

**Initial response by Rossendale Borough Council to
Pre-Hearing Note 1 from the Inspectors to the Council
Rossendale Local Plan Examination – Preliminary Questions
28 May 2019**

Thank you for sending through the Initial Questions.

Please find below the Council's response to questions 1, 2, 3, 4, 5, 8, 9, 12 (in part), 16 and 19.

Dates by which the Council intends to respond to the other questions are indicated below too.

I hope this meets with your expectations and please do not hesitate to contact me if you have any further queries.

List of Appendices

Appendix 1 - Amendments that were made to the Pre-Submission version prior to submission and the reasons for these changes (relates to Question 1)

Appendix 2 – The Duty to Cooperate Statement incorporating a Draft Statement of Common Ground, Update May 2019 (relates to Question 2)

Appendix 3 – List of Submission Documents and Dates of Consultation Undertaken (relates to Question 3)

Appendix 4 – Updated Addresses for Each Housing and Employment Allocation (relates to Question 9)

Appendix 5 – Maps of sites partly in countryside / partly in urban boundary (relates to Question 16)

General

1. The Submission Version of the Plan (SD001) appears to have a number of differences to the Pre-Submission Publication Version (SD023). Can the Council confirm the nature and purpose of these changes, and whether SD001 was published for consultation purposes?

1.1 The most significant difference between the version of the Local Plan submitted to the Inspectorate (reference SD001) and the Pre-Submission (Regulation 19) Publication Version (SD023) are changes which have been made to incorporate the errors identified in the Regulation 19 Errata document (SD024). The Errata document was published on 6th September 2018, during the Regulation 19 consultation period (which ran from 23rd August to 5th October 2018).

1.2 The document set out various errors which had been identified just after the Pre-Submission Local Plan had been published for consultation. Some of these had been brought to the Council's attention by respondents to the consultation, whilst others were identified by Council officers. None of the Errata changes were considered to change the meaning of the text previously published and did not change the content or appearance of the Local Plan. The changes were simply identified to correct clear errors (such as incorrect totals in the site allocation tables) in order to reduce any misunderstanding. As the Errata document was consulted on alongside the Local Plan, it was felt appropriate that these should be incorporated into the Submission Version to unify the Plan into a single document and to avoid any confusion.

1.3 A "tracked changes" copy of the Submission Version Local Plan has also been produced (see SD002) which shows all amendments made and makes clear where changes have been made to rectify errors identified in the Errata document.

1.4 Changes have also been made to the Glossary of the Local Plan, namely to amend the definitions of "Affordable Housing" and "Previously Developed Land" to reflect the latest NPPF and to remove some terms which are not actually referred to in the body of the text. The definitions of Affordable Housing and Previously Developed Land in the Pre-submission (Regulation 19) Local Plan were taken from the 2012 NPPF, as these were the definitions available when the Plan was first being prepared. The changes made to reflect the latest NPPF are considered to be appropriate and necessary as it is now acknowledged that the Plan is to be examined in light of the latest version of the NPPF. Furthermore, as these particular definitions are taken from national guidance (which would be used in any case, regardless of any Local Plan definition) it is not considered to represent a change to the meaning, intent or purpose of the rest of the Local Plan.

1.5 The Glossary had originally been copied over from the previous Core Strategy. It has since been identified that some of the terms within it are not actually referred to in the main document or they may be out of date. These have therefore been removed from the Glossary.

1.6 Other changes which appear through the Submission Version document are typographical, grammatical and formatting amendments to correct minor errors not previously picked up. The changes have only been made to amend clear errors such as spelling mistakes, misplaced spaces and other punctuation, capitalisation etc. which were felt to be easily rectifiable and simply improve the appearance of the text.

1.7 The Submission Version also now includes paragraph numbers to aid referencing.

1.8 The removal of some of the text from the Glossary and other formatting changes mean that there are slightly fewer pages in the Submission Version than the previous document.

1.9 SD001 was not published for consultation purposes as the Council does not consider these changes to alter the meaning, intent or purpose of the previously published text as shown in the Tracked Change version – SD002.

1.10 **Appendix 1** summarises the amendments that were made to the Pre-Submission version prior to submission and explains the reasons for these changes.

2. The Duty to Cooperate Statement (SD008) incorporates what is described as a 'Draft Statement of Common Ground.' Are there any updates to the document since submission of the Plan, or are any updates planned prior to the hearing sessions?

2.1 This document has been updated and is included as **Appendix 2**, showing it as Updated May 2019. (A tracked change version is also available to view but has not been appended to this Report).

