

Rossendale Local Plan Examination

MATTERS, ISSUES AND QUESTIONS (MIQs)



Matter 2 – Vision and spatial strategy

Issue – Does the Plan set out a clear vision, strategic objectives and spatial strategy which present a positive framework that is consistent with national policy and will contribute to the achievement of sustainable development?

**[Policy SS
Policy SD1
Policy SD2]**

a) Does the Plan clearly articulate a vision and strategic priorities for the development use of land in Rossendale, in line with legislation and national policy?

2.1 The Introduction to the Spatial Strategy articulates the Vision in paragraph 1 saying ***“the Local Plan seeks to promote sustainable housing and employment growth while protecting and enhancing the special valley and moorland setting of the Borough.***

2.2 The Vision is set out on pages 5 to 10 of the Plan. In essence it seeks to meet all of Rossendale’s development needs over the next 15 years, taking account of Rossendale’s character and its location in the South Pennines. This vision is translated into a spatial strategy, which is set out on pp 11-12 and provides a sustainable development hierarchy, which is supported by a comprehensive suite of policies for the landscape, Green Belt, economy, town centres etc. This fully accords with relevant legislation and national policy.

2.3 The Strategic Policy (SS) sets out how and where growth will be delivered, establishing a **Development Hierarchy** which features a number of Key Service Centres (Rawtenstall, Bacup and Haslingden and Whitworth) and several Major Sites, which are strategic to the Borough’s development: Edenfield (for housing) and the mixed use allocation at Futures Park, as well as New Hall Hey and Carrs Industrial Estate for new employment growth. Other smaller localities have been defined as Urban Local Service Centres and Rural Local Service Centres.

2.4 The Spatial Strategy sets out how development will be achieved, for example maximising brownfield land and seeking higher densities where appropriate near town centres and, where needed, developing at the edge of

existing settlements, which includes the release of Green Belt land. Transport is identified as a key priority, and so too is the need to protect and retain Green Infrastructure and the Built Heritage.

2.5 The Plan contains a number of strategic policies to set out how and where development will be delivered.

2.6 The Council published a Strategy Topic Paper in August 2018 ([EB001](#)) to discuss the overall Strategy in more depth and this accompanied the consultation on the Regulation 19 Draft of the Local Plan. The overall thrust of the Plan is to facilitate housing and economic growth in sustainable locations while maintaining the attractiveness of the area as a place to live, work and visit.

b) What is the basis for the overall spatial strategy, as set out in Policy SS, which seeks to focus growth and investment in Key Service 2.4 Centres, on major sites and on well located brownfield sites? Is the strategy and distribution justified and sustainable? What other strategies were considered, and why were they discounted?

What is the basis for the overall spatial strategy, as set out in Policy SS, which seeks to focus growth and investment in Key Service Centres, on major sites and on well located brownfield sites?

2.7 The overall spatial strategy seeks to focus growth and investment in the Key Service Centres, on major sites and on well located brownfield sites. Development opportunities in Rossendale are constrained by a number of environmental and market issues. For example, typical of its South Pennine location, the Borough contains steep sided valleys, often topographically challenging for development, or at risk of flooding or exacerbating flooding elsewhere, or with potential impacts on the natural environment, given the moorland that is a feature of the Borough and its proximity to the Special Protection Area of the South Pennines and the extent of the West Pennine Moors SSSI (Site of Special Scientific Interest), and the amount of land designated as Green Belt (almost 25%). Infrastructure can also be challenging, particularly in relation to highway capacity, but also facilities such as education and GP services. Providing opportunities for development that are well located to existing services, and that can be accessed easily and sustainably, has been key to developing the overall strategy.

2.8 Co-operation has taken place with neighbouring authorities and, as a result, agreement was reached that Rossendale will meet its own development needs within the Borough boundary. No adjoining authorities can accommodate any of Rossendale's needs and given this Borough's constraints neither can Rossendale meet the development requirements, even in part, of any other authorities.

2.9 As a result, the Spatial Strategy that was developed has tried to maximise development opportunities, on sites that can be considered deliverable, whilst minimising adverse impacts to the natural environment. It has also taken account of flood risk, which is a key concern, and the need to avoid additional pressure on infrastructure, whilst trying to reduce the amount of greenfield land needed by identifying brownfield sites and increasing densities where appropriate in suitable locations.

Is the strategy and distribution justified and sustainable?

2.10 The Strategic Policy SS – the Spatial Strategy – identifies a development hierarchy where growth and investment will be appropriate to the size of the settlement as well as a number of specific Major Sites outside of the Key Service Centres.

2.11 The identification of development locations has been constrained by: natural factors such as topography and/or the risk of flooding, or exacerbating flood risk elsewhere; by economic factors such as viability and market-demand; environmental factors, such as proximity to the South Pennine Moors Special Protection Area (SPA); infrastructure deficiencies; as well as by the availability of willing landowners and the presence of Green Belt.

