



**Edenfield Community Neighbourhood Forum
Rossendale Local Plan Examination**

30th August 2019

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?

Response:

No. In short, Edenfield Community Neighbourhood Forum (ECNF) cannot find any reference in the [Publication Plan](#) to a vision for the future of Rossendale. The Plan's strategic (and other) policies are therefore prepared in a vacuum, with there being no framework for identifying and then addressing needs and priorities in the Borough. The fundamental omission of a vision from the Plan's formulation in turn explains why the Plan's policies are misguided and unsound, due to being inconsistent with the 2018 (as revised in 2019) [National Planning Policy Framework](#) (NPPF), paragraphs 15 to 17.

From the responses below to parts a) to l) of this question, it is clear that the Publication Plan is not in accordance with legislation and has further inconsistencies with national policy, with regard to the absence of a vision leading to ill-defined strategic objectives and the absence of a coherent spatial strategy.

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 Centres, on major sites and on well located brownfield sites?

Response:

This is a question that only Rossendale Borough Council (RBC) can respond to fully, as the Plan itself does not have a Borough-wide spatial strategy. Instead, its approach to strategic policy-making in Policy SS simply takes two *'development hierarchy'* elements with *'strategic value'* for housing and employment development – one relating to the four Key Service Centres defined in the Plan, and the other to four named *'major sites'* (two of which are currently in the Green Belt, with one being *'Edenfield'*). There is no discernible basis for this approach; all that ECNF can deduce from page 5 of the Plan is that because of the Borough's physical constraints (its hilly terrain, moorland, flood risk, at-capacity roads and brownfield site issues), Green Belt land at Edenfield is identified as having *'strategic value for development'* in the Plan - simply because *'large, easy to develop sites are in short supply'*.

Is the strategy and distribution justified and sustainable? What other strategies were considered, and why were they discounted?

Response:

No, in relation to the first of these two questions.

ECNF responded extensively on the strategy and distribution in its Publication Plan representations, specifically in relation to Edenfield. This settlement is not identified in the Local Plan as a Key Service Centre, or as an Urban Local Service Centre, or as a Rural Local Service Centre. Edenfield is not classified in the Policy SS settlement hierarchy at all. Yet the [Rossendale Local Plan Strategy Topic Paper](#) (2018) refers to the strategic allocation for residential development being at Edenfield, a Local Service Centre (page 10); the *'strategic location west of Market Street'* is referred to as *'considered to be of broader Borough-wide significance'*. There is no explanation of this *'significance'* but Page 11 of the Topic Paper goes on to list reasons for the site's selection, the first being that the *'proposed housing is deliverable with willing developers and would make a significant contribution to overall housing numbers'*.

ECNF considers that it is because these *'willing developers'* have been promoting the site west of Market Street since an early Call for Sites, its existence has been a significant factor in formulating the Plan's content – made worse in planning terms by the other three proposed major site allocations on Green Belt land being in or adjacent to Key Service Centres, and for employment-led development. The outcome of the Council's approach is that a small village at a low tier in the settlement hierarchy has been identified as a suitable location for a major housing site, despite it being in the Green Belt. This distribution outcome is a clear indication of an unsound approach to policy making in the Plan, principally because it is an entirely unjustified one.



In response to the second question, the 2018 [Sustainability Appraisal of the Rossendale Local Plan](#) considered four '*spatial options*' for vastly differing volumes of residential development and employment land that did not appear to be based on any form of evidence for the various scales of development and patterns of distribution selected and considered. The 2019 [Sustainability Appraisal Addendum](#) does not seek to explain the approach, only to summarise it. Once again, ECNF commented extensively in its Plan representations on the 2018 Sustainability Appraisal. At the heart of the matter is the fact that it is entirely unclear how RBC have been able to conclude that the Plan's approach and its proposed distribution of development have been sustainability appraised. The Plan's housing numbers, and its residential land and employment land allocations differ substantially from the then preferred Option D's 5000 dwellings (and the standard method for assessing housing need has in any event reduced the total number of new homes needed in the Plan period (2019 to 2034) still further and to 3180, from 3975).

It can only be concluded that the Plan is unsound, on the basis of being unjustified. It has not taken into account reasonable alternatives, and there is no evidence that reasonable alternatives were considered in 2018.

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?

Response:

ECNF's only comment relates to ii. above. Extensive representations were made on the Publication Plan that in summary, highlighted all of the inconsistencies in how Edenfield was categorised as a centre, and how the methodology for classifying centres for Strategic Policy SS: Spatial Strategy was poorly defined. ECNF is not aware of any subsequent information having been published by RBC since, to provide the missing detail.

d) Is the predicted distribution of growth¹ 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?

Response:

Once again, ECNF's Publication Plan representations tackle this series of questions at length, concluding that there is no reasoned justification for the land for 400 new homes to be released from the Green Belt at Edenfield, when it is a settlement with few services and limited social infrastructure.