2.2 Amendments include updates to the table showing the stages of plan-making for adjoining authorities (p7 in the document). Comments submitted by Lancashire Fire and Rescue Service, Natural England and Highways England have also been added.

2.3 For completeness all organisations referred to in this document have been contacted to confirm their agreement so a later update is expect to be submitted prior to the Hearings.

3. Can the Council provide a list of all documents that were submitted to the Examination but were not publicly available when the Pre-Submission Version Local Plan (SD023) was published under Regulation 19.

3.1 A full list is shown in **Appendix 3**, together with the dates that relevant documents were published.

3.2 Table 1 below highlights the documents that were submitted for examination but were not publicly available at the Regulation 19 consultation stage (23/08/18 – 05/10/18):

Table 1: Submission Documents not publicly available during Regulation 19 consultation

Key:

| |
|--|
| Documents that were not available at Reg. 19 because they were post-consultation related, are produced on a regular basis (e.g. Monitoring Reports) or were produced outside the Local Plan process (e.g. Economic Development Strategy) |
| Local Plan / Evidence Base documents that support the Local Plan but were not available at Reg. 19 |
| Documents that have been produced for the purposes of the Examination e.g. Soundness Self-assessment or were sent to PINS only as they are not for publication |

| Ref. No. | Document | Date Published on RBC website (when after 23/08/2018) |
|-----------------------------|---|---|
| SUBMISSION DOCUMENTS | | |
| SD001 | Rossendale Local Plan Submission Version Written Statement | 27/03/2019 |
| SD002 | Rossendale Local Plan Submission Version Written Statement – showing Tracked Changes from Pre-Submission Publication Version (with Regulation 19 Errata incorporated) | 27/03/2019 |
| SD003 | Rossendale Local Plan Policies Map Submission Version (Incorporating errata) | 27/03/2019 |
| SD005.1 | Sustainability Appraisal Addendum 2019 | 27/03/2019 |
| SD006.1 | Habitat Regulations Assessment 2019 update | 27/03/2019 |
| SD007 | Statement of Consultation 2019 | 27/03/2019 |
| SD008 | Duty to Co-operate and Draft Statement of Common Ground 2019 | 27/03/2019 |
| SD009 | NON-REDACTED Representations made under Regulation 20 to Local Plan Pre-Submission Publication Version – PDFs of individual representations | Not for Publication |
| SD010 | PUBLISHED Representations made under Regulation 20 to Draft Local Plan Pre-Submission Publication Version | (Folder title – contents in 10.1 – 10.9 below) |
| SD010.1 | Regulation 19 Consultation – List of Respondents (alphabetical order by name) | 09/11/2018 |
| SD010.2 | Regulation 19 Consultation – List of Respondents (by reference number) | 04/04/2019 |
| SD010.3 | Overview of the comments received – December 2018 update | 13/12/2018 |
| SD010.4 | Comments received - December 2018 update – sorted by policy | 13/12/2018 |
| SD010.5 | Comments Received (larger representations) Appendix 1 | 09/11/2018 |

| Ref. No. | Document | Date Published on RBC website (when after 23/08/2018) |
|--|---|--|
| SD010.6 | Comments Received (larger representations) Appendix 2 | 09/11/2018 |
| SD010.7 | Comments Received (larger representations) Appendix 3 | 09/11/2018 |
| SD010.8 | Comments Received (larger representations) Appendix 4 | 09/11/2018 |
| SD010.9 | Comments Received (larger representations) Appendix 5 | 09/11/2018 |
| SD010.10 | Comments Received Late | Not for Publication |
| SD011 | Additional Comments and Information Received to Draft Local Plan Pre-Submission Publication Version – February 2019 | 26/02/2019 |
| SD014 | Infrastructure Delivery Plan 2019 update | 27/03/2019 |
| SD017 | Local Development Scheme and Proposals Map Timetable 2018 to 2021 | 13/12/2018 |
| SD018 | Statement of Community Involvement 2019 | 01/03/2019 |
| SD021 | Soundness Self-Assessment Checklist | 01/04/2019 |
| SD022 | Legal compliance Checklist | 01/04/2019 |
| Housing | | |
| EB002 | Strategic Housing Market Assessment 2019 update | 27/03/2019 |
| EB006 | Housing Topic Paper 2019 | 27/03/2019 |
| EB008 | Brownfield Land Register 2018 | 18/12/2019 |
| EB010 | 5 Year Housing Land Supply Report 2017/18 | 20/03/2019 |
| Economy and Employment Evidence Base | | |
| EB016 | Employment Land Review Update 2019 – amended Site Proforma | 27/03/2019 |
| EB018 | Employment Topic Paper 2019 | 02/04/2019 |
| Viability | | |
| EB019 | Rossendale Local Plan Economic Viability Assessment 2019 | 27/03/2019 |
| EB033 | Flood Risk Incorporating Sequential Test Topic Paper 2019 | 02/04/2019 |
| Transport | | |
| EB038 | Rossendale Employment Site Access Study 2019 | 27/03/2019 |
| EB040 | Highway Capacity Study 2018 | 02/10/2018 |
| EB041 | CEBR Report – Rail options 2018 | 12/12/2018 |
| Monitoring | | |
| EB043 | Authority Monitoring Report 2017/18 | 20/03/2019 |
| SUPPORTING DOCUMENTS | | |
| Rossendale Borough Council's Strategies | | |
| SU008 | Economic Development Strategy For Rossendale 2018-2033 | 28/11/2018 |
| SU009 | The Prevention of Homelessness Strategy and Review 2018-21 | 28/11/2018 |
| REGIONAL | | |
| SU018 | National Heritage at Risk North West Register 2018 | |
| SU020 | Review of the Joint Lancashire Minerals and Waste Local Plan Publication Consultation Version (Regulation 19) 2018 | 28/09/2018 |
| NATIONAL | | |
| SU024 | National Planning Policy Framework (NPPF) 2019 | |