2.12 A relevant and proportionate evidence base has been prepared which underpins the overall strategy and the distribution for development. The Sustainability Appraisal ([SD005](#) and [SD005.1](#)) demonstrates that the strategy and distribution are sustainable.

What other strategies were considered, and why were they discounted?

2.13 The Council identified four different Strategic Options to deliver sustainable development within Rossendale, and Option D, looking at a Combined Option of the other three, was chosen. These are summarised below and then discussed further in the subsequent sections:

Option	Option A	Option B	Option C	Option D
Description	Focus on Key Centres (Rawtenstall, Bacup, Haslingden and Whitworth)and immediate environs	Minimum intervention- Maximise Growth Opportunities and Market Viability	Focus Development within existing Urban Areas, on Brownfield Land And at higher densities	Combined Option

Option A – Focus on Key Centres (Rawtenstall, Bacup, Haslingden and Whitworth and environs)

2.14 This would bring forward some brownfield land for housing land but the main focus would be on greenfield land adjacent to the Urban Boundary and pursuing this option would result in more Green Belt release in Whitworth than identified in the submission Local Plan, and also to the south of Rawtenstall though not Edenfield, as it is not an identified Key Centre. There would be limited development in the smaller centres, proportionate to their size. Employment would be focused on sites in Haslingden, Rawtenstall and also at Bacup.

2.15 However, Rawtenstall does not offer much land availability, and there is also a limited number of sites in Haslingden identified in the SHLAA. By focusing on the Key Service Centres alone there are likely to be infrastructure issues, particularly with regard to highway capacity and school places. Building on urban fringe sites may result in additional landscape impacts. Releasing sites in Whitworth and Bacup may impact on species present in the Special Protection Area of the South Pennines, as this land may fall within the buffer of the SPA.

Option B – Minimum Intervention / Maximise Growth Opportunities and Market Viability

2.16 This Option would deliver development based on land availability rather than according to any policy or infrastructure constraints, looking to maximise the potential development on sites owned by willing landowners and developers and could result in identifying more land than needed. There would be a focus on developing Greenfield land (with little previously developed land coming forward apart from existing mill sites) and more Green Belt release would ensue, including Whitworth. This option would identify the greatest development in Edenfield and at Loveclough/Goodshaw. Employment land availability would be affected with some of the older existing employment sites released to housing,

albeit that there would still be uncertainty about their deliverability and attractiveness to the housing market.

2.17 This option was discounted because of its impact on Rossendale's environment in particular, including the Special Protection Area of the South Pennines (located to the east of the Borough) and the SSSI status of the West Pennine Moors, located in the west. It would also result in the greatest loss of Green Belt land, which could not be justified. Furthermore, there were concerns about the capacity of existing and planned infrastructure to accommodate this option.

Option C - Focus Development within existing Urban Areas, on Brownfield Land and at higher densities

2.18 This would minimise urban sprawl and the loss of countryside and Green Belt land. It would also encourage the redevelopment of former/existing mill sites and other land not in use for development (e.g. informal open space).

2.19 Pursuing this option would result in the least development as opportunities are limited within the existing Urban Areas and developing here could have impacts for green infrastructure and recreation too. Developing here is better related to existing services though there could be concerns over capacity issues.

2.20 There would be a lack of new employment sites, particularly in areas attractive to the market, and so a lack of supply of employment land could result. Pressure would be placed on existing employment sites to change to residential, although these sites would not necessarily come forward to the market given viability issues.

2.21 Increasing the brownfield target would be challenging, even as a result of increasing density, given the lack of sites.

Option D – Combined Option

2.22 This would look to provide for a mix of spread development across the Borough, making optimal use of brownfield land and encouraging higher density development in town centre locations. Greenfield land though will be required, with priority given to sustainable locations, such as the edge of the urban area. This option recognises constraints to development (e.g. flood risk, highway capacity etc.) and looks to identifying sustainable sites with limited impacts and greatest deliverability. Given that the option will not bring forward sufficient development it will be necessary to look to Green Belt release in suitable locations that will not harm the openness in order to deliver the development requirements. Appendix 1 provides more detailed information.

- c) Are the settlement groupings in the Development Hierarchy soundly based and supported by robust evidence? In particular:**
- i. Should Rawtenstall be identified in a different category to the other Key Service Centres?**
 - ii. What category does Edenfield fall under?**
 - iii. Does the hierarchy capture all other relevant settlements in Rossendale?**
 - iv. How do the settlement groupings fit with the Retail Hierarchy in Policy R1?**

2.23 The settlement groupings were established based on three criteria: retail hierarchy, access to services and public transport. The Appendix of the Strategy Topic paper (submitted document [EB001](#)) illustrates the draft settlement hierarchy criteria which were used to produce the Development Hierarchy.

Should Rawtenstall be identified in a different category to the other Key Service Centres?

2.24 The emerging Local Plan does not differentiate between Rawtenstall and the other Key Service Centres. Although it is the Borough's principal town centre, it is not expected to provide the greatest additional new development, and development is to be spread across all the Key Service Centres throughout the Borough. The Table below (taken from Qn. 15 of the Inspector's Preliminary Questions [EL1.002k](#)) summarises the development proposed in the Development Hierarchy.

