

Rossendale Local Plan Examination – Matters,
Issues and Questions
Matter 19 Statement

Hollins Strategic Land
August 2019

1 Matter 19 – Housing supply and delivery

Question a) ii. - Are the estimated lead in times and build out rates for each committed site as shown in the housing trajectory, justified and soundly based? Where relevant, are the rates supported by clear evidence that sites are deliverable in line with the NPPF definition?

Question e) – Are all of the allocated sites confirmed as being available for development within the Plan period?

Question h) ii. – Is there clear evidence to support the inclusion of sites which fall under category b) in the NPPF definition of deliverable? E.g. sites which have outline permission for major development, are allocated in the Plan, have a grant of permission in principle or are identified on a brownfield register.

- 1.1 Following the submission of the Local Plan for Examination and the approval of application 2018/0554 (Land west of Burnley Road, Loveclough), HSL reviewed the emerging Local Plan to ascertain whether any further development opportunities could be secured. Allocated sites were considered and the Council's submission documents were used to identify sites which had no developer backing and may be of interest¹.
- 1.2 Letters/emails were sent to landowners and the LPA helpfully agreed to forward HSLs details to the landowners of the following allocated sites, confirming that HSL were interested in discussing the promotion of the site:
- H14: Hall Carr Farm, Yarraville Street;
 - H17: land south of Goodshaw Fold Road, Loveclough.
 - H28: Sheephouse reservoir, Britannia;
 - H31: Lower Stack Farm;
 - H40: Land off Todmorden Road, Bacup;
 - H50: Land adjacent Park Avenue/Criccieth Avenue;
 - H52: Land to the rear of Haslingden Cricket Club;
 - H70: Irwell Vale Mill; and,
 - H71: Land east of Market Street, Edenfield.
- 1.3 Haslingden Cricket Club (H52) confirmed that it does already have developer backing. One of the owners of land within H40 contacted HSL; this has been discussed in HSLs

¹ Appendix 1: Email to LPA

Matter 11 Statement. The owner of H71 also contacted HSL and discussions are ongoing although the land is currently in employment use.

- 1.4 HSL has not received responses from the landowners of the other sites listed above. Of course, this does not mean that the landowner does not intend to develop the site; there could be numerous reasons why no response was received, including that there was no interest in working with HSL. However, it is perhaps an indication of the lack of appetite for the sites to be developed.
- 1.5 HSL met with the LPA to discuss the above sites in more detail, focussing on H40 given the landowner had indicated a willingness to discuss the possibility of working together to promote the site. During the meeting, HSL confirmed concerns surrounding a number of the allocated sites. The LPA asked if HSL would provide more information in advance of the MIQ submissions. An email² was sent to the LPA on 12/07/2019, setting out possible issues with sites identified as contributing housing in the initial 5-year period.
- 1.6 HSL has since undertaken an appraisal of the Local Plan housing allocations to assess deliverability/developability. This has been referred to in other Matter Statements, but can be provided in full below. Photographs of some site are also appended in case they are of use³.

Allocation	Total Dwellings	Projected delivery	Notes
H1: Greenbridge Mill, Lambert Haworth	64	1-5 years	The Site Assessment Overview Document states that the Mill has become vacant but is also still in existing employment use. If the site is not vacant it is unlikely that most of the site can be delivered within 5 years. There is currently no application submitted but completions are forecast for 2021. There is no clear evidence to suggest the site can come forward in that time frame.

² Appendix 2: Email to LPA

³ Appendix 3: Photographs

H4: Turton Hollow, Goodshaw	30	1-5 years	<p>The site has significant level changes and tree coverage.</p> <p>The Site Assessment Overview Document states that 70% of the site is available now. The site has multiple landowners and therefore the Council will need to clarify if the land available now includes the land required for the access.</p>
H5: Swinshaw Hall, Loveclough	47	1-5 years	<p>The site is not developer backed and does not have an application submitted but completions are meant to begin in 2021. There is no clear evidence to suggest the site can come forward in that time frame</p>
H7: Land adjacent to Laburnum cottages	10	1-5 years	<p>The Council will need to investigate whether there is a ransom on Church Street which would prevent access into the site.</p>
H8: Oak Mount Garden, Rawtenstall	9	1-5 years	<p>Level changes and tree coverage are significant. The Council will need to prove that the site is viable.</p> <p>An access from Haslingden Road appears difficult to achieve.</p>
H14: Hall Carr Farm, Yarraville Street	26	1-5 years	<p>There have been two previous applications on the site yet it has not come forward, which suggests delivery issues.</p>
H15: Willow Avenue off Lime Tree Grove	10	11-15 years	<p>The site has significant tree coverage and level changes. The Council needs to evidence that the site is viable.</p>
H18: Carr Barn and Carr Farm	25	6-10 years	<p>The Site Assessment Overview Document states that access is the principle issue which requires a resolution before any development can take place. There is no clear evidence that an access can be achieved so the site should not be allocated.</p>
H19: Land off Lower Clowes	7	6-10 years	<p>There was a planning permission granted in 2002 for 7 units but the site was never delivered, which implies the site may have deliverability issues.</p>