4. Can the Council direct us to Natural England's response to consultation on the Habitats Regulations Assessment (2019) (SD006.1)? If Natural England has not been formally engaged on this document, please can the Council do so and advise how long it will take for a response to be received and submitted to the examination.

4.1 Natural England replied to the Council on 22/05/2019 with the following email, confirming:

From: @naturalengland.org.uk>
Sent: 22 May 2019 15:00
To: Anne Storah
Subject: Rossendale Local Plan revised HRA

Dear Sir/Madam,

We have had the opportunity to review the Revised HRA of the Local Plan 2019 and can confirm that Natural England are satisfied with the additional information provided and with the overall conclusions. We have no additional comments to make.

Yours faithfully,

Lead Adviser – Greater Manchester & Merseyside;
Cheshire, Greater Manchester, Merseyside & Lancashire Area
Natural England
2nd floor, Arndale House, Manchester Arndale
Manchester, M4 3AQ

Landline: Mobile:

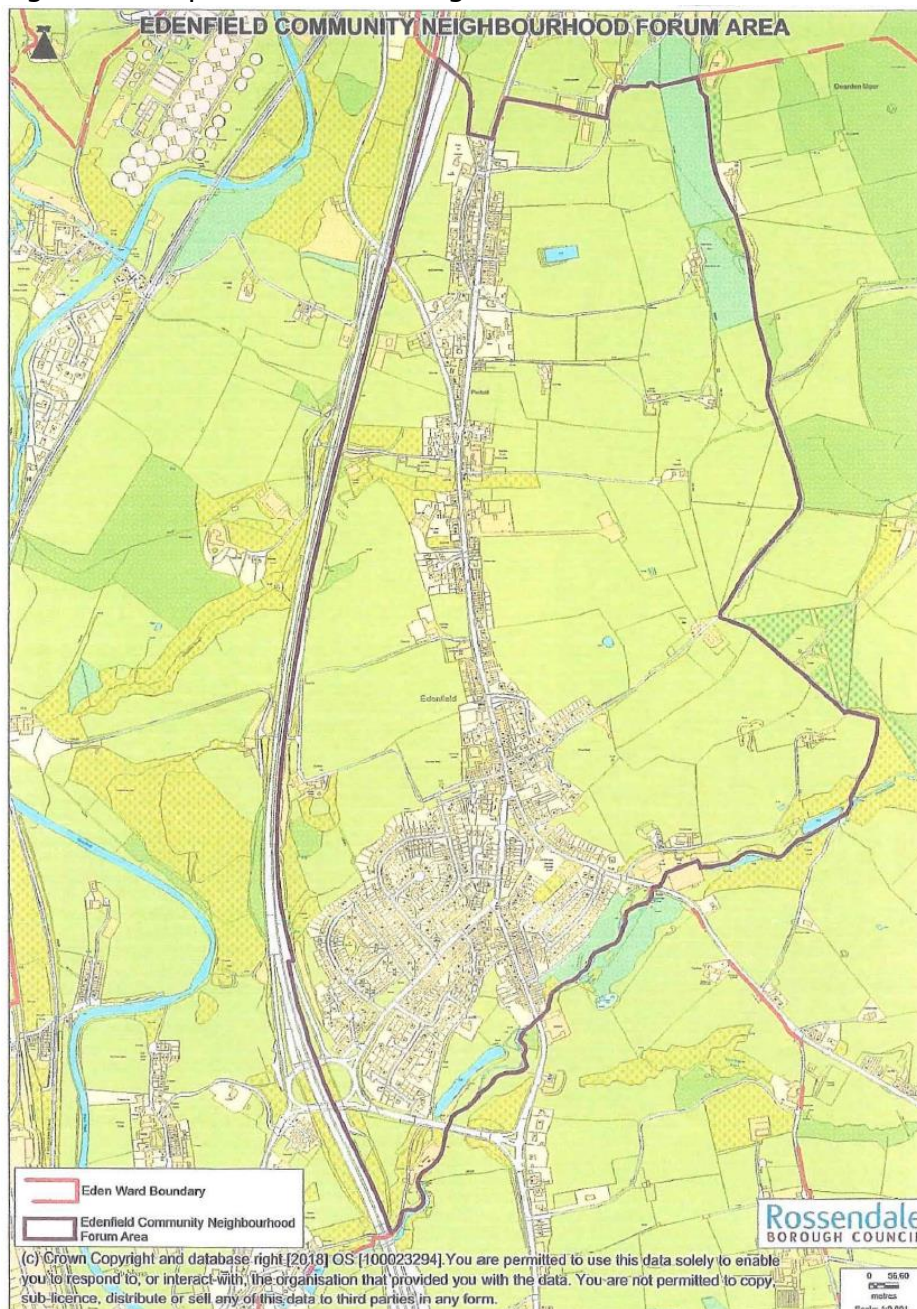
**5. What area does the Edenfield Community Neighbourhood Forum cover?
The Council is requested to include documentation relating to the area and the designation of the Forum in the examination library.**