Table 1: Summary of Housing and Employment Growth Locations

Development hierarchy	Settlement	No of dwellings	No of dwelling	No of dwelling	Total no. of dwelling	Net developable area (Employment growth)
		Years 1-5	Years 6-10	Years 11-15		
Key Service Centres	Bacup	395	286	0	681	1.2 ¹
	Haslingden	144	6	0	150	9.25 ²
	Rawtenstall	302	78	43	423	6.82 ³
	Whitworth	137	51	0	188	0.01
<i>SUBTOTAL</i>		<i>[978]</i>	<i>[421]</i>	<i>[43]</i>	<i>[1442]</i>	<i>[17.28]</i>
Edenfield⁴	Edenfield	119	197	150	466	0
Urban Local Service Centres	Britannia	10	63	0	73	0
	Broadley/Tonacliffe	7	0	0	7	0
	Facit	7	5	0	12	0.28
	Helmshore	133	54	0	187	1.2
	Stacksteads	79	36	0	115	0.02
	Stubbins	0	0	0	11	0
	Waterfoot	172	81	0	253	0.28
<i>SUBTOTAL</i>		<i>[419]</i>	<i>[239]</i>	<i>[0]</i>	<i>[658]</i>	<i>[1.78]</i>
Rural Local Service Centres	Loveclough/Goodsshaw	158	37	0	195	0
	Water	0	39	0	39	0.51
	Weir	55	62	0	117	0
	Whitewell Bottom	7	0	0	7	0.01
<i>SUBTOTAL</i>		<i>[220]</i>	<i>[138]</i>	<i>[0]</i>	<i>[358]</i>	<i>[0.52]</i>
Smaller Villages	Cowpe	4	11	0	15	0
	Irwell Vale	45	0	0	45	0
	Ewood Bridge	0	0	0	0	2.81
<i>SUBTOTAL</i>		<i>[49]</i>	<i>[11]</i>	<i>[0]</i>	<i>[60]</i>	<i>[2.81]</i>
Other urban boundary	Shawforth (nearest identified settlement is Facit)	4	0	0	4	0

¹ Includes land at Futures Park which is also identified as a Major Site in the Development Hierarchy

² Includes land at Carrs Industrial Site which is also identified as a Major Site in the Development Hierarchy

³ Includes land at New Hall Hey which is also identified as a Major Site in the Development Hierarchy

⁴ Edenfield is identified under the Major Sites category in the Development Hierarchy; for the purposes of this exercise, any growth identified in the settlement including proposed allocations and other committed sites have been included

Develop ment hierarchy	Settlement	No of dwelli ngs	No of dwelli ng	No of dwelli ng	Total no. of dwelli ng	Net developa ble area (Employ ment growth)
		Years 1-5	Years 6-10	Years 11-15		
Outside Develop ment Hierarchy		58	0	0	58	5.76
TOTAL		1847	1006	193	3046	28.15

2.25 Similarly the Table produced in response to Qn. 17 of the Inspectors Preliminary Questions [EL1.0021\(i\)](#), which includes development in Local Centres, as well the Key Service Centres, also shows that development is spread across the Borough. Infrastructure (particularly social infrastructure such as public transport, schools and health facilities) is also available throughout Rossendale. This is a result of the Borough's topography which resulted in development very much tied to the valley bottoms. Hence, given the linear nature of Rossendale's historic development, with all the towns inter-linked, it has been proposed to take advantage of development opportunities, where they are sustainably located and relatively free from constraints, such as flood risk or steep slopes.

ii) What category does Edenfield fall under?

2.26 Based on the criteria used to define the settlement hierarchy, Edenfield is a Local Centre, having relatively good public transport links, and is located along the route of an express bus, linking Manchester City Centre with Rawtenstall, Burnley, and on to Skipton in North Yorkshire. It also possesses a primary school and a community centre. However, the Local Plan proposes a large number of residential units for allocation and it is expected that these will come forward quickly should the site be allocated in the adopted Local Plan, given the level of developer interest. Therefore, in order to reflect the amount of growth proposed in the Local Centre, Edenfield has been assigned to a specific category entitled 'major sites'.

iii) Does the hierarchy capture all other relevant settlements in Rossendale?

2.27 All relevant settlements have been defined. The case could be made to add Rising Bridge to the list, as it is referenced in paragraph 23 of the emerging Local Plan as a Rural Local Service Centre, and possesses a primary school and employment opportunities (the Former Baxenden Chemical Works, and the Rising Bridge Enterprise Park), is located on a Quality Bus Corridor (running from Accrington to Rochdale), and has a limited retail and food offer.

iv) How do the settlement groupings fit with the Retail Hierarchy in Policy R1?