Road, New Hall Hey			
H20: Old Market Hall, Bacup	16	1-5 years	There is no application or developer backing the site, yet completions are meant to begin in 2020, which seems unrealistic. There is no clear evidence to suggest the site can come forward in that time frame.
H21: Reed Street, Bacup	22	1-5 years	An outline application was submitted in August 2018 but appears to have stalled, which suggests deliverability issues.
H25: Land at Blackwood Road, Stacksteads	41	1-5 years	There is no developer backing the site and no application. There is no clear evidence to suggest the site can come forward in the next 5 years. The Site Assessment Overview Document states that only part of the site is developable in the short term yet all 41 units are forecast to come forward in the next 5 years. There is no clear evidence to suggest this is achievable.
H27: Land off Fernhill Drive, Bacup	5	6-10 years	Significant tree coverage.
H28: Sheephouse Reservoir	63	6-10 years	Significant level changes in parts of the site and lots of tree coverage.
H30: Tong Farm	51	1-5 years	Planning application has been withdrawn, which suggests deliverability issues.
H31: Lower Stack Farm	10	1-5 years	There does not appear to be a developer backing the site and there is no clear evidence that the site can come forward within the next 5 years.
H33: Land off Rockcliffe Road and Moorlands Terrace	63	1-5 years	Part of the site has approval for 26 dwellings but the rest of the site has no application pending. There is no clear evidence to suggest the site can come forward in the next 5 years.

H34: Land at Higher Cross Row, Bacup	17	6-10 years	The Site Assessment Overview Document says the site capacity should be reduced to 10 dwellings.
H35: Shadlock Skip, Stacksteads	22	6-10 years	A lot of demolition and potential remediation given the sites previous use, which will affect the viability of the site.
H36: Hare and Hounds Garage, Newchurch Road	9	6-10 years	Outline planning permission expired in November 2018, which suggests there are deliverability issues.
H39: Land off Cowtoot Lane	151	1-10 years	There is no clear evidence to suggest the site can come forward in the next 5 years as there is no developer backing the site or planning application submitted.
H40: Land off Todmorden Road, Bacup	53	1-5 years	<p>Council own a ransom strip along the frontage onto Bacup Road.</p> <p>3 different landowners – the landowners are not all working together to bring the site forward.</p> <p>The site is in a low market area, so the viability of the site is questionable for the quantum of development allocated considering that there are 3 different landowners involved and a ransom payment.</p> <p>No application or developer backing the site. There is no clear evidence to suggest the site can come forward in the next 5 years.</p>
H41: Thorn Bank, Bacup	46	6-10 years	Development of the site would reduce the amount of recreation space available to the local residents.
H44: Irwell Springs, Weir	56	1-5 years	Site has stalled after 10 units, which suggests deliverability issues.

H46: 1 Laburnum Street, Haslingden	8	1-5 years	The site previously has planning permission, but this wasn't implemented. This suggests delivery issues.
H47: Land at Kirkhill Avenue, Haslingden	22	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years.
H48: Land of Highland Street	13	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years.
H49: Land adjacent to 53 Grane Road, Haslingden	5	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years.
H50: Land adjacent to Park Avenue/Cricceth Close	30	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years.
H52: Land to the rear of Haslingden Cricket Club	30	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years.
H55: Carr Mill and Bolton Mill, Cowpe	11	6-10 years	The amount of demolition and site clearance could make the site unviable.
H57: Foxhill Drive, Whitewell Bottom	7	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years.
H60: Jonny Barn Farm	80	1-5 years	RM application for 30 units withdrawn due to deliverability issues. There is no application on the remainder of the site and there is no clear evidence to suggest the site can come forward in the next 5 years.
H70: Irwell Vale Mill	45	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years.

			The site is in the green belt. Other sites which would not require green belt release are available.
H71: Land east of Market Street Road, Edenfield	9	1-5 years	There is no clear evidence to suggest the site can come forward in the next 5 years. The site is in the green belt. Other sites which would not require green belt release are available.
H73: Edenwood Mill, Edenfield	47	6-10 years	The site is in the green belt. Other sites which would not require green belt release are available.
H74: Grane Village, Helmshore	174	1-10 years	30 completions on the site forecast for 2020/2021 yet there is no application. There is no clear evidence to suggest the site can come forward in the next 5 years.

