

# ROSSENDALE LOCAL PLAN STATEMENT OF CONSULTATION



March 2019

Rosendale  
BOROUGH COUNCIL

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# 1. Introduction

## Purpose of the Statement of Consultation

1.1 This Statement of Consultation sets out the consultation that Rossendale Borough Council has undertaken in producing the Proposed Submission version of the Rossendale Local Plan 2019-2034. It explains how consultation and engagement has shaped the Local Plan.

1.2 This document has been updated since it was first published in August 2018, to take account of the representations received on the Publication version of the Local Plan (the Regulation 19 version) in relation to soundness, legal compliance and the Duty to Cooperate.

## Regulatory Context for Consultation and Engagement

1.3 This Statement of Consultation forms one of the proposed submission documents referred to in Regulations 17, 19 & 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and has been prepared under these Regulations. Regulation 22 (1)(c) 2012 requires that a statement of consultation, including the following information, be submitted alongside the development plan documents:

- *which bodies and persons the local planning authority invited to make representations under Regulation 18,*
- *how those bodies and persons were invited to make representations under Regulation 18,*
- *a summary of the main issues raised by any representations made pursuant to Regulation 18,*
- *how any representations were made pursuant to Regulation 18 have been taken into account;*
- *if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and*
- *if no representations were made in regulation 20, that no such representations were made.*

1.4 Regulation 18 further states that a local planning authority must—

*(1) (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and*

*(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.*

*(2) The bodies or persons referred to in paragraph (1) are—*

*(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;*

*(b) such of the general consultation bodies as the local planning authority consider appropriate; and*

*(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations*

*(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).*

## **Duty to Cooperate**

1.5 This statement of consultation provides a record of the stages of consultation that have been carried out on the Local Plan. However, the Council also has a duty to cooperate with other local planning authorities and other prescribed bodies in the formulation of development plan documents. This 'duty to co-operate' is a requirement of Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by the Localism Act 2011. Under the latest National Planning Policy Framework (NPPF), 2018 a requirement is placed on local planning authorities to produce Statements of Common Ground to detail cross boundary planning matters.

1.6 Full details of how the Council has engaged with those bodies is available in the Duty to Cooperate Statement incorporating the Draft Statement of Common Ground, which is published alongside this Statement of Consultation. Please note that this was produced without the benefit of any specific detailed guidance so will need to be reviewed as appropriate. Furthermore, as discussions continue it is likely that progress will need to be documented further.

## **Statement of Community Involvement (SCI)**

1.7 The Council's Statement of Community Involvement (SCI) 2014 sets out how the Council will involve people in the development of development plan documents. It is considered that the consultation processes outlined in this statement comply with the SCI and NPPF.

1.8 Please note that a consultation has been undertaken to refresh the SCI at the same time as the regulation 19 consultation, but this is in respect of changes to the planning application process (with the changes to the General Permitted Development Regulations (GDPR) introducing flexible uses, permissions in principle etc.), neighbourhood planning and the General Data Protection Regulations. It is considered that this update has not affected the consultation in respect of the Regulation 19 version of the Local Plan.

## 2. Rossendale's Local Plan Context

2.1 The Rossendale District Local Plan (RDLP) was adopted in 1995. Following the introduction of the 2004 Planning and Compulsory Purchase Act the Council started work on producing the Local Development Framework. In 2011 the Council adopted the Core Strategy, which became known as Part 1 of the Local Plan, covering the period 2011 to 2026.

2.2 Work began on producing the Local Plan Part 2 – Site Allocations and Development Management Policies DPD. Consultation was undertaken under Regulation 18 of the Town and Country Planning (Local Planning) (England Regulations) of 2012, and this included an initial draft which was publicised at various roadshow events around the borough, where residents had the opportunity to submit comments. However, it was becoming clear that the Council could no longer rely on the housing requirement that was set out in the adopted Core Strategy as this originated from the Regional Spatial Strategy (RSS) for the North West, which was revoked in 2012.

2.3 In order to arrive at a housing requirement the Council had to identify its Objectively Assessed Need for housing. This work was undertaken by Nathaniel Lichfield and Partners, and using their accepted methodology, a number of different scenarios was identified providing a range for what the housing requirement could be. The Council's favoured approach (based on a scenario of demographic increase plus uplift for affordable housing) resulted in an increase to 265 dwellings per annum. As a result of this the Council decided to withdraw the Site Allocations and Development Management DPD in February 2016 and start work on producing a new combined Local Plan for Rossendale, updating the strategic policies as well as providing site allocations to meet revised development requirements and also to set out policies to guide development. The formal withdrawal notice is available to view at [https://www.rossendale.gov.uk/downloads/file/13580/withdrawal\\_notice\\_of\\_local\\_plan\\_part\\_2](https://www.rossendale.gov.uk/downloads/file/13580/withdrawal_notice_of_local_plan_part_2)

2.4 Although the Local Plan Part 2 was withdrawn it has provided the Council with some initial comments, particularly in relation to some of the sites identified as proposed allocations. The Evidence Base for this study has also been used in preparing the new Local Plan, where appropriate.

2.5 The Local Development Scheme sets out the timetable for producing the Local Plan. The latest version was agreed by Council on 12<sup>th</sup> December 2018.

### 3. Regulation 18 consultation on the Rossendale Local Plan 2019-2034

3.1 The Council aimed to engage with a number of stakeholders on the emerging Local Plan through a developer forum, an information event on the Evidence Base documents, a formal Local Plan consultation and a series of roadshows.

3.2 Developers and registered providers were invited to a forum that was held on 21<sup>st</sup> June 2017 to discuss the emerging Local Plan and its Evidence Base documents. Please see the minutes of the meeting in Appendix A.

3.3 Emails and letters were sent to stakeholders to inform them of the publication of the Evidence Base documents and of the information event that was held on 4<sup>th</sup> July 2017 at the Council's offices. Please find in Appendix B the notification sent. The list of general and specific consultation bodies consulted, as well as other consultees (with the exception of residents and local businesses), is available to view in Appendix C. During the information event, members of the public had the opportunity to view the documents and ask questions to members of the Forward Planning team.

3.4 The Council then consulted on the draft Local Plan (Regulation 18) version between 24<sup>th</sup> July 2017 and 9<sup>th</sup> October 2017, a period of 11 weeks in total. A press notice was advertised within the Rossendale Free Press edition of Friday 21<sup>st</sup> July 2017 to inform residents of the consultation (please see Appendix D). In addition, over 1,700 emails and 560 letters were sent to people who expressed an interest to be kept informed about the Local Plan process.

3.5 During the consultation period, seven roadshow events took place at various locations throughout the Borough during which people were able to view the proposed allocations and the documents themselves. The Evidence Base was also available to view, and members of the public had the opportunity to ask questions. They were also helped in making comments using the online questionnaire. Table 1 lists the roadshow events that took place.

**Table1 – Roadshow events during the draft Local Plan consultation (Regulation 18)**

Venue	Date	Time
Whitworth Riverside	Thursday 27 <sup>th</sup> July	4pm until 7pm
Kay Street Baptist Church, Rawtenstall	Thursday 7 <sup>th</sup> September	4pm until 7pm
Top Club, Loveclough	Monday 11 <sup>th</sup> September	4pm until 7pm
Edenfield Community Centre	Tuesday 12 <sup>th</sup> September	4.30pm until 7.30pm
Bacup A B and D Centre	Thursday 14 <sup>th</sup> September	4pm until 7pm
Haslingden Library	Tuesday 19 <sup>th</sup> September	4pm until 7pm
Council Chamber, Futures Park, Bacup	Thursday 21 <sup>st</sup> September	3pm until 7pm

3.6 Unfortunately it was not possible to count the number of people attending each of the sessions but they were all well attended.

3.7 Over 3,000 comments were received from over 1,700 individuals and organisations. The majority of comments were objections to site allocations. Six petitions were also received. More information on the responses received can be viewed in Appendix E. The Council published the comments received on the Local Plan webpage at [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan).

### **Summary of Key Issues**

3.8 The informal regulation 18 consultation raised a number of issues of concern, including those listed below:

- concerns regarding the housing target over the plan period, some comments considered the target was too high while other comments stated the target was too low,
- concerns about the proposed development of a number of greenfield sites across the Borough,
- release of sites for development currently situated within the Green Belt,
- concerns regarding proposed changes to the Urban Boundary,
- the level of congestion on existing on the roads within the Borough and the impact of future developments on the road capacity,
- vehicular access to specific sites, especially regarding sites situated off Bankside Lane in Bacup,
- the level of infrastructure currently available within the Borough and the impact future development will have, particularly for schools and health facilities
- concerns regarding the proposed transit site for the Gypsies and Travellers community at Sharneyford,
- comments were made on the wording of specific policies

### **How Key Issues have been taken into account to prepare the Publication version of the Local Plan**

3.9 Since the regulation 18 consultation took place, the Government has published a standard methodology to calculate the local housing need. This is further discussed within the Housing Topic Paper. The housing target of the publication version of the Local Plan has been modified and is now based on the standard methodology. This has reduced the requirement from 265 p.a. (3,975 over the 15 year plan period) to 212 (or 3,180).

3.10 As a result of the comments received by members of the public and statutory consultees such as the Lancashire County Council (LCC), as Highway Authority, a number of sites have been removed and not included in the revised Publication version.

These include:

- Land between Newchurch and Bacup Road, Cloughfold (HS2.54)
- Sites alongside Haslingden Old Road, Rawtenstall (HS2.64 and HS2.66)

- Sites alongside Bankside Lane, Bacup (HS2.11, 12, 13, 32)
- Land west of Sow Clough, Stacksteads (HS2.29)
- Land at Park Road, Waterfoot (HS2.91)
- Sites at Snig Hole (HS2.76) and Curven Edge (HS2.77) in Helmshore

3.11 The greatest number of objections (808) to the draft (Reg 18) Local Plan were received from residents of Edenfield objecting to a large housing site allocation on Green Belt land to the west of Market Street. Subsequent to this consultation a Neighbourhood Forum covering the Edenfield Area has been designated. They are at the initial stage of preparing a Neighbourhood Plan which will have to align with the Local Plan. A number of meetings have been held with representatives of the group and information exchanged. It is clear that residents do not consider the Green Belt land at Edenfield should be developed. It is however considered by the Council that, on balance, the majority of the Green Belt land suggested for release at Edenfield should continue to be allocated. The Council had considered other options to increase housing supply, such as increasing densities and identifying more land (including brownfield sites) but, despite this, a shortfall still exists without the Edenfield allocation. Discussions have taken place with LCC Education to try to address the concern with schools capacity and as a result some land has been identified for a new/enlarged school. A detailed Topic Paper has also been produced setting out why “Exceptional circumstances” are considered to exist to justify Green Belt release. The Employment Land and updated Housing Topics Papers also discuss the site selection process.

3.12 Potential Green Belt land allocations were carefully assessed both against the draft NPPF available at the time the Local Plan was being prepared and the recommendations of the Green Belt Review undertaken by consultants LUC. As a result a number of proposed allocations have been taken out of the Plan, including the following:

- Land north of Blackburn Road/west of Moorfield View, Edenfield (part of HS2.71)
- Green Lane/Rosendale Golf Club (HS2.79)
- Land at Snig Hole, Helmshore (HS2.76)
- Land to east of Tonacliffe School (HS2.106)
- Horsefield Avenue, Tonacliffe (HS2.109)
- Land south of Quarry Street, Shawforth (HS2.104)
- Land at Hollingate Farm (EMP2.38) in Rising Bridge
- Haslam Farm (HS2.60) in Rawtenstall

3.13 The withdrawal of the land at Tonacliffe leaves a relatively low amount of new housing land to be allocated in Whitworth. However the area has seen substantial brownfield development in recent years. The two Green Belt sites proposed for development in Tonacliffe attracted over 100 objections from local residents. The Tonacliffe sites were also recognised as having a potential impact on Moorland Habitat which was identified in the Habitat Regulations Assessment. Natural England raised concerns about detrimental impacts on the South Pennine Special Protection Area (SPA).



3.14 Two Green Belt employment sites (south of New Hall Hey, Rawtenstall and Land north of Hud Hey near Acre) have been allocated contrary to the findings of the LUC Study. The acute shortage of suitable employment land close to the A56, where there is greatest demand by existing companies to expand, is considered to represent “exceptional circumstances” to justify release of these sites. There are significant infrastructure issues that remain to be addressed in each location and a transport study is underway looking at how the sites can be accessed. Similar to Edenfield, a Topic Paper has been produced setting out the “Exceptional Circumstances” which are considered to exist.

3.15 Following comments raised by the Highways Authority about the level of congestion within the local road network, a study was commissioned to understand the capacity of the network to support the level development proposed in the Local Plan. A study looking at access to employment sites was commissioned later.

3.16 The level of infrastructure currently available within the Borough and the future need is discussed within the Infrastructure Delivery Plan (2018 and the 2019 Update).

3.17 Other changes were made to the Local Plan prior to the formal Pre-Submission Publication (Regulation 19) consultation. These include:

- Identification of Strategic policies in line with the draft NPPF
- A reduction of the Housing target to 3,180 based upon the proposed standard method of calculating housing need which equates to 212 dwellings per year
- An increase in the brownfield development target to 30%
- A reduction in Green Belt land release
- A reduction in the Wind Turbine Areas of Search
- Gypsy and Traveller Transit site relocated to Barlow Bottoms, Whitworth.

3.18 In total six additional housing sites were taken forward into the Regulation 19 version (equating to 252 units), having been suggested through the Regulation 18 consultation and assessed favourably in the SHLAA update. These are listed below:

- Waterside Mill, Bacup
- Old Market Hall, Bacup
- Land to the rear of Haslingden Cricket Club
- Former Oakenhead Resource Centre
- Land south of Commercial Street, Loveclough as an extension to the Loveclough working Men’s Club
- Land off Todmorden Road, Bacup as an extension to Greens Farm and Bull Hall Barn

3.19 In total 38 housing sites were removed, equating to 900 units. These are listed in Appendix F.

3.20 Changes were made to the Policies Map expanding the Green Infrastructure to include the woodland and grassland ecological networks, and to add blue infrastructure. This is to help address concerns over loss of biodiversity.

#### **4. Regulation 19 consultation on the Rossendale Local Plan 2019-2034**

4.1 At the Council's meeting held on Wednesday 11<sup>th</sup> July 2018, it was resolved to "undertake formal consultation in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012 with all stakeholders on the Pre-Submission Publication version of the Local Plan for Rossendale (Written Statement and Policies Map) and the associated documents for six weeks starting w/b 20<sup>th</sup> August 2018."

4.2 Further resolutions included the approval of the consultation on the Statement of Community Involvement, the request that "the Planning Inspector give full and due consideration to the local community plan in relation to Edenfield", and the amendment of the plan to remove Barlow Bottoms and state "Gypsy and Traveller Transit site relocated to a small discrete piece of land owned by the Borough Council at the far corner of Futures Park".

4.3 The Regulation 19 consultation started on Thursday 23<sup>rd</sup> August 2018 and ended on Friday 5<sup>th</sup> October 2018.

4.4 On Thursday 23<sup>rd</sup> August, a total of 1,068 emails were sent as well as 59 letters to notify stakeholders of the start of the consultation. Please see Appendix G for an example of an email sent. The consultation documents were made available on the Council's website that day. The next day, the consultation documents were delivered at several libraries within the Borough and three Topic Papers were also published on the website. Later on documents were also made available at the Crawshawbooth Village Centre, the Offices of Whitworth Town Council and the mobile library.

4.5 A press notice was released in the Rossendale Free Press edition of Friday 31<sup>st</sup> August 2018. Please see Appendix H for a copy of the notice.

4.6 As requested by the Limey Valley Residents Association (LVRA), a presentation was made on the Local Plan at an evening meeting on Monday 10<sup>th</sup> September 2018.

4.7 Two information events took place at the Council's offices in September between 3pm and 7pm. The first, held on Thursday 13<sup>th</sup> September 2018, attracted at least 31 members of the local community. The main topics discussed were the level of development in Bacup and Edenfield as well as the access to a proposed new employment site in Haslingden (extension to the existing Carrs Industrial Estate). The second event was held on Tuesday 18<sup>th</sup> September 2018 and at least 14 members of the local community attended. The main issue discussed at this event related to the

proposed mixed-use allocation site at Futures Park which includes a transit site for Gypsies and Travellers.

## Representations received

4.8 During the six week consultation, 556 respondents made 826 comments on the Local Plan. The Council also received comments from a further 12 respondents after the end of the consultation. These late comments have not been recorded but are submitted as a separate document for the attention of the Planning Inspector.

4.9 The vast majority of respondents did not specifically indicate whether they found the Local Plan to be legally compliant, sound or whether it complies with the duty to co-operate (i.e. by providing answers to the specific questions on these included in the response form), although they may have made reference to this within their comments. Amongst the total 826 comments received, 7% specifically stated that the Local Plan is not legally compliant, 23% stated that the Local Plan is not sound and 7% stated that the Local Plan did not comply with the duty to co-operate.

4.10 The majority of respondents are residents (88%). 36 respondents specifically requested to participate in the Examination in Public (please see Appendix I).

4.11 The majority of the comments received are in relation to policy HS2 on the Housing Site Allocations (over 500 comments received). The other policies or topics which attracted the most (i.e. over 10) comments are as follows:

- Employment Site Allocations (Policy EMP2) with 34 comments
- General comments on the Local Plan (28 comments)
- Urban Boundary and Green Belt policy (Policy SD2) with 25 comments
- Gypsies, Travellers and Showpeople policy (Policy HS18) with 21 comments
- Meeting Rosendale's Housing Requirement (Policy HS1) with 12 comments
- Wind Turbines policy (ENV7) with 11 comments

4.12 Further information on the representations received during the Local Plan (regulation 19) consultation can be found in Appendix J.

## Summary of key issues raised

4.13 The majority of the concerns raised related to the proposed site allocations:  
Housing site allocations:

- Concerns were raised over the following proposed housing allocations in:
  - **Goodshaw and Loveclough:** H4 Turton Hollow, H5 Swinshaw Hall, H6 Land south of 1239 Burnley Rd, H7 Land adj Laburnum Cottages, H13 Loveclough Working Mens Club, H17 Land south of Goodshawfold Road;
  - **Rawtenstall:** H10 Land at Bury Rd, H12 Reedsholme Works, H15 Willow Avenue);
  - **Bacup:** H22 Former Bacup Health Centre, H29 Land off Pennine Rd, H33 Land off Rockcliffe Rd and Moorlands Terrace, H37 Land off Gladstone

- St, H38 Land off Burnley Rd and Meadows Ave., H39 Land off Cowtoot Lane, H40 Land off Todmorden Rd and H41 Thorn Bank;
  - **Weir:** H43 Land west of Burnley Rd;
  - **Haslingden:** H47 Land at Kirkhill Ave, H50 Land adj Park Ave, H52 Land to the rear of Haslingden Cricket Club;
  - **Waterfoot and Cowpe:** H53 Waterfoot Primary School, H60 Johnny Barn;
  - **Whitworth:** H65 Albert Mill, H66 Land north of King St, H67 Land behind Buxton St, H68 Former Spring Mill, H69 Cowm Water Treatment Works;
  - **Irwell Vale and Edenfield:** H70 Irwell Vale Mill, H71 Land east of Market St, H72 Land west of Market St, H73 Edenwood Mill;
  - **Helmshore:** H74 Grane Village.
- The concerns include loss of amenity (e.g. green space, potential overlooking), lack of infrastructure to support new development (e.g. roads, schools and health services), highway safety, loss of countryside and wildlife habitat, loss of Green Belt, flood risk, land contamination, land stability and impact on character of local area.
  - Also, landowners objected to the fact that some sites were not allocated in the Local Plan in the following locations:
    - Loveclough (land behind the Glory),
    - Rawtenstall (land south of Hollin Lane; land behind the former hospital; and land at Haslam Farm),
    - Bacup (site at Huttock Top),
    - Helmshore (land west of Holcombe Rd),
    - Edenfield (land off Elm St)
    - Haslingden (land off Lindon Park; land off Moorland Rise)

#### Employment site allocations:

- Concerns were raised regarding the following new employment sites:
  - NE1 Extension to Mayfield Chicks
  - NE2 Land North of Hud Hey,
  - NE3 Carrs Industrial Estate Extension
  - NE4 New Hall Hey Extension
- The issues raised included flood risk, loss of Green Belt, loss of amenity (e.g. green spaces) and highway safety.
- Some landowners would like to change the allocation of all or part of the following sites from employment to other uses (e.g. mixed-use or residential):
  - EE12 large site at Hud Hey, Haslingden
  - EE20 Wavell House, Helmshore
  - EE30 Toll Bar Business Park, Stacksteads
  - EE37 Stubbins Vale Mill, Stubbins
  - EE41 Forest Mill, Water
  - EE42 Waterfoot Mills, Waterfoot
  - EE44 Hugh Business Park, Cowpe

- Also, a new employment site was proposed in Rawtenstall to extend the Riverside Business Park

#### Mixed-use site allocations:

- A landowner would like to change the use of a proposed mixed-use site to residential at M3 Isle of Man Mill in Water
- There is strong opposition to a transit Gypsies and Travellers site at M4 Futures Park, which is proposed as part of a mixed-use allocation. Respondents raised concerns over land contamination, the presence of a covenant, the impact on existing businesses and future businesses and the loss of woodland.

4.14 Respondents also raised the following concerns regarding the Local Plan:

#### Spatial Strategy

- Rawtenstall should host the majority of the development;
- Housing development in Bacup will not be able to deliver affordable housing;
- Residents and Edenfield Community Neighbourhood Forum (ECNF) state that exceptional circumstances do not exist to release Green Belt land while developers think they do exist;
- Landowners support changes to the urban boundary and Green Belt while the local community object to them;
- Residents want development to focus on brownfield sites;
- Request for good design;
- New policy proposed to refer to the agent of change principle referred to in NPPF;
- Increase the use of compulsory purchase orders.

#### Housing

- Residents think there is no demand for housing while housebuilders and landowners think the housing target should increase;
- Developers state that not enough sites have been allocated for housing;
- The Local Plan period should be extended to 2036 and should include safeguarded land;
- Developers request more flexibility on housing policies and request further evidence.

#### Employment

- Residents and ECNF state the employment target is not justified and too much land is being allocated; landowners believe the plan is over reliant on existing employment sites.

#### Retail

- Primary and secondary frontages are not mentioned in the definition of town centres in NPPF and this should be reflected in town centre boundaries;
- LCC requests some amendments to the policy on hot food takeaways;

- New policy suggested for the former Regal Cinema in Bacup.

### Environment

- Development should provide net gain in biodiversity;
- Developers request more flexibility on environmental policies and request further evidence;
- Community groups and developers request clarity and changes to the wording on the wind turbines policy;
- A service provider proposes to split policy ENV9 into two policies (one on flood risk and one on surface water)

### Transport

- Concerns over the capacity of the road network
- Concerns over air quality

4.15 Further representations were received on other topics:

- Concerns over the lack of consultation especially regarding the proposed housing site at Loveclough Working Mens Club, the proposed mixed-use site at Futures Park and the Highways Capacity Study;
- Lack of duty to co-operate regarding housing figures, Gypsies and Travellers demand and the impact of development on road networks;
- Disagreement with some assessments in the Evidence Base documents (e.g. Green Belt Review, Strategic Housing Land Availability Assessment, Employment Land Review, Heritage Impact Assessments and Highway Capacity Study) and with some statements in the Topic Papers (e.g. Green Belt, Gypsies and Travellers, Strategy Topic Papers);
- Issues raised regarding the lack of monitoring targets;
- Concerns over the reasonable alternatives assessed in the Sustainability Appraisal.

Appendix K provides a more detailed summary of the representations received on the Policies and the proposed site allocations, arranged according to type of respondent (for example, resident or landowner).

## **5. Conclusion**

5.1 The preparation of Rossendale's Local Plan provided several opportunities for members of the public, organisations and statutory consultees to engage in the Local Plan process via two consultation exercises. The regulation 18 consultation lasted 11 weeks. This was to ensure residents and other stakeholders had sufficient time to look at the new proposals, particularly as it covered the summer holiday period. The regulation 19 consultation lasted 6 weeks from 23<sup>rd</sup> August to 5<sup>th</sup> October 2018.

5.2 The Council has used different ways to engage with the public, by making documents available on its website, in the Council's offices and at libraries. The Forward Planning Team also accepted comments during the consultation exercises from various sources such as an online survey, emails and letters.

**Appendix A – Minutes of the Developer Forum meeting held on 21<sup>st</sup> June 2017**

**Developer Forum**  
21st June 2017 @ 10.00am

Council Chamber, Futures Park, Bacup, OL13 0BB

<b>Present</b>	
Anne Storah	Rossendale BC (Forward Planning)
Peter Vernon	Vernon & Co.
Chris Jones	Willmott Partnership Homes
Paul Nolan	Nolan Redshaw
Hugh Taylor	Rossendale BC (Economic Growth)
Gary Hoerty	Gary Hoerty Associates
Lee Greenwood	Smith & Love Planning Consultants
Wendy Malone	Calico Housing
Renea Cammish	Together Housing
Trevor Ashworth	Hurstwood Group
Michael Gilbert	Peter Brett Associates
Michael Nuttall	Peel Development
Rebecca Thompson	Hourigan Connolly
Nathaele Davies	Rossendale BC (Forward Planning)
Adrian Smith	Rossendale BC (Forward Planning)
Peter Boys	B & E Boys Ltd
Daniel Connolly	Hourigan Connolly
Brian Sheasby	Lancashire County Council (Property)
Justin Cove	Nexus Planning
Trevor Ashworth	Hurstwood Crystal
Sebastian Tibenham	Pegasus Group
Jordan Gresham	Taylor Wimpey
Tom Snape	Rowland Homes
Nicola Hopkins	Rossendale BC-Planning Manager

## SHMA

***Do you have any comments on the Housing Market Area and Annual Housing numbers identified through the SHMA? If you disagree with the approach used, could you explain why and the approach you would use.***

Expected there to be more movement into Rossendale from Bury than vice versa given Rossendale's lower values. Shouldn't Rossendale accommodate some of GM's housing needs to take account of people who choose to live here? Why doesn't Rossendale consider aligning themselves with GM rather than Lancashire given the established links?

Makes sense for Rossendale to be treated as its own Housing Market Area and given what is happening with the GMSF and at a national level Rossendale is right to carry on as proposed.