5.1 Documentation relating to the area and designation of the Edenfield Community Neighbourhood Forum is now included in the Examination Library, references (and web links) below:

EL1.004a Edenfield Community Neighbourhood Forum Constitution February 2018 Redacted
EL1.004b Appendix A - Map of the Edenfield Community Neighbourhood Forum Area

5.2 The map below shows the extent of the area covered by this Neighbourhood Forum.

Figure 1: Map of Edenfield Neighbourhood Forum Area



6. The Council is requested to produce separate Submission Policies Maps for each settlement identified in the hierarchy and Edenfield. These should preferably be between 1:2500 and 1:5000 scale and on a more detailed map base which shows physical features such as buildings, boundaries as well as road and place names.

6.1 The Council will provide 2 paper copies of these Maps and a digital version. These will be submitted to the Inspectorate by **w/e 7 June 2019**.

7. The Submission Policies Map shows a number of changes to urban boundaries and Green Belt boundaries, in addition to the proposed allocation sites. The Council is requested to provide a document/note which outlines these individual changes and the reasons for the changes (and includes site maps detailing each change).

7.1 The Council will submit Major changes to the Urban Boundary by **w/e 14 June 2019**.

7.2 Minor changes (such as corrections of obvious cartographic errors) will be submitted by **w/e 28 June 2019**, if required.

8. The Local Plan requires some development to provide or contribute to the provision of sites of Suitable Alternative Natural Green Space (SANGs). Can the Council explain whether any specific proposals for SANGs have been identified; and if so, are there any relevant local documents that can be submitted to the examination?

8.1 No specific proposals for SANGs have been identified in the emerging Local Plan. It is expected that this will be undertaken across the South Pennines area, working with other local authorities, Natural England and Pennine Prospects, which is the Local Nature Partnership for the South Pennines.

9. Can the Council confirm the addresses of the proposed housing allocations and existing employment allocations (specifically the settlement names)? In some cases this information is missing from Tables 1 and 2 in the Plan.

9.1 An updated Table is shown in **Appendix 4**.

10. The Council's site assessment work (of rejected and allocated sites) is set out in a range of documents, and cross referencing is not straightforward due to different site numbering systems and an absence of borough-wide maps in the Sustainability Appraisal (SA) and Strategic Housing Land Availability Assessment (SHLAA). In order to aid the Examination process the Council is requested to produce:

- **A Site Assessment overview document (one for accepted and one for rejected options) which sets out for each individual site:**
 - **a summary of the technical site appraisal results – drawing on conclusions from the SHLAA, Green Belt Review, Heritage Impact Assessment document, Employment Land Review, Employment Sites Access Study and other documents where relevant**
 - **summary of site SA results**
 - **conclusion, setting out reasons for allocation/rejection**
 - **individual site map (on a clear OS map base showing physical features and road/place names)**
 - **site reference number (plus site numbers used in other evidence documents, to allow cross referencing)**

- **Linked to this, a map of the borough which shows the rejected sites (with site reference numbers).**

10.1 The Council will submit this response by **w/e 21 June 2019**.

11. The Council's Heritage Impact Assessment (HIA) document (EB034) sets out a summary of results relating to the allocated sites. The Council is requested to add the full HIAs to the examination library, in order to clarify the identified assets, likely impacts and potential mitigation measures.