1.7 This assessment demonstrates that there are reasonable concerns surrounding the deliverability and developability of a significant number of allocated sites. There is no clear evidence to demonstrate that they can be relied upon to provide the much-needed housing.

1.8 It is acknowledged that the LPA may provide further information on each of these sites via the MIQ responses and during the Local Plan Hearing sessions. However, at the time of writing this Statement, it appears evident that the LPA must allocate additional sites which are supported by clear evidence to demonstrate that they can deliver housing within the initial 5-year period and indeed, during the plan period.

Appendix 1

Matthew Symons

From: Matthew Symons
Sent: 03 June 2019 16:14
To: 'Anne Storah'
Cc: Christine Whittle
Subject: FW: Rossendale LP Housing Allocations

Hi Anne,

Sorry, I left one off the list by mistake. It isn't included in table 2 of document EL1.002a but is one that we like to consider and I don't think it has developer support:

- H17: land south of Goodshaw Fold Road, Loveclough.

Thanks,
Matthew

Matthew Symons BA MPlan MRTPI
Planning Manager



On behalf of Hollins Strategic Land |

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From: Matthew Symons
Sent: 03 June 2019 16:10
To: Anne Storah < >
Cc: Christine Whittle < >
Subject: RE: Rossendale LP Housing Allocations

Hi Anne,

My initial thoughts are that I would be interested in looking at the following sites in some more detail:

- H14: Hall Carr Farm, Yarraville Street;
- H28: Sheephouse reservoir, Britannia;
- H31: Lower Stack Farm;
- H40: Land off Todmorden Road, Bacup;
- H50: Land adjacent Park Avenue/Criccieth Avenue;
- H52: Land to the rear of Haslingden Cricket Club;
- H70: Irwell Vale Mill; and,
- H71: Land east of Market Street, Edenfield.

This list is based on a bit of desk-top work that I've done this morning. I haven't been out to look at the sites yet, nor have I looked at market values for them. But before getting into that level detail, I'd want to check if they are available.

Thanks for your help on this, hopefully something will come out of it and we'll be able to provide developer support, which an Inspector may find helpful.

I will continue to look at these and if I find the ownership information that I need, I'll write to the landowners. But if you could let me know if/when you've contacted the landowners and if they respond, that would be helpful. I do obviously appreciate you'll be very busy at the moment with all of the eLP work!

Thanks,
Matthew

Matthew Symons BA MPlan MRTPI
Planning Manager



On behalf of Hollins Strategic Land |

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From: Anne Stora
Sent: 03 June 2019 15:48
To: Matthew Symons
Cc: Christine Whittle <
Subject: RE: Rossendale LP Housing Allocations

Hi Matthew,
Thanks for your email. Could you list the sites that you are particularly interested in and I can contact the landowners with your details so they can get in touch with you if they wish to do so? I think that's probably the best way to avoid GDPR issues.
Kind regards,
Anne

Anne Stora
Principal Planner (Forward Planning)
Rossendale Borough Council

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Facebook: [Rossendale Borough Council](https://www.facebook.com/RossendaleBoroughCouncil)
Visit Rossendale: <http://www.visitrossendale.com/>
Local Plan: www.rossendale.gov.uk/localplan



From: Matthew Symons
Sent: 03 June 2019 11:23
To: Anne Storah
Subject: Rossendale LP Housing Allocations

Hi Anne,

Having recently obtained planning permission for our Loveclough site, we're looking to see if there are opportunities for further success in Rossendale.

I'm looking at Table 2 of document EL1.002a this morning and note that a number of sites don't seem to have secured developer backing as yet. I'd be interested in looking further at the sites that could do with some developer support.

Do you have the ownership details for the sites listed in Table 2 and is this something you can share? Or is it a data protection issue?

Thanks,
Matthew

Matthew Symons BA MPlan MRTPI
Planning Manager



On behalf of Hollins Strategic Land |

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Appendix 2

Matthew Symons

From: Matthew Symons
Sent: 12 July 2019 11:36
To: 'Anne Storah'
Subject: Housing Trajectory

Hi Anne,

As promised, here are my initial thoughts on some of the allocations.

I've only looked at the ones that are expected to deliver in years 1 – 5 for now. I haven't looked at the 6 – 15 year sites or the small sites that are listed in the trajectory with application numbers – that'd be a lot more work! I'll probably get into that at some point.