Why chose the bottom of the range figure (265)? The Plan should be more ambitious; at the very least we should provide a breakdown of the implications of different figures (low/medium/high) e.g., the proportion of Green Belt lost under each option.

***In your view/that of your organisation, are these figures deliverable? What would be the best approach to bringing forward the housing numbers required?***

Discussed Rossendale's Housing Land Supply (about 2.5 years + 20% for under-delivery) and past delivery.

There should be more proactive engagement with the Development Industry to enhance delivery.

There is a Five year land supply issue. A pragmatic approach is needed to release greenfield and countryside sites and to limit the influence of environmental constraints

Rossendale needs a plan which delivers for everyone and responds to market demand. Really need to understand the Council's economic aspirations to comment on whether the housing figures are suitable.

***Both the government and particularly the public are keen to see an emphasis on previously developed land and higher densities. How do you think that this can best be achieved in Rossendale?***

Depends on the type of housing wanted and the type of site as high densities not suitable everywhere. Assumption of 30 dpha in the SHLAA seems reasonable (12 units to the acre, possibly could go 15/16 dwellings to the acre.

Higher densities will not be deliverable in all parts of the Borough

Previous developed land often comprises employment sites, which are not suitable for present day uses. Must protect the best employment land. Also allowing residential on brownfield employment sites may just result in the need to allocate additional employment land on greenfield sites.



Where there is a shortage of both housing and employment land wouldn't it be best to let the market decide, but should protect key strategic employment sites.

Similarly affordable housing is a result of an overall lack of housing so best to approve housing, limiting affordable housing where appropriate to ensure viability is not compromised and to encourage housing delivery.

Viability is a key issue-brownfield sites are more costly to develop and often have many constraints. Delivery on pdl will be an issue in the Borough due to viability, the constraints of such land and the location of the sites.

Ilex Mill is only 75% occupied and values have fallen. The lack of a market for flats in Rossendale means that conversions of Mills are problematic.

Mill owners are sometimes hard to track down and frequently expect unrealistic values for sale.

Conversion of offices is not economic in Rossendale. The main market is for houses with gardens and 200% parking.

For affordable housing the costs of building on brownfield land have to be passed on in rent and services charges to occupiers; this can make them too expensive for those on benefits.

***How do you think we can best deliver the affordable housing requirement and also the need for specialist housing such as for the elderly?***

Consideration should be given to inclusion of tenure and size advice in the Plan

Getting suitable land is key which is partly caused by political issues on Council owned land. Registered Providers are happy to work with developers.

Viability is key to bring forward affordable housing both for private developers and Registered providers. Registered Providers can go down to 6% profit margin but viability depends a lot on the ability of the target market to afford the product.

HCA timetables can be an issue for deliverability.

The delivery of specialist care is being held back by the lack of a collaborative approach among all the different parties involved, including wider local government and the Health sector. Staffing is a key element of costs for specialist housing.

Consideration should be given to applying standards on space and accessibility of Market housing though standards in RP affordable housing have been reduced from "lifetime Homes" to save costs.

Rossendale still has places where housing is affordable. Build more housing overall to provide more housing and hopefully some affordable too. House builders are more interested in profitability margins, rather than actual values.

The 40% figure appears high and would not expect such a high figure even on very good, un-constrained sites. Queried whether this was aspirational or purely the consultants view on viability- confirmed purely a viability exercise at this stage.

Concerns were raised over the figures that Keppi Massi produce as they don't tend to use RICs guidance for basic costs. This is being challenged in respect of Knowsley's required figure of 25% which was based on Keppi Massi's evidence. Also questioned the included transfer rates of 75% for S/O and 45% for rent which appear high.

Asked about Extra Care / Dementia Care Units etc and how it is being delivered. Has Rossendale got a need and is it thinking about allocating sites? The need is referred to in the SHMA, and we would welcome conversations on potential sites with developers.

## **SHLAA**

**Do you have any comments on the methodology used to produce the SHLA? If so, what changes do you think are required to make the approach used more robust?**

The White Paper is pushing the delivery of small sites

The weight given to the Playing Pitch Strategy should be reduced (specific site issue)- the approach taken is too inflexible

The Ecological Networks approach has not been consulted on previously and is not a helpful introduction as it reduces the amount of housing that can be delivered on some sites.

**Are you satisfied, in general, as to how sites are classified into deliverable, developable and non-deliverable?**

Queried phasing of sites in the SHLAA, and the impact of slippage in the delivery of sites – eg takes 2 years from outline for development to start on site. Also just because a developer is on board does not necessarily mean that the site will be delivered quickly – there may be other issues still to overcome.

General consensus was that a dwelling rate of 30 units per year was reasonable for market housing, but this is high for delivering affordable units (they are not delivered instantly). Ribble Valley's delivery rate seems about 24 dpha, excluding affordable housing. Local and regional house builders tend to deliver out at a slower rate.

Densities will depend on site specifics.

**Have you any comments on how the results are presented?**

Will comment further in detailed responses.

**How do you think, in partnership, we can better relate housing provision to the availability/quality of infrastructure such as roads, schools and medical facilities?**

Access is often a reason for not bringing sites forward-maybe there is a need for a more

pro-active approach by the public sector for funding improvements. Otherwise sites are effectively “landlocked”.

Shouldn't be trying to shift burden from public to private sector because of wider cuts. Some developer contributions may be possible, depending on viability.

It may be feasible to share costs between sites if a developer has a number in the area to cross-fund infrastructure. Similarly if more than one developer on the same site.

Whilst the Borough Council has design aspirations will LCC be willing to consider other design solutions for constricted sites, such as relaxations on the required road gradients. Given the constraints of the valley more innovative solutions may be required to deliver sites which could be dismissed early on if LCC use their standard approach.

Also need to understand the drainage constraints within the Borough directly linked with possible site allocations.

### **Other Studies**

**What more could be done by developers to ensure that flood risk is proportionately addressed and Sustainable Drainage solutions supported?**

**Should Green Belt release, if it occurs, be a “final alternative” or proactively promoted?**

Not necessarily, especially small brownfield sites in the Green Belt – why keep these sites in the Green Belt?

It should be actively promoted as part of the mix.

**Should Green Belt release, if it occurs, be in a number of locations or one or two strategic releases?**

Mix of Green Belt sites is needed. Small sites, especially on PDL, are often less controversial.

We are not being ambitious enough with Green Belt release and should be bold in promoting release. In addition, some additional sites which are marked for continued protection could have parts of the land released for development.

**How can improving sustainability of new development, e.g. energy efficiency, be reconciled with viability?**

We should try, especially as for example installing car charging point for electric vehicles costs very little. But should remember though that often house buyers prefer a cheaper house, rather than cheaper energy costs over the longer term. There is a similar position with commercial sites and BREEAM. But as cost is coming down, we should be raising the bar. But there's scepticism among house buyers that the energy savings and costs are exaggerated.

Market confidence is vital to delivery. Other issues to consider are access to finance and market condition issues. Also need to see how SMEs can be helped and sites de-risked.

Developers prefer a 'fabric- first' approach

**How do you think the provision of new housing development within “Ecological Corridors” can occur without destroying its wildlife potential?**

Gardens are a key preserve for much wildlife and can often mitigate too. For example, maintaining hedge lines and setting out buffers. Also often open space is provided onsite and should use sensitive landscaping too. Obligations could be imposed to demonstrate enhancements to nature conservation such as installing bird boxes.

The Local Plan should establish wildlife corridors so the developable area of land is clear to developers.

**How do we balance the need for finding sites for employment, as well as new housing?**

Protect key strategic employment sites. But for other sites consider redevelopment to try to meet need for housing too.

**Any comments on viability issues, s.106s and CIL, etc?**

CIL works in some districts (eg Preston and Chorley) but only where values are strong to withstand it. There could be issues with delivery, particularly in respect of affordable housing.

Has a decision been reached on CIL? A response was given that this decision would be made after consideration of the Government's proposals to reform the system, expected in the Autumn Statement.

Do not think CIL would work in Rossendale and it is better to continue negotiating S106 Agreements- need to be conscious of the resource requirements associated with becoming a CIL Charging Authority.

**Other**

We should look at Masterplanning for places like Bacup to promote more Town Centre development.

Need to be clear about contributions, such as Education etc – would be keen for education input to form part of the evidence base so it is clear to developers on the likely level of contribution requests.

## Appendix B – Letter sent to stakeholders (regulation 18)



**Chief Executive's Directorate  
Forward Planning  
Room 120  
The Business Centre  
Futures Park  
Bacup  
OL13 0BB**

This matter is being dealt with by:  
Anne Storah/Adrian Smith  
Telephone: 01706 252418 or 252419  
Email: [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)  
Minicom: 01706 252277

Date: 12<sup>th</sup> June 2017

Dear Sir / Madam,

### **Local Plan for Rossendale**

Thank you for your interest in Rossendale's Development Plan. As you have asked to be kept informed about Rossendale's Local Plan I am updating you about how we are progressing with this document.

#### **Publication of the Local Plan Evidence Base**

The Council has commissioned a number of evidence base documents to inform the preparation of the Local Plan. These documents are being published to provide transparency about the factual basis on which the Local Plan will be prepared. The evidence base is listed below:

- Town Centre, Retail, Tourism and Leisure Study
- Employment Land Review
- Strategic Housing Market Area Assessment (SHMA)
- Strategic Housing Land Availability Assessment (SHLAA)-Stages 1&2 and Site Assessments
- Green Belt Review
- Strategic Flood Risk Assessment (SFRA)
- Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA)
- Environmental Network Study
- Viability Study
- Affordable Housing Viability Study
- Landscape Study (*previously published*)
- Playing Pitch Strategy (*previously published*)

The Evidence Base is also accompanied by a Sustainability Appraisal and Habitat Regulations Assessment.

All the documents will be made available on the Council's website [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan)

Hard copies of each of the documents will be available to view at the Council's offices at the Business Centre, Futures Park, Bacup, OL13 8AP

An Open Day on the Evidence Base will be held on Tuesday 4<sup>th</sup> July from 1pm-6pm. This will be held in the Council Chamber at Futures Park and is intended to provide an opportunity for anyone interested to come along and ask questions about the documents.

### **Authority Monitoring Report (AMR) and Five Year Land Supply Report**

The adopted Core Strategy contains a number of targets for measuring the performance of policies. The latest AMR is now being published and includes statistics about the achievement of targets over the last three year period (2014/15; 2015/16 and 2016/17). The AMR provides important evidence that will help inform the preparation of the Local Plan.

The Council also prepares annual 5 year Housing Land Supply Reports. This looks at the delivery of new housing as well as the supply of sites. This enables the Council to identify how much land is currently available with permission as well as where a supply of new sites may derive from. Reports are now being published for 2015/16 and 2016/17.

These documents can be accessed on [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan)

### **Preparing the new Local Plan (2019-2034)**

There are 3 elements to the new Local Plan:

- Review of the policies set out in the adopted Core Strategy (2011), where appropriate, such as the development requirements
- Identifying sufficient land to meet these development needs (e.g. for housing, employment land, etc)
- Draft Development Management policies to guide development.

It is anticipated that a consultation exercise on a full Draft Plan, informed by the Evidence Base, will commence in late July and run for an extended period. You will be notified when this occurs and asked to take part.

### **Consultation database**

If you no longer wish to be contacted about the Local Plan please email [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk) and asked to be removed from the database.

### **Core Strategy**

The existing Adopted Core Strategy (2011) remains the Development Plan for Rossendale until it is superseded by the new Local Plan. The Core Strategy can be viewed at [www.rossendale.gov.uk/corestrategy](http://www.rossendale.gov.uk/corestrategy)

I hope you find this helpful but if you have any specific queries please e-mail [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk).

Yours faithfully,  
Planning Manager

## Appendix C – List of consultees (regulation 18)

<b>General Consultation Bodies</b>
Bacup Rotary
Burnley Pendle Rossendale Council for Voluntary Service
Change Grow Live
East Lancashire Chamber of Commerce
East Lancashire Railway Ltd
Edenfield Village Residents Association
Grane Residents' Association
Irwell Vale and Lumb Residents' Association
Lancashire Wildlife Trust
M3 Project
National Farmers Union
Pennine Prospects
Proffits
Rossendale Civic Trust
Rossendale Leisure Trust
The Magdalene Project
The Star Centre

<b>Specific Consultation Bodies</b>
Blackburn with Darwen Council
Burnley Borough Council
Cadent Gas Limited
Calderdale Council
Coal Authority
Department of Energy and Climate Change (now part of Department for Business, Energy & Industrial Strategy)
East Lancashire Clinical Commissioning Group
EDF Energy
EE
Electricity North West
Environment Agency
Highways England
Historic England
Homes and Communities Agency (now Homes England)
Hyndburn Borough Council
Lancashire Constabulary
Lancashire County Council

Lancashire Police and Crime Commissioner
Metropolitan Borough of Bury
Metropolitan Borough of Rochdale
Mobile Operators Association
National Grid
Natural England
Network Rail Ltd
Npower
Pendle Borough Council
Scottish Power
United Utilities PLC
Whitworth Town Council

<b>Other Consultees</b>
Age Concern Lancashire
Alder Grange Community and Technology School
Bacup Royal Court Theatre
Barn Owl Trust
BHA for equality in health and social care
Burnley Pendle Rossendale Council for Voluntary Service
Calico Housing Group
Campaign for Real Ale
Campaign to Protect Rural England
Citizens Advice Rossendale and Hyndburn
Civil Aviation Authority
Country Land and Business Association Ltd
Department for Digital, Culture, Media & Sports
Department for Transport
Department for Work and Pensions
East Lancashire Hospitals NHS Trust
Education and Skills Funding Agency
Equality and Human Rights Commission
Forestry Commission
Friends, Families and Travellers
Great Places Housing Group
Haslingden High School
Health and Safety Executive
Home Builders Federation
Home Office
Lancashire Care NHS Foundation Trust



Lancashire County Cricket Club
Lancashire Fire and Rescue
Lumb Baptist Church
Manchester Airport
National Trust
Newchurch St Nicholas Church of England School Primary School
North West Ambulance Service
Pennine Acute Hospitals NHS Trust
Pennine Prospects
Planning Inspectorate
Property NHS
Protect Rossendale Green Belt
Ribble Valley Council
Rising Bridge Community
Rossendale Golf Club
Rossendale Leisure Trust
Rossendale Raptors Basketball Club
Rossendale Transport
Royal Mail
RSPB
Sport England
Suez Recycling and Recovery UK
Sustrans
The White Horse project
Theatre Trust
Together Housing Association
Tor View Community Special School
Transport for the North
Transport for Greater Manchester
Whitworth Leisure Centre
Woodland Trust

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**ADUL-DVDS** 10new dvds +10 free dvds. 20 dvds in total £49. 07486544275. **THE GODFATHER TRILOGY** 5dvds all godfather films-extras £7. 07392480563. **ROCKY-BOXED SET** 5DVDS £5 Rambo trilogy £5 07392480563

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**PRESS NOTICE**

**HAVE YOUR SAY ABOUT THE PROPOSED LOCAL PLAN FOR ROSSENDALE (Regulation 18 Draft)**

Rossendale Borough Council is asking for comments on the emerging new Local Plan which will replace the Core Strategy once it is adopted. The new Local Plan identifies sites to help meet the Borough's development needs over the next fifteen years and sets out policies to guide development within the Borough.

Sites are being proposed for development as well as for environmental protection and recreational uses on the Policies Map. Changes are also being proposed to the existing Green Belt and Urban Boundary, and new Conservation Areas or extension to existing Conservation Areas are being suggested.

The draft Local Plan and its accompanying Policies Map will be available to view on the Council's website at [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan) and hard copies available at The One Stop Shop, Futures Park, in Bacup and public libraries.

The consultation will run from **Monday 24th July 2017 until 5pm on Monday 9th October 2017**. Comments should preferably be submitted via the online consultation at [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan) or alternatively in writing.

The Forward Planning team will be attending venues across Rossendale where you can view maps and see copies of the consultation documents.

Whitworth Riverside	Thursday 27th July	4pm until 7pm
Kay Street Baptist Church, Rawtenstall	Thursday 7th September	4pm until 7pm
Top Club, Loveclough	Monday 11th September	4pm until 7pm
Edenfield Community Centre	Tuesday 12th September	4.30pm until 7.30pm
Bacup A B and D Centre	Thursday 14th September	4pm until 7pm
Haslingden Library	Tuesday 19th September	4pm until 7pm
Council Chamber, Futures Park, Bacup	Thursday 21st September	3pm until 7pm

Any queries please email [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk) or phone 01706 217777.

**THE PLANNING MANAGER GIVES NOTICE THE FOLLOWING APPLICATIONS HAVE BEEN RECEIVED BY ROSSENDALE BOROUGH COUNCIL**

**NOTICE UNDER SECTION 73 OF THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**  
**REGULATION 5 OF THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) REGULATIONS 1990.**  
Application No: 2017/0311  
Applicant: Mr D Stenton  
Location: 4 North Street Ramsbottom Bury Lancashire BL0 0PB  
Proposal: Fit a flood door to front of house  
The site of the above mentioned proposed development may affect the Character or Appearance of a Conservation Area.

**NOTICE UNDER SECTION 73 OF THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**  
**REGULATION 5 OF THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) REGULATIONS 1990.**  
Application No: 2017/0346  
Applicant: Mr & Mrs J Whittles  
Location: Highbury Bolton Road North Edenfield Bury Lancashire BL0 0LZ  
Proposal: Demolition of two storey side extension (retrospective), removal of existing chimney stack, removal of existing curved bay window, erection of two storey side extension, construction of pitched roof to existing porch and changes to external facing materials.

The site of the above mentioned proposed development may affect the Character or Appearance of a Conservation Area. Members of the public may view copies of these applications by visiting our website, [www.rossendale.gov.uk](http://www.rossendale.gov.uk), available to use at The One Stop Shop Futures Park Bacup OL13 0BB. Anyone who wishes to make representations about these applications should write to Development Control, Room 121 The Business Centre Futures Park Bacup OL13 0BB or email [planning@rossendalebc.gov.uk](mailto:planning@rossendalebc.gov.uk) quoting the appropriate reference number by no later than 21 days from the date of this notice. Representations will not be acknowledged but will be taken into consideration. Mrs N Hopkins - Planning Manager. 21/07/2017

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## Appendix E – Overview of the representations received (regulation 18)

### 1. General overview

#### 1.1 General overview

3046 comments on various sites, policies or topics were received from 1773 individuals or organisations. Also, 6 petitions were received.

#### 1.2 Comments received

Amongst the 3046 comments received, 2676 were objections, 145 were support representations and 225 were neutral (neither objections nor support). The nature of the comments is shown in figure 1.

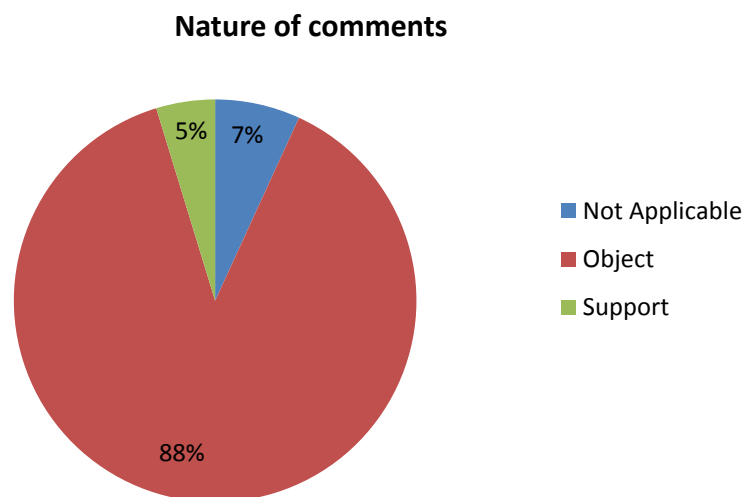


Figure 1 Nature of comments received during the draft Local Plan consultation  
The majority of the comments were received via the online survey (2087 comments) while 480 comments were received via emails and 401 received via letters. The remaining comments came from a combination of sources (e.g. online survey with attachments submitted via emails or letters). The distribution of the sources of the comments is shown in figure 2.

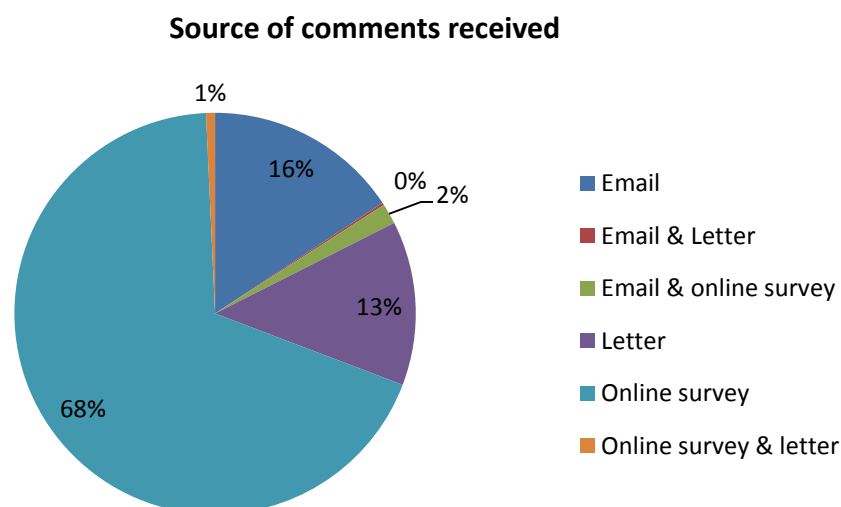


Figure 2 Sources of the comments received

### 1.3 Consultees

The majority of individuals who participated in the consultation were residents (1666), the remainder being landowners, developers or agents (35), association and groups (17), businesses (10), statutory consultees (8), Councillors (4), Local Government (5) and others (28) (please see figure 3). The category “others” includes comments received by individuals living outside of the Borough as well as anonymous representations.

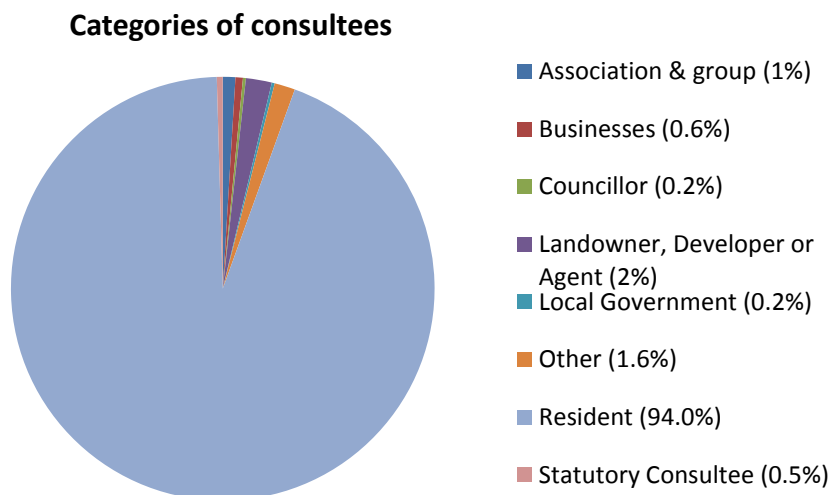


Figure 3 Categories of consultees

### 1.4 Petitions

Table 1 describes the 6 petitions that were received as part of the consultation.

Petitions		
Reference	Site or Policy Name	Number of signatures
HS2.54	Land between Newchurch Road and Bacup Road and west of Dobbin Lane	231
HS2.76	Land at Snig Hole	52
HS2.54	Land between Newchurch Road and Bacup Road and west of Dobbin Lane	158
HS2.54	Land between Newchurch Road and Bacup Road and west of Dobbin Lane	83
SD2	Urban Boundary change at Goodshaw Lane	25
HS2.51	Land adjacent Laburnum Cottages	37

Table 1 Petitions received during the draft Local Plan consultation

## 1. Comments received by sites and policies

Table 2 lists the number of comments received for each site or policy.