2.28 The table below shows how the settlement groupings fit with the Retail Hierarchy in Policy R1.

Development Hierarchy	Name of Settlement	Retail hierarchy
Key Service Centres	Bacup	Bacup District Centre
	Haslingden	Haslingden District Centre
	Rawtenstall	Rawtenstall Town Centre
	Whitworth	Whitworth Local Centre
Edenfield	Edenfield	Edenfield Neighbourhood Parade
Urban Local Service Centres	Britannia	Not identified in the Retail hierarchy
	Broadley/Tonacliffe	Not identified in the Retail hierarchy
	Facit	Facit Neighbourhood Parade
	Helmshore	Helmshore Neighbourhood Parade
	Crawshawbooth	Crawshawbooth Local Centre
	Stacksteads	Stacksteads Neighbourhood Parade
	Stubbins	Not identified in the Retail hierarchy
Waterfoot	Waterfoot Local Centre	
Rural Local Service Centres	Loveclough/Goodshaw	Not identified in the Retail hierarchy
	Water	Not identified in the Retail hierarchy
	Weir	Not identified in the Retail hierarchy
	Whitewell Bottom	Not identified in the Retail hierarchy
Smaller Villages	Cowpe	Not identified in the Retail hierarchy
	Irwell Vale	Not identified in the Retail hierarchy
	Ewood Bridge	Not identified in the Retail hierarchy
Other urban boundary	Shawforth (nearest identified settlement is Facit)	Not identified in the Retail hierarchy

d) Is the predicted distribution of growth⁵ in line with the spatial strategy? To what extent is development focused on Key Service Centres rather than Major Sites? Does it represent an appropriate balance between locational sustainability, and other strategic factors and priorities?

2.29 The table below illustrates the distribution of growth in relation to the Development Hierarchy. This shows that growth has been allocated in descending order according to the Development Hierarchy with most growth identified in the Key Service Centres and least in the Smaller Villages. Clearly major sites do have a role to play in accommodating Rossendale's future development for housing at Edenfield (466 dwellings identified), but growth has mainly been identified within the Key Service Centres (1,442 dwellings).

⁵ As set out in the Council's response to the inspector's Pre-Hearing Note (Question 15).

Development hierarchy	Settlement	Dwellings Years 1-5	Total no. dwelling	Net developable area (Employment growth)
Key Service Centres	Bacup	395	681	1.2 ⁶
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	Ewood Bridge	0	0	2.81
<i>SUBTOTAL</i>		<i>[49]</i>	<i>[60]</i>	<i>[2.81]</i>
Other urban boundary	Shawforth (nearest identified settlement is Facit)	4	4	0
Outside Development Hierarchy		58	58	5.76
TOTAL		1847	3046	28.15

2.30 Haslingden in particular and Rawtenstall too, have been identified for employment growth as a result of their access to the Strategic Road Network,

⁶ Includes land at Futures Park which is also identified as a Major Site in the Development Hierarchy

⁷ Includes land at Carrs Industrial Site which is also identified as a Major Site in the Development Hierarchy

⁸ Includes land at New Hall Hey which is also identified as a Major Site in the Development Hierarchy

⁹ Edenfield is identified under the Major Sites category in the Development Hierarchy; for the purposes of this exercise, any growth identified in the settlement including proposed allocations and other committed sites have been included

which other parts of the Borough do not possess. The most sustainable pattern of growth, as identified in Option 4 of the Sustainability Appraisal, focuses on the re-development of brownfield sites within settlements, together with the development on the edge of existing settlements.

d) What strategic factors/priorities were key in determining the Major Sites?

2.31 Major Sites are listed in the Spatial Strategy as:

Edenfield	H72	Housing allocation
Futures Park	M4	Mixed use
New Hall Hey	NE4	New Employment
Carrs Industrial Estate	NE3	New Employment

2.32 Three of these Major Sites fall within the Settlement Hierarchy, only Edenfield has not been listed. For example, Futures Park is located within Bacup, New Hall Hey at Rawtenstall and Carrs Industrial Estate at Haslingden. However, given their strategic importance to delivering the Local Plan over the next 15 years they have been selected as Major Sites.

2.33 The need to identify suitable sites for development that are sustainable with no adverse impacts on flooding in particular or unacceptable levels on traffic growth and are considered to be deliverable (or at least developable in the longer term), has influenced the inclusion of the Major Sites. The locational advantages for the proposed new employment sites being nearer the A56, as identified by the Employment Land Study, has also featured highly in the assessment of these sites.

2.34 Rossendale faces many constraints to development given its semi-rural location, between the Greater Manchester conurbation and East Lancashire, within the South Pennines. The Borough's distinctive character with urban areas adjoining countryside is a key feature which needs to be retained. However, the need to provide longer term employment opportunities within the Borough is necessary to ensure the Borough's development requirements are met. The need to find land to meet the Borough's future housing requirements has necessitated the need to find suitable sites, which are sustainable and will not result in adverse harm to the Borough's ecology and landscape, whilst also being attractive and viable to the market.

2.35 A major constraint to development is topography with many parts of the Borough too steep for development unless expensive ground works are undertaken. Such work would detrimentally affect the Borough's character and have adverse impacts on the countryside, some of which forms part of the West Pennine Moors or sits within the buffer for the South Pennines - both of which are important for ecology.

