the policy to ensure that inappropriate development will not be permitted, i.e. '<i>planning permission will only be granted for proposals <u>which are not classed as inappropriate in a Flood Zone,</u> would not be subject to unacceptable flood risk or materially increase the risks elsewhere</i>'</p> <p>Commentary</p> <p>Not all development types are appropriate in a Flood Zone, even if a FRA demonstrates that the risks can be appropriately managed. The provision of a FRA will not make such developments acceptable and so the wording of the draft policy should be amended to ensure that it is clear that only development classed as appropriate can be permitted in a Flood Zone.</p>
<p>Policy ENV11</p>	<p>Issue Where necessary, planning applications will need to be supported by a Flood Risk Assessment (FRA) but this is not clear based on the policy or supporting statement.</p> <p>Impact A lack of clarity over the need for a FRA could lead to planning applications being submitted contrary to the requirements of Paragraph 103 of the NPPF.</p> <p>Solution Revise the policy and / or supporting statement to ensure that the need for a FRA to consider and assess flood risk is clear and sufficient detail is provided to ensure applicants know what they will be expected to submit with their planning application.</p>

	<p>Commentary</p> <p>Paragraph 103 of the NPPF identifies when planning applications should be accompanied by a FRA. While we are not suggesting that Policy ENV11 should repeat this criteria, we would suggest that making reference to the need for all applications to be accompanied by a FRA in accordance with paragraph 103 of the NPPF provides more clarity and avoids any doubt.</p>
<p>Policy ENV11</p>	<p>Issue There is no cross-referencing between the policy and the Strategic Flood Risk Assessment (SFRA)</p> <p>Impact Any mitigation measures identified in the SFRA to make any allocations acceptable in terms of NPPF requirements have not been identified so it is unclear whether all the proposed site allocations are NPPF compliant</p> <p>Suggested solution Review the policy and supporting statement and revise / amend as necessary to ensure that any SFRA requirements can be clearly cross-referenced and secured through the application of Policy ENV11 when considering planning applications on any allocated sites with known flood risks.</p> <p>Commentary</p> <p>Where site specific mitigation measures are necessary to make a development safe in planning terms, these should be specified at an appropriate point in the local plan and it logical that they would form part of Policy ENV11.</p>
<p>Monitoring:</p>	<p>In relation to the proposed criteria for monitoring the implementation of the plan, the following information could also be used to track plan progress and measure success:-</p> <ul style="list-style-type: none"> • Number of applications approved contrary to an objection from the Environment Agency

If you have any comments or queries relating to any of these comments, please do not hesitate to contact us.

Yours faithfully

Philip Carter
Planning Officer - Sustainable Places

Direct dial
Direct e-mail

(encs)

Appendix 1:-

Table 1 – Environmental Constraints impacting upon proposed Residential Allocations:

Site reference		Environment Agency constraint(s)			
Housing Allocation Reference	SHLAA Reference	Main River	Flood Zone 3	Flood Zone 2	Potential contamination (historic landfill)
Bacup Stacksteads Britannia & Weir					
HS2.4	SHLAA16080				Yes
HS2.4	SHLAA16081				Yes
HS2.15	SHLAA16040				Yes
HS2.18	SHLAA16060			Yes	
HS2.19	SHLAA16063	Yes		Yes	
HS2.25	SHLAA16112	Yes	Yes		
HS2.10	SHLAA16073	Yes			
HS2.14	SHLAA16359	Yes	Yes	Yes	
HS2.24	SHLAA16109				Yes
HS2.30	SHLAA16110	Yes	Yes	Yes	
Haslingden & Rising Bridge					
HS2.34	SHLAA16324				Yes
HS2.43	SHLAA16190		Yes	Yes	
HS2.65	SHLAA16404	Yes	Yes	Yes	
South West					
HS2.72	SHLAA16273	Yes	Yes		
HS2.77	SHLAA16288				Yes
HS2.73	SHLAA16271	Yes	Yes		
HS2.78	SHLAA16304				Yes
HS2.78	SHLAA16402				Yes
HS1.110	SHLAA16278	Yes	Yes	Yes	
Waterfoot, Lumb, Cowpe & Water					
HS2.88	SHLAA16124	Yes			
HS2.90	SHLAA16128	Yes	Yes	Yes	
HS2.92	SHLAA16143			Yes	
HS2.93	SHLAA16146			Yes	
HS2.94	SHLAA16147			Yes	
HS2.95	SHLAA16390			Yes	
HS2.98	SHLAA16407	Yes	Yes	Yes	
HS2.101	SHLAA16120	Yes	Yes	Yes	
Whitworth, Facit and Shawforth					
HS2.102	SHLAA16020				Yes
HS2.102	SHLAA16019				Yes
HS2.103	SHLAA16021				Yes
HS2.105	SHLAA16006	Yes	Yes	Yes	
HS2.107	SHLAA16005	Yes	Yes	Yes	Yes
HS2.108	SHLAA16016	Yes	Yes	Yes	