Site Ref	Address	HSL Comments
H1	Greenbridge Mill	EL1.002e (ii) states that the site is vacant but also states that the mill building is in existing employment use?
H4	Turton Hollow, Goodshaw	Access looks like it could be challenging. As are levels and the site had heavy tree coverage
H6	South of 1293 Burnley Rd, Loveclough	The trajectory states this is RBC owned land – is this correct?
H7	Laburnum Cottages, Goodshaw	Access look challenging – or does RBC own the track?
H8	Oak Mount Garden, Rawtenstall	Trajectory provides no evidence on delivery. EL1.002e (ii) refers to access and gradient issues that would need to be mitigated?
H10	Bury Rd, Rawtensall	This site looks challenging due to flood risk, gradients, trees and footpath.
H14	Hall Carr Farm, Yarraville Street	The trajectory refers to 2 previous applications having been reused for reasons that are not insurmountable. This appears correct but no applications have been approved since that time suggesting reasons cannot be overcome.
H20	Old Market Hall, Bacup	EL1.002e (ii) refers to a previous consent but does not state when this was approved or whether it is an extant consent? The non-implementation would suggest delivery issues.
H21	Reed Street, Bacup	The trajectory refers to a pending application, but it has been pending since the summer of 2018, with no documents uploaded onto the webpage since November and no Committee Date listed
H24	Former Commercial Hotel	A permission expired and there is no application pending – suggests delivery issues

H25	Blackwood Rd, Stacksteads	The trajectory states 41 will be delivered in years 1 – 5. EL1.002e (ii) states that only the small portion of the site could come forward in the short term.
H30	Tonge Farm, Bacup	Trajectory confirms that an application was withdrawn and EL1.002e (ii) states that 2 applications were withdrawn. Suggests delivery issues
H31	Lower Stack Farm	Trajectory provides no evidence. Access looks challenging for 10
H33	Moorland Rd, Bacup	This part of the allocation does not have PP and neither the trajectory nor EL1.002e (ii) confirm developer interest
H40	Todmorden Rd, Bacup	Trajectory refers to keen interest from developer but this interest relates to a discussion in 2018 and the western portion of the site which has no access. Access would require third party land. Eastern portion subject to RBC ransom. To be discussed.
H44	Irwell Springs, Weir	The site stalled and has not recommenced. Delivery issues
H46	1 Laburnum Street	The trajectory states site previously had permission – no further applications.
H49	Grane Rd, Haslingden	RBC owned – any developer partners?
H57	Foxhill Drive, Whitewell Bottom	RBC owned – any developer partners?
H60	Johnny Barn Close, Rawtenstall	RM application withdrawn. Delivery issues. No application on remainder of site.
H65	Albert Mill, Whitworth	Trajectory confirms recent application withdraw and EL1.002e (ii) states that are issues to be overcome with the EA.
H70	Irwell Vale Mill	Developer support? Flood issues and a Green Belt release site?
H71	Land east of Market Street, Edenfield	Requires cessation of employment uses
H72	West of Market Street, Edenfield	Delivery of 30 in 2021/22 seems optimistic given requirement for Masterplan approval, subsequent planning applications and condition discharge approvals.
H74	Grane Village, Helmshore	Delivery of 30 in 2020/21 seems optimistic for such a large site with no planning permission. Lead in time would suggest delivery would be reduced in that initial year, or moved later into trajectory

I'd be interested to get your views on the above comments. It may be that I've missed info on some of them – there are a lot of documents to go through online.

Have a good weekend, and I'll be in touch next week about H40 no doubt.

Thanks,
Matthew

Matthew Symons BA MPlan MRTPI
Planning Manager



On behalf of Hollins Strategic Land

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From: Matthew Symons
Sent: 11 July 2019 15:22
To: Anne Stora
Subject: H5: Swinshaw Hall, Loveclough

Hi Anne,

Thanks for the meeting earlier this week. We found it helpful.

As discussed, we're meeting H40 landowners tomorrow and will come back to you on that. I will also email you about the sites I thought could be difficult to deliver asap.

On H5, you asked if I could let you have the contact details for the person I have written to and had no response from. It is Mr Ainsworth Is that the same as what you have?

If possible, I would certainly welcome you contacting the landowner to confirm our potential interest in promoting the site.

Thanks,
Matthew

Matthew Symons BA MPlan MRTPI
Planning Manager



On behalf of Hollins Strategic Land |

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Appendix 3

Rossendale Site Allocations: Photos

H4: Turton Hollow Road, Goodshaw



H7: Land adjacent to Laburnum Cottages, Goodshaw



H8: Oak Mount Garden, Rawtenstall



H15: Willow Avenue off Lime Tree Grove



H16: Land East of Acrefield Dive



H28: Sheephouse Reservoir, Britannia





H33: Land off Rockcliffe Road and Moorlands Terrace, Bacup





H41: Thorn Bank, Bacup





H64: Hargreaves Fold Lane, Chapel Bridge