2.36 As well as the terrain of the Borough, there are also issues relating to flooding. Rossendale has been affected by a number of flood incidents in recent

years, generally as a result of surface water flooding. In particular the Boxing Day Floods of 2015 caused damage to properties in Rossendale. A Strategic Flood Risk Assessment (SFRA) was undertaken as part of the Evidence Base and this has played an important role in determining the suitability of sites, with some land being avoided due to this impact. The land that have been avoided due to flood risk also contributes to the Borough's Green (and Blue) infrastructure.

2.37 Transport has also been a limiting factor, with the Borough's inhabitants and businesses relying on single carriageway roads with relatively easier access to the Strategic Road Network (and the A56) available only to the western parts of Rossendale. Public transport relies on buses as the only rail service currently is the heritage rail link from Rawtenstall to Bury and beyond to Heywood in Rochdale and then to connect with mainline train services on the Calder Valley line. A Quality Bus Service runs across the Borough from west to east (Accrington to Rochdale) and there is an express bus service running north to south in the western parts of the Borough from Loveclough to Rawtenstall and beyond to Manchester. The Highway Capacity has identified a number of junctions where intervention, if possible, is needed in order to avoid congestion.

2.38 As the Infrastructure Delivery Plan acknowledges, as well as highway constraints, capacity in respect of education and health services may require improvements over the plan period too, another limit to growth, unless the improvements and increase in capacity can be achieved.

2.39 As a result of these constraints it has been necessary to consider sites that can contribute to meeting Rossendale's needs for future development where the scale may not reflect the settlement's position in the Hierarchy, ie Edenfield. The sustainability assessment undertaken has been used in particular to assist the assessment of the sites and some of these have progressed to become allocations.

e) To what extent does the spatial strategy seek to focus development on non-Green Belt sites in the countryside rather than Green Belt land?

2.40 In line with NPPF, the retention of the Green Belt is important and such land should only be released in exceptional circumstances through the Local Plan process. The Regulation 18 Draft featured a larger number of sites that would need to be released from the Green Belt than the Submission Version of the Local Plan. In line with NPPF, a sequential assessment was undertaken that considered sites in the Urban Boundary first, followed by sites adjoining the Urban Boundary then other land currently in the Countryside and then finally the consideration of sites that are in the Green Belt. The Green Belt Topic Paper [EB023](#) which was produced to accompany the Regulation 19 consultation version explains this in greater detail.

2.41 A Study was commissioned to assess Rossendale's current Green Belt and how it meets the Green Belt functions. A number of Green Belt sites were removed from the submission version of the Local Plan as it was considered that

the potential impact on the South Pennine Moors Phase 2 Special Protection Area (SPA) was too great or that the harm resulting from the loss of Green Belt was in fact too great and did not outweigh the benefit of providing a relatively small number of additional units. The application of higher densities for the residential allocations in the more accessible locations (e.g. Rawtenstall Town Centre) has also been used in order to reduce the amount of land needed and this has resulted too in some of the smaller parcels of Green Belt land being retained in the Green Belt.

f) How has flood risk been factored into decisions about the spatial strategy and distribution of growth?

2.42 Flood risk is an important issue for Rossendale, and occurs across the Borough with many of the settlements having grown along watercourses, in the bottom of the valleys. The spatial strategy does not avoid any broad areas due to flood risk, however the sequential and exceptional tests were applied in order to choose the more sustainable sites for growth.

2.43 A key piece of Evidence has been the Strategic Flood Risk Assessment that was undertaken to steer development away from areas at high risk of flooding. Discussions have also taken place with the Environment Agency and Lancashire County Council to ensure that sites have not been allocated that will be adversely affected by flood risk or themselves increase the risk of flooding.

2.44 The spatial strategy encourages growth within existing settlements or at the edge of existing settlements to deliver sustainable patterns of development. However, several settlements within the Borough are located on flat land close to rivers or within steep-sided valleys, which means that they are vulnerable to flood risk from rivers and surface water.

g) Does Policy SS provide sufficient clarity on the degree of concentration and the distribution of growth?

2.45 The Council considers this policy to provide sufficient clarity as well as flexibility to focus growth within the Borough. The Key Diagram, found on page 6 of the Submission Version, illustrates how growth will be distributed.

h) Is Policy SS also intended to be used to determine individual planning applications? In this context are the constraints relating to the scale of growth in Urban Local Service Centres, Rural Local Service Centres and Other Places robustly based and adequately defined? Would the policy allow effective re-use of brownfield sites in sustainable village locations?

2.46 The Strategic Policy SS on the Spatial Strategy is intended to guide the drafting of the Local Plan policies and the identification of proposed site allocations as well as any other policies contained in any forthcoming Development Plan Documents. Together with other policies it is intended to be used to assist with the determination of planning applications.

Would the policy allow effective re-use of brownfield sites in sustainable village locations?