Reference	Policy or Site Name	Total number of Comments	Number of comments			Number received from							
			Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
<b>Policies</b>													
SD1	Presumption in Favour of Sustainable Development	6	0	3	3	1	1	2	0	2	0	0	0
SD2	Urban Boundary and Green Belt	96	84	6	6	79	9	3	2	1	1	0	1
<b>Housing</b>													
HS1	Meeting Rossendale's Housing Requirement	18	12	1	5	7	7	2	1	1	0	0	0
HS2	Housing Site Allocations-General comments	65	56	1	8	53	4	3	1	3	0	0	1
HS3	Edenfield Masterplan	20	10	4	6	10	3	2	0	4	1	0	0
HS4	Affordable Housing	6	1	2	3	0	3	2	0	0	1	0	0
HS5	Housing Density	4	2	1	1	0	3	1	0	0	0	0	0
HS6	Housing Standards	5	2	1	2	0	3	1	0	0	1	0	0
HS7	Private Residential Garden Development	1	0	1	0	0	0	1	0	0	0	0	0
HS8	Open Space Requirements in New Housing Developments	6	1	1	4	0	3	1	0	1	1	0	0
HS9	Playing Pitch Requirements in New Housing Developments	4	1	1	2	0	2	1	0	1	0	0	0
HS10	Private Outdoor Amenity Space	2	0	1	1	0	1	1	0	0	0	0	0
HS11	House Extensions	1	0	1	0	0	0	1	0	0	0	0	0
HS12	Replacement Dwellings	1	0	1	0	0	0	1	0	0	0	0	0
HS13	Rural Affordable Housing - Rural Exception Sites	2	0	2	0	0	0	2	0	0	0	0	0
HS14	Conversion and Re-Use of Rural Buildings in the Countryside	3	1	1	1	0	0	2	0	1	0	0	0
HS15	Rural Workers Dwellings	1	0	1	0	0	0	1	0	0	0	0	0
HS16	Gypsies, Travellers and Travelling Showpeople	2	0	2	0	1	0	1	0	0	0	0	0
HS17	Specialist Housing	4	1	1	2	0	0	1	0	2	1	0	0
HS18	Self Build and Custom Built Houses	2	0	1	1	0	1	1	0	0	0	0	0

Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
<b>Employment Growth and Employment</b>													
EMP1	Provision for Employment	2	0	1	1	0	0	1	0	1	0	0	0
EMP2	Employment Site Allocations	7	3	1	3	2	0	1	1	2	1	0	0
EMP3	Employment Site and Premises	4	2	1	1	0	0	1	1	2	0	0	0
EMP4	Development Criteria for Employment Generating Development	2	0	1	1	0	0	1	0	1	0	0	0
EMP5	Employment Development in non -allocated employment areas	2	0	1	1	0	0	1	0	1	0	0	0
EMP6	Futures Park	4	0	2	2	0	0	1	0	2	1	0	0
EMP7	New Hall Hay	5	0	2	3	0	0	1	0	3	1	0	0
<b>Retail</b>													
R1	Retail and Other Town Centre Uses	3	0	1	2	1	0	1	0	1	0	0	0
R2	Rawtenstall Town Centre Uses	2	0	1	1	0	0	1	0	1	0	0	0
R3	Development and Change of Use in District and Local Centres	1	0	1	0	0	0	1	0	0	0	0	0
R4	Existing Local Shops	1	0	1	0	0	0	1	0	0	0	0	0
R5	Hot Food Takeaways	4	1	1	2	0	0	1	1	1	1	0	0
R6	Shopfronts	1	0	1	0	0	0	1	0	0	0	0	0
<b>Environment</b>													
ENV1	High Quality Development in the Borough	9	2	3	4	1	2	1	0	4	1	0	0
ENV2	Heritage Assets	7	2	3	2	3	1	2	0	1	0	0	0
ENV3	Local List	5	1	2	2	1	2	1	0	1	0	0	0
ENV4	Landscape Character and Quality	5	1	4	0	2	1	2	0	0	0	0	0
ENV5	Biodiversity, Geodiversity and Ecological Networks	7	2	2	3	2	1	1	0	2	0	0	1
ENV6	Green Infrastructure	7	1	3	3	2	2	1	0	1	1	0	0
ENV7	Environmental Protection	4	2	1	1	1	1	1	0	1	0	0	0
ENV8	Wind Turbines Areas of Search	9	5	0	4	2	1	2	0	2	0	0	2
ENV9	Wind Farms and Individual Turbines	7	3	1	3	1	1	2	0	2	0	0	1

Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
ENV10	Other Forms of Renewable Energy Generation	6	2	1	3	1	0	2	0	3	0	0	0
ENV11	Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality	4	1	2	1	0	1	1	0	2	0	0	0
ENV12	Trees and Hedgerows	2	1	1	0	0	1	1	0	0	0	0	0
Leisure and Tourism													
LT1	Protection of Playing Pitches, Existing Open Spaces and Sport and Recreation Facilities	3	0	2	1	1	0	1	0	1	0	0	0
LT2	Community Facilities	2	0	1	1	1	0	1	0	0	0	0	0
LT3	Tourism	2	0	2	0	1	0	1	0	0	0	0	0
LT4	Overnight Visitor Accommodation	1	0	1	0	0	0	1	0	0	0	0	0
LT5	Equestrian Development	1	0	1	0	0	0	1	0	0	0	0	0
LT6	Farm Diversification	1	0	1	0	0	0	1	0	0	0	0	0
Transport													
TR1	Strategic Transport	8	2	3	3	3	1	1	0	1	2	0	0
TR2	Footpaths, Cycleways and Bridleways	4	1	1	2	1	1	1	1	0	0	0	0
TR3	Road Schemes and Development Access	1	0	1	0	0	0	1	0	0	0	0	0
TR4	Parking	4	1	1	2	1	2	1	0	0	0	0	0
Monitoring													
Monitoring	Monitoring	2	0	0	2	0	0	0	0	2	0	0	0
SITES													
Housing Sites													
Bacup, Stacksteads, Britannia and Weir													
HS2.1	Land off Greensnook Lane	1	0	1	0	0	1	0	0	0	0	0	0
HS2.2	Land near Greensnook Farm	0	0	0	0	0	0	0	0	0	0	0	0
HS2.3	Land at Higher Cross Row	7	7	0	0	7	0	0	0	0	0	0	0
HS2.4	Land off Rockcliffe Road	2	2	0	0	2	0	0	0	0	0	0	0

Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
HS2.5	Off Fernhill Drive and Anvil Street, Stacksteads	13	13	0	0	12	1	0	0	0	0	0	0
HS2.6	Greens Farm and Bull Hall Barn, Bacup	13	11	0	2	11	0	0	1	0	1	0	0
HS2.7	Land off Cowtoot Lane, Bacup	15	14	0	1	13	0	0	0	0	1	1	0
HS2.8	Land south of the Weir Public House, Weir	6	6	0	0	6	0	0	0	0	0	0	0
HS2.9	Land west of Burnley Road, Weir	6	4	2	0	6	0	0	0	0	0	0	0
HS2.10	Irwell Springs, Weir	3	2	1	0	3	0	0	0	0	0	0	0
HS2.11	Land at Huttock Top Farm, Bacup	71	71	0	0	69	0	0	0	0	1	0	1
HS2.12	Huttock Top, Bacup	71	70	1	0	69	0	0	0	0	1	0	1
HS2.13	Land south of Huttock Top Farm, Bacup	72	71	0	1	70	0	1	0	0	1	0	0
HS2.14	Land off Burnley Road and Meadows Aveznue	1	1	0	0	1	0	0	0	0	0	0	0
HS2.15	Sheephouse Reservoir	0	0	0	0	0	0	0	0	0	0	0	0
HS2.16	Land behind Pennine Road and to the north east of Pennine Road	9	8	0	1	8	0	0	0	0	1	0	0
HS2.17	Tong Farm	1	1	0	0	0	0	0	0	0	0	0	1
HS2.18	Reed Street	0	0	0	0	0	0	0	0	0	0	0	0
HS2.19	Former Bacup Health Centre	0	0	0	0	0	0	0	0	0	0	0	0
HS2.20	Land off Douglas Road	0	0	0	0	0	0	0	0	0	0	0	0
HS2.21	Lower Stack Farm	0	0	0	0	0	0	0	0	0	0	0	0
HS2.22	Thorn Bank	2	2	0	0	2	0	0	0	0	0	0	0
HS2.23	Land east of Rochdale Road	3	2	0	1	2	0	0	0	0	1	0	0
HS2.24	Land at Blackwood Road and north of Blackwood Road	1	0	1	0	1	0	0	0	0	0	0	0
HS2.25	Glen Mill, 640 Newchurch Road	1	0	1	0	0	1	0	0	0	0	0	0
HS2.26	The former Commercial Hotel	0	0	0	0	0	0	0	0	0	0	0	0
HS2.27	Land adjacent 83 Booth Road	0	0	0	0	0	0	0	0	0	0	0	0
HS2.28	Booth Road / Woodland Mount	2	0	1	1	1	1	0	0	0	0	0	0
HS2.29	Land west of Sow Clough	1	1	0	0	0	0	0	0	0	1	0	0
HS2.30	Shadlock Skips	0	0	0	0	0	0	0	0	0	0	0	0
HS2.31	Hare and Hounds Garage	0	0	0	0	0	0	0	0	0	0	0	0



Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
HS2.32	Land off Newchurch Old Road	73	71	1	1	72	0	0	0	0	1	0	0
<b>Haslingden &amp; Rising Bridge</b>													
HS2.33	Land at Kirkhill Avenue, Haslingden	10	9	0	1	9	1	0	0	0	0	0	0
HS2.34	Land rear of Highfield Nursing Home	1	0	1	0	1	0	0	0	0	0	0	0
HS2.35	Land off Highfield Street	0	0	0	0	0	0	0	0	0	0	0	0
HS2.36	Former Haslingden Police Station	0	0	0	0	0	0	0	0	0	0	0	0
HS2.37	Land adjacent Park Avenue / Criccieth Close	3	3	0	0	3	0	0	0	0	0	0	0
HS2.38	Land to side and rear of Petrol Station, Manchester Road	0	0	0	0	0	0	0	0	0	0	0	0
HS2.39	Land at Holme Lane	0	0	0	0	0	0	0	0	0	0	0	0
HS2.40	Land adjacent 53 Grane Road	1	1	0	0	1	0	0	0	0	0	0	0
HS2.41	1 Laburnum Street	0	0	0	0	0	0	0	0	0	0	0	0
<b>Rawtenstall, Crawshawbooth, Goodshaw and Loveclough</b>													
HS2.42	Hollin Way	1	1	0	0	1	0	0	0	0	0	0	0
HS2.43	Reedsholme Work and land west of Hollin Way	0	0	0	0	0	0	0	0	0	0	0	0
HS2.44	Land at Hollin Lane and north of Hollin Lane	10	9	1	0	9	1	0	0	0	0	0	0
HS2.45	Willow Avenue off Lime Tree Grove	6	5	0	1	6	0	0	0	0	0	0	0
HS2.46	Land east of Acrefield Drive	0	0	0	0	0	0	0	0	0	0	0	0
HS2.47	Land adjacent Goodshaw Lane and Swinshaw Hall, Loveclough	18	16	0	2	16	0	1	0	0	1	0	0
HS2.48	Land south of 1293 Burnley Road, Loveclough	1	0	0	1	0	0	1	0	0	0	0	0
HS2.49	Loveclough Working Mens Club	4	3	0	1	4	0	0	0	0	0	0	0
HS2.50	Turton Hollow	3	2	0	1	2	0	1	0	0	0	0	0
HS2.51	Land adjacent Laburnum Cottages	15	14	0	1	14	0	1	0	0	0	0	0
HS2.52	Land south of Goodshaw Fold Road	5	4	1	0	4	0	1	0	0	0	0	0
HS2.53	Johnny Barn Farm and east of Johnny Barn Farm	15	11	1	3	11	2	1	0	0	1	0	0
HS2.54	Land between Newchurch Road and Bacup Road and west of Dobbin Lane	27	26	0	1	23	0	3	0	0	1	0	0
HS2.55	Spinning Point	0	0	0	0	0	0	0	0	0	0	0	0

Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
HS2.56	Land at Hurst Platt	4	3	0	1	4	0	0	0	0	0	0	0
HS2.57	Land at Conway Road	2	1	1	0	1	1	0	0	0	0	0	0
HS2.58	Land at Higher Cloughfold	2	2	0	0	2	0	0	0	0	0	0	0
HS2.59	Land to the north side of Hall Carr Road	0	0	0	0	0	0	0	0	0	0	0	0
HS2.60	Haslam Farm, north of Duckworth Lane	79	77	0	2	70	2	1	0	1	0	0	5
HS2.61	Land off Oaklands and Lower Cribden Avenue	0	0	0	0	0	0	0	0	0	0	0	0
HS2.62	Former Hospital, Haslingden Road	1	0	0	1	0	1	0	0	0	0	0	0
HS2.63	Magistrates Court	0	0	0	0	0	0	0	0	0	0	0	0
HS2.64	Land at Oakenhead Wood	6	5	0	1	4	0	0	0	0	1	0	1
HS2.65	Land at Bury Road, Rawtenstall	0	0	0	0	0	0	0	0	0	0	0	0
HS2.66	Land behind no. 173 to 187 Haslingden Old Road	11	8	0	3	10	0	0	0	0	1	0	0
HS2.67	Land at Carr Barn and Carr Farm	0	0	0	0	0	0	0	0	0	0	0	0
HS2.68	Land east of Lower Clowes Road	1	0	1	0	0	1	0	0	0	0	0	0
HS2.69	Land off Lower Clowes Road	0	0	0	0	0	0	0	0	0	0	0	0
HS2.70	Hall Carr Farm	0	0	0	0	0	0	0	0	0	0	0	0
<b>South West</b>													
HS2.71	Horse and Jockey Hotel, land to the west of Moorland View, land between Blackburn Road and A56, land west of Market Street and land off Exchange Street, Edenfield	818	810	5	3	800	3	5	1	0	1	0	8
HS2.72	Croft End, Stubbins	1	1	0	0	1	0	0	0	0	0	0	0
HS2.73	Land off Wood Lane, Edenfield	12	9	2	1	9	2	0	0	0	1	0	0
HS2.74	Land east of Burnley Road	5	5	0	0	5	0	0	0	0	0	0	0
HS2.75	Wavell House	1	1	0	0	1	0	0	0	0	0	0	0
HS2.76	Land at Snig Hole, Helmshore	77	76	0	1	77	0	0	0	0	0	0	0
HS2.77	Land off Curven Edge, Helmshore	58	57	0	1	58	0	0	0	0	0	0	0
HS2.78	Grane Village and land off Holcombe Road	60	54	2	4	58	1	1	0	0	0	0	0
HS2.79	Rosendale Golf Club	37	36	1	0	36	1	0	0	0	0	0	0
HS2.110	Irwell Vale Mill	5	3	1	1	3	1	0	0	1	0	0	0

Waterfoot, Lumb, Cowpe & Water													
Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
HS2.80	Land off Lea Bank	2	1	0	1	1	0	1	0	0	0	0	0
HS2.81	Greenbridge Mill (Hall Carr Mill)	0	0	0	0	0	0	0	0	0	0	0	0
HS2.82	Land adjacent Dark Lane football ground	4	3	0	1	4	0	0	0	0	0	0	0
HS2.83	Hareholme	1	0	0	1	1	0	0	0	0	0	0	0
HS2.84	Land behind Myrtle Grove Mill	2	2	0	0	2	0	0	0	0	0	0	0
HS2.85	Land off Peel Street	1	0	0	1	1	0	0	0	0	0	0	0
HS2.86	Land by St Peter's School	7	6	0	1	5	1	1	0	0	0	0	0
HS2.87	Carr Mill and 1 Carr Lane	0	0	0	0	0	0	0	0	0	0	0	0
HS2.88	Former Kearns Mill	0	0	0	0	0	0	0	0	0	0	0	0
HS2.89	Knott Mill Works and Orchard Works	0	0	0	0	0	0	0	0	0	0	0	0
HS2.90	Waterfoot Primary School	0	0	0	0	0	0	0	0	0	0	0	0
HS2.91	Park Road Garage Site	2	2	0	0	2	0	0	0	0	0	0	0
HS2.92	Field at Scout Road	0	0	0	0	0	0	0	0	0	0	0	0
HS2.93	Hollin Farm, Waterfoot	0	0	0	0	0	0	0	0	0	0	0	0
HS2.94	Foxhill Drive	0	0	0	0	0	0	0	0	0	0	0	0
HS2.95	Land at Ashworth Road	0	0	0	0	0	0	0	0	0	0	0	0
HS2.96	Bolton Mill, Cowpe	0	0	0	0	0	0	0	0	0	0	0	0
HS2.97	Isle of Man Mill and Garage	1	0	1	0	0	1	0	0	0	0	0	0
HS2.98	Land south of Shawclough Road, Scout Bottom	0	0	0	0	0	0	0	0	0	0	0	0
HS2.99	Land south of Forest Mill	0	0	0	0	0	0	0	0	0	0	0	0
HS2.100	Land opposite Baptist Church	1	0	1	0	0	1	0	0	0	0	0	0
HS2.101	Waterhouse, Cowpe	0	0	0	0	0	0	0	0	0	0	0	0
Whitworth, Facit & Shawforth													
HS2.102	Barlow Bottoms and land north of King Street	78	73	2	3	73	0	1	0	0	2	0	2
HS2.103	Land behind Buxton Street	22	20	1	1	19	0	1	0	0	0	0	2
HS2.104	Land south of Quarry Street, Shawforth	66	66	0	0	63	0	1	0	0	0	0	2
HS2.105	Albert Mill, Whitworth	66	61	3	2	62	0	1	0	1	0	0	2

Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
HS2.106	Land to the east of Tonacliffe School	129	126	1	2	124	1	1	0	0	1	0	2
<b>Transit Gypsies and Travellers Site</b>													
HS16.1	Little Tooter Quarry, Sharneyford	67	67	0	0	61	0	0	3	0	0	3	0
<b>New &amp; Existing Employment sites</b>													
EMP2.2	Henrietta Street	1	1	0	0	0	0	0	1	0	0	0	0
EMP2.7	Kings Cloughfold	1	1	0	0	1	0	0	0	0	0	0	0
EMP2.12	Extension to Mayfield Chicks	1	1	0	0	0	1	0	0	0	0	0	0
EMP2.14	Large site at Hud Hey	1	1	0	0	0	0	0	1	0	0	0	0
EMP2.15	Land north of Hud Hey	14	11	1	2	11	2	0	0	0	1	0	0
EMP2.19	Carrs Industrial Estate	1	1	0	0	0	1	0	0	0	0	0	0
EMP2.23	Carrs Industrial Estate North Extension	14	13	0	1	13	0	0	0	0	1	0	0
EMP2.26	Extension of New Hall Hey	2	0	0	2	0	0	0	0	1	1	0	0
EMP2.29	Land at Robert Street	1	0	0	1	0	1	0	0	0	0	0	0
EMP2.31	New Hall Hey	1	0	0	1	0	0	0	0	1	0	0	0
EMP2.32	New Hall Hey Road	1	0	0	1	0	0	0	0	1	0	0	0
EMP2.34	Extension to New Hall Hey	4	2	0	2	1	0	0	1	1	1	0	0
EMP2.35	Baxenden Chemicals Ltd, Rising Bridge	2	2	0	0	1	0	0	1	0	0	0	0
EMP2.38	Land adj Hollin Gate Farm	40	39	0	1	38	0	0	0	0	1	0	1
EMP2.40	Toll Bar Business Park	1	1	0	0	0	1	0	0	0	0	0	0
EMP2.50	Riverside Business Park	1	0	0	1	0	1	0	0	0	0	0	0
EMP2.51	Forest Mill	1	1	0	0	0	1	0	0	0	0	0	0
EMP2.52	Isle of Man Mill	1	0	1	0	0	1	0	0	0	0	0	0
EMP2.53	Waterfoot Mills	1	0	0	1	0	1	0	0	0	0	0	0
EMP2.54	Warth Mill	1	1	0	0	0	0	0	1	0	0	0	0

Reference	Policy or Site Name	Total number of Comments	Objections	Support	Neutral comments	Residents	Landowners, Developers or Agents	Association & Group	Businesses	Statutory Consultee	Local Government	Councillor	Other
Site Not Allocated													
Site not allocated	Site not allocated	69	50	10	9	56	10	3	0	0	0	0	0
Other													
Evidence Base	Evidence Base	15	2	1	12	3	3	1	0	7	1	0	0
General	General comments	51	17	4	30	32	3	6	0	5	3	0	2
New Policy	New Policy Proposed by Consultee	1	0	1	0	0	0	1	0	0	0	0	0
New site not known	New Site Proposed by Consultee unknown	8 1	1 1	5 0	2 0	2 1	5 0	0 0	0 0	0 0	0 0	1 0	0 0
SCI	Statement of Community Involvement	1	0	0	1	1	0	0	0	0	0	0	0

Table 2 Number of comments received for each site or policy

## Appendix F – Housing sites not taken forward to regulation 19

Draft Local Plan Allocation Ref (Reg 18)	Site name	Gross Area (ha)	Net developable area (ha)	No. of units proposed	Delivery Timescale	Greenfield/Brownfield	Urban Boundary/Countryside/Green Belt	Draft Local Plan Allocation (Reg 18)	Pre-submission version Allocation (Reg 19)	Planning permission	Route number or Hub name	Buffer (crow fly)	Notes
HS2.2	Land near Greensnook Farm	0.11	0.11	7	Year 1-5	Brownfield	UB	Housing	Site not going forward	Yes			The site is under construction and likely to be completed before the beginning of the Local Plan period.
HS2.11	Land at Huttock Farm, Bacup	0.74		22	Years 6-15	Mixed	CS	Housing	Site not going forward	No			Serious concerns from LCC regarding highways.
HS2.12	Huttock Top, Bacup	1		30	Years 6-15	Greenfield	UB	Housing	Site not going forward	No			Serious concerns from LCC regarding highways.
HS2.13	Land south of Huttock Top Farm, Bacup	1.34		40	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Serious concerns from LCC regarding highways.
HS2.20	Land off Douglas Road, Bacup	1.09		27	Years 1-5	Greenfield	UB	Housing	Site not going forward	Completed			The site is completed.
HS2.27	Land adj 83 Booth Road, Tunstead	0.14		5	Years 1-5	Mixed	GB	Housing	Site not going forward	2017/0423			Outline (2017/0423) granted for a single dwelling. The site is too small for an allocation
HS2.29	Land west of Sow Clough, Stacksteads	1.21	1.08	32	Years 6-15	Greenfield	CS	Housing	Site not going forward	No	464	300m	LCC highways objection and landowner intentions unknown
HS2.32	Land off Newchurch Old Road	1.57		47	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Serious concerns from LCC regarding highways
HS2.34	Land Rear of Highfield Nursing Home	0.25		2	Years 1-5	Greenfield	UB	Self-Build	Site not going forward	Yes for 2 dwellings			Potential land contamination as historic landfill (EA). Existing permission for 2 dwellings. The site is too small for an allocation..

HS2.39	Land at Holme Lane, Haslingden	0.18	0.18	5	Years 6-15	Greenfield	GB	Housing	Decision not yet taken	No	X41 and 464	300m	Green Belt site which not identified for potential release in the Green Belt Review.
HS2.44	Land at Hollin Lane, Rawtenstall	2.59		51	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Access issue via Hollin Lane which is a narrow single lane with no possibility of widening.
HS2.54	Land Between Newchurch Road and Bacup Road and to the west of Dobbin Lane	5.63	1.83	82	Years 1-5	Greenfield	UB	Housing	Site not going forward	No			LCC stated it could not accommodate 55 houses. Badger setts are present on site. Strong community objection. Highways England: commented that the site should be assessed within Highways Capacity Study. Potential land instability.
HS2.56	Land at Hurst Platt, Waingate Road	0.15		8	Years 1-5	Greenfield	UB/CS	Housing	Site not going forward	Under construction			Site under construction. 4 houses remaining which is too small for allocation
HS2.57	Land at Conway Road	0.25	0.16	5	Years 1-5	Greenfield	CS	Self-Build	Site not going forward	No			Delivering 5 units is over-optimistic so the site is no longer proposed for allocation, though there is a change proposed to bring the land into the urban boundary
HS2.58	Land At Higher Cloughfold	0.25		7	Years 6-15	Greenfield	CS	Self-Build	Site not going forward	No			Too small to deliver 5 or more houses. Also, vehicle access issues raised.
HS2.59	Land to the north side of Hall Carr Road	0.3		5	Years 1-5	Mixed	UB	Self-Build	Site not going forward	No			Site too small to deliver 5 or more dwellings.
HS2.60	Haslam Farm, north of Duckworth Lane	1.63	0.71	21	Years 1-5	Greenfield	GB	Housing	Site not going forward	No			Site located in the Green Bel, too small to advocate exceptional circumstances. Presence of infrastructure and Stepping stone habitat limiting the developable area. Strong objection from the local community.
HS2.62	Former Hospital, Haslingden Road	1.87		41	Years 1-5	Brownfield	GB	Housing	Site not going forward	Almost completed			The site is completed
HS2.64	Land at Oakenhead Wood, Rawtenstall	0.75		22	Years 1-5	Greenfield	CS	Housing	Site not going forward	No			LCC raised an objection due to unsuitable vehicle access

HS2.66	Land behind no. 173 to 187 Haslingden Old Road	0.45		13	Years 1-5	Greenfield	CS	Housing	Site not going forward	No			LCC raised an objection due to unsuitable vehicle access
HS2.68	Land east of Lower Clowes Road	0.19	0.19	5	Years 6-15	Brownfield	CS	Housing	Site not going forward	No			Site is too small to deliver 5 or more dwellings. An Urban Boundary change is proposed to facilitate development
HS2.71 (part)	Land to the west of Moorland View, Edenfield	2.63	2.63	45	Years 6-15	Greenfield	GB	Housing	Site not going forward				Green belt land that is not identified for potential release in the Green Belt Review. Potential land instability.
HS2.72	Croft End, Stubbins	0.8	0.8	11	Years 1-5	Brownfield	UB	Housing	Site not going forward	Yes (2016/0228)	X41	300m	Site under construction and likely to be completed before the beginning of the Local Plan period.
HS2.75	Wavell House	0.25		32	Years 1-5	Brownfield	UB	Housing	Site not going forward	Under construction			Site under construction and likely to be completed before the beginning of the Local Plan period.
HS2.76	Land at Snig Hole, Helmshore	0.25		7	Years 1-5	Greenfield	GB	Housing	Site not going forward	No			A landowner requested withdrawal of site. Green belt site too small to advocate exceptional circumstances. Strong objection from the local community.
HS2.77	Land Off Curven Edge	0.18		5	Years 1-5	Greenfield	UB	Housing	Site not going forward	No			Potential land contamination. Recreational use. Strong objection from the local community.
HS2.79	Rosendale Golf Club, Haslingden	0.58	0.52	15	Years 6-15	Greenfield	GB	Housing	Housing	No	X41	300m	Green Belt site not identified for potential release in the Green Belt Review. Green infrastructure present on site.
HS2.84	Land behind Myrtle Grove Mill, Waterfoot	3.57	1.35	40	Years 6-15	Greenfield	CS	Housing	Site not going forward	No	464	300m	Vehicular access issues to the site.
HS2.86	Land by St Peter's School	0.32	0.32	9	Years 6-15	Mixed	CS	Housing	Site not going forward	No			Landscape and heritage impact.
HS2.88	Former Kearns Mill	1.01		14	Years 1-5	Brownfield	CS	Housing	Site not going forward	Under construction			Site under construction and likely to be completed before the beginning of the Local Plan period.



HS2.91	Park Road Garage Site	0.36		11	Years 1-5	Mixed	UB	Housing	Site not going forward	No			Drainage issues, presence of a culvert, garage colony in existing use.
HS2.92	Field at Scout Road, Whitewell Bottom	0.17	0.17	5	Years 1-5	9	CS	Housing	Site not going forward	No			Site in flood zone 2. Too small to deliver 5 or more dwellings. An Urban Boundary change is proposed to facilitate development
HS2.98	Land south of Shawclough Road, Scout Bottom	1.08		32	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Site close to a main river and within flood zone 3 and 2.
HS2.99	Land South of Isle of Man Mill	2.12	1.58	47	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Landscape impact. Fairly isolated location.
HS2.101	Waterhouse, Cowpe	0.09	0.07	5	Years 6-15	Brownfield	CS	Housing	Site not going forward	No			Site near a main river and within flood zone 3 and 2. Too small to deliver 5 houses. An Urban Boundary change is proposed to facilitate development

## Appendix G – Email sent to the consultees (regulation 19)

**From:** Forward Planning  
**Sent:** 23 August 2018 19:11  
**Subject:** Local Plan and Statement of Community Involvement Consultations  
**Attachments:** Statement of Representations.pdf

Dear Sir / Madam,

### **Publication version of the Local Plan for Rossendale (Regulation 19) Consultation from Thursday 23<sup>rd</sup> August to Friday 5<sup>th</sup> October 2018**

Rossendale Borough Council has published the Rossendale Local Plan (Reg 19 version) for consultation. All the consultation documents and the [online comments form](#) are available to view online at [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan).