11.1 The Council will submit this response by **w/e 21 June 2019**.

12. Does the Council have any further supporting information/technical work available relating to the suitability, availability and deliverability of the proposed housing, employment and mixed-use site allocations, which could be included in the examination library? For example, draft Masterplans, technical reports and other evidence?

12.1 The following tables list sites where there is known developer interest or a recent planning history.

12.2 No more detailed information has been received other than that submitted by various landowners and developers as part of the consultation undertaken on the Regulation 19 Draft of the Local Plan.

12.3 The Council is undertaking a review of the 5-Year Housing Land Supply document and when this is available, the housing allocation table can be updated accordingly.

Table 2: Update on Local Plan housing allocations

| Housing Allocation Ref. | Site name | Allocation | SHLAA Ref. | Additional Information |
|-------------------------|---|-------------------------|--|--|
| H1 | Greenbridge Mill (Hall Carr Mill) Lambert Haworth | Housing | SHLAA16176 | There has been some initial interest in this site. |
| H3 | Land at former Oakenhead Resource Centre | Housing | SHLAA18422 | Approval for 19 dwellings - Planning Ref: 2018/0132 Site is currently under construction. |
| H4 | Turton Hollow, Goodshaw | Housing | SHLAA16220 | Owned in part by RBC |
| H9 | Land off Oaklands and Lower Cribden Avenue | Housing | SHLAA16362 | Approval for 34 dwellings - Planning Ref: 2015/0334 Site is currently under construction and should be fully completed by May 2019. |
| H10 | Land at Bury Road, Rawtenstall | Housing | SHLAA16404 | Owned by RBC |
| H11 | The Hollins, Hollin Way | Housing | SHLAA16188; SHLAA16361; SHLAA16360 and part of SHLAA16363 | Approval for 175 dwellings in 1990 - Planning Ref: 1990/815 Developer delivers 4-6 dwellings a year and therefore build out should last approximately 15 years |
| H12 | Reedsholme Works, Rawtenstall | Housing | SHLAA16190 and SHLAA16191 | Outline approval for up to 107 dwellings -2016/0267 Approval of reserved matters (to 97 dwellings) - 2018/0535 |
| H13 | Loveclough Working Men's Club and land at rear and extension | Housing | SHLAA16367 and SHLAA18213 | 3 ownerships: Outline application for up to 80 dwellings currently under consideration. 2018/0554 - minded to approve. Extant approval for 10 dwellings - Planning Ref: 2011/0457 |
| H14 | Hall Carr Farm, off Yarraville Street | Housing | SHLAA16236 | Two previous outline applications in 2014 & 2015 have been refused but reasons for refusal not insurmountable |
| H19 | Land off Lower Clowes Road, New Hall Hey | Housing | SHLAA16244 | Approval for 7 dwellings - Planning Ref: 2002/0532 Lawful Development Certificate approved in 2016 to say start was made on planning application prior to expiration |
| H21 | Reed Street, Bacup | Housing | SHLAA16060 | Current outline application for 22 terraced properties under consideration - Planning Ref: 2018/0414 |
| H22 | Former Bacup Health Centre | Housing (Special needs) | SHLAA16063 | Approval for 22 dwellings - Planning Ref: 2017/0100 Site currently under construction |
| H23 | Glen Mill, 640 Newchurch Road, Stacksteads | Housing | SHLAA16112 | Outline approval for 9 dwellings - Planning Ref: 2017/0130 (outline) |
| H24 | The Former Commercial Hotel, 318A, 316B and 316C Newchurch Road | Housing | SHLAA16357 | There has been some initial interest in this site. |
| H25 | Land at Blackwood Road, Stacksteads | Housing | SHLAA16109 and part of SHLAA16107 | There has been some initial interest in this site. |