2.47 The Council considers that Policy SS would allow the re-use of brownfield sites in sustainable village locations.

i) Is the approach to development in the countryside, as set out in the first paragraph of Policy SD2, justified? What type of development needs to be in a countryside location?

2.48 SD 2 requires development to take place within the Urban Boundary "except where development needs to be located within a countryside location and the development enhances the rural character of the area".

2.49 The NPPF promotes development within the countryside where it would "enhance or maintain the vitality of rural communities" and this includes residential schemes and economic development which support the rural economy, subject to certain conditions.

2.50 It is considered that the approach to development in the countryside is justified and consistent with the NPPF policies on rural housing and the rural economy.

2.51 Developments that need to be located within the countryside are often related to agricultural, forestry, tourism and leisure activities. Residential development which responds to the need of rural communities may also be supported within the countryside.

j) Are the Urban Boundaries clearly defined and robustly based? Are the proposed boundary changes to reflect existing development on the ground, provide defensible edges and correct errors, as set out in document EL1.002d, justified?

[changes to urban boundaries to enable development of allocation sites are a separate issue and will be covered under the site-specific matters below]

2.52 The Urban Boundaries are defined on the Policies Map (submitted document [SD003](#)). As part of the preparation of the Local Plan, the Urban Boundaries have been amended to enable development of allocation sites, to acknowledge new development on the ground, to tidy up cartographic errors (e.g. where the urban boundary cuts through a building on the 1995 Rossendale

District Local Plan), and to ensure the urban boundary follows a defined boundary on the ground.

2.53 The existing Urban Boundaries are designated on the Core Strategy Proposals Map which is based on the Local Plan Proposals Map adopted in 1995. The Council consider that an update of the Urban Boundaries was needed to acknowledge developments that have occurred since 1995. Furthermore, the digitisation of the proposed Urban Boundaries enables the tidying up of cartographic errors. In some cases, the proposed changes will enable the development of sites assessed as suitable for housing but considered too small for allocation in the plan (e.g. sites that could deliver less than 5 dwellings). This has been based on work undertaken previously for the Local Plan Part 2 in 2015, which was withdrawn as the scale of development was based on the housing requirement set out in the (revoked) Regional Spatial Strategy for the North West, rather than the Objectively Assessed Need (OAN).

k) To what extent does the Plan seek to reduce out-commuting and promote greater self-containment? Is a significant shift in commuting patterns attainable?

2.54 The Local Plan does not attempt to reverse out-commuting per-se, although since it promotes a better balance between homes and jobs it may be anticipated that there will be some reduction in out commuting over the life of the plan as people are able to live closer to work.

2.55 Rossendale experiences significant levels of out-commuting. According to the 2011 Census out of the 33,000 residents in employment who live in Rossendale only about 17,000 both live and work here (ie 51%). A large number of people who live in Rossendale commute out to Greater Manchester (9,000 residents commute into one of the ten Greater Manchester boroughs). In addition Burnley, Hyndburn and Blackburn with Darwen all experience commuting levels of over 1,000 Rossendale residents each. People who commute into Rossendale for work tend to live in Hyndburn and Bury.

2.56 The Employment Land Review ([EB017](#)) found that the number of jobs based in the Borough is very low with a job density of 0.54. ONS jobs density data for 2014 shows that there are 23,000 jobs in Rossendale at a density of 0.54, which is below the North West (0.78) and England (0.82). The jobs density data indicates that for every two people aged 16-64 there is one job available in Rossendale. The study concludes this low job density figure is likely to contribute to the relatively high levels of out commuting from Rossendale to Bury and Rochdale.

2.57 Another characteristic of Rossendale's employment market is that Gross Annual Median resident earnings are slightly higher than workplace earnings in Rossendale indicating that residents commute out of the Borough for higher paying jobs. For example, the gross median Weekly Earnings by Residence in Rossendale was £380.80 in 2015, compared to £400.50 across the North West and £425.8 across Great Britain as a whole.

2.58 The proximity to Greater Manchester places Rossendale as a convenient 'commuter district'. The economic centres of Manchester, Bury and Rochdale are strong pulling forces for the residents of Rossendale and results in significant levels of out-commuting from the Borough. The earning potential of jobs in these destinations (most notably in Manchester City Centre) is significantly greater than those on offer within Rossendale, and are in greater supply. As such, this results in resident-based earnings in Rossendale (£23,843 per annum) being higher than workplace hence labour costs are lower in the Borough.

2.59 The Local Plan is allocating 27 ha of employment land in line with the findings of the Employment Land Review, this was based on a scenario aligned with a labour supply based on 220 additional new dwellings per year.

2.60 Delivering new employment land will increase the number of jobs within the Borough and by creating new modern offices will attract companies that can offer wages comparable to those outside of the Borough. This will provide choice and flexibility for companies in the area.