Paper copies can be viewed at the **One Stop Shop, Futures Park, Bacup, OL13 0BB**, on a Monday to Friday between 8.45am and 5.00pm (except Tuesdays from 09.15pm to 5.00pm), and at all libraries in Rossendale during normal opening hours, as well as at Crawshawbooth Village Centre. Copies can be viewed at Whitworth Town Council offices from Tuesday 4<sup>th</sup> September between 9am and 2.30pm.

Comments **must relate to soundness, legal compliance, and compliance with the Duty to Cooperate**. Please be aware that they cannot be anonymous and will be forwarded on for consideration to the appointed Planning Inspector as part of the Local Plan examination. Comments must be received on or before **Friday 5<sup>th</sup> October 2018**, and any arriving after this time will not be accepted.

The attached Statement of Representations Procedure provides more information on this consultation.

Information sessions will be held at Futures Park on 13<sup>th</sup> and 18<sup>th</sup> September from 3pm to 7pm. Paper copies of the consultation form can be obtained from the One Stop Shop or by phoning 01706 21777.

You are receiving this email as you have asked to be kept informed about the Local Plan. If you no longer wish to receive correspondence on this matter please contact us.

### **Statement of Community Involvement Consultation from Thursday 23<sup>rd</sup> August to Friday 5<sup>th</sup> October 2018**

A consultation is also taking place on the Statement of Community Involvement. Please refer to [www.rossendale.gov.uk/SCI](http://www.rossendale.gov.uk/SCI) for further details.

If you have any queries please email [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)

Yours faithfully,

## Appendix H – Press Notice (regulation 19)

# Man 'racially abused store security guard'

CHRIS GILL  
@rossendale

A MAN who claimed a security guard after being struck in a robbery was racially abused during the incident, according to a statement a court has heard.

Dariusz Lee Minkick, 45, of Great Street, Scap, appeared at Leeds County Court alongside his brother, a public order officer. The court heard that a robbery took place in the street in front of a public order officer's house on Monday.

Police officer Adam Guter in Scap said that one of three African men racially abused the officer.

Prosecutor Stephen Fisher told Judge Ross Dudd that a man up with a knife was the victim's brother. The court heard that the defendant was a security guard who was on duty at the time of the robbery.

The court heard that the defendant had been seen by the victim's brother on the night of the robbery. The court heard that the defendant was seen by the victim's brother on the night of the robbery.

The court heard that the defendant was seen by the victim's brother on the night of the robbery. The court heard that the defendant was seen by the victim's brother on the night of the robbery.



Dariusz Minkick is accused of racially abusing a security guard after being beaten over a knife.

**brief**

**CRIPPLED DAY OUT**  
The Rossendale Chamber of Commerce is organising a free 'crippled day out' on Thursday, September 1st.

There are available to be picked up from the church's coffee morning between 10.30am and 12.30pm on Thursday, September 1st.

Couples will leave Claxworth and Kay Street, Rossendale at 11am on Wednesday, September 5th.

There will be a coffee on board the coach and there is food for sale on the coach.

**Do you have a story for us?**  
Call 01673 211 2577



A charity day at the Woodpeck raised £1,000 for the Duffell Foundation Charity.

## Pub's fun day hits £1,000 charity mark

A BUSY WOODPECK pub has raised more than £1,000 for its favourite charity following a recent fundraising day.

The Woodpeck is raising money this year for the Duffell Foundation charity, and has a planned return event throughout the year.

An all day event at the Woodpeck Road venue on Saturday, August 30th raised the amount raised to £1,000.

The Duffell Foundation was to use the funds of children back without an internet system.

## New bid to build guest house

OWNERS of building cottages have submitted plans to expand after their previous bid failed to secure planning permission for a new eight-room guest house at its site at Dean Lane, West. It would be the number of visitors the

couple could hold from time to time.

An earlier application was refused in July with Rossendale Council's planning committee citing grounds of highway safety, light, noise pollution and over-development.

The new bid to build a three-room cottage with a guest room which would merge into the building. The architects and professional services have carried out all the necessary reports and changes to the original application, as recommended by the council and have addressed the objections.

"Should this application prove successful, we will offer a further eight jobs. We very much respect the opinion of our neighbours and hope to alleviate their concerns and do everything we can to work alongside them, where possible."

A decision will be made later in the year.

## Rossendale BOROUGH COUNCIL

**ROSSENDALE BOROUGH COUNCIL**  
**ROSSENDALE LOCAL PLAN (REG 18) PRE-SUBMISSION CONSULTATION**

Rossendale Borough Council has published the Local Plan that it intends to submit to the Minister for Housing, Communities and Local Government for independent examination.

The Local Plan will cover the whole of Rossendale Borough and will provide the statutory planning framework for the Borough up to 2034.

**Period for Representations**

The Rossendale Local Plan has been consulted on previously. This is your opportunity to comment on the draft plan before it is submitted for independent examination. At this stage we are looking views on the soundness, legal compliance, and compliance with the Duty to Cooperate. Any comments made will be forwarded on for consideration by the appointed Planning Inspector as part of the examination process.

**Locations Where Documents Can Be Inspected**

The Rossendale Local Plan and all relevant supporting documents can be viewed online at <https://www.rossendale.gov.uk/localplan>

Paper copies can be viewed at:

- One Stop Shop, Victoria Park, Scap, OL13 0BB, on Monday to Friday between 9.30am and 5.00pm (except Tuesdays from 09.15pm to 5.00pm).
- All libraries within Rossendale during normal opening hours.
- Crawshawbooth Village Centre, Adelside Street, between 10am and 4pm Monday to Friday and by appointment on Saturdays.
- Offices of Whitworth Town Council, Rensick, Market St., OL12 3DF between 9am and 2.30pm Monday to Friday from Tuesday 4th September until the end of the consultation.

Comments must be received on or before Friday 09th October 2018. Comments arriving after this time will not be accepted.

**Representations must be sent to:**

Online Form: <https://www.rossendale.gov.uk/localplan>

Electronically: [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)

By post / hand to: Forward Planning, Rossendale Borough Council, One Stop Shop, Scap, OL13 0BB

**CONSULTATION ON STATEMENT OF COMMUNITY INVOLVEMENT**

A consultation is also taking place over the same time period on an update to the Statement of Community Involvement (SCI). This sets out how the Council will consult on planning matters including Local Plans and planning applications.

## Appendix I – List of respondents wishing to participate to the Examination in Public

(Interest stated in the representation during Regulation 19 consultation)

Reference	Title	First Name	Last Name	Organisation	Reasons
79	Mr	P	Ramsden	Linden Park Developments Ltd	In order to purvey the above representation in a professional manner, resulting in the best possible outcome for our client.
97	Mr and Ms	John and Lynne	Atherton and Lomax	Moorside/Moor View Residents Group	We would like to discuss further all the issues we have noted at question no. 8
28	Mr	Paul	Bradburn	Edenfield Village Residents Association	To explain in more detail to the Inspector, if required, the reasons why we find the Plan unsound.
82	Dr.	Falmai	Youngman	Bury Rural Inequalities Forum - BRIF	Our organization was seriously involved in the last attempt to develop a major windfarm in the area - and there is no doubt in our mind that it is most important to give oral representation. We would be most grateful of this consideration to explain the particular aspect of the visual damage to our rural area across the Valley to Rossendale Scout Moor. Our expert witness Dr. Alan Heyworth has also agreed to give evidence of the need to protect and regenerate the peat fields which could be damaged and are most important ecologically for the High Plateau of Moorland.
41	Mrs	Stanley	Ainsworth	represented by HPDA Ltd	To ensure the matter is fully considered

94	Mrs	L	Bower	represented by Emery Planning	Our objections raise significant issues with the plan, the housing requirement and the omission of our client's site as an allocation. Our objection raises significant issues with the supply of housing and insufficient sites to meet the figure in Policy HS1. For the reasons set out we consider that the site should be reinstated as an allocation. For the reasons set out for SD2. Our conclusion that the plan has failed the Duty to Co-operate requires attendance at the Examination.
101	Ms	Helen	Hartley	Nexus Planing on behalf of The Methodist Church	As landowners of part of 'Major Site' H72: Land West of Market Street, the Methodist Church consider it is important to have the opportunity to participate in the examination in support of the allocation of the site and Policy HS3.
18	Mr	Kenneth	Howieson	represented by Hourigan Connolly	I can state my case better
65	Mr	Robert	O'Shaunessy	Voith Paper Ltd	To state the case for an amendment to the plan
112	Mr	L	Wrigley	represented by Cassidy + Ashton	To enable the inspector to have the opportunity to consider the points made and address questions that may arise.
53	Mr	Clive	Balchin	James Trickett & Son Ltd	To ensure I communicate effectively my objection to this land being included
5150	Mr	Alan	Ashworth	Edenfield Community Neighbourhood Forum	I hereby confirm that I wish to appear at the upcoming Local Plan Examination Hearing as a Resident of the Village of Edenfield and the Secretary of Edenfield Community Neighbourhood Forum.
15	Mrs	Janet	Boon		It is imperative that resident thoughts and opinions are taken into consideration. These plans are the future of Bacup. We want to improve the town, to be proud of our town and to ensure that development and decisions are made for the right reasons. We have questions which need addressing. Why was the feasibility study not acted upon. Why did the company involved in a business venture pull out?
44	Mr	Ian	Boucher		To ensure local voices are heard.

83	Mr	Christopher	Dance		I feel strongly that points I have made have been ignored by the council officers (and therefore councillors based their approval on inaccurate information) and that to have any faith in the process, I want them to justify the fact that inaccuracies have not been amended.
74	Mr	Alwyn	Davies		I hope that the information that I have provided explains why I do not believe that the plan is sound and I have tried to be as succinct as possible however as this is not my area of expertise I would welcome the opportunity to explain the content of this response or to provide any additional information to the inspector in the public element of this process. To support me in this process I would also kindly request that my daughter attends to support me. Thank you for your time and consideration. I am happy to be contacted at any time by the inspector.
85	Mr	Michael	Dop		I think peoples voices should be heard and not just the voices of the council. They have had several years to put these roads and infrastructure right and they cannot do that correctly, so why should we trust and believe them on this We have lived here for 14 years and understand the area including the roads so we have a better understanding of the area than a bunch of councillors who have probably visited this area once in the last seven years.
107	Mrs	S	Downham		So that representations can be made
76	Mr	Harry	Dutton		Because I have grave concerns that if the proposals are adopted in their present form they will have a detrimental effect on the quality of life of local residents. i also feel that the Inspector should hear from local people.
114	Mr	Ian	Francis		I have just moved into the area and would by then have accumulated significantly more evidence to present.
105	Mr	Antony	Greenwood		To give my point of view if necessary.
75	Mrs	Anne	Hardiman		To make representations
39	Mrs	Candice	Harwood		So that the matter can be fully considered and adequately dealt with

1	Mrs	Pamela	Haslam-Jones		The inspector should be able to hear the views of local people as this site was included without proper consultation and we did not have any opportunity to raise objections before it was included in the plan.
48	Mr	Terence C	Haslam-Jones		I would welcome the opportunity to discuss this further with a member of the Inspection Team in order to clarify and expand on some of the points I have raised, provide further information and answer questions. I am willing to accompany members of the Inspection Team on their visits to the site
67	MRS	Christine	Holden		I consider it necessary to attend the oral part of the examination as I have lived here for 33 years and have anecdotal evidence in support of my objections to the proposed access point. I feel strongly that this form does not allow sufficient space to adequately voice my concerns and I do not believe that I have received all relevant information which has been made available to Rossendale Planning Committee during this consultation process. I therefore question its transparency.
68	MR	Andrew	Holden		I consider it necessary to attend the oral part of the examination as I have lived here for 33 years and have anecdotal evidence to support my objections to this proposed access point. I also feel strongly that this form provides insufficient space to adequately voice my concerns.
5119	Mr	Richard	Lester		
17	Mrs	N	Longmire		In order the inspector fully understands the area and it's needs and the way the whole process has been carried out by the council and local councillors.
109	Ms	Susan	Riley		For the consideration of the process and the site
81	Mr	Jack	Rogers		
29	Mrs	Emma	Smurthwaite		
3	Mr	Alan Peter	Webb		Because the people of Stacksteads didn't have an opportunity to comment on the adoption of this site before it was put in the plan. Other areas did have a chance when a proposal was near them.
5145	Mr	Rob	Wells		

118	Mr	Michael	Whitworth	Manchester Museum	Planners seem to have no local knowledge
5157	Ms	Joanne	Harding	Home Builders Federation	The HBF would like to participate at any examination of this local plan, to ensure we are able to debate the comments made within our representation in greater detail as required and to ensure we are able to respond to any additional evidence provided by the Council or others following submission of the plan.
5135	Mr	Michael	Murray	Grane Residents' Association	[NB Interest stated after the end of the regulation 19 consultation]



## Appendix J – Overview of the representations received (Regulation 19)

### 1. Overview

1.1.1 The six weeks consultation on the Local Plan Pre-Submission Publication version, also called Regulation 19 consultation, took place between 23 August 2018 and 5 October 2018. During this time, 556 respondents made 826 comments on the Local Plan.

1.1.2 The Council also received comments from 12 respondents after the end of the consultation period and therefore those comments are not included in the report. The Planning Inspector will be made aware that some comments were received late.

1.1.3 The view of respondents regarding the legality, soundness and compliance with the duty to co-operate is summarised in Table 1. The majority of the respondents did not explicitly respond to the questions set out in the questionnaire. This is partly due to the fact that the online and paper forms were not widely used by the respondents, and instead different templates and emails were received.

Percentage of responses based on 826 comments	Yes	No	Did not answer
Is the Local Plan legally compliant?	9%	7%	84%
Is the Local Plan sound?	4%	23%	73%
Does the Local Plan comply with the duty to co-operate?	8%	7%	85%

Table 1: Percentage of respondents' opinions regarding the legality, soundness and compliance with the duty to co-operate of the Local Plan.

1.1.4 It is to be noted that respondents expressed an interest to participate at the Local Plan Examination in Public on 65 topics. Table 2 summarises the responses to this question.

Percentage of responses based on 826 comments	Yes	No	Did not answer
Do you want to participate at the EIP?	9%	13%	78%

Table 2: Percentage of respondents' interest in participating to the Examination in Public based on 817 comments.

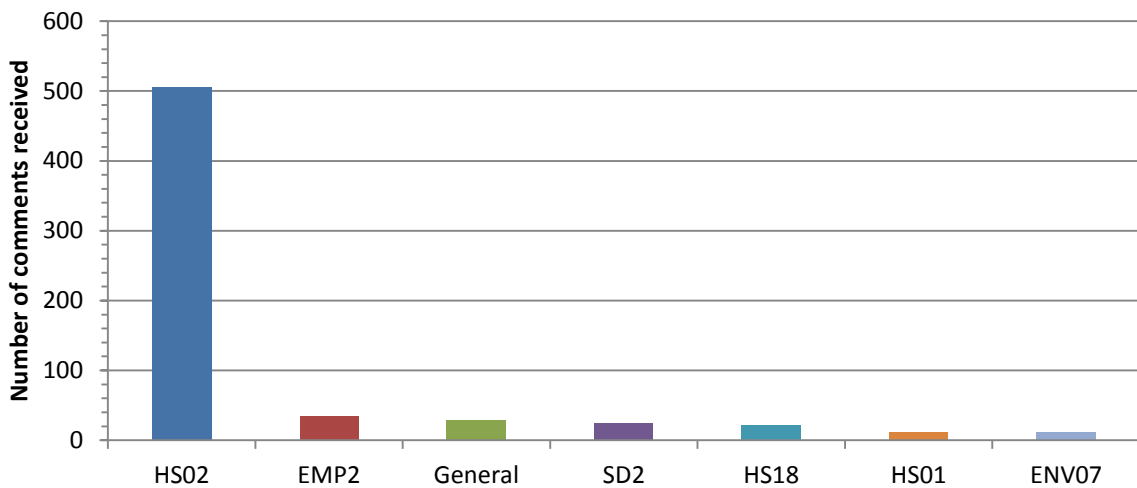
### Policies or Topics attracting interest

1.2.1 The majority of the comments (over 500 comments) relate to Policy HS2: Housing Site Allocations. Six other policies attracted large number of comments:

- Employment Site Allocations (Policy EMP2) with 34 comments
- General comments on the Local Plan (28 comments)
- Urban Boundary and Green Belt policy (Policy SD2) with 25 comments
- Gypsies, Travellers and Showpeople policy (Policy HS18) with 21 comments
- Meeting Rosendale's Housing Requirement (Policy HS1) with 12 comments
- Wind Turbines policy (ENV7) with 11 comments

Graph 1 shows the seven policies / topics which attracted the largest number of comments.

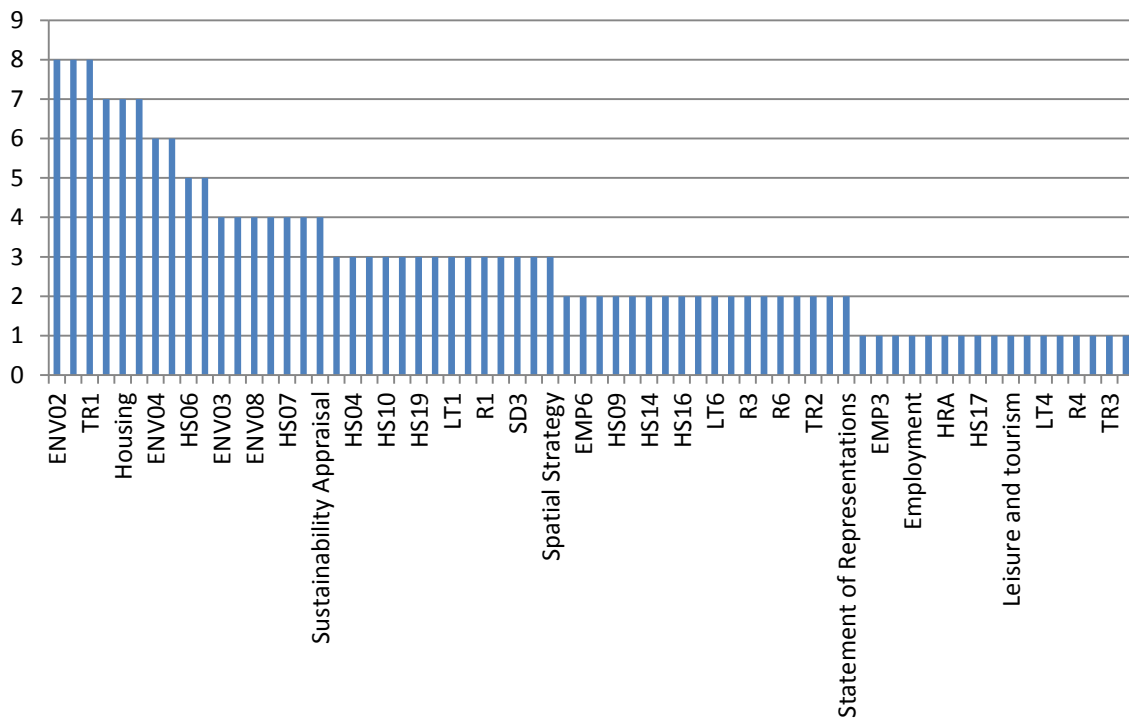
**Seven policies/topics attracted over 10 comments**



Graph 1: Seven policies or topics which attracted over 10 comments

1.2.2 The remainder of the policies attracted less than 10 comments (please see graph 2).

**Policies / topics attracting fewer than 10 comments**

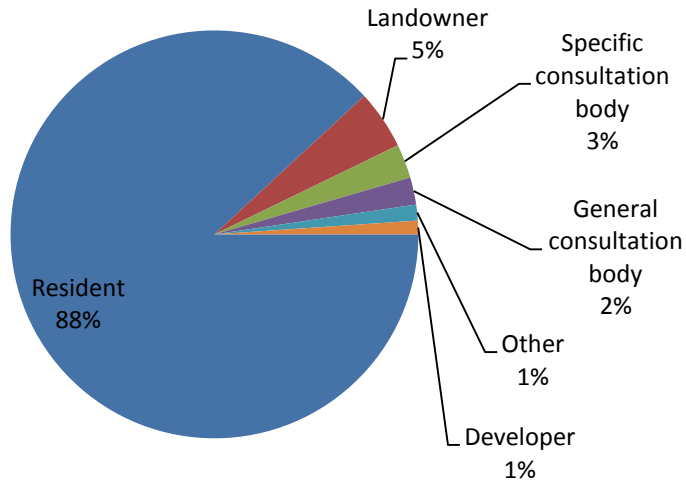


Graph 2: Policies or topics which obtained fewer than 10 comments

**Who responded and how?**

1.3.1 The majority of the respondents who commented during the consultation are residents (please see graph 3).

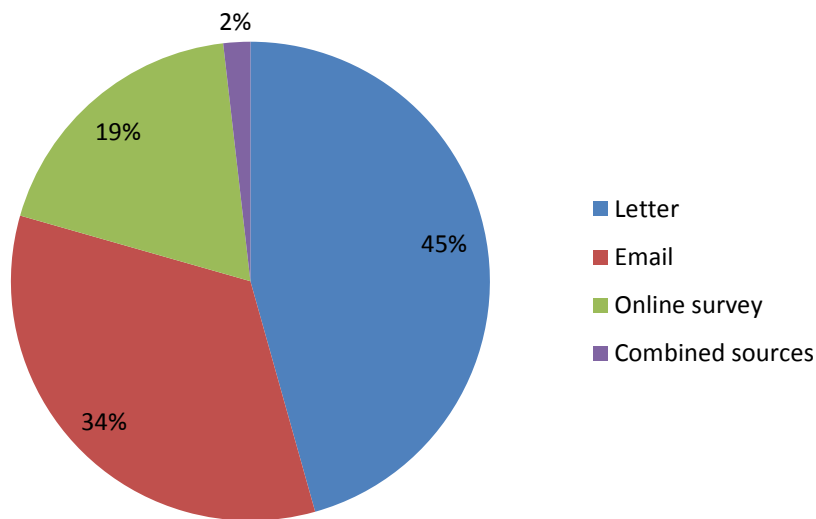
### Status of respondents



Graph 3: Pie chart showing the status of the respondents

1.3.1 The largest number of comments were received by letters posted or handed in, only 19% of the comments originated from the online survey (please see graph 4).

### Source of comments received



Graph 4: Source of comments received.

## 2. Comments received on specific policies

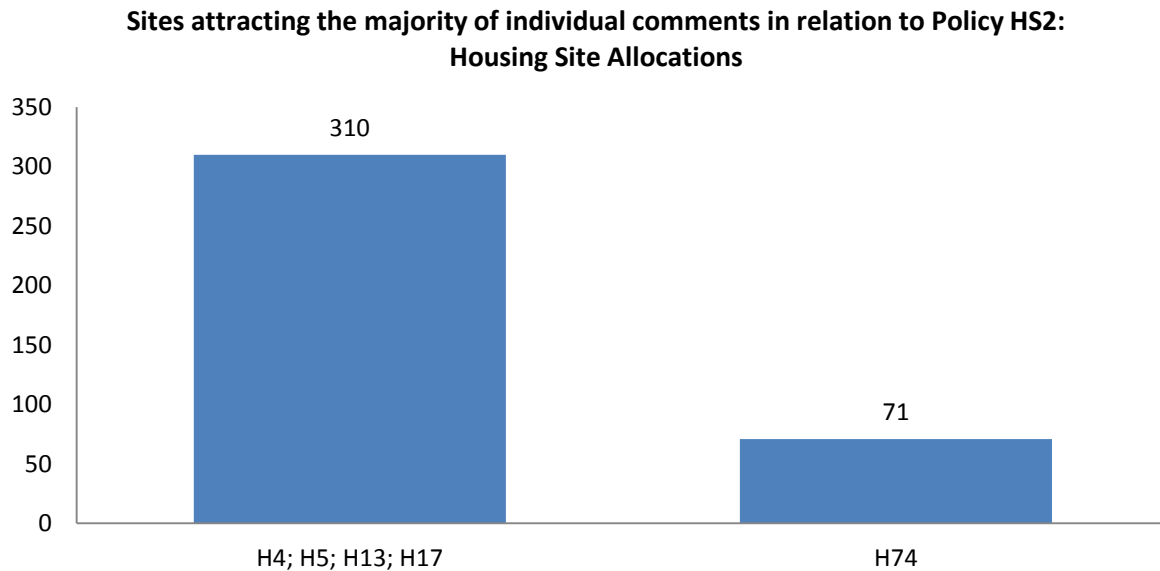
2.1 Regarding comments on Policy HS2: Housing Site Allocations, the larger amount of individual responses received were in respect of four site allocations in Loveclough:

- H4 Turton Hollow, Goodshaw;
- H5 Swinshaw Hall, Loveclough;
- H13 Loveclough Working Mens Club and land at rear extension; and
- H17 Land south of Goodshaw Fold Road

Approximately 310 comments were received, all using the same template.

2.2 However, it is to be noted that the representation from Edenfield Community Neighbourhood Forum focussing on the site H72 Land west of Market Street, Edenfield, was supported by 1,213 people.

2.3 Another site attracting interest was H74 Grane Village, Helmshore (71 comments). Please see graph 5.



Graph 5: Sites attracting the majority of the comments in relation to Policy HS2: Housing Site Allocations.