| | | | | |
|-----|---|-------------------------|---------------------------------------|--|
| H26 | Land off Greensnook Lane, Bacup | Housing | SHLAA16053 | Current planning application for 26 dwellings under consideration - Planning Ref: 2018/0202 |
| H27 | Land off Fernhill Drive, Bacup | Housing | SHLAA16083 | RBC owned site |
| H28 | Sheephouse Reservoir, Britannia | Housing | SHLAA16040 | There has been some initial interest in this site. |
| H29 | Land off Pennine Road, Bacup | Housing | SHLAA16042 and SHLAA16043 | RBC owned site - some initial interest |
| H30 | Tong Farm, Bacup | Housing | SHLAA16047 and SHLAA16045 | Current outline planning application for up to 33 dwellings under consideration - Planning Ref: 2019/0007 |
| H31 | Lower Stack Farm | Housing | SHLAA16038 | No current planning application or approval |
| H32 | Booth Road/Woodland Mount, Brandwood | Housing | SHLAA16098 | No current planning application or approval |
| H33 | Land off Rockcliffe Road and Moorlands Terrace, Bacup | Housing | SHLAA16080 and SHLAA16081 | Approval for 26 dwellings (all affordable) - Planning Ref: 2018/0043 This is for part of the housing allocation and is related to land off Rockcliffe Road section. Land off Moorlands Terrace currently has no planning application or approval on it. |
| H34 | Land at Higher Cross Row, Bacup | Housing | Part of SHLAA16065 | No current planning application or approval |
| H37 | Land off Gladstone Street, Bacup | Housing | part of SHLAA16066 | Owned in part by Lancashire County Council |
| H38 | Land off Burnley Road and Meadows Avenue, Bacup | Housing | SHLAA16359 | Outline approval for 6 dwellings - Planning Ref: 2013/0200 |
| H39 | Land off Cowtoot Lane, Bacup | Housing | SHLAA18067 | Council owned land. Allocation will not involve relocation of Bacup Football club. |
| H40 | Land off Todmorden Road, Bacup | Housing | SHLAA16051; SHLAA16052 and SHLAA18419 | Keen interest from landowner for part of this site in submitting an application. |
| H41 | Thorn Bank, Bacup | Housing | SHLAA16058 | RBC owned site |
| H42 | Land south of The Weir Public House | Housing | SHLAA16070 | There has been some initial interest in this site. |
| H44 | Irwell Springs, Weir | Housing | SHLAA16073 | Site has planning consent but stalled after building 10 units (all occupied). Agent has made contact - the new landowner wants to market the site, and are working with Environment Agency to discharge conditions, and are resolving access issues. |
| H45 | Former Haslingden Police Station, Manchester Road | Housing | SHLAA16329 | Approval for 8 dwellings - Planning Ref: 2016/0320 |
| H47 | Land at Kirkhill Avenue, Haslingden | Housing | SHLAA16319 | Initial interest in the site |
| H49 | Land adjacent 53 Grane Road | Housing | SHLAA16388 | RBC owned land |
| H50 | Land Adjacent Park Avenue/Criccieth Close | Housing | SHLAA16308 | Initial interest in the site |
| H52 | Land to the rear of Haslingden Cricket Club | Housing | SHLAA16284 | Initial interest in the site |
| H53 | Waterfoot Primary School | Housing (Special needs) | SHLAA16128 | Approval for 20 dwellings (supported living accommodation) - Planning Ref: 2016/0599 Although the approved inspectors had no record of completion, all 20 units appear to be occupied. |
| H54 | Land at Ashworth Road, Water | Housing | SHLAA16390 | Approval for 6 dwellings - Planning Ref: 2016/0440 As of June 2018, no works had started on site |
| H57 | Foxhill Drive | Housing | SHLAA16147 | RBC owned land |
| H59 | Land Adjacent Dark Lane Football Ground | Housing | SHLAA16159 | Outline application submitted and approval granted for up to 100 dwellings, subject to conditions and s106 agreement - Planning Ref: 2016/0563 |
| H60 | Johnny Barn Farm and land to the east, Cloughfold | Housing | SHLAA16171 and part of SHLAA16393 | Outline approval for up to 30 dwellings, with all matters reserved - Planning Ref: 2015/0517 |
| H61 | Hareholme, Staghills | Housing (Self Build) | Part of SHLAA16161 | RBC owned site |
| H65 | Albert Mill, Whitworth | Housing | SHLAA16006 | Outline approval for up to 49 residential dwellings - Planning Ref: 2012/0588 (granted in 2018) Current application under consideration for 85 residential units in total (37 dwellings and 48 self-contained apartments) - Planning Ref: 2018/0498 Due for March planning committee but application likely to be delayed due to outstanding reports |
| H66 | Land North Of King Street | Housing | SHLAA16019 | No current planning application or approval |

