

/1 INTRODUCTION

- 1.1. PWA Planning have been instructed by E3P on behalf of James Industrial Land (the landowner) to make formal representations on Rossendale's Local Plan (2019 to 2034) in relation to the Inspector's Matters, Issues and Questions.
- 1.2. Formal representations were made by Cass Associates on behalf of the landowner in December 2018 on Rossendale's Local Plan (2019 to 2034).
- 1.3. These representations respond to the Inspector's Matters, Issues and Questions to Rossendale's Local Plan (2019 to 2034) in relation to the soundness of the Plan and should be read in conjunction with those previous representations.

/2 MATTER 8: APPROACH TO SITE ALLOCATIONS AND GREEN BELT RELEASE

Issue – Is the Plan's approach to identifying site allocations (housing, employment and mixed use) and Green Belt releases soundly based and in line with national policy? Do the allocation policies provide a clear and effective framework for growth?

e) Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk on potential development sites? Is this adequately evidenced? Are there any outstanding concerns from the Environment Agency?

- 2.1 Site allocation H70, Irwell Vale Mill, was, until recent modelling by the Environment Agency, located within Flood Zones 1, 2 and 3a. The site now currently largely lies in Zone 3a. The site has been assessed in the Council's Strategic Flood Risk Assessment (SFRA) level 2 and the recommendation was to continue with the Exception test. It recommended that the northern part of the site may be

deliverable, and the southern part is at medium risk of surface water flooding. It is accepted that the Council has adequately carried out the Sequential test. The SFRA then carried out the Exceptions test for the site and concludes that development of the site can have minor positive effects on housing and employment location and scores well for employment skills. It is accepted that the Council has adequately carried out the Exceptions test.