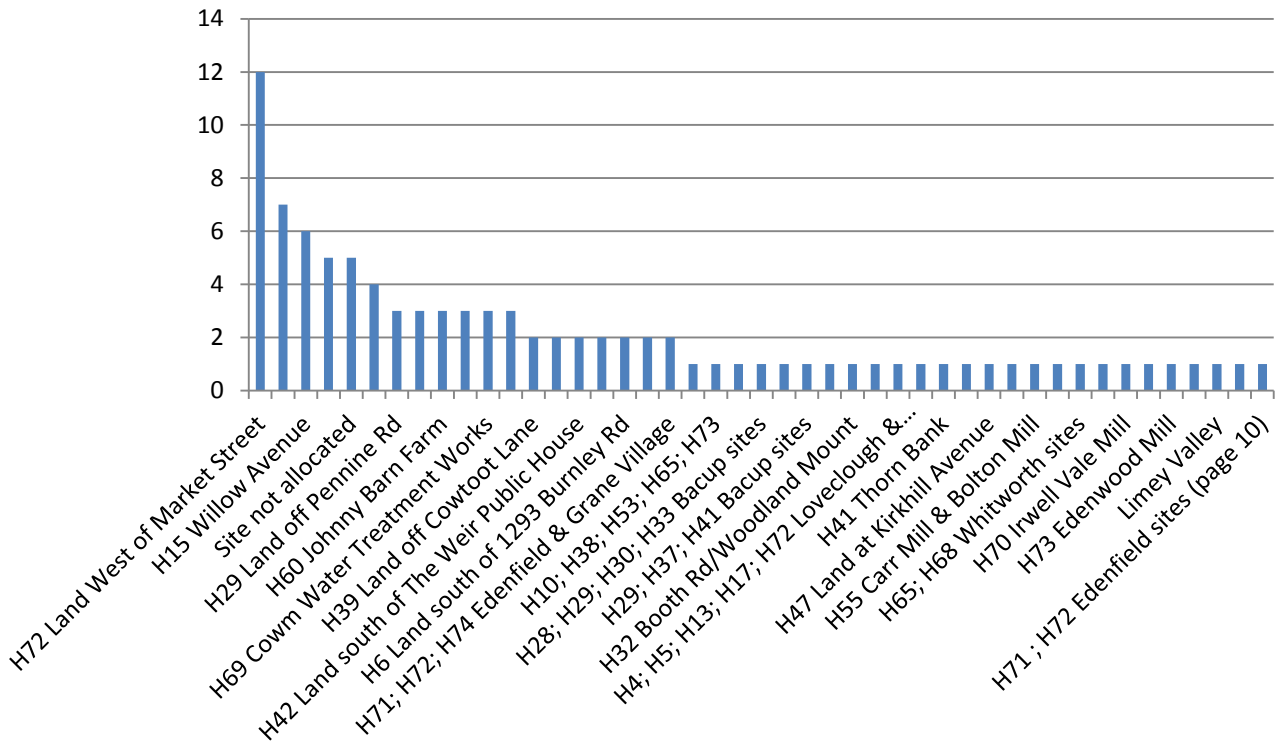
2.4 HPDA submitted a representation on behalf of 18 households about a boundary change in Newchurch, Rawtenstall.

2.5 A further representation has been made by Tom Whitehead acting on behalf of 16 community groups, in respect of Policy ENV7 on Wind Turbines.

2.6 Also, a representation from Pam Anthony objecting to the site H15 at Willow Avenue off Lime Tree Grove was supported by 12 households.

2.7 Graph 6 shows how many comments were received on other sites / topics in relation to Policy HS2: Housing Site Allocations.

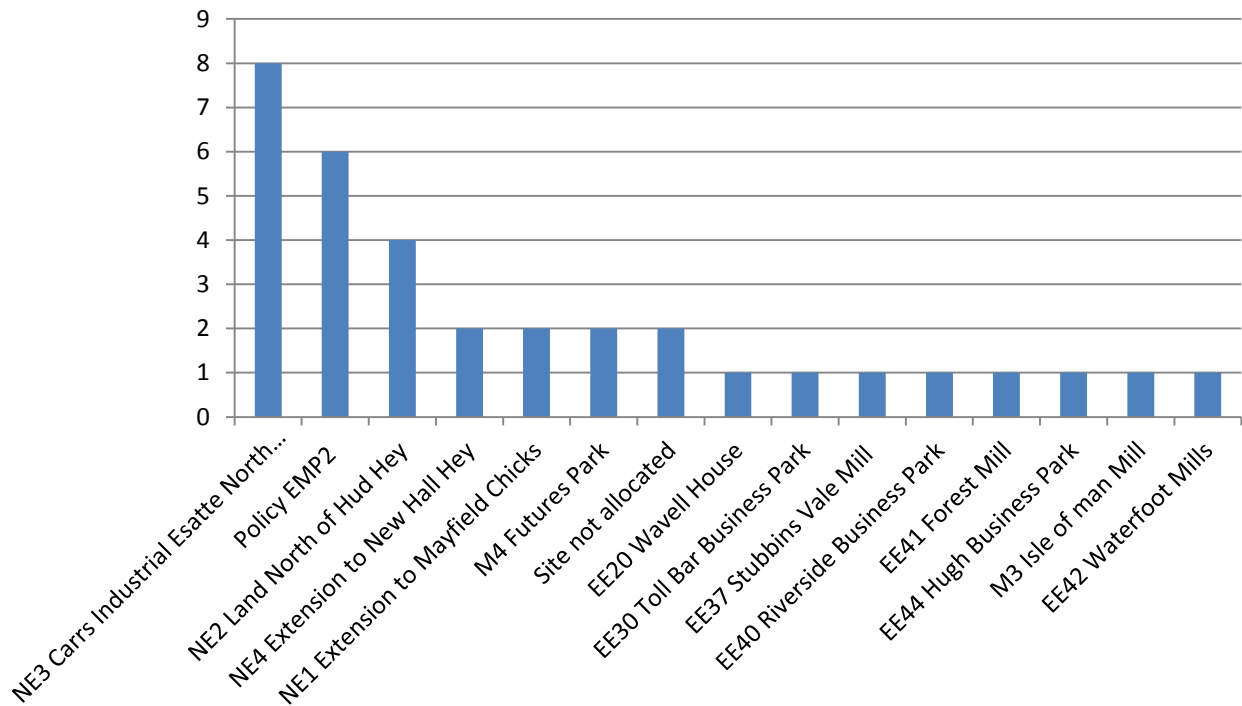
**Reminder of specific sites / topics commented on in relation to Policy HS2: housing  
Site Allocations**



Graph 6: Other sites and topics commented on in relation to policy HS2.

2.4 The comments received on specific sites relating to Policy EMP2: Employment Site Allocations are shown in Graph 7.

## Sites commented on in relation to Policy EMP2: Employment Site Allocations



Graph 7: Sites commented on in relation to Policy EMP2: Employment Site Allocations

2.5 The two main proposed employment sites attracting more than 3 comments are: NE3 Carrs Industrial Estate North Extension, Haslingden and NE2 Land North of Hud Hey, Haslingden.

### 3. Further information

3.1 The list of respondents, individual comments and supported documents submitted as part of this consultation can be viewed on the Council's website in the Planning and Building Control/Local Plan/Emerging Local Plan section.

**23 August 2018 –**

**5 October 2018**

## **Summary of Representations**

*Please be aware that this Summary has been prepared simply to help understanding of the responses received in general in regard to proposed policies and site allocations.*

*It is possible that in summarising the responses some representations received may have unintentionally been misinterpreted. The Council apologises for this.*

*An unabridged version of each and every response received during the Consultation period (between 23<sup>rd</sup> August and 5<sup>th</sup> October) is available to view in full on the Council's website or at the Council's offices.*



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<b>Sites Comments</b>	
<b>Sites</b>	<b>Key points raised</b>

## Housing sites

### Site H4 – Turton Hollow, Goodshaw

- (See also general comments under HS2)

#### Residents stated:

- Land to the rear of Stone Holme Terrace, within H4, experienced a land slide in 2014 due to previous building work and from water load being carried downhill - proposed development in this area would put existing housing on Stone Holme Terrace at risk of further land slides and flooding;
- Stone Holme Terrace would be overlooked and privacy would be affected;
- Would affect local wildlife such as bats, birds and deer;
- Apart from the general concerns to sites at Loveclough, LVRA has little objection to H4 - it is relatively small and set in an existing built up area.

### Site H5 – Swinshaw Hall, Loveclough

- (See also general comments under HS2)

#### Residents stated:

- Goodshaw Lane is narrow and unsuitable for additional traffic;  
Detrimental impact on the heritage asset Swinshaw Hall and will destroy setting of this;  
Properties have already experienced heavy flooding due to poor drainage on housing allocation site.  
Development would exacerbate flood risk;
- H5 and H6 will create continuous urbanisation all the way from Rawtenstall to the northern borough boundary with eastwards urban creep in future, encroaching on moorland between Goodshaw and Water;
- Development of the field would affect the stability of existing boundary walls;
- Daylight would be blocked to some existing properties;
- If the allocation were to go ahead, modifications should be made to the text of Policy HS5 [see summary for HS5].

#### Landowner states:

- The site is suitable for bungalows as there is a shortage of this housing type in the area and would address concerns of residents not wanting large detached properties; access could easily be provided by widening the entrance to Goodshaw Lane;
- LCC Highways state that a widened access off Burnley Road appears achievable, potentially to include the private access to Broad House; secondary/ emergency and pedestrian/cycle access onto Goodshaw Road should be provided.

**Site H6 – Land south of 1293 Burnley Road, Loveclough**

Residents stated:

- Access to/from the site would be dangerous;
- The benefit from the small number of homes proposed would not outweigh safety concerns.

**Site H7 – Land Adjacent Laburnum Cottages, Goodshaw**

Residents stated:

- The site is open space and was created to replace the playground when Hawthorne Meadows was built and has been maintained and promoted as a play area since – loss of this goes against drive to promote healthier lifestyles;
- New development may affect parking for existing residents.

**Site H10 – Land at Bury Road, Rawtenstall**

- Environment Agency requests further evidence that it would be safe on flood terms to develop the site

**Site H12 – Reedsholme Works, Rawtenstall**

- A resident stated the infrastructure cannot support the development.

**Site H13 – Loveclough Working Mens Club and land at rear and extension**

(See also general comments under HS2)

Residents stated:

- The extension of the site was not consulted during regulation 18.
- Concerns regarding flood risk, the lack of infrastructure (roads, schools, doctors) to support the development, the impact on wildlife and on the impact on the amenity of neighbouring residents during and after construction.
- The countryside should be protected.

The landowner supports the allocation of the site and states the capacity can be increased to 105 dwellings; also states the masterplan is unnecessary.

**Site H15 – Willow Avenue off Lime Tree Grove**

- Residents objected due to the topography, vehicular access issues (via a private road), highway safety, role as rainwater soak away and the impact on the amenity of residents of Slaidburn Avenue.

**Site H17 – Land south of Goodshaw Fold Road**

(See also general comments under HS2)

Residents stated:

- This site will have a serious impact on wellbeing of residents to the east;
- Access via Goodshawfold Rd. is unsuitable and will worsen existing safety concerns.

**Site H22 – Former Bacup Health Centre**

- Environment Agency stated they are aware that H22 has been subject to a planning application and the development has been approved following EA consultation.

**Site H29 – Land off Pennine Rd, Bacup**

Residents stated:

- Concerns over access issues, highway safety, the loss of wildlife habitat and public amenity (e.g. land used by dog walkers and horse riders), previous mining history, increased pollution and water run-off;
- Lack of infrastructure and existing services that cannot cope with the increased housing.
- The number of units should be reduced.
- Will lead to unacceptable increase in density and traffic;

**Site H32 – Booth Road / Woodland Mount, Brandwood**

- The landowner supports the allocation of the site but would like the number of dwellings to be increased to 16.

**Site H33 – Land off Rockcliffe Rd and Moorlands Terrace, Bacup**

- A resident raised a concern regarding the loss of amenity (e.g. Green Infrastructure)

**Site H37 – Land off Gladstone Street, Bacup**

- Residents raised concerns about the loss of greenspace used by children, walkers and horse riders, loss of wildlife habitat and the lack of infrastructure (roads, schools, health facilities)

**Site H38 – Land off Burnley Road and Meadow Avenue, Bacup**

- Environment Agency requests further evidence that it would be safe on flood terms to develop the site

**Site H39 – Land off Cowtoot lane, Bacup**

Residents stated:

- It is Common land to be used for recreational purposes;
- Concerns over access, environmental impacts, visual amenity, flood risk, loss of greenfield, health impact from the mine water sedimentation site where ferrous / oxides are captured which can be carried by the wind over the site, lack of infrastructure (schools, roads, health facilities) with no plans to make improvements.
- LCC Highways stated that subject to more than one vehicular access being provided to distribute the traffic, the site could be acceptable. It would be necessary to use the football ground for an access point, Cowtoot Lane is too narrow to take up ant traffic generated by the development.

**Site H40 – Land of Todmorden Road, Bacup**

Residents stated:

- Unsustainable location with poor access to/from the site, to the road network and public transport and other services; there are not enough existing services to serve new development;
- Existing flood/surface water/drainage issues;
- Development will affect wildlife and recreation opportunities;
- Land is steeply sloping;
- There is an existing oversupply of larger properties and there is little demand for homes in Bacup - but evidence demonstrating viability has not been made available.
- LCC Highways state that subject to suitable vehicular access being secured via Moorside Crescent estate, site access would be acceptable.

**Site H41 – Thorn bank, Bacup**

- A resident raised concerns about the loss of amenity, highway safety, loss of wildlife habitat and the lack of infrastructure (roads, schools and health facilities).

**Site H43 – Land West of Burnley Road, Weir**

Residents stated:

- Consultation process has been unsound - evidence questioning the accuracy of the previous site assessment has been ignored;
- Hillside Crescent is not a suitable access point - the Deer St. access is better;

- Local schools are already over-subscribed.

**Site H47 – Land at Kirkhill Avenue, Haslingden**

Residents stated:

- Land should remain in the Green Belt and not be allocated for housing;
- Local roads and services cannot cope with the number of houses proposed;
- Existing issues with surface water run-off makes development unsuitable.
  
- Landowner fully supports H47 but wishes to see the allocation extended to include adjacent Moorland Rise site to round off north eastern part of Haslingden up to the logical settlement boundary at Kirkhill Rd./Haslingden Old Rd; this extension is a modest release of Green Belt; this piece of land was previously deemed suitable for development as "safeguarded land" in the draft Lives and Landscapes DPD.

**Site H50 – Land Adjacent Park Avenue/Criccieth Close**

Residents stated:

- New housing would exacerbate existing access problems for residents and emergency services;
- Development may cause flooding to existing properties.

**Site H52 – Land to the rear of Haslingden Cricket Club**

Residents stated:

- This is not a deliverable or developable site in accordance with NPPF and should not be allocated;
- The site includes land that is part of Haslingden Cricket Club, which is designated as Greenland and a Recreation Area - 2016 Playing Pitch Strategy also concludes that the facility needs to be protected and enhanced;  
The allocation includes land used for cricket practice and car parking which is clearly essential to the running of the cricket club;
- Removal of the car park would have a detrimental impact on residential amenity and create a significant traffic management and parking problems on match days and when the club hosts events;
- As this land would fall under the definition of a "playing pitch" it should be protected in accordance with NPPF, local strategies and Sport England policy;
- The access along Private Lane is unsuitable for further traffic;  
The net developable area should not include the car park, which would reduce the number of houses capable of being built.

Haslingden Cricket Club and the owner of the housing land:

- support the allocation but seek a revision to the Plan to create a specific stand-alone policy encompassing a housing allocation and the cricket club, to create a residential-led mixed use site (see representation for suggested policy wording);
- Housing development would enable improvements to cricket facilities; the two are intrinsically linked as the new housing is essential to future financial viability of the club whilst the housing cannot be delivered unless benefits to the ground are delivered;
- Currently the plan has not been positively prepared as HS2 on its own could not deliver the houses; The new proposals include: relocation of the practice pitch to land at Haslingden High School (which will replace the pitch lost as part of H52 and has been agreed in principle), new and improved access, including alternative access for the cricket club users directly from Clod Lane and providing parking wholly within the club site; Objections would be raised by Sport England to the loss of the cricket strip which is currently within H52 but the policy as it stands does not address this.

**Site H53 – Waterfoot Primary School**

- Environment Agency objects to the allocation of this site on flood risk grounds

**Site H55 – Carr Mill and Bolton Mill, Cowpe**

- The landowner supports H55

**Site H60 – Johnny Barn Farm and land to the east, Cloughfold**

- Residents state that the area suffers from severe traffic and flooding issues which would be exacerbated by new development.
- Landowners support the housing site but suggest that the allocation should be extended to include additional land in their ownership (shown on the map enclosed with the representation); the land is adjacent to the existing settlement; in a sustainable location and could be made available in the short or medium term.
- LCC Highways state that a new access via Newchurch Road appears achievable with the loss of some mature trees; a pedestrian/cycle link should be provided through the site to Johnny Barn Close and surrounding links.



**Site H65 – Albert Mill, Whitworth**  
(See also general comments under HS2)

- Residents state new development at Albert Mill will worsen existing traffic problems, especially in combination with other sites.

**Site H66 – Land North of King Street**  
(See also general comments under HS2)

- LCC Highways state that existing access onto Market Street appears suitable and could be designed to accommodate the potential resident and quarry traffic.

**Site H67 – Land Behind Buxton Street**  
See general comments under HS2.

**Site H68 – Former Spring Mill (land off eastgate and westgate)**  
(See also general comments under HS2)

Residents state:

- New development at Spring Mill will worsen existing traffic problems, especially in combination with other sites;
- The allocation is not legally compliant with the Plan's policies: these state development will not be permitted unless there is no adverse impact on species/habitat etc.;
- there is wildlife on site and development will block their access to the moor (the HRA was undertaken at the wrong time of year and did not identify this or the mature trees on sites);
- The diversion of footpaths/bridleways is unacceptable;
- The land is contaminated;
- Gleeson's report states no affordable housing will be provided - this is contrary to the Local Plan and LCC report states there are no school places available for the new site;

Landowner/developer:

- Strongly support the allocation; the site has an outline permission and is currently subject to a full planning application for 119 dwellings; it was assessed by the council as a brownfield site, within the urban boundary,

well connected to existing services, infrastructure and public transport; Gleeson specialise in bringing forward complex sites and are committed to remediating and delivering the site in the short term.

**Site H69 – Cowm water treatment works, Whitworth**

See also general comments under HS2)

Residents stated:

- The access to the site is not suitable for new development;
- New development will affect heritage, listed buildings and wildlife (ecological study on the site was undertaken at wrong time of year);
- Potential impact on the underground reservoir has not been assessed;
- It is not economically viable to develop only 20 houses here.
  
- Whitworth Town Council oppose H69 - the land should remain in the Green Belt and be protected from development.

LCC Highways state that Tong Lane is constrained in width and has poor pedestrian access; HGV traffic is higher than average due to the quarry; site access off Tong End is too narrow and requires widening onto potentially third party land; any housing here would be a concern given the road/access constraints.

**Site H70 – Irwell Vale Mill**

(See also general comments under HS2)

Residents stated:

- 45 new houses would increase the Conservation Area by 100%;
- There are no doctors or public transport in this areas; roads could not cope and flooding is a big issue (there is no viable plan to ensure this does not happen again following development);

Landowner:

- Fully support allocation of H70: it is suitable, available and deliverable within 5 years; a planning application has been submitted for land within the allocation;
- Existing factory has been vacant since 2015 and is no longer an appropriate employment site;
- Development would create opportunities to provide flood alleviation measures for the site and the wider area

and would meet NPPF requirements;

- Access can be made north of River Ogden so will not significantly increase traffic within Irwell Vale and will create less impact than the former HGV traffic from the site.

**Site H71 – Land East of Market Street, Edenfield**

See general comments under HS2 summary

**Site H72 – Land West of Market Street, Edenfield**

(See also general comments under HS2 summary and SD2)

Residents stated:

- Landscape Assessment stated that sites were unsuitable here due to landscape impact;
- Not opposed to some houses being built but not the high numbers being proposed as it is out of proportion.
- The Technical Note by Mott MacDonald stated the Rochdale Road / Market Street junction would have poor operational performance by 2024, irrespective of the Local Plan allocations. Therefore, the Edenfield Community Neighbourhood Forum (ECNGF) state the scale of housing proposed under housing allocation H72 is not justified.
- ECNF comment that it is understood developers of the H72 housing allocation are preparing their own assessment of the impact potential housing would have on potential junctions off Market Street and Exchange Street and this raises issues of impartiality with regard to these studies as RBC are not conducting their own.
- A resident has stated that the H72 housing allocation of 400 dwellings contradicts the Policy HS7 as, according to the latter, sustainable locations should expect higher densities and from the resident's calculations, based on a density of 40 dwellings per hectare, the development would lead to 610 houses or more. Therefore, these policies contradict each other and are unsound.

Landowners/housebuilders stated:

- Wholly support the allocation;
  - Green Belt release is necessary and it has been demonstrated that there are exceptional circumstances to justify this; it is important in the delivery of aspirational family homes which are currently lacking; the land is suitable, available and it is confirmed it can be delivered in the short term.
  - Methodist Church state the land in their ownership (land off Exchange St.) could be the first phase, to be developed in the next 5 years;
- Peel support H72 - it does not have insurmountable constraints, can be accessed off Blackburn Rd., is a

sustainable location and currently makes a limited contribution to Green Belt aims;

- Highways England - wait for latest comments; Highways England would like further evidence on the impact of the allocation of H72 on the Strategic Road Network.
- LCC Highways state that each land parcel should be linked to provide maximum permeability in accordance with Manual for Streets; if brought forward piecemeal, should be designed with future connectivity in mind (see original comments for details);
- Lancashire County Council School Planning Team advises that the site should include as a minimum 1 form entry school. The location to be defined in the masterplan. The masterplan, phasing and bedroom mix will enable the School Planning Team to understand the point of need.

**Site H73 – Edenwood Mill, Edenfield**

(See also general comments under HS2 summary);

- Landowner of the site supports the allocation but requests that two further parcels are included (as shown on the map included with the representation); Plot A is the mill's former car park and was included within the proposal already granted permission; Plot B is to the north of the allocation and both sites should be removed from the Green Belt and included in H73, as the land does not serve the purposes of the Green Belt as set out in NPPF.
- Environment Agency requests further evidence that it would be safe on flood terms to develop the site
- LCC Highways state that proximity of site access to J1 M66 and visibility splays for Wood Lane are a concern; development of the site limits the possibility of a southbound slip road onto the M66 at J1.

**Site H74 – Grane Village, Helmshore**

Residents stated:

- Development will lead to an oversupply of houses in the area;
- The village character and quality of life will be negatively affected;
- Additional access points and more traffic onto Grane Road would exacerbate existing traffic and pedestrian

safety problems along an already very busy road;

- Development will affect wildlife corridors and landscape;
- The site assessment results are inaccurate and misleading and have changed without explanation between the first and second consultation; There are not enough school places and other existing infrastructure cannot cope with additional development;
- The land is boggy and development will lead to flooding;
- There are coal mining and contamination issues;
- Development will lead to loss of light and create overlooking;  
If the allocation is allowed, there should be a large reduction in the number of houses and it should provide larger homes to attract working families to the area.
- Irwell Catchment Natural Flood Management Group state the allocation should be removed as it will give rise to increased surface water run-off, in contravention with Policy ENV9; hard development in proximity to such flashy watercourses such as Ogden/Irwell should not be permitted;
- Landowner/developer: wholly support H74; Green Belt release is necessary and it has been demonstrated that there are exceptional circumstances to justify this; the timescale for delivery should be changed to years 1-5 of the Plan as the developer is committed to bringing the site forward in the short term; Taylor Wimpey's representation provides a rebuttal to some of the evidence base used to assess the site (details can be found in the original comments).

**Sites not proposed for housing allocations in the draft Local Plan:**

Landowner/ housebuilders:

- requests the site south of Hollin Lane to be allocated for housing.
- would like the site off Lindon Park Road in Haslingden to be included as a housing site allocation.
- requests Haslam Farm to be allocated for housing.
- Land south of Grane Road and west of Holcombe Road, Helmshore (SHLAA18305) is considered suitable for housing in the SHLAA and should be included in the urban boundary or allocated for housing;
- Allocate land behind the former hospital site, off Union Road (SHLAA16318) for housing and remove from the Green Belt
- Land to the west of the Glory pub (Loveclough) should be allocated for housing and included within the urban boundary;

	<ul style="list-style-type: none"><li>• Land at Elm Street, Edenfield should be included in the urban boundary and removed from the Green Belt - the site has a limited role as Green Belt, it provides an opportunity to round off the existing settlement boundary without encroaching on remaining open Green Belt, access is achievable via Elm St.;</li><li>• Huttock Top, Bacup should be allocated for housing in the Local Plan;</li></ul>
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**New  
Employment  
sites**

**Site NE1 - Mayfield Chicks, Ewood Bridge**

- Environment Agency stated that the presence of Flood Zone 3 on NE1 and NE4 may mean flood risk issues that need to be addressed; it cannot be demonstrated that these sites satisfy the sequential test; sufficient evidence needs to be provided that these sites comply with NPPF and can be developed safely (e.g. through a supplement to the SFRA);
- Highways England and LCC Highways stated: Access seems achievable; impact on the A56 Bentgate roundabout would need to be included in modelling proposals.

**Site NE2 – Land North of Hud Hey, Haslingden**

Residents stated:

- The proposed extension of Hud Hey Estate into Green Belt will encapsulate no. 39 Hud Hey Road and the land should not be allocated for development;
- Green Belt Review Plan states that relatively poor performance of land against the GB purposes is not an exceptional circumstance, in itself, to justify release; it recommends further policy or masterplans to support development - this has not been done and the release of the land is not justified;
- The plan states the acute shortage of employment land constitutes an exceptional circumstance but there is 80% unused space already available on Hud Hey Road indicating there is not a high demand;.
- The Local Plan and the future plans of Highways England do not align; any highway upgrade would be expensive;
- Previous consultations on the Core Strategy did not support release of Green Belt land and previous policy for the area states that new housing and employment should be on brownfield land - the proposed allocation contradicts both of these.

Landowner stated:

- Support for NE2 and the release of the land from the Green Belt: site is surrounded by built development (including employment) and highways, this sense of enclosure makes it appropriate for employment development; it is well linked to other employment sites and is highly accessible; it does not fulfil the purposes of the Green Belt and development here would not harm wider openness.

LCC Highways state access to A56 via Bridge Street remains a concern, especially in relation to HGV traffic; a new access onto Blackburn Rd. would require major earth moving and removal of mature trees; existing retaining wall may affect visibility splays; access via existing industrial estate appears unachievable without

removal of an existing building.