2.61 Out-commuting, particularly into Bury and Manchester City Centre, contributes to congestion along the M61 motorway. The Council is working with Transport for Greater Manchester (TfGM) and bus operators to improve journey time and reliability into Manchester but often journeys are slow, with buses held up by congestion. It is Rossendale Borough Council's long-term aim to improve public transport between Rawtenstall and Manchester by the Valley-City Link, which will utilise the existing heritage rail line of the East Lancashire Railway, and this is referenced by Transport for the North. The Council is continuing to lobby for further work to be undertaken to assess the scheme and look at how it can be delivered, without adverse impacts on the heritage railway.

2.62 Only limited assessment has been undertaken of the effect of any change on commuting patterns for the Local Plan. The key priority has been to provide choice and flexibility.

I) Does Policy SD1 adequately reflect the presumption in favour of sustainable development?

2.63 Policy SD1 reflects the wording of the presumption in favour of sustainable development from an older version of the NPPF (2012). The latest wording can be found in paragraph 11 of the 2019 NPPF. The Council recognise that this policy is a duplication of national policy but if the Inspector deems it to be appropriate for the Council to retain this policy in the Local Plan, the Council could re-word the policy to reflect the wording of paragraph 11 of 2019 NPPF.

APPENDIX 1 – STRATEGY OPTIONS

Strategy Option A

Focus on Key Centres (Rawtenstall, Bacup, Haslingden and Whitworth) and immediate environs

Spatial implications

- *Housing*- focus primarily on land within or adjacent to Urban boundary in Rawtenstall; Bacup; Haslingden and Whitworth (**approx. 58ha of which 3ha in Haslingden and 9.5ha in Whitworth; the remainder nearly equally split between Bacup and Rawtenstall**)
- Opportunities for brownfield (**<20% allocated**) but primarily greenfield adjacent to urban boundary
- Some Green Belt development, especially in Whitworth and Haslam Farm, Rawtenstall (**approx. 5ha**)
- Smaller scale development appropriate to size of other settlements
- Little/No Green Belt development in Edenfield –greenfield land at equivalent level in hierarchy of settlements to be investigated first
- Limited development in smaller centres and villages-in proportion to their size
- *Employment* – develop a site by A56 in Haslingden (greenfield) and south of Rawtenstall (Green Belt) plus Futures Park, Bacup (mixed brown/green- largely leisure) and Barlow Bottoms (Whitworth). Retention of existing sites where feasible. (**New employment land approx. 10ha plus existing**)
- *Retail/Leisure*- within existing town centres-possible extension of Bacup Town Centre; issue of sequential suitability of retail at Futures

Deliverability and Viability

- Housing around Rawtenstall and Whitworth would be viable and deliverable-likely to be able to subsidise affordable housing
- Bacup – mostly deliverable but less viable; lower end of market
- Employment sites close to A56 attractive to market but site constraints including access including major infrastructure
- More peripheral areas of Rawtenstall most attractive
- Potential for masterplanning

Issues and Risks

- Green Belt releases will need justification as to why other land should not take precedence
- Lack of available SHLAA sites in Haslingden
- Some potential infrastructure issues, e.g. road capacity
- Brownfield potential higher than some other options but still low figures <20%

- Some possible landscape impacts regarding urban fringe sites, e.g. in Bacup and Whitworth
- Sequential approach for retail may need amending in Bacup

Strategy Option B

Minimum intervention-Maximise Growth Opportunities and Market Viability

Spatial implications

Housing

- Maximise potential of sites owned by willing landowners and developers
- Scale of Option A plus additional sites –provision in excess of SHMA, i.e. 4 000+ houses and in excess of 24 ha employment
- Heavy focus on greenfield and Green Belt sites (**less than 10% brownfield**)
- Edenfield expanded significantly beyond current settlement size/place in hierarchy (**min of 15ha, nearly all Green Belt-potential for more releases**)
- Allow greater expansion at Loveclough/Goodshaw (**approx. 18ha of land-virtually all greenfield**)
- Further Green Belt release in Whitworth (**6ha**) and Rising Bridge (**5ha**) to residential
- More development in the west of the Valley
- Increased use of greenfield sites in villages (**25ha**)
- Pattern of development based primarily on land availability rather than on policy or infrastructure constraints

Employment

- Maximise Green Belt and Greenfield sites close to A56/M66 (south of New Hall Hey, Rawtenstall and by Carrs Industrial Estate) and possibly Tesco Haslingden (**15ha**)
- Encourage loss of former mill sites to housing

Leisure/Retail

- Allow expansion of leisure/retail at Futures Park, Bacup and allow employment/leisure to spread up hillside (**Total 6.5ha incl 4.5 brownfield**)
- Allow retail expansion of Winfields into Green Belt (**1ha**)
- Promote large scale leisure and accommodation development in green belt and countryside (e.g. at Water, south of Helmshore and south of Turn) (**5ha**)

Deliverability and Viability

- Would be likely to deliver at least the projected housing numbers required
- Viability levels good with high potential for delivering section 106 contributions and some new paid for infrastructure (especially in Edenfield)

- Economies of scale of larger developments
- Masterplanning can be required
- Could reduce ability to attract larger new developments to less viable parts of the Borough