| | | | | |
|-----|---|-------------------------|--|---|
| H67 | Land Behind Buxton Street | Housing (Special needs) | SHLAA16021 | Approval for 28 bed specialist care home - Planning Ref: 2014/0522 Nearly complete |
| H68 | Former Spring Mill (land off eastgate and westgate) | Housing | SHLAA16005 | Current planning application for 119 dwellings under consideration - Planning Ref: 2018/0318 Due for February planning committee, minded to approve |
| H69 | Cowm water treatment works, Whitworth | Housing | SHLAA16016 | Initial interest in the site |
| H70 | Irwell Vale Mill | Housing | SHLAA16278 | No current planning application or approval |
| H71 | Land East of Market Street, Edenfield | Housing | SHLAA16259 | Initial interest in the site |
| H72 | Land west of Market Street, Edenfield | Housing | SHLAA16358; SHLAA16256; SHLAA16262 and SHLAA16263 | Part of the site is owned by Taylor Wimpey who note that expect to submit an application on adoption of the Local Plan (scheduled for early 2020). Technical work has been instructed with surveys taking place over this summer. So the only information available currently is that submitted with our latest reps in October 2018 (attached again for completeness), however the initial findings from the technical works, and potentially some complete reports will be available by the time of EiP, scheduled for September/ October 2019. |
| H73 | Edenwood Mill, Edenfield | Housing | SHLAA16271 and SHLAA16270 | Initial interest in the site |
| H74 | Grane Village, Helmshore | Housing | SHLAA16304 and SHLAA16402 | The owner of the larger part of the proposed allocation (Taylor Wimpey) is about to start a pre-app consultation with residents for 150 units. |
| M1 | Waterside Mill, Bacup | Mixed-use | SHLAA16069 | No current planning application or approval |
| M2 | Spinning Point, Rawtenstall | Mixed-use | SHLAA16238 | 28 apartments approved as part of a wider mixed use scheme on Phase 2 of Spinning Point; Planning ref. 2017/0617 – see employment allocations update below |
| M4 | Futures Park | Mixed Use | | Approval on part of the overall site for “Erection of industrial / manufacturing building (Use Class B2) incorporating ancillary office and storage space”; Planning ref. 2019/0102 |

12.4 The following table provides an update on any employment allocations where new floorspace is proposed to be created:

Table 3: Update on Local Plan employment allocations

| Employment Allocation Ref. | Site name | |
|----------------------------|-----------------------------|--|
| M2 | Spinning Point, Rawtenstall | Work underway on Phase 1 (2015/0476: redevelopment of the site for a bus station and retail/cafe units (Use Classes A1, A2, A3, A4, A5 or B1), including associated facilities, car parking and landscaping, demolition of former police station, town hall annex, public toilets and part demolition and works to the Old Town Hall; Approval for Phase 2 (2017/0617: redevelopment of the former Valley Centre site for a mixed use development comprising leisure, hotel, housing and commercial uses (including Use Classes A1, A2, A3, A4, B1, C1, C3 and D2 of the Town and Country Planning (Use Classes) (Amendment) (England) Order 2015) including the creation of an area of public open space with associated landscape and highway works |
| M4 | Futures Park, Bacup | 2019/0102: Approval on part of the overall site for “Erection of industrial / manufacturing building (Use Class B2) incorporating ancillary office and storage space” |
| EE24 | New Hall Hey | 2018/0437: Approval for construction of Construction of 3 No. industrial buildings (1 no. B2 Use Class, and 2 no. B2 / B8 Use Class) with offices, service yard car parking and associated works. |

Housing and employment provision

13. The Council is requested to provide a Housing Supply Topic Paper which identifies likely housing provision over the Plan period, updates the Council's five year land supply position, and draws together all the supply evidence in one place. This will aid the Examination process. The Paper should include:

- **A summary table which sets out estimated housing provision over the Plan period, broken down by sources of supply (e.g. existing planning permissions, other commitments, windfalls, allocations and other sources).**
- **An overview of sources and assumptions/method applied to derive site capacity, delivery rates and timings (including, for example, justification for any lapse rates or other adjustments, a breakdown/analysis of past windfall rates, and general phasing and density assumptions).**
- **Linked to the summary table, a housing trajectory (which takes account of all sources of supply and builds on that in Appendix 4 of the Plan)**
- **Background tables of existing commitments and allocations, which set out gross and net site areas, net density, number of units, estimated phasing/delivery rates by year, and brief commentary/overview on delivery progress and planning applications (building on the allocation tables in Appendix 4 of the Plan). Where relevant this should include evidence relating to whether a site is deliverable (having regard to the definition in the NPPF).**
- **Updated five year housing land supply calculations (taking account of all relevant sources of supply, and updating document EB010).**