Highways England would like further evidence on the impact of the allocation of NE2 on the Strategic Road Network.

**Site NE3 – Carrs Industrial Estate North Extension, Haslingden**

Residents stated:

- More logical to fill empty employment units before proposing additional development in the countryside;
- There is little evidence of unmet demand - only once a need has been identified should more sites be considered;
- Hud Hey Rd. car park is for residents and is where children play, it is over a culvert and sewer, includes a right of way, has japanese knotweed and provides access to rear of properties - it should not be used as part of the access as it is both already used and would be very costly to redevelop; it would be very difficult to incorporate a suitable new access into a narrow, sloping site;
- Hud Hey Rd. / Haslingden Old Rd. is a single lane road and is used by children to get to school; it cannot take HGVs; it is already a known speeding blackspot and current hazards will be worsened by increasing traffic; parking, congestion and visibility are already problems which will be made worse;
- The most suitable access is off the A56 but as understand this has been refused, the next most suitable and safer option would be the existing exit and bridge over the A56, adapted to take extra traffic;
- Changing the urban boundary and building on open countryside to the north side of the A56 is unnecessary urban sprawl and will lead to further urban creep; the plan must provide evidence to show that it has exhausted its development options on brownfield sites and should insist that all future development should be phased to ensure that unused brownfield sites are developed first and that occupiers have been secured on the site and there is evidence of sufficient further demand before considering open countryside;

Highways England state proposed access to NE2 and NE3 is immediately adjacent to A56 overbridge abutments and verge which may affect HGV access; the creation of accesses to NE2/ 3 pose geotechnical risks to the A56 embankments and abutments of the Hud Hey Road Bridge over the A56; a detailed feasibility study should be done to identify if an optimum solution can be achieved that poses no safety risk to A56; this should begin as soon as practicable to allow a further detailed study on the viability of the proposal.

LCC Highways stated: The site is acceptable in principle but an alternative should be found to the proposed



access onto Hud Hey Road (B6236); the proposed access would encourage HGVs from the site to travel along B6236 rather than the SRN which would be inappropriate and exacerbate existing safety concerns; to achieve adequate visibility displays would involve the need for parking restrictions which may not be supported; there is a potential point of access from Commerce Street that would be an appropriate access for HGVs and other traffic generated by any new development, although this would require additional land and the existing private access road adjoining Commerce St. would need widening.

Landowner stated: Support the allocation of NE3; the landowner is willing to make the land available for employment development; it is suitably located, adjacent to existing A road and is close to Haslingden, helping to make the site economically viable and easy to access by workers; it is reasonably flat, development will have little landscape effect, is not affected by flood risk and is in keeping with other employment development in the area.

#### **Site NE4 - Extension of New Hall Hey**

Residents stated:

- Strongly object to removal of Green Belt;
- It would disturb wildlife and affect the walking and recreation route;
- The area adjacent to the river is a massive flood risk, which was covered by water in the 2016 floods;
- Support the development for the extension reaching the mature trees but not further;
- the need for these employment sites need to be identified as there are lots of units empty along the A56;
- the plan is unsound as no exceptional circumstances exist for removal of the Green Belt and is therefore contrary to NPPF; there is not a shortage of existing land; it is irrelevant that this land would be attractive to developers; the fact that the A56 provides a defensible boundary and the site provides a Masterplanning opportunity does not constitute exceptional circumstances - nor do any of the other reasons set out; NPPF has also been misinterpreted in relation to offsetting Green Belt loss - identifying land for SANG or enhancing other open space as compensation does not improve remaining Green Belt as required by NPPF;
- The points set out in the last paragraph of the policy explanation (need for Scoping Study, Transport Assessment etc.) should be in the actual policy wording;
- The opportunity to create attractive development on a prime, gateway location has already been wasted on the existing site as the council have allowed poorly designed, ugly, low density development; further land should not be sacrificed when the benefits (a few jobs) do not outweigh the harm.

Environment Agency stated:

- The presence of Flood Zone 3 on NE1/NE4 may mean flood risk issues that need to be addressed; it cannot be

demonstrated that these sites satisfy the sequential test; sufficient evidence needs to be provided that these sites comply with NPPF and can be developed safely (e.g. through a supplement to the SFRA)

Highways England stated:

- Proposed access may cause queues but unlikely to impact on A56 - however, cumulative effect of new junctions has not been assessed; detailed modelling is needed and the need for proposed mitigation measures should be identified and assessed.

LCC Highways stated:

- Access onto existing highway network seem achievable but major infrastructure work would be required to free up the land.

<p><b>Existing Employment Sites</b></p>	<p><b>Site EE12 – Large Site at Hud Hey</b> Landowner states:</p> <ul style="list-style-type: none"> <li>• Winfields intend to move their office and warehousing activity to the north of Acre, leaving this site entirely vacant; much of the existing site has already been long term vacant despite being allocated for some time; there are issues with access with no prospect of improving links onto the A56;</li> <li>• NPPF suggests that sites shouldn't be protected for an allocated use when there is no prospect of that use coming forward - the site would therefore be more suitable for mixed use development, including residential and retail.</li> </ul> <p><b>Site EE16 – Carrs Industrial Estate</b> Residents stated:</p> <ul style="list-style-type: none"> <li>• Access to the proposed extension of Carrs Industrial Estate via land to east of terraced property of Hud Hey Road - access from the B6236 is very narrow, any widening would be constrained by proximity of A56 overpass; there are serious concerns about road safety if this access is used - it should come from the A56.</li> </ul> <p><b>Site EE20 – Wavell House</b> Landowner stated:</p> <ul style="list-style-type: none"> <li>• Site currently in office use but current occupiers (Rossendales Ltd.) intend to move out by Dec. 2018, leaving the building vacant;</li> <li>• Owner of the site may consider change of use to residential under PD rights but also wish to promote the site as a housing allocation – the site is more suitable for housing due to the following:</li> <li>• The site no longer serves the current occupier's needs; once vacant, unlikely the site will be reoccupied for some time given its market unattractiveness; requires significant modernisation to bring it up to modern standards, considered unviable for the landowner;</li> <li>• It is brownfield land, in a sustainable location, within the urban area and is therefore an appropriate site to meet the borough's housing needs;</li> <li>• EMP2 has not been positively prepared, is not justified and is not effective as it allocates the site for employment when it is no longer suitable and there are no real prospects for its continued commercial use;</li> <li>• It could already become housing under PD rights which further renders the allocation ineffective.</li> </ul> <p><b>Site EE30 – Toll Bar Business Park</b> Landowner stated:</p> <ul style="list-style-type: none"> <li>• The site should be allocated for housing instead of employment and object to the designation of part of the</li> </ul>
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site as a Neighbourhood Parade under R1 due to the following:

- Much of the upper floorspace has been unoccupied for some time due to the condition of the building and its unsuitability for modern commercial practices;
- Access is taken off busy Newchurch Rd. and is restrictive for deliveries and servicing due to the orientation of existing buildings – this makes it less attractive for prospective tenants;
- High costs of necessary repair and maintenance, particularly for the listed mill building, makes the future employment use unviable;
- The site is in single ownership and is available;
- The ELR gives the site an overall rating of “poor”; this demonstrates that the allocation for employment is not justified;
- Also wish to oppose the designation of part of the site as Stacksteads Neighbourhood Parade; the building is not suitable for retail use and offers no active frontage; there are natural breaks within this and the business park does not form part of a row of shops and therefore could be easily excluded from this parade;
- Ask that the site is allocated for housing instead of employment / neighbourhood parade as this is the only viable use and the proposals map amended to reflect this.

#### **Site EE37 - Stubbins Vale Mill**

Landowner stated:

- Site should be allocated for housing instead of employment for the following reasons:
- Much of the site is vacant or under-occupied;
- The net area available for employment is limited due to physical constraints and land in third party ownership;
- The site was assessed as “average” but since the ELR the site has become almost entirely vacant and the buildings on the western side are in a worsening condition, so it could now be considered below average;
- The council are seeking to balance employment and housing provision; however, in providing for future employment land the council has predominantly relied on existing employment land, much of which is average or below;
- This undermines the plan because required take up levels are unlikely to be achieved; some of this (including EE37) will deteriorate if it remains unused;
- It would be logical and in accordance with NPPF to re-use this previously development land within existing settlements for housing, in preference to greenfield sites on the edge of settlement, such as sites at HS2, 73, and 74.

**Site EE40 - Riverside Business Park**

Landowner stated:

- The existing business park should be extended to the west (all the land is in single ownership) and the land removed from the Green Belt, incorporated into the urban boundary and allocated for employment;
- The land does not meet all the purposes of Green Belt as set out in NPPF – similar sites have been removed from the Green Belt nearby;
- There is good road connectivity, it is close to an existing population and is adjacent to an existing reasonably modern, accessible employment site which is looking to expand;
- Site is bordered by existing employment to the east which separates it from any housing, Holme Lane to the north and the River Irwell and A56/A682 form defensible boundaries to the south and west;
- The land has a close physical relationship with the existing settlement of Rawtenstall, does not relate to the wider countryside located to the south and is not considered to be of landscape value; it is of poor or very poor agricultural land quality.

**Site EE41 - Forest Mill**

Landowner stated:

- Remove the current employment allocation EE41 and allocate the site for residential for the following reasons:
- Residential development will facilitate the viable regeneration of the site;
- It is within single ownership and can be made available;
- Many of the existing employment units are vacant; Forest Mill is no longer attractive to modern businesses
- Site is poorly located for an employment use and this is backed up by the Council's Employment Land Review 2017 which concludes that the site is "Poor".

**Site EE42 - Waterfoot Mills**

Landowner stated:

- Part of site is allocated for employment but a large part has no allocation and is "white land" within the urban boundary; support employment allocation but white land should be allocated for housing either as part of a wider mixed use site or a separate housing allocation under HS2;
- The wider potential of this site to meet objectively assessed development needs has not been recognised, therefore the Plan is not positively prepared; this also means the council's strategy for the land is not the most appropriate and the proposed employment allocation will sterilise developable brownfield land and is not

effective or sound;

- It is suitable for housing for the following reasons: Existing vacancy, access issues and lack of viability for continued employment.

**Site EE44 – Hugh Business Park**

Landowner stated:

- It was understood that the western part of the allocation (between H55 and the health centre) was to be allocated for housing and a representation was sent in support of this - however this was not picked up and the site has been wrongly included with Hugh Business Park when it is a separate site with its own access from Cowpe Road;
- This brownfield site, adjacent to another housing allocation, would be better suited to residential use and should be a housing allocation.

<p><b>Mixed use sites</b></p>	<p><b>Site M3 – Isle of Man Mill, Water</b>  Landowners stated:</p> <ul style="list-style-type: none"> <li>• Support the allocation of this site for mixed use but there are vacancies on site and if existing tenants were to vacate, it will be difficult to find new occupiers; therefore the site would be better suited to be allocated for housing.</li> <li>• would like the site to be allocated or housing instead of mixed-use.</li> </ul> <p><b>Site M4 – Futures Park, Bacup</b>  See also comments to EMP6</p> <ul style="list-style-type: none"> <li>• Highways England state access to the site would be provided by utilising the existing priority junction with the A681 Newchurch Road and upgrading it to a signal-controlled junction; no material impact is expected on the SRN.</li> </ul> <p>LCC Highways state:</p> <ul style="list-style-type: none"> <li>• Signalised site access proposals will improve the existing right turn; however current issues are due to the volume of traffic along this corridor which will worsen if all allocations are built out; careful consideration should be given employment potential in relation to catchment areas for likely employees.</li> </ul> <p>Residents stated:</p> <ul style="list-style-type: none"> <li>• Policy is not positively prepared, justified, effective or sound: it seeks "new high quality development" but a gypsy transit site is unlikely to attract new business;</li> <li>• Site contamination means it may not be suitable for business, let alone as a gypsy/traveller site;</li> <li>• Unable to find any evidence of duty to cooperate with neighbouring local authorities about the provision of sites (which is also required in the Planning Policy for Traveller Sites);</li> <li>• Bacup residents not given the opportunity to comment fully as the transit site at this location only appeared in the Reg. 19 consultation; this is unfair and appears the council is trying to regularise an existing unauthorised site.</li> <li>• RCT support EMP6 but note that a mixed use site here could be a competitor to other centres, this needs referencing in other policies such as R1.</li> </ul>
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<b>Strategic Policies Comments</b>	
<b>Strategic Policies</b>	<b>Key points raised</b>



**Strategic Policy  
SS: Spatial  
Strategy**

Residents stated:

- Housing allocations in Bacup are situated far away from the employment sites in Haslingden and Rawtenstall.
- Housing allocations should be concentrated in the west of the Borough where there is more infrastructure.
- New businesses are not attracted to Bacup, there is lack of jobs in the area and increasing the housing allocations will lead to unemployment.
- National Infrastructure Commission reported Accrington and Rossendale as being one of most congested areas in UK;
- Road congestion is severe and should be dealt with prior to allow development;
- Developing sites with mining history means stabilising works (e.g. filling in mine shafts) that could increase water run-off and flood risk - Plan disregards NPPF's section on Mineral Safeguarding Area;
- The employment land allocations and evidence needs to be re-examined and corrected - many sites are missed off; there is an over-supply of employment land identified and some allocations would be more suitable for housing, eliminating the need for Green Belt release for housing;
- Many of the sites previously considered suitable have been discounted and this needs to be re-examined; site density should be optimised in line with NPPF, before consideration of Green Belt release;
- The Plan is unsound as it fails to take account of the public health issues caused by living near the A56 and proposals to build extra houses in this area.
- housing development on higher grounds will increase flood risk on lower grounds in the Borough;
- Plan lacks an overall holistic approach by focusing development along the motorway instead of the railway and developing on Green Belt land which permanently removes the soil needed for water attenuation and reducing CO2 levels; climate change will mean we need Green Belt more than ever.
- The Helmshore Local History Society have stated insufficient consideration has been given to the conversion of former commercial property in town centres
- The level of development proposed in Edenfield is excessive
- There are no exceptional circumstances to release land from the Green belt for development

Edenfield Community neighbourhood Forum stated:

(Please also see comments summary for HS2 and SD2)

- Edenfield does not have the services to support a major site. Also, the Plan fails to place Edenfield in the settlement hierarchy and the method used to define it is unclear. Edenfield should be lower in the hierarchy.
- The choice of site allocation is not evidence led.
- Edenfield is not an extension of Ramsbottom and Ramsbottom is not a large built up area. Does the Council

think that a masterplan led development is favoured over development in a key service centre?

Landowners/developers stated:

- The council should consider a new and more sustainable development strategy which involves releasing Green Belt in the south of the district with better access to the road network, public transport and main centres.
- The current Local Plan timetable looks at adoption in 2020; NPPF requires Local Plans to be based on a 15 year timeframe and therefore the Plan period should be extend beyond that which is currently stated (2019-2034) to at least 2036;
- Rawtenstall should be identified as the ‘Strategic Service Centre’ with Bacup, Haslingden and Whitworth as ‘Key Service Centres’. Rawtenstall is the most sustainable location for development and should allocate more than 14% of residential development. Also, too much development is directed towards Bacup, which will lead to under-delivery of housing, including affordable housing as indicated by the Viability Study.
- the Spatial Strategy is sound as it identifies H72 as a major site for development, also the policy aims to balance meeting the borough’s needs and protecting its environment and heritage assets
- support the fact that Haslingden is identified as a Key Service Centre and considers the allocation at Grane Rd to be more closely related to Haslingden than Helmshore.
- disagree that development in other settlements (e.g. Acre) should be limited to infill or conversion as it can limit the use of brownfield land. Also, development in such settlement can address local need but also support existing businesses.

United Utilities point out that greenfield sites tend to have little or no existing infrastructure; development on such sites needs to be carefully planned and phased to ensure new infrastructure provision to avoid delays to housing delivery; UU appreciates the inclusion of trajectory information and encourages updated information as soon as it becomes available;

Historic England requests that the “Built Heritage” section in the Spatial Strategy text should read “Historic Environment”.

<p><b>Strategic Policy SD1: Presumption in Favour of Sustainable Development</b></p>	<ul style="list-style-type: none"> <li>• Landowner / developer supports the policy but requests to delete “unless material consideration indicates otherwise, taking into account whether”.</li> <li>• A community group supports the policy subjects to an amendment of the definition of sustainable development.</li> </ul>
<p><b>Strategic Policy SD2: Urban Boundary and Green Belt</b></p>	<p><u>Borough Wide</u> Residents stated:</p> <ul style="list-style-type: none"> <li>• By allocating less sites for employment, some of those sites could be allocated for housing and this would reduce the need for Green Belt release.</li> <li>• A resident states that the explanation text misinterpret paragraph 138 of the NPPF because it mentions SANG or enhancing open space.</li> </ul> <p>Developers/Landowners stated:</p> <ul style="list-style-type: none"> <li>• A landowner/developer proposes that a site located off Lindon Park Road under their ownership should be changed from Green Belt to a housing allocation</li> <li>• They agree that exceptional circumstances exist to release land from the Green Belt for development.</li> <li>• They raise concerns over the requirement for Suitable Alternative Natural Greenspace and how this affects viability (please also see policy ENV4).</li> <li>• Requests the designation of safeguarded land to meet requirement beyond the Local Plan period.</li> <li>• A landowner objects to the last paragraph of the policy and states that land released from the Green Belt is no longer subject to Green Belt policy controls and restrictions.</li> </ul> <p>Highways England would like further evidence on the impact of the allocation of H72 and NE2 on the Strategic Road Network.</p> <p><u>Rawtenstall, Goodshaw and Loveclough</u> Residents/community group stated:</p> <ul style="list-style-type: none"> <li>• Support the fact that the land north and south of Haslam Farm is proposed to be retained within the Green Belt.</li> <li>• Remove site SHLAA17162 (Higher Cloughfold, Rawtenstall) from urban boundary and list of suitable housing</li> </ul>

sites: access very narrow and on a blind bend; it is a wooded area used for recreation / walking; development would affect wildlife.

**Landowners/developers stated:**

- The land opposite 1019 Burnley Rd should be included within the urban boundary at Loveclough.
- Asks for the site to the east of Goodshaw lane to be included in the Urban Boundary.
- Requests the site south of Hollin Lane to be included in the Urban Boundary and allocated for housing.
- Supports the release of Green Belt at the back of no. 198 Haslingden Road but would like the area to be included in the Urban Boundary.
- Supports the inclusion of the land east of Lower Clowes Rd within the Urban Boundary.
- Objects to the policy as the land at Townsend Fold is not being released from the Green Belt to provide further employment.

Haslingden, Rising Bridge and Acre

**Landowners/developers stated:**

- Would like the site off Lindon Park Road to be included in the Urban Boundary and as a housing site allocation.
- Supports the extension of the Urban Boundary and release from Green belt at Acre but asks for further release from the Green Belt.
- Would like further land to be released from the Green Belt and included within the new employment site allocation NE5.
- Supports the release of the site NE2 from the Green Belt and its allocation for employment.

Edenfield

**Residents and ECNF stated:**

- There are no exceptional circumstances to release Green Belt land in Edenfield (e.g. housing need in itself is not an exceptional circumstance, plus there are enough brownfield sites and other sites to deliver the needs).

**Landowners/housebuilders stated:**

- Support the release from the Green Belt and the existence of exceptional circumstances.

Waterfoot

- A landowner supports the inclusion of the land at Delph House, Scout Road within the urban boundary.

**Strategic Policy  
HS1: Meeting  
Rossendale's  
Housing  
Requirement**

Residents stated:

- Development should focus on brownfield sites; Plan only allocates 30% of housing on brownfield (compared to 65% in Core Strategy);
- Sufficient brownfield sites and empty homes are already available and empty houses should be brought back into use before developing greenfield;
- Phasing of development should ensure brownfield allocations developed before greenfield - will prevent developers cherry picking easiest / most attractive sites;
- If the need for housing is as great as being stated, then brownfield sites should be just as viable as greenfield.
- Given the lower housing target now required and the significant objection to the Regulation 18 plan, why is so much housing land still being allocated?
- Infrastructure should be put in place first before sites are proposed.
- A resident asked whether local demand has been calculated and whether first time buyers would be able to buy those houses.
- Small sites and windfall can enable the Council to reach its housing target.
- A resident supports HS1 as it would provide local housing for local people of all ages, thus meeting the housing needs of Rossendale
- The latest ONS 2016 projections provide a revised housing requirement figure of 2,692 over the plan period and this should be used as opposed to the target of 3,180 dwellings.
- The Edenfield Community Neighbourhood Forum believe policy HS1 is not compliant with the NPPF as the 47% increase in housing would have a detrimental impact on the rural nature and character of the settlement. The housing target for ECNF is unjustified, undeliverable and inappropriate.

Developers/Housebuilders/Landowners stated:

- Object to HS1 and Housing Trajectory (Appx 4);
- Significant concerns that Plan will not deliver housing requirement as it has not identified sufficient land - delivery assumptions (e.g. on density, lead-in times, build-out rates) are simplistic, overly optimistic and do not provide enough flexibility/certainty to respond to changing circumstances as required by NPPF;
- If any sites are removed or not delivered, even more land will be required;
- Overall housing requirement should be increased to take account of economic aspirations and historic under delivery - strong evidence to justify the Council setting a housing target of at least 265 dwellings per annum - Government's standardised housing methodology calculation is just a minimum, not a cap;
- The council should take into account the 2016 based household projections published in September 2018 and

expected amendments to the Government's standardised housing methodology.

- The council should account for an economic uplift when calculating the housing requirement for the Local Plan.
- Five year supply is mainly made up of allocations but NPPF states these should only be included if clear evidence of delivery – this is doubtful so many sites may be undeliverable;
- Should apply a lapse rate and should have at least 20% flexibility/non-delivery allowance;
- Additional land therefore needs to be identified or brought forward for delivery in the first five years e.g. can be achieved through allocating more sites than is required or allocating "reserve sites" which can come forward in the event of non-delivery
- Peel has identified a number of concerns with proposed allocations including known physical and ownership constraints - it has not been demonstrated these sites are developable or will deliver the assumed yield;
- The Plan should cover the period up to 2036 (not 2034 as stated) - based on this there would be a significant shortfall in housing land, which increases if a flexibility allowance of 10-15% is applied; an additional source of land (to provide c3000 dwellings) needs to be found in order to make the plan sound and effective, which will need to be on Green Belt and open countryside;
- The target delivery of housing on brownfield land is too low and should be reviewed.
- A landowner supports the inclusion within HS1 that the housing requirement figure for Edenfield is 456 dwellings.
- The 'minimum' housing figure of 212 per annum would fall well short of supporting the economic growth potential of the borough and would slow job growth in Rossendale
- The provision of only 212 homes per annum would have a significant impact on the borough's sustainability, particularly in relation to an aging population, worsening housing affordability, failure to provide the required affordable housing and employment commuter trends.
- A figure in excess of 265 is recommended to take account of employment needs and to provide some flexibility to accommodate any unmet needs from surrounding Greater Manchester authorities.
- Since 1995 there is a significant supply of land allocated for employment that has not come forward and this should be reviewed and considered for housing or mixed-use sites.

<b>Strategic Policy EMP1: Provision for Employment</b>	RCT support EMP1 but policy should include support for “live/work” units - these could act as buffers between housing and employment sites
<b>Strategic Policy R1: Retail and Other Town Centre Uses</b>	<p>RCT offer qualified support for R1 but note the following:</p> <ul style="list-style-type: none"> <li>• Lower Cloughfold, Bacup Road; Musbury Fabrics, Helmshore; Winfields, Rising Bridge; Tesco, Sykeside; Rossendale Interiors, Stacksteads and Retail Parks at New Hall Hey are not identified as Neighbourhood Centres or Parades;</li> <li>• There have been a number of permissions for large retail units, including food shopping floorspace (e.g. at New Hall Hey); some of these have remained vacant and would question the need for any more such development.</li> </ul> <p>Asda:</p> <ul style="list-style-type: none"> <li>• Fully support the need and importance of establishing and maintaining a hierarchy of centres within the borough;</li> <li>• Rawtenstall Town Centre should be retained as a town centre and sit at the top of the retail hierarchy; its role and function should be strengthened; the retail hierarchy is considered sound;</li> <li>• The proposed town centre boundary accords with the definition in the updated NPPF and is sound; the retention of the Asda store within the town centre is welcomed, recognising the range of services it provides, its role as a key attractor to the town centre and the ability to link trips with other shops and services;</li> <li>• However, the proposed Primary Shopping Area (PSA) boundary is unsound as it does not accord with NPPF and is not justified; the PSA definition in the updated NPPF has dropped any reference to primary and secondary frontages and simply defines the PSA as a "Defined area where retail development is concentrated"; the Asda site would fit this description and should be included in the PSA; this would provide protection from out of centre shopping to ensure it continues to contribute towards vitality and viability of the town centre;</li> <li>• Support the floorspace threshold for retail impact assessments of 400m<sup>2</sup> - this part of the policy is sound; however would suggest wording is reviewed to ensure it still complies with updated NPPF.</li> </ul> <p>Landowner:</p> <ul style="list-style-type: none"> <li>• Wish to oppose the designation of part of the Toll Bar Business Park site as Stacksteads Neighbourhood Parade; the building is not suitable for retail use and offers no active frontage; there are natural breaks within</li> </ul>

	<p>the parade already and the business park does not form part of a row of shops;</p> <ul style="list-style-type: none"><li>• The loss of the units would not harm the objectives of R1 as the loss of these inadequate retail premises would not harm of retail offer / function of Stacksteads;</li><li>• The only viable use of the site (which includes the wider employment allocation) is for housing; the site should be removed from the Neighbourhood Parade and employment boundary and the land should instead be allocated for residential development.</li></ul> <p>Landowner:</p> <ul style="list-style-type: none"><li>• A landowner has commented that Policy R1 should acknowledge that there is no reasonable prospect of the Regal Cinema being brought back into use. As such, it should be demolished and allocated for retail use to positively reflect the aims of Policy R1.</li></ul>
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<p><b>Strategic Policy ENV1: High Quality Development in the Borough</b></p>	<ul style="list-style-type: none"> <li>Environment Agency stated the policy does not make provision for enhancement of existing environment features to provide a net environmental gain as set out in Defra 25 Year Environment Plan and proposes changes to criterion k.</li> </ul> <p>Developers stated:</p> <ul style="list-style-type: none"> <li>The requirement of a Development Brief or Design Code is unclear, as well as the definition of ‘major development proposals’. There should be no requirement for a design brief or code to be approved by the Council prior to submitting a planning application.</li> <li>Design Briefs could delay delivery rates on development sites (e.g. added constraints during sale to house builders specialised in particular design)</li> </ul>
<p><b>Strategic Policy ENV2: Heritage Assets</b></p>	<p>A local group and resident stated:</p> <ul style="list-style-type: none"> <li>Support the new proposed Conservation Areas and asks for the development of Management Proposals Plans.</li> <li>Request expansions to proposed Haslingden and Helmshore Conservation Areas</li> </ul> <p>Developers/ landowners stated:</p> <ul style="list-style-type: none"> <li>Support the establishment of local list and request the document to be well publicised</li> <li>Request that policy mentions demolition of existing building to facilitate development.</li> <li>Commented that ENV2 has not been positively prepared as it fails to plan for the proper growth of Bacup which would involve demolishing the Regal Cinema and allocating the site for retail use.</li> <li>Historic England supports the policy but request change title to ‘Historic Environment’</li> </ul>
<p><b>Strategic Policy LT1: Protection of Playing Pitches, Existing open Space, Sport and recreation Facilities</b></p>	<p>Sport England state:</p> <ul style="list-style-type: none"> <li>LT1 is still lacking as it is not supported by an evidence base on built sports facilities; without this, it is not possible to ascertain whether there is a surplus or deficiency of existing facilities and questionable whether the Plan is justified or consistent with NPPF;</li> <li>To resolve this, the following text should be added: "Given the important role indoor sports facilities play in promoting the physical and mental well-being of the community, the Council will work closely with Sport England and other partners to ensure that any future decision on the provision of all sports facilities is based on a robust and up-to-date evidence base. To assist with this, it is the intention of the Council to produce an</li> </ul>

	<p>Indoor Sports Strategy during the next 12-24 months to help underpin effective policy application";</p> <ul style="list-style-type: none"><li>• If this can be added, then Sport England will not raise an objection to the Local Plan in relation to the "justified" and "consistent with national policy" soundness texts;</li><li>• To further support this, Sport England and the Council should develop a Statement of Common Ground to help the inspector consider this at the examination.</li></ul>
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**Strategic Policy  
TR1: Strategic  
Transport**

- Rossendale Civic Trust support TR1
- Lancashire Fire & Rescue Service have concerns over the potential requirement to relocate Rawtenstall Fire Station as a result of improvements to the Gyrotory system. Lancashire Fire & Rescue Service seek confirmation at the earliest opportunity that a suitable alternative location for the existing Rawtenstall Fire station

Edenfield Community Neighbourhood Forum (ECNF) believe:

- Policy TR1 has not been positively prepared or appropriately evidenced.
- no improvements have been proposed to promote walking, cycling and public transport use.
- 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 private cars.