Issues and Risks

- Release of such large amounts of Green Belt land would need clear justification for “exceptional circumstances” and face challenge at the EIP
- Development related primarily to opportunity rather than need
- Development sometimes poorly related to services
- Loss of greenfield land in areas such as Loveclough which have previously been resisted would face considerable public opposition
- Bringing forward some sites would depend on infrastructure improvements and phasing with most housing coming forward after 5 years
- Very low levels of brownfield growth and low density
- Environmental and Landscape impacts (though with masterplanning and possible “net gain” in Green Belt this could be compensated)

Strategy Option C

Focus Development within existing Urban Areas, on Brownfield Land And at higher densities

Spatial Implications

Housing

- Would minimise urban sprawl and loss of countryside
- Focus on all urban areas regardless of place within settlement hierarchy (e.g Stacksteads and Waterfoot)
- Maximise use of vacant mills for housing, especially along Irwell Corridor
- Increases housing density within the Borough (**use of minimum densities of 30-35 per ha and 40-45ha near Transport Hubs**)
- Highest SHLAA brownfield potential in Stacksteads (**101 dwellings**), Worsley (Haslingden-**78**) and Healey/Whitworth (**65**). **Aim for 35% brownfield overall**
- More development on non-allocated brownfield sites of under 5 houses (windfalls) wherever these are located (**Currently on average 10-20 houses pa but exceptionally nearly 50**)
- More development in deprived locations and within urban areas
- Better related to existing services
- A number of larger sites, such as Reedsholme Mill north of Rawtenstall, already have residential consent
- Maximises use of existing services

Employment

- Employment allocations at Barlow Bottoms and Baxenden Chemicals-**less than 6ha (target 23ha)**
- Increases demand to change older employment sites to residential. This could have implications for Employment Land Supply (**loss of approx. 15% of current supply**)
- Lack of large, flattish brownfield sites near the motorway-**retain land at Ewood Bridge and Winfields in Haslingden for employment**
- Lack of a range of supply
- Many existing employment sites are in sub-optimal locations

Retail and Leisure

- Limited number of suitable sites to provide suitable expansion opportunities
- Would emphasise upgrading of the existing offer

Deliverability and Viability

- SHLAA brownfield land supply is limited (capacity for less than 400 dwellings identified though "mixed" greenfield/brownfield sites comprise

another 1 000 dwellings. There is a greater supply of brownfield when sites with planning permission are included and small sites (less than 5 dwellings) are additionally usually classified as brownfield. Nevertheless it will be challenging to meet a high brownfield target)

- Brownfield sites often have a range of issues such as flood risk and contamination that can be costly to remediate and render viability marginal
- Brownfield sites are often in less desirable areas for development
- Lack of new employment sites for large floorplate buildings
- The apartment market (especially change of use from mills) is relatively limited within Rossendale
- Lack of viability to deliver affordable housing and new infrastructure

Issues and Risks

- It is likely that a range of greenfield sites would also be required because of low levels of brownfield land identified in the SHLAA
- Reliance on brownfield and higher density unlikely to deliver the required housing numbers
- Potential loss of open space within urban areas
- Reluctance by some developers to invest in the Borough
- Developers/landowners with substantial greenfield land-holdings will resist such an approach but public will welcome it
- Has benefit of improving or replacement of some low quality employment stock

Option D
Combined Option

Spatial Implications

Housing

- Provides for a mix of development across the Borough including making optimal use of brownfield land including higher densities (**40-45 dwellings per ha**) in number of town centre locations
- Greater emphasis on working with owners of brownfield sites with infrastructure issues to bring forward mill sites for housing, especially between Water and Waterfoot (**5ha total**)
- Accepts the need for greenfield land on urban fringe in proportion to size of settlements and in order to meet housing numbers
- Most development around Rawtenstall-especially north-**(5.7ha)** and east **(4.5ha)** and around fringes of Bacup (**approx. 14ha**). At least 70%-80% around these settlements greenfield
- Recognises Edenfield as an exceptional case for Green Belt release as a major masterplanned development (**450 houses**) and in Whitworth (**130 houses**) because of the lack of alternative sites within the settlement

Employment

- Retain key existing sites
- Seek to develop site north of Carrs Industrial Estate, Haslingden (**5ha**) recognising issues with access/wildlife
- Develop Green Belt site south of New Hall Hey (**3ha**) (recognising constraints)
- Develop land at Barlow Bottoms for employment (**1.2ha**)

Retail and Leisure

- Focus on existing town centres with small extension to Bacup
- Leisure/retail employment at Futures Park but limited extension into countryside (**approx. 7ha mostly brownfield**)

Deliverability and Viability

- Green Belt and many greenfield sites viable, especially in west of Borough
- Greenfield sites in Bacup are viable but little capacity to deliver infrastructure
- Infrastructure is an issue including ability to channel future traffic through key junctions

Issues and Risks

- Lack of available housing sites around Haslingden
- Brownfield sites still challenging to develop with respect to infrastructure constraints
- Impacts on landscape
- Elements of flood risk in some sites
- Delivery of sufficient housing in first 5 years of Plan