13.1 The Council will submit a response by **w/e 5 July 2019**.

14. In relation to employment land, the Council is requested to confirm:

- **The Plan period for employment provision (2019-2034 or 2014-2034?)**
- **The employment land requirement and estimated employment land supply relating to this period (broken down by source of requirement/supply)**
- **Whether the requirement and supply figures are gross hectares, or net; and**
- **The type/mix of different B use classes (B1, B2, B8) that the Plan seeks to provide.**

14.1 The Council will submit a response by **w/e 21 June 2019**.

15. The Council is requested to produce a series of tables which set out how housing and employment growth over the Plan period would be spatially distributed by Development Hierarchy categories (e.g. Key Service Centres etc) and by settlement. The tables should incorporate a detailed breakdown of the various supply sources (e.g. extant permissions, allocations, windfall). Allocations should be sub-divided further to delineate between sites within existing urban boundaries, Green Belt releases, and other allocations outside existing urban boundaries.

15.1 The Council will submit a response by **w/e 5 July 2019**.

16. Can the Council confirm which proposed allocation sites are currently located in the countryside (but not in the Green Belt)?

16.1 The proposed allocation sites currently located in the countryside (but not in the Green Belt) are:

Housing

- H5 – Swinshaw Hall, Loveclough
- H6 – Land south of 1293 Burnley Road, Loveclough
- H13 – Loveclough Working Mens Club and land at rear and extension
- H17 – Land south of Goodshaw Fold Road
- H18 – Carr Barn and Carr Farm
- H25 – Land at Blackwood Road, Stacksteads
- H28 – Sheepphouse Reservoir, Britannia
- H30 – Tong Farm, Bacup
- H31 – Lower Stack Farm
- H39 – Land off Cowtoot Lane, Bacup
- H40 – Land off Todmorden Road, Bacup
- H42 – Land south of The Weir Public House
- H43 – Land west of Burnley Road, Weir
- H47 – Land at Kirkhill Avenue, Haslingden
- H60 – Johnny Barn Farm and land to the east, Cloughfold
- H63 – Hollin Farm, Waterfoot
- H64 – Hargreaves Fold Lane, Chapel Bridge, Lumb

New Employment

- NE3 – Carrs Industrial Estate North Extension, Haslingden

Existing Employment

- EE9 – Springvale Works, Shawclough Road
- EE35 – Broad Clough
- EE51 – Kippax Mill

16.2 A number of proposed allocation sites are located partly within the Urban Boundary and partly within the countryside (but not in the Green Belt):

- H11 - The Hollins, Hollin Way (Rawtenstall). Approximately two thirds of the proposed allocation H11 is situated within the existing Urban Boundary with the remainder located in the countryside (see Figure 1 in Appendix 5).
- H14 – Hall Carr Farm off Yarraville Street (see Figure 2 in Appendix 5)
- H16 – Land east of Acrefield Drive (see Figure 3 in Appendix 5)
- H74 – Grane Village, Helmshore. A small part of the site is within the existing Urban Boundary (see Figure 4 in Appendix 5).
- M4 – Futures Park, Bacup (see Figure 5 in Appendix 5).

Infrastructure

17. The Infrastructure Delivery Plan (March 2019 Update) (SD0014) identifies a number of medium and high priority projects where either the delivery mechanism or costs are unknown and many items of infrastructure are subject to gaps in funding. Is the Council is able to provide an updated position for any of the infrastructure projects identified?

17.1 The Council will provide a response by **w/e 5 July 2019**.

18. The Council is requested to prepare a Gantt chart showing the delivery of overall growth over the Plan period (including commitments, windfall etc). It should also show each housing, employment and mixed-use allocation and the infrastructure necessary to bring forward each site, so we are able to see when items of infrastructure are required to unlock specific development. Each item of infrastructure should use the same references as detailed in Table 22 of SD014.

18.1 The Council will provide a response by **w/e 5 July 2019**.

Potential timescales for the hearings

19. At this stage we anticipate it may be possible to hold the hearing sessions in Autumn 2019. We can confirm that we are available the week commencing 22nd September 2019, for a period of 2-3 weeks. It would be appreciated if you could let us have your feedback on these potential timings and the availability of venues.

19.1 The Council is able to confirm that these dates are suitable and the Council Chamber at the Business Centre at Futures Park in Bacup OL13 0BB will be available.

19.2 Some days will require an earlier than normal finish in order to prepare the Council Chamber for evening meetings as shown below, which I hope will not inconvenience the Inspectors:

| Date | Finish Time |
|---------------|--------------------|
| Mon 23rd Sept | 4.30 finish |
| Wed 25th Sept | 3pm finish |
| Tues 1st Oct | 4.30 finish |
| Mon 7th Oct | 4.30 finish |
| Wed 9th Oct | 4pm finish |

Please see separate documents for Appendices