Table 2 – Environmental Constraints impacting upon proposed Residential Allocations

Site reference		Environment Agency constraint(s)			
Employment Allocation reference	Employment Land Survey reference	Main River	Flood Zone 3	Flood Zone 2	Potential contamination (historic landfill)
EMP2.12	EMP10	Yes	Yes	Yes	
EMP2.15	EMP13			Yes	
EMP2.23	ADD6			Yes	Yes
EMP2.26	EMP11			Yes	
EMP2.34	EMP72	Yes	Yes	Yes	

Helmshore
Rossendale

Forward Planning Team
Rossendale Borough Council
Business Centre
Futures Park
Newchurch Road
Bacup
OL13 0BB

7 October 2017

Dear Sir/Madam

Consultation Rossendale Draft Local Plan

Housing Allocation Reference HS2.77– Land at Curven Edge, Helmshore

As residents of Helmshore for over 40 years we wish to put forward our objections to the inclusion of the above area of land in the Rossendale Draft Local Plan for future housing development.

1. Unsuitability of land for Development

This land was the subject of a Derelict Land Reclamation Scheme in 1979. For more information please refer to Rossendale B.C. Planning Committee Minute no. 597(c) 10/9/79, minute no. 885 12/11/79 and minute no. 1077(b) 10/12/79.

The land was culverted and then filled in using spoil from the Haslingden By-Pass Scheme. From personal knowledge the material tipped was more like slurry and many complaints were made at the time about the type of material being used to fill the site. The land was then top soiled and seeded. The result of this has meant that part of the site in the vicinity of the deep manhole shafts (see photographs) is always wet throughout the year whatever the weather. We would suggest that the unsuitable/unsafe ground conditions would preclude any possible housing developments without expensive and extensive engineering/foundation works being undertaken, thus making it uneconomical to develop.

2. Loss of amenity

This land and the land opposite forms a pleasing aspect at the entrance to the estate and its development would mean the loss of a valuable amenity to the residents of the estate.

The main area of land which is adjacent to Curven Edge has been and still is used by residents and others as a dog exercise area, by families and children for ball games, communal bonfire/firework displays and for sledging and snowballing in the winter. It provides a safe play area for children on the estate.

Our own children enjoyed the use of this land and we would not like to see the current and future generation of children deprived of the use of this valuable recreation facility.

The loss of this area of land would therefore be injurious to the amenities at present enjoyed by the residents of the estate and Helmshore as a whole.

3. Overdevelopment

Since the 1970's Helmshore in general has been overdeveloped. The most recent developments at Sunnybank, Alden Rise, The Power Mill, Holden Vale and the former Airtours' sites, to name but a few, have placed tremendous pressure on the local infrastructure particularly the local primary and secondary schools and the Health services. Further development such as this will only exacerbate the current situation.

4. Previous History

As we understand it part of the land is owned by the Council and the Council in the past has refused to dispose of their interest therein. In addition planning permission has been refused for housing development for the whole site. No doubt your records will confirm the planning history of the site.

Please acknowledge receipt of this letter. We hope that our objections will be given very careful consideration and for the reasons stated above the Draft Plan will be amended by the removal of this site HS2.77 from policy HS2- Housing Site Allocations.

Yours faithfully

Mr P N & Mrs J Heath

Email:

c.c. Jake Berry MP

Councillors : Brian Essex

Tony Haworth