Highways England:

- support the development of the “Expressway” concept to the A56 corridor as part of a broader approach to creating an enhanced “Central Pennine route.”
- support the proposals setting out the need for sustainable transport solutions to address congestion and air pollution, to integrate transport more effectively into new developments and to ensure development that generates significant movement is located where the need to travel by private car is minimised.

Lancashire County Council (LCC):

- Believe a significant amount of additional work is required to mitigate the highway impacts of development associated with the Local Plan proposals and note a re-evaluation of Local Plan provision in terms of quantum of development or location should be considered.
- Note the Highway Capacity Study highlights existing capacity issues at a number of junctions studied which will result in additional congestion and potential safety concerns. Of particular concern are the safe and efficient operation of the Rawtenstall gyratory system (and associated St Marys Way corridor), Haslingden Road (Tesco) roundabout and the A681 Rawtenstall to Bacup corridor.
- With regards to the Rawtenstall Gyrotory, LCC comment that option 3 and option 12 presented by Mott

	<p>Macdonald in the Highways Capacity Study could both be further examined in order to provide as much mitigation to the Local Plan proposals as possible. Option 3 would be most deserving of further examination with regards to value for money and deliverability.</p> <ul style="list-style-type: none"> <li>• provided a response to the 15 junctions identified by Mott Macdonald and these can be viewed in full in the Local Plan Reg 19 Consultation Comments Received document.</li> </ul>
<b>Non-strategic Policies Comments</b>	
<b>Non-strategic policies</b>	<b>Key points raised</b>

<p><b>Non-strategic spatial strategy</b></p>	<p><b>Policy SD3: Planning Obligations</b></p> <ul style="list-style-type: none"> <li>• A community group supports the policy.</li> <li>• Lancashire County Council School Planning Team reports a projected shortfall of primary schools in Rawtenstall and Ramsbottom within the next 5 years. There is a shortfall in Whitworth of primary schools. There is an overall surplus of secondary schools in the district, however individuals schools are operating at or near capacity. Expansion of existing schools is the preferred option. The School Planning team is not seeking a new site for primary or secondary schools. The district has an impact on inward and outward migration of pupils and this is being monitored.</li> </ul>
<p><b>Housing Policies</b></p>	<p><b>Policy HS2: Housing Site Allocations</b> (Please also see comments summary on the Spatial Strategy)</p> <ul style="list-style-type: none"> <li>• Environment Agency would like the sites allocated to be cross referenced with the sites assessed in SFRA. Also, the limitations of developing next to a Main River should be made clear in the policy.</li> <li>• A resident stated that the National Infrastructure Commission reported Accrington and Rossendale at position 26 for congestion. The road congestion is severe and should be dealt with prior to allow development. Also, the resident raised the issue that developing sites with mining history means stabilising works (e.g. filling in mine shafts) that could increase water run-off and flood risk. According to him, the draft Local Plan disregards the NPPF’s section on Mineral Safeguarding Area.</li> <li>• Residents have objected to more houses in Bacup due to the lack of infrastructure.</li> <li>• Residents raised a concern that development will reduce the Green infrastructure and play areas.</li> <li>• A resident raised concerns regarding air quality.</li> <li>• A resident supports the land identified for future development within Policy HS2.</li> </ul> <p>Residents of Goodshaw/Loveclough stated:</p> <ul style="list-style-type: none"> <li>• Level of housing proposed is inappropriate, excessive, ill-advised and unacceptable;</li> <li>• Allocations were included at last minute (only at Reg. 19 stage) with a failure to properly consult those residents most affected – this is not sound or legally compliant (procedurally questionable and morally indefensible);</li> <li>• Conflicts with Core Strategy when council undertook there would be no development west of Burnley Road (A682) (i.e. H13 and H17) – proposed allocation is a complete U-turn and betrayal of local residents;</li> <li>• Sheer number of houses proposed is excessive and will destroy amenity;</li> <li>• The change that development brings will affect community spirit in Loveclough and Crawshawbooth;</li> <li>• Road network cannot support additional traffic – will exacerbate existing congestion, parking and safety</li> </ul>

issues;

- Local school is already full with no plans for expansion - would have to double in size making it unacceptable in educational terms; would place pressure on already overburdened infrastructure and services;
- There are no plans outlining any new facilities to serve new houses (Infrastructure Delivery Plan offers no solutions or funding);
- Allocating these sites would set a precedent for further speculative development;
- Should be located near to transport hubs, such as the rail link;
- Need affordable homes for local people in this area, not large houses;
- No evidence shown of local demand / whether first time buyers can afford the new homes;
- Already many empty properties so no shortage of houses in this area;
- Concerns over impact on landscape/views/openness of the countryside from the A682; will affect tourism as visitors come to enjoy scenery and open countryside;

Bacup area residents stated:

- Bacup to accommodate 25% of new housing - this is disproportionate;
- Area is deprived with a lack of employment opportunities
- Object to more houses in Bacup as will exacerbate existing inadequate infrastructure and cause more congestion and air pollution;

Sites proposed in Greensclough ward are contrary to policy ENV3 which states pastures enclosed by dry stone walls will be protected and enhanced;

- Question whether affordable housing will be delivered in this area as current development at the attractive site at Greensnook Lane has avoided the requirement due to viability - how will less attractive sites provide any?

Whitworth residents stated:

- Object to sites H65-69 - the geography of the valley make it unsuitable to accommodate more development;
  - Existing services, infrastructure and roads already at capacity and cannot cope with more development;
  - Congestion and road safety issues in Whitworth are just as pressing as those which get more attention (e.g. Rawtenstall gyratory) - Plan is unsound as it proposes new development that will worsen existing issues without monitoring conditions and finding solutions;
- There are no jobs in the area for new residents – this will lead to more out-commuting and worse traffic.
- Sports facilities in Whitworth and Shawforth have declined - more houses will need more public facilities; will

also increase pressure on GPs and already over-subscribed local schools.

- Proposed housing sites in Whitworth would increase commuter (as no jobs are proposed) and other traffic onto already congested roads close to schools, with unreliable public transport and poor cycling infrastructure; the traffic survey fails to recognise these issues;

**Irwell Vale/Edenfield residents stated:**

- Object to H70,71,72,73;
- The Plan is unsound as the Council have failed to demonstrate exceptional circumstances for Green Belt release - requiring a Masterplan and using the A56 as a new boundary are not justifiable reasons;
- Existing schools, health facilities and roads are already full and cannot accommodate more development;
- Will worsen existing flooding issues and no viable plan to ensure this does not happen again;
- Highway and traffic impacts have not been fully assessed before proposing allocation;
- The increase in the volume of traffic as a result of the proposed development in Edenfield would be a threat to highway and pedestrian safety.
- Large developments proposed will radically alter village character and the wider landscape of the area;
- Development will affect landscape and openness of the Green Belt, reducing Edenfield to just a link between Bury / Rawtenstall. Environment Agency would like the sites allocated to be cross referenced with the sites assessed in SFRA. Also, the limitations of developing next to a Main River should be made clear in the policy.
- Edenfield Community Neighbourhood Forum (ECNF) state the allocation of 456 dwellings within Edenfield will generate 'significant movement' in transport terms, yet Edenfield has minimal services, with no secondary school or doctor's surgery, and sustainable modes of transport are restrained.

**Other residents stated:**

- Land at Snig Hole should remain in the Green Belt;
- If all sites built on/adjacent to Newchurch Road are built out, traffic will become intolerable.

**Landowners stated:**

- Land to the west of the Glory pub (Loveclough) should be allocated for housing and included within the urban boundary;
- Land off Lindon Park Road, Ewood Bridge, Haslingden should be allocated for housing and removed from the Green Belt; the site has previously had permission for housing - part of this has been built and the remainder remains available; this site is more deliverable than many of those that have been allocated - and a full and proper review of suitability of these sites should be undertaken;

- Land at Elm Street, Edenfield should be included in the urban boundary and removed from the Green Belt - the site has a limited role as Green Belt, it provides an opportunity to round off the existing settlement boundary without encroaching on remaining open Green Belt, access is achievable via Elm St.;
- Huttock Top, Bacup should be allocated for housing in the Local Plan; Employment allocation EE37 (Stubbins Vale Mill) will be completely vacant in 2019, owners are interested in developing the site for housing and therefore it should be allocated for housing instead of employment;
- Land south of Grane Road and west of Holcombe Road, Helmshore (SHLAA18305) is considered suitable for housing in the SHLAA and should be included in the urban boundary or allocated for housing;
- Allocate both north and south parcels of Land at Haslam Farm, Rawtenstall for housing - there are multiple options for accessing the site; the northern part of the site was previously considered suitable for allocation but no reasons have been set out why this is no longer proposed in Reg. 19;
- Allocate land at Burnley Road, Edenfield for housing - it is a sustainable location, can achieve suitable access, will not have significant impacts and can contribute to affordable housing;
- Allocate land behind the former hospital site, off Union Road (SHLAA16318) for housing and remove from the Green Belt – it performs a limited Green Belt function and is assessed as suitable in the SHLAA; also question the decision not to extend the urban boundary around the former hospital site as the land is not performing the Green Belt function and could contribute to development land;
- Allocate land to the south of Edinburgh Road, Helmshore for housing and include in the urban boundary;
- EE12 Land at Hud Hey should be allocated as a mixed use or fully residential site instead of an employment allocation - much of the site has remained vacant despite being allocated for employment for some time, the status of the site has changed with the retail permission at Britannia Mill, it is a brownfield site, close to services and public transport and existing highway constraints make the land more suitable for residential use
- EE20 (Wavell House) should be allocated for housing instead of employment (see also employment policies summary);
- EE41 (Forest Mill) should be allocated for housing instead of employment (see also employment policies summary);
- EE42 (Waterfoot Mills) should be allocated for housing instead of employment (see also employment policies summary);
- Amend the urban boundary to include land opposite 1019 Burnley Road, Loveclough – the site is brownfield and is close to existing services;
- Object to the omission of Land south of Hollin Lane; it should be allocated for housing and included in the urban boundary; this was proposed for allocation in Reg. 18 - there have been no changes in circumstances



since then and no opportunity was given to the landowner to respond to any concerns; the site is in a sustainable location, access can be achieved, it represents a logical rounding off opportunity, existing trees and planting would provide a defensible boundary.

- Home Builders Federation: HS2 is not sound as it is not positively prepared - the number of dwellings identified on allocations falls below the housing requirement and suggests reliance on other sources such as small sites or windfalls (although this is not clearly set out); recommend that a greater number of sites are allocated to provide a buffer over and above those required as this is only a minimum and a buffer will balance out the inevitable under or non-delivery from existing commitments or allocations.
- Environment Agency objects to a number of sites (see individual allocations below) - the sites allocated should be cross referenced with the sites assessed in SFRA; the limitations of developing next to a Main River should be made clear in the policy.
- The Coal Authority points out that mine entries and mining legacy matters should be considered as part of site allocations and policies to avoid future public safety hazards; they are pleased that the Mineral Safeguarding Area is identified on the Policies Map.

**Policy HS3: Edenfield**

(see also comments to HS2; H71;H73)

Residents stated:

- HS3 is unsound (see also objections to H72) and sets out an unachievable requirement in enhancing quality and access to Green Belt as this area is outside the developer's control; numerous items mentioned in the explanatory text should be in the actual policy wording.

Landowners/developers state:

- Taylor Wimpey are committed to the comprehensive development approach set out in HS3 between the 3 landowners; they have produced a Joint Concept Masterplan and Joint Highway Impact Study with the Methodist Church and has been discussed with the council;
- Peel Holdings are progressing a separate masterplan which can be integrated with the wider development;
- Methodist Church (part owners of H72) welcome HS3 and considers it to be sound; confirm commitment to working together with other landowners and others to ensure a comprehensive approach is taken to development.
- Design Codes and additional documents can delay delivery and a design framework can be secured through a detailed masterplan rather than a separate process;
- Concur with LCC that expansion of the existing primary school is more appropriate than a new school, this could be funded through S106 monies;
- Unclear how mechanisms to enhance quality and access to Green Belt beyond the development site can be achieved through developer contributions (when NPPF is clear that local authorities should consider this) - welcome further clarity on this from the council;
- Taylor Wimpey's representation provides a rebuttal to some of the evidence base used to assess the site (details can be found in the original comments);

RCT support HS3 but consider that the community should be involved in preparing any Masterplan, not just landowners to look at how it fits in with the wider area.

**Policy HS4: Loveclough**

- A landowner states the masterplan would be onerous and would delay the delivery of the houses on the site H13. The elements mentioned in policy HS4 could be dealt with as part of the planning application process.
- RCT support HS4 and welcome the aim to keep a section of the urban boundary to the east of Burnley Road to maintain open views to the west;

	<ul style="list-style-type: none"> <li>• The Coal Authority support the inclusion of criteria g) which requires measures to deal with minerals on the site.</li> </ul>
	<p><b>HS5: Swinshaw Hall</b> (see also comments to H5)</p> <p>Residents state:</p> <ul style="list-style-type: none"> <li>• If H5 is to be allocated, suggest a number of modifications to the policy wording referring to the Design Code, hours of construction, layout considerations, school funding, playground (see original comment for detail);</li> <li>• The Coal Authority support the inclusion of criteria g) which requires measures to deal with minerals on the site.</li> </ul>
	<p><b>Policy HS6: Affordable Housing</b> Resident/ community group stated:</p> <ul style="list-style-type: none"> <li>• Housing allocations in Bacup will not be able to provide at least 10% of affordable housing as stated in NPPF, because the viability study stated it is not a viable area. Similarly, a developer stated that the policy target will not be achievable in zone 1 (Bacup, Stacksteads and Weir) and zone 2 (Whitworth and part of Rawtenstall) according to the Updated Economic Viability Study.</li> <li>• Would like a new policy stating the Council should identify and buy land for affordable and social housing to be managed by Registered Social Landlords.</li> </ul> <p>Developers stated:</p> <ul style="list-style-type: none"> <li>• Ability to deliver the full requirement might depend on other factors.</li> <li>• the policy is not compliant with NPPF and PPG and will undermine the deliverability of the plan.</li> <li>• criterion 'd' should add "where practical" as in some instance the affordable housing might be better located near public transport or in such a way to be more easily managed by registered providers.</li> <li>• support the fact that the tenure, size and type of affordable provision be based on the latest available information.</li> <li>• support the provision of on-site or off-site contribution.</li> </ul> <p>The Home Builders Federation stated:</p> <ul style="list-style-type: none"> <li>• The threshold is not appropriate and should start at 11 dwellings according to the PPG on planning Obligations.</li> </ul>

- The policy is not supported by evidence. Also, the needs for an applicant to demonstrate the need for a viability assessment might jeopardise future housing delivery.
- Suggests that changes to the affordable homes definition and their provision should be considered; HBF also proposes some changes to the policy;
- Concerned about the implementation of paragraph 'c' and whether viability has been considered. It is also unclear if all development need to make provisions for older people's homes and disabled people homes and what portion will be expected. On the contrary, a developer supports that no fix requirement has been set as it allows more flexibility.

**Policy HS7: Housing Density**

- A community group supports the policy and the changes since regulation 18. However it suggests changes to the policy.
- The HBF states the policy is not effective, justified or consistent with national policy. It claims that evidence should be made available to support the policy. HBF proposes new wording to the policy to make it more flexible. A developer also requests more flexibility to the policy by adding "where possible" in the second sentence.

**Developer/housebuilder:**

- Do not object to the policy but feel it is too prescriptive in that it applies throughout the borough not just to areas of high landscape or heritage value;
- It may conflict with HS2 which sets specific housing numbers for each site and HS6 on affordable housing which is influenced by viability which in turn is affected by e.g. density - would be more appropriate to make the policy more general and to be dealt with under a design policy.

**Policy HS8: Housing Standards**

- A community group supports the policy and mentions the Part M of the Building Regulations.
- The HBF and a developer state the housing standard should be optional and that there is not enough evidence to make them a requirement (e.g. the SHMA information on the number of households with disability cannot be directly translated into a new housing requirement and the Viability study does not provide enough details). HBF would like the policy to be deleted or if there is evidence to support the policy, the HBF and a developer require a transitional period. The policy might have an impact on the affordability of homes.
- A developer would like criterion 'b' to be deleted or further evidence to be provided.

**Policy HS9: Private Residential Garden Development**

- A community group supports the policy.

**Policy HS10: Open Space Requirements in New Housing Developments**

- A community group supports the policy, subject to a reference to Sport England’s guidance in the SPD.

Developers stated:

- Sites below 100 homes should also have the possibility to provide on-site open space and proposes some changes to the policy.
- Concerns regarding the provision of Suitable Alternative Green Spaces which is outlined in their comments under policy ENV4.

**Policy HS11: Playing Pitch Requirements in New Housing Developments**

- A community group supports the policy, subject to a reference to Sport England’s guidance on needs.
- A developer suggests that the playing pitch requirement should only be requested when there is evidence that the existing provision is insufficient to meet the needs of the development and proposed changes to the policy.

**Policy HS12: Private Outdoor Amenity Space**

- A community group and developer support the policy.

**Policy HS13: House Extensions**

- A community group supports the policy subject to the inclusion of presumption against certain roof extensions (e.g. wall to wall box dormers)

**Policy HS14: Replacement Dwellings**

- The Lancashire Wildlife Trust would like a reference to statutorily protected species and request replacement like for like of structures providing net gain for biodiversity (e.g. bat roosts, bird nesting boxes)

**Policy HS15: Rural Affordable Housing – Rural Exception Sites**

- The Lancashire Wildlife Trust states there is no reference to protecting the natural environment and providing net gain in biodiversity.

- A community group supports the policy subject to referencing the Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 and the statement that the Council would not remove such areas.

**Policy HS16: Conversion and Re-use of Rural Buildings in the Countryside**

- The Lancashire Wildlife Trust states the policy does not mention delivering a net gain in biodiversity.
- A community group supports the policy.

**Policy HS17: Rural Workers Dwellings**

- A community group supports the policy.

**Policy HS18: Gypsies, Travellers and Travelling Showpeople**

(Please also see Site Comments for Mixed-Use site M4 and Policy EMP6)

- The Lancashire Wildlife Trust mentions that there is no reference to providing net gain in biodiversity.

**Residents stated:**

- Request the removal of the transit site for Gypsies and Travellers and suggest working with other authorities to understand the needs.
- Provision of the site might not change the fact that the caravans will park on the highways.
- Cannot understand how the location of the Gypsy Traveller site was moved to Futures Park when it had not been previously discussed and Officers had no opportunity to assess this change.
- There is a contradiction between this policy which states a minimum of 4 pitches and policy HS2 which states a maximum of 4 pitches.
- They are concern over the methodology and consideration to guidance when selecting a site, including the lack of consideration of the site in the SA, Employment Land Review and SHLAA.
- That Hyndburn's latest GTAA shows excess capacity

**Policy HS19: Specialist Housing**

- A community group supports the policy subject to differentiation between retirement and extra care accommodation.
- Environment Agency objects to the allocation of H53 Waterfoot Primary School.
- A developer supports the allocation of sites for specialist housing.

**Policy HS20: Self Build and Custom Build Houses**

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|  | <ul style="list-style-type: none"><li>• A community group supports the policy.</li><li>• The Home Builders Federation considers the policy to be restrictive and requires further evidence.</li><li>• A developer supports the allocation of sites for self-build but not the provision of 10% of houses on schemes of 50 houses or more.</li></ul> |
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**Employment Policies**

**Policy EMP2: Employment Site Allocations**

Edenfield Community Forum stated:

- Employment land target of 27ha is not adequately justified;
- Employment Topic Paper not published alongside consultation;
- No breakdown of B1, B2, B8 or non-B land requirements;
- No explanation of how land equates to job numbers and no analysis of how employment land/jobs balance with Local Plan targets or the implications for transport movements.
- 20ha of land identified for employment use has not been allocated;
- Consider that there is an oversupply of employment land which could be released for housing.

Residents stated:

- Employment levels in Rossendale have declined since 1997 - plan fails to demonstrate why an additional 27 hectares of employment land is therefore needed;
- Plan does not set out how unemployment, out-commuting, vacancy levels and poor wages are to be addressed and how the plan fits in with other employment strategies;
- Pool of labour in the borough not large enough to sustain warehousing/industrial jobs, the focus on improving skill levels and the ageing population means that an increase in the land available for these types of jobs is not necessary or appropriate;
- The plan fails to outline what vacant space is currently available for B-class uses - thus it cannot demonstrate the exceptional circumstances required for Green Belt release for employment, especially as much of the land allocated was not identified for release in the GB Review;
- Need employment and facilities before allowing more housing; the statement that "there is a shortfall of employment land" in Whitworth is outrageous as such land has already been developed or been given permission for housing.
- The list is inaccurate as some site measurements are wrong and it misses sites.

Landowners stated:

- The council are seeking to balance employment and housing provision; however, in providing for future employment land the council has predominantly relied on existing employment land, much of which has been assessed as average or below for employment use;
- This undermines the plan because required take up levels are unlikely to be achieved; some of this (including EE37) will deteriorate if it remains unused;
- It would be logical and in accordance with NPPF to re-use this previously development land within existing



settlements for housing, in preference to greenfield sites on the edge of settlements.

- In relation to the plan making requirements of NPPF: the plan includes several employment sites with questionable delivery credentials and also fails to recognise additional opportunities to provide new employment land in successful, market-led locations - due to this, it may fail to meet objectively assessed need and therefore is not positively prepared;
- EMP2 fails to plan for proper growth and it does not identify all available opportunities to meet employment requirements; this is not an appropriate strategy and not releasing the site from GB is not justified;

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Highways England state:

- Several employment sites are adjacent to the SRN; previously indicated that Policy Circular 02/2013 sets out a presumption against new accesses/junctions on high-speed routes such as A56(T);
- Whilst new junctions on this road have not been considered within Interim Employment Sites Study, all accesses directly onto SRN were ruled out as not in accordance with 02/2013;
- Still awaiting updated employment study to fully understand where new access is proposed and if deliverable.

**Policy EMP3: Employment Sites and Premises**

RCT support EMP3

**Policy EMP4: Development Criteria for Employment Generating Development**

Lancs Wildlife Trust state that the policy should make specific reference to the need to consider biodiversity and any effect on wildlife, habitats, species, ecological networks, wildlife corridors in accordance with NPPF; RCT support EMP4

**Policy EMP5: Employment Development in non-allocated employment areas**

RCT support EMP5

**Policy EMP6: Futures Park**

(Please also see comments on Mixed-use site M4 and policy HS18)

Residents stated:

- The Transit site for Gypsies and Travellers should be removed;
- The views of local people were not taken into account in relation to proposed gypsies, travellers and travelling showpeople site at Futures Park
- An Ecological Impact should be carried out.

- RCT support EMP6 but note that a mixed use site here could be a competitor to other centres, this needs referencing in other policies such as R1.
- There is a covenant on the land that states the use of site should be for business
- Presence of protected species on the site
- Impact on the tourist attraction Lee Mill Quarry, local businesses and the threat to further investment on the site.
- Development of the site would be at a huge cost to the taxpayer and is not viable.
- Concerns regarding the contamination of the land, topography, land stability and loss of woodland. The mitigation of land contamination has not been addressed.
- Asked for the precise location of the transit site
- The transit site was not consulted on at regulation 18 stage at this location.
- There is a petition against the development with 2,000 signatures.

**Policy EMP7 – New Hall Hey**

(Please see also comments to Site NE4)

RCT Support EMP7; consideration should be given to quality/appearance of any new development in this "gateway" location.

<p><b>Retail Policies</b></p>	<p><b>Policy R2 - Rawtenstall Town Centre Extension</b>  RCT support the aspirations of R2 but question the provision of car parking.</p> <p><b>Policy R3 - Development and Change of Use in District and Local Centres</b>  RCT support R3</p> <p>A landowner has commented that the Regal Cinema should be demolished and the site allocated for retail use to positively reflect the aims of Policy R3.</p> <p><b>Policy R4 - Existing Local Shops</b>  RCT support R4</p> <p><b>Policy R5 - Hot Food Takeaways</b></p> <ul style="list-style-type: none"> <li>• RCT support S5 subject to the following text being included: "The development of hot food takeaways (use class A5) will be considered against the latest guidance published by the Council, currently the "Interim Statement on Hot Food Takeaways". The development of hot food takeaways will not be permitted on sites located within 250 metres of a school entrance, youth-centred facility or a park boundary".</li> </ul> <p>LCC state:</p> <ul style="list-style-type: none"> <li>• Since the Reg. 18 draft of the Local Plan, a Public Health Advisory Note on Hot Food Takeaways has been published by LCC;</li> <li>• Fast food outlets increased by 27% in Rossendale in 2012-16, with a fast food takeaway density that is significantly higher than the national average;</li> <li>• Welcome policy R5 but concerned that it is open to interpretation, in relation to opening times and defining the criteria "would not adversely contribute to obesity";</li> <li>• Wording should be amended to reflect: 400m restriction zone surrounding secondary schools (refusing all new A5 uses or a restriction on opening hours within this); Refusing new A5 uses in wards with more than 15% of year 6 pupils or 10% of reception pupils are classed as obese; Prevent the clustering of A5 uses in deprived neighbourhoods.</li> </ul> <p><b>Policy R6 - Shopfronts</b>  RCT support R6</p> <p>Historic England: policy should include reference to "character and appearance" of the conservation area in line with requirements of the 1990 Act.</p>
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<p><b>Environment Policies</b></p>	<p><b>Policy ENV3: Landscape Character and Quality</b></p> <ul style="list-style-type: none"> <li>• Developers requested that it should be recognised that harm to the environment cannot be eradicated but should be minimised and managed. They proposed a change to the policy that development proposals ‘where possible’ should conserve and enhance the natural and built environment.</li> </ul> <p><b>Policy ENV4: Biodiversity and Ecological networks</b></p> <ul style="list-style-type: none"> <li>• Natural England asks for the “net gain” to biodiversity to be made clearer in the policy ENV4. The definition of Green Infrastructure from NPPF (page 67) should also be used. A list of the priority habitats type appropriate to enhance would be welcomed, as is the SPD on Ecological Networks.</li> <li>• The Home Builders Federation requests a change to the policy as it believes options, other than Suitable Alternative Natural Green Space (SANGS), may be more effective to protect Priority Species.</li> <li>• A developer raised the issue that there is no evidence that viability was considered for the creation of SANGS in Policy ENV4.</li> <li>• Also a developer says, there is no justification as to why the threshold of 100 units has been chosen to trigger an “Appropriate Assessment”</li> </ul> <p><b>Policy ENV5: Green Infrastructure Networks</b></p> <ul style="list-style-type: none"> <li>• Lancashire Wildlife Trust states the Local Plan should identify the areas in the Ecological Networks that need strengthening. There should also be a requirement for developer to deliver net gains in nature. Also, the policy should be stronger to protect designated wildlife sites.</li> <li>• A community group supports the policy.</li> <li>• A local group would like Natural England to be consulted regarding Green Infrastructure sites bought with their funding.</li> <li>• A landowner raised the issue that if the second criteria of Policy ENV5 is met (the GI functions are not undermined), there is no need to also satisfy the first criteria (off-site provision).</li> <li>• Natural England asks for the NPPF definition of Green Infrastructure to be used.</li> <li>• A landowner raised that policy ENV5 designates previously developed land, built form and private land as GI, this should be reviewed or clarified, as it could impact on the delivery of brownfield site over greenfield sites.</li> <li>• A resident said another analysis of Rossendale’s Green Infrastructure should be undertaken using Mersey Forest techniques.</li> </ul>
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**Policy ENV6: Environmental Protection**

- The Home Builders Federation said it is too onerous to expect all new housing developments to provide electric charging points. The wording “where practical” should be added.

**Policy ENV7: Wind turbines**

- The Lancashire Wildlife Trust says the policy should specify the need to avoid/minimise impacts on recognised wildlife sites, other habitat types and notable species including protected species. The Construction Management Plan should include impacts on wildlife / habitats during construction and restoration of habitat after decommissioning.

Resident/community group stated:

- There should be no wind farm development on the Rossendale moorland due to impact on heritage assets, peat, hydrogeology and landscape
- The phrase “community led” is unclear, and a developer stated Community groups and residents stated that the Areas of Search designed on the Policies map should be deleted as they are based on out-of-date evidence from a 2014 landscape study.
- The policy is contradictory as it states that “Community led proposals for wind turbines in all part of the Borough will be supported” and then “development outside Areas Suitable for Wind Turbines would be resisted. Also, they stated the policy is contradictory in terms of what will be allowed or not based on the height of proposals. They propose new wordings for the policy.
- The map from Julie Martin’s study should be added and updated, and it should include important open view area (e.g. west of Burnley Road, Loveclough),
- Planning applications for single wind turbine should consider cumulative effects with other schemes. All applications should go through a public assessment process.
- The turbines and associated infrastructure should not be developed on blanket bog and there should be a requirement to fund decommissioning.
- There are no details regarding the regeneration of peat fields and decommissioning should be enforced.

A developer stated that:

- the policy ENV7 should not support only “community led” proposals.
- the policy is overly onerous on repowering existing turbines,
- It should not ask developers to “fully address” the impacts identified from the local community,

- the fourth bullet point should be amended,
- the reference to precautionary approach taken to mitigation of shadow and reflective flickers should be dropped, as it is a standard,
- the reference to amplitude modulation should be withdrawn, together with the fact that ‘no development is proposed on peat depth of over 40cm’. On the other side, Natural England supports the avoidance of development on areas of deep peat.

The Coal Authority supports the policy and bullet point no. 9

**Policy ENV8: Other forms of Energy generation**

- The Lancashire Wildlife Trust requests that the policy should consider biodiversity and effect on species and habitats (designated or not). There is a requirement for development to deliver net gain.

**Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality**

- The Environment Agency asks the site allocations to be linked to the SFRA recommendations in the explanation text of policy ENV9.
- A service provider mentioned that the surface water cannot be discharged into the foul network, so the policy ENV9 should be amended. It also stated the policy fails to mention the need to follow the surface water hierarchy outlined in NPPG. It recommends to split the policy into two policies: one for flood risk and one for surface water management. The surface water management policy would set out a clear process with an approach to drainage for all new developments rather than applications with certain criteria. New wording for new surface water management policy is proposed.

**Policy ENV10: Trees and Hedgerows**

A landowner stated the words “where possible” should be added to the policy ENV10 criteria (except number 3).

<p><b>Leisure and Tourism Policies</b></p>	<p><b>Policy LT2 – Community Facilities</b></p> <ul style="list-style-type: none"> <li>• Theatres Trust welcome the inclusion of cultural facilities within the policy (this is consistent with NPPF) and the protection the Plan affords to such facilities.</li> <li>• RCT support LT2 but notes that Bacup no longer has a leisure centre and East Rossendale is less well provided for despite being proposed to have most new housing.</li> <li>• Peel does not agree that all of the criteria listed at a) to e) should be required to be satisfied to permit a proposal involving loss of a community facility; only one of these criteria should be required so replace ‘and’ by ‘or’ after each criterion.</li> <li>• A resident objects to the site at Higher Cloughfold no longer forming part of the Marl Pits recreation area.</li> </ul> <p><b>Policy LT3 - Tourism</b> RCT support LT3 and note that the tourism sector has an important role to play in Rossendale's future prosperity.</p> <p><b>Policy LT4 – Overnight Visitor Accommodation</b> RCT support LT4 as the borough is lacking in overnight accommodation.</p> <p><b>Policy LT5 – Equestrian Development</b></p> <ul style="list-style-type: none"> <li>• Lancashire Wildlife Trust Ltd. state that the policy should make specific reference to the need to consider biodiversity and any effect on wildlife, habitats, species, ecological networks or wildlife corridors; in accordance with NPPF, development should deliver net gains in nature.</li> <li>• RCT support LT5 but question the encouragement to use timber in the construction of facilities as it is flammable – there are examples of stone built stables.</li> </ul> <p><b>Policy LT6 – Farm Diversification</b></p> <ul style="list-style-type: none"> <li>• Lancashire Wildlife Trust Ltd. state that the policy should make specific reference to the need to consider biodiversity and any effect on wildlife, habitats, species, ecological networks or wildlife corridors; in accordance with NPPF, development should deliver net gains in nature.</li> <li>• RCT support LT6, and suggest specific support for funding grant applications for projects that would bring benefits to the community in terms for example of improved access to the countryside outside the Urban and Green Belt Boundaries.</li> </ul>

<p><b>Transport Policies</b></p>	<p><b>Policy TR2 – Foothpath, Cycleways and Bridleways</b></p> <ul style="list-style-type: none"> <li>• A resident stated that public right of way should be maintained and not tarmacked.</li> <li>• Rossendale Civic Trust support TR2, yet comment that much of Rossendale’s PROW network is in a poor condition and, as such, there is an identified need to develop, extend, upgrade and improve access to the network.</li> <li>• The Forest of Rossendale Bridleways Association object to the poor provision for horse riders within policy TR2. The Association comment that there is a lack of acknowledgement of horse riders within Rossendale and a lack of awareness over the health benefits associated to horse riding and its boost to the local economy.</li> </ul> <p><b>Policy TR3 – Road Schemes and Development Access</b></p> <ul style="list-style-type: none"> <li>• RCT support TR3.</li> </ul> <p><b>Policy TR4 – Parking</b></p> <ul style="list-style-type: none"> <li>• RCT support TR4 but have specific objections to policies affecting Bacup and its lack of car parking provision within the town centre.</li> <li>• The Home Builders Federation (HBF) considers TR4 to be unsound as the policy unnecessarily repeats the expectation that developments incorporate charging points for electric vehicles where the Council considers it appropriate to do so. The HBF suggest that this expectation be removed from either policy TR4 or ENV6 and consider it appropriate to add an element of flexibility to this policy.</li> <li>• Taylor Wimpey state that Policy TR4 requires compliance with the parking standards set out in Appendix 1, which sets out maximum standards (with some exceptions). Unless clear and compelling justification is provided for the requirement of maximum standards Taylor Wimpey recommend that the maximum standards provided in Appendix 1 should be deleted.</li> </ul>
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**Other / General comments**

<p><b>General Comments</b></p>	<p>Residents stated:</p> <ul style="list-style-type: none"> <li>• There are air quality issues with the M66 and traffic jams at peak hours being the main sources;</li> <li>• The borough floods and freezes in winter due to surface water run-off and this is not tackled in the Local Plan;</li> <li>• Where landowners of proposed sites have indicated they are unwilling to develop their land, the council has failed to consider the use of Compulsory Purchase Orders to ensure the proper planning of the area;</li> <li>• Due to the council's previous poor record on planning and design (e.g. Asda, Rawtenstall is insensitive and ugly; new development at New Hall Hey ruins this gateway location), it is vital the Plan contains well written, tight policies on design standards (colours, materials, roofs etc.), landscape and landscaping, green infrastructure (including green roofs), links to footpaths and cycleways, ecology etc. which are able to be monitored.</li> </ul> <p>Landowner:</p> <ul style="list-style-type: none"> <li>• A landowner has suggested extending Wood Lane, one of the exits off the gyratory above M66/A56, across to the east to link up with Rochdale Road in order to reduce traffic through Edenfield.</li> </ul>
<p><b>Consultation process / Statement of Consultation</b></p>	<p>Residents stated:</p> <ul style="list-style-type: none"> <li>• Lack of consultation on H13, Loveclough - was not proposed with the extension to the site during regulation 18; There has been a failure to consult residents most affected by these last minute proposals and question the soundness and legal compliance of this;</li> <li>• Lack of consultation on M4 Futures Park</li> <li>• Overall, the council has failed to consult the people of Loveclough appropriately on the housing allocations proposed in the area. Therefore, the council has failed its duty of informing residents in a timely manner and have obstructed proper dialogue.</li> <li>• The Edenfield Community Neighbourhood Forum (ECNF) argue that The Highways Capacity Study should have been evidence for Regulation 18, yet was only made public 4 days before the end of the Regulation 19 consultation period. As a result, ECNF comment that the public were inadequately consulted and were allowed insufficient time to review the Highways Capacity Study.</li> <li>• Displays in Rawtenstall are inaccessible to those who work or cannot get there; the website is hard to negotiate so a mailshot would have been more effective;</li> <li>• The process of commenting is inaccessible for many residents, who do have computers or the skills required to find information online; this is unfair and unlawful;</li> <li>• Statement of Consultation is not legally compliant and contains incorrect and misleading statements which make it void. It also fails to specify important details about the consultation process making it defective. In</li> </ul>

the absence of a compliant Statement, the Regulation 19 consultation has passed without all the relevant documents being available and the consultation must be re-run;

- The council has failed to adequately consult with residents affected by proposed development; the inspector is asked to consider if the council has met its statutory legal duty to consult requirement and if they should be forced to begin this process again. The council have breached the following principles:
- “Consultations should be clear and concise”: Documents associated with the consultation contain jargon and acronyms which many consultees may not understand and some documents are over 50 pages long; The Council has made no effort to ensure documents are easy to follow or are understandable to those who are not familiar with the details of planning system / local plan process; no consideration has been made to those who do not speak English as a first language or those with learning difficulties.
- “Consultations should have a purpose”: The Council have failed to respond to consultation as they have retained sites in the Local Plan, despite objections being raised against these sites in previous stages in the preparation of the local plan.
- “Consultations should be informative”: Information provided is not sufficiently detailed as to enable consultees to understand proposals and make meaningful representations on them. In order to comment, the respondent has had to read several other documents, including the draft Local Plan which is too complex and specialised, as well as other evidence documents such as the Green Belt review, AMR and so on.
- “Consultations should be targeted”: At a meeting at Haslingden Library on 19/09/17, it was confirmed that the Local Plan consultation had been publicised via an article in the Rossendale Free Press, through a Facebook post and on the Council’s website. As well as having failings in themselves, these methods fall significantly short of a targeted consultation and, rather, the Council has tried to consult as few people as possible.
- The timing and location of public meetings has also been raised as an issue – in relation to the time of day that meetings were held (4-7pm was felt to exclude those who worked), meetings should have been spread out (i.e. meetings should not have been held in the same week) to ensure more opportunity to attend and the location of meetings meant that those reliant on public transport would not be able to attend.
- “Conducting a fair consultation”: Despite being a resident who would be directly affected by the local plan (i.e. a proposed site will surround their property), the respondent had no knowledge of the proposals until they were informed of them by a neighbour. The council had a duty to notify those that are affected;
- Inconsistent document titles and formatting including a lack of page and section numbers makes the Plan difficult to follow and make specific comments on;
- A resident asks, how have people who are registered blind been able to access this information?

<b>Statement of Community Involvement (SCI)</b>	<ul style="list-style-type: none"> <li>LCC's School Planning team consider that engagement with the council in relation to education provision has involved good working practice and the sharing of information has been open and transparent; However, it must be noted that increasing pressure on staff time and resources mean that councils should ensure that reasonable and practicable timescales are allowed for any future responses required from LCC.</li> </ul> <p>Resident stated:</p> <ul style="list-style-type: none"> <li>The other consultation methods quoted in the SCI (e.g. posts on twitter, leafleting, one to one meetings, letters to individuals etc.) have not been employed. When questioned why residents affected by proposals were not written to directly, attendants at the meeting were told that this was an ineffective method. However the respondent questions the evidence to support this assumption.</li> </ul>
<b>Statement of Representation</b>	<ul style="list-style-type: none"> <li>Edenfield Community Neighbourhood Forum stated the Statement of Representation is not compliant with the Local Plan Regulations as it does not mention the Green Belt release. A resident also stated the statement did not record accurate opening hours of libraries.</li> </ul>
<b>LDS</b>	<p>Residents/Community Forum stated:</p> <ul style="list-style-type: none"> <li>Local Plan, Sustainability Appraisal and supporting evidence base is unsound and is not legally compliant, because It is not in conformity with the LDS;</li> <li>The decision to consult on the draft was so unreasonable as to be unlawful as it proposes Green Belt release when there is no evidence and exceptional circumstances have not been identified to justify this (as is required in NPPF) without taking into account reasonable alternative sites;</li> <li>If amendments were made after 11/07/18 (the date of Council meeting agreeing to publication of Reg. 19 consultation) but before it was published, these were made by an officer or officers acting ultra vires (beyond their powers) and the consultation is flawed;</li> <li>Some proposed submission documents were added to the council's website after the consultation had started and evidence has been produced retrospectively – respondents have had less time to read and comment on them and they cannot be regarded as evidence on which the Local Plan was prepared;</li> <li>Other evidence documents are out of date or not fit for purpose (e.g. the Economic Viability Study prepared back in 2015/16 and the update in 2017 which only looked at affordable housing), or have not been made available at all (e.g. final Highways Capacity Study);</li> <li>Planning and Compulsory Purchase Act (2004) requires plans to be prepared in accordance with the LDS; if there is no approved LDS then the plan cannot comply with this;</li> <li>It is questioned whether 2016 LDS had actually been "approved" when it was published following the 14/12/16 Council meeting held to discuss the emerging plan as there is no minute that indicates that the LDS was even considered at this meeting;</li> </ul>

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|  | <ul style="list-style-type: none"><li>• In relation to the Local Plan, the LDS only contains a coloured timetable and a key specifying relevant regulations; however the 2004 Act is clear that an LDS should specify the documents which are to be development plan documents and the subject and area to which each document relates; the LDS fails to do this and this lack of specificity makes it impossible for the Local Plan to conform with it; this means the draft Local Plan is not legally compliant.</li></ul> |
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<p><b>Duty to cooperate</b></p>	<ul style="list-style-type: none"> <li>• A landowner stated that during the duty to co-operate RBC consulted with other authorities on the Objectively Assessed Need arising from the Strategic Housing Market Area Assessment (SHMA) rather than the standard methodology which is used to define the housing requirement in policy HS1; there is no evidence that the implications of this have been discussed with other authorities or is fully understood by RBC (see also comments on HS2 re. meeting housing land requirement);</li> </ul> <p>Residents stated:</p> <ul style="list-style-type: none"> <li>• Question whether the impact of development was discussed with Highways England;</li> <li>• Have a concern over the duty to co-operate in regards to Gypsies and Travellers as the latest GTAA for Hyndburn shows an excess in capacity.</li> <li>• Report lacks information (e.g. minutes, names and signatures).</li> <li>• Blackburn with Darwen BC: confirm that there are no outstanding duty to cooperate issues with RBC and BDBC and concur with the statement in the SCI relating to meeting housing requirements between neighbouring authorities.</li> </ul>
<p><b>Evidence Base and Topic Papers</b></p>	<p><b>Environmental Network Study</b></p> <ul style="list-style-type: none"> <li>• A resident said the techniques Mersey Forest developed to map Green Infrastructure should be used.</li> </ul> <p><b>Green Belt Topic Paper</b></p> <p>Residents / Edenfield Community Neighbourhood Forum stated:</p> <ul style="list-style-type: none"> <li>• The topic paper does not demonstrate exceptional circumstances to release the Green Belt</li> <li>• There are no exceptional circumstances because: <ul style="list-style-type: none"> <li>○ There is not a balanced approach to supply as Edenfield will have a large number of housing.</li> <li>○ Houses in Edenfield could be accommodated on land identified as existing employment.</li> <li>○ Brownfield sites could also provide a mix of housing types and tenures.</li> <li>○ Brownfield sites could also deliver fund for infrastructure.</li> <li>○ Brownfield and mixed-sites are enough to cover housing and employment needs.</li> <li>○ Improving the Green Belt land is a mitigation and is not an exceptional circumstance.</li> </ul> </li> </ul> <p><b>Green Belt Review</b></p> <ul style="list-style-type: none"> <li>• Edenfield Community Neighbourhood Forum queries the reliability of the site visits for certain parcels and the conclusion of some of the assessments. Parcels situated in proximity to Greater Manchester are according to the forum more at risk of being affected by sprawl.</li> </ul>

### **Gypsies and Travellers Accommodation Assessment**

- A resident stated that the assessed need lacks robust evidence and provided examples, including inconsistency in the methodology

### **Gypsy and Traveller Topic Paper**

Residents:

- Note that the records of unauthorised encampments include both encampments on land and highways. Also, there has been more than one occurrence of encampments on the highway at Futures Park. The provision of the site might not change the fact that the caravans will park on the highways. Also, the stays at Futures Park are shorter than at other locations.
- Request an Ecological Impact to be carried out.
- Raised the fact that the topic paper mentions “some political” support while the MP has supported a petition against the allocation.

### **Heritage Impact Assessment**

The Heritage Impact Assessment of proposed sites does not specify which heritage assets are being assessed or whether the "setting" is being considered; these are considerable shortcomings of the study which means it's not compliant with NPPF and not fit for purpose;

### **Phase 1 of the Highway Capacity Study**

- Highways England commented that “the models and associated results are not considered suitable to provide evidence on the highway impact of the Rossendale Local Plan”, more clarification is needed for traffic growth and trip information used in the models and the assessment of A56/A56/A682 is incomplete. More work should be done on the proposed mitigations. The Assessment is currently incomplete: suitable mitigation measures need to be identified and need to be reviewed once the modelling is completed; appropriate phasing also needs to be considered to ensure these measures are delivered in line with development; where changes to slip roads are required, suitable solutions have to be identified by the LPA;
- A resident mentioned the fact that the traffic statistics were taken in October 2017 just few weeks after the opening of new retail in New Hall Hey and therefore the impact of this development would not be reflected; a sample should be assessed over a longer time period

### **Strategy Topic Paper**

Residents / Edenfield Neighbourhood Community Forum stated:

- The paper does not provide exceptional circumstances to justify Green Belt release.
- The method to define the settlement hierarchy is unclear.
- The justification to allocate H72 is unfounded because:
  - the topic paper and the Local Plan fail to show the infrastructure costs identified in the Infrastructure Delivery Plan.
  - it does not show why H72 is a deliverable site.
  - the evidence on viability is out of date.
  - Edenfield does not have access to the M66
  - Edenfield is not identified as a Local Service Centre
  - The Green Belt Review is inaccurate
- The landscape statement is inaccurate

**Strategic Housing Land Availability Assessment**

Residents disagrees with:

- the assessment of the site at Higher Cloughfold (SHLAA16172)
- the assessment of two allocated sites at Weir.

**Technical Note on the Highways Capacity Study**

- Highways England note that The Technical Note produced by Mott MacDonald provides commentary on the assessment inputs, model development and results from the junction modelling, and have raised some significant concerns relating to this work.

**Viability Assessment**

Residents stated:

- Study is not up-to-date, does not reflect the recommended approach and the transparency requirements;
- The SHLAA refers to the Viability Study, stating that greenfield sites in Bacup have good prospect of viability; disagree with this but as the document has not been shared, unable to read the evidence upon which this statement is based;
- The council has proceeded with a Plan which has not had a full viability assessment and which is missing key pieces of evidence.



<b>HRA</b>	<ul style="list-style-type: none"> <li>• Natural England would like HRA to include screening stage. Likely Significant Effects should not be used in HRA but Adverse Impacts On Site Integrity. HRA is unclear whether there are impacts as it proposes mitigation.</li> <li>• A developer raised the issue that there is no justification as to why the threshold of 100 units has been chosen to trigger an “Appropriate Assessment”</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>• The Home Builders Federation considers the Monitoring Section of the Local Plan as unsound as it does not contain any targets, timescales, trigger points or remedial actions. As such, the Local Plan is ineffective in dealing with changing circumstances. With regards to housing, triggers for reviewing the Local Plan would include the lack of a five-year supply or delivery which is below anticipated housing trajectory. To ensure action will be taken when targets are met, the HBF recommends that appropriate targets are introduced and that specific monitoring triggers are used.</li> <li>• Highways England notes that no targets are proposed to monitor the Local Plan’s impact upon transport and travel. In order to measure the impact of proposed development upon the Strategic Road Network in Rossendale, it is recommended that transport and travel data is collected to measure the impact of the Plan upon transport policies within the document.</li> </ul>
<b>New Policy</b>	<ul style="list-style-type: none"> <li>• A service provider recommends to split the policy ENV9 into two policies: one for flood risk and one for surface water management. The surface water management policy would set out a clear process with an approach to drainage for all new developments rather than applications with certain criteria. New wording for new surface water management policy is proposed.</li> <li>• A community group would like a new policy stating the Council should identify and buy land for affordable and social housing to be managed by RSL</li> <li>• Asda states that Para.s 182 and 183 of NPPF set out new guidance on the "Agent of Change" principle; the Plan does not include any policy in relation to this and therefore is not in compliance with national policy; the principle relates to the integration of new development with existing development, with the onus being placed on the applicant to provide suitable mitigation for any effect that existing development might have on future development; the Local Plan should include a specific policy on this.</li> <li>• One resident states the Council has failed to demonstrate they have considered using their compulsory purchase powers to ensure the proper planning of the area. As a result, potential development sites have been omitted from the calculations of available sites which renders the Local Plan unsound.</li> <li>• A landowner has commented that a new policy should be created which deals specifically with the Regal Cinema in Bacup enabling it to be demolished and allocated for retail use.</li> </ul>

**Sustainability Appraisal (SA)**

- Edenfield Community Neighbourhood Forum stated that:
  - the SA does not explain how the alternatives were chosen, how the employment quantum was selected and what is the relation between the two,
  - None of the option tests the Local Plan housing target, or seeks to meet the 27ha, employment need or do both: 3 options test an employment figure lower than the one in the Local Plan, 2 options test housing numbers which are different from the draft Local Plan housing target,
  - there is inconsistent terminology between ‘Strategy Approaches’, ‘Spatial Strategies’ and ‘Spatial Strategy Reasonable Alternatives’,
  - the SA does not mention heritage assets specially related to H72
- A landowner stated that the spatial distribution is not properly assessed as different spatial distributions with different housing figures are assessed.
- Resident stated that:
  - the proposed mixed-use site (including a transit site for Gypsies and Travellers) M4 has not been appraised in the SA
  - the sites reference numbers in the SA are different then the sites reference numbers in the draft Local Plan which misled consultees.