ECNF has conducted further research regarding the anomaly of the Edenfield single use 'major site', concluding that with overall housing growth in the Borough of 10%, the removal of Green Belt land in Edenfield for new dwellings results in growth of 47% - this scale of development is totally disproportionate and unsustainable in terms of the settlement's infrastructure. 87% of the developments proposed on Green Belt land are allocated to Edenfield, despite RBC having identified a high level of housing need for the east of the Borough and in Rawtenstall (Green Belt Topic Paper, page 21), where no Green Belt is being released.

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

Response:

This is a question that RBC will need to answer; ECNF has not been able to identify either 'strategic factors', or priorities. Neither the Sustainability Appraisal nor the 2019 Addendum throw any light on the matter.

For the major site at Edenfield, the Council openly admits (in the Strategy Topic Paper, page 11) that it was selected '*for a range of reasons*': willing developers; '*high viability*' (for providing the opportunity for developer contributions); proximity to the M66; the X41 bus route; and Edenfield being a Local Service Centre. Last but not least, the site was selected – a statement that ECNF strongly disagrees with - because:

"The Green Belt Review did not consider that the land performed strongly in Green Belt terms."

It is not possible to term any of these reasons '*strategic factors*', or priorities – and the Green Belt '*reason*' does not contribute an exceptional circumstance for altering the boundary to exclude the site.

¹ As set out in the RBC's response to the inspector's Pre-Hearing Note (Question 15).



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

Response:

Having concluded that the Plan has no spatial strategy, its *'development strategy'* (Policy SD2: Urban Boundary and Green Belt) is a simple one that categorically states that all development will take place within *'Urban Boundaries'* and on sites removed from the Green Belt, together with development that *'needs to be in a countryside location'* elsewhere (the examples cited being farm diversification and tourism uses). House extensions and replacement dwellings will also be granted planning permission in the countryside, subject to lists of policy criteria being satisfied (Policies HS13 and 14).

ECNF wishes to draw attention to the fact that in Rossendale, there is far more countryside than Green Belt - yet RBC prefers to remove land from the Green Belt to create development sites. The total area of the Borough is 13,800ha, of which approximately: 67% is countryside; 23% is Green Belt and less than 10% is within the *'Urban Boundary'* (Green Belt Topic Paper (2018), page 3). Contrary to the above referred-to policies in the Plan, the Topic Paper (at section 7., Exceptional Circumstances – part 1., *'To meet housing land requirements through a balanced approach to supply'*) states misleadingly:

"The Council has sought to prioritise brownfield land first, followed by Greenfield land in the urban area then in the countryside, followed by Green Belt."

While some - albeit limited - explanation is given for development allocations on brownfield and *'mixed'* sites, it is not possible to distinguish this prioritisation in the Plan itself. There is no obvious analysis of the scope for development in the countryside, of any type or at any scale. ECNF has therefore come to the conclusion that there has not been an appropriate – or even any – analysis of potential development sites in the countryside.

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

Response:

RBC should respond in full to this question, with reference to their Flood Risk Topic Paper (2019). While that Paper makes mention of the Plan's *'overall strategy'*, and flood risk assessment work undertaken, in reality it only assesses each of the sites allocated for development (it also refers to protected employment sites). There is no overall analysis relating to any spatial strategy, or to the distribution of housing and employment growth Borough-wide.



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

Response:

No, for the reasons given above; Policy SS does not seek to implement a spatial strategy for growth. Instead, it simply sets out how growth should be physically distributed.

i) 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?

Response:

RBC should respond to the first question.

In reply to the second question, ECNF notes that Policy SS does not define the constraints to growth in the Centres and on the sites listed. Instead, it simply states that '*growth and investment will be concentrated*' in the four Key Service Centres and on the four '*Major Sites*', while in the Local Service Centres, an '*appropriate*' level of growth and investment to help meet needs will be encouraged. In the Rural Local Service Centres, '*limited growth and investment*' will be encouraged, to meet local needs; in '*other places*', small scale development and infilling are referred to for meeting local need, but also there is scope for larger scale redevelopment. No explanation of these broad-brush references to types of need in the various locations is given in support of Policy SS. ECNF is of the view that the policy's parts a) to e) are in insufficient detail for development management purposes – a case could be made on the basis of their wording for almost any scale and type of development.

With reference to the third question, while Policy SS would allow for brownfield development in the named settlements, it does not specifically encourage the re-use of previously developed land in sustainable locations – if a settlement is not in the lists of centres, it is entirely unclear how/ if the policy would apply elsewhere for development management purposes and whether it would mean that such applications would not be in accordance with the Plan. ECNF would point out that Edenfield is one such '*other*' settlement, not named in Policy SS; this omission was commented on extensively in ECNF's representations on the pre-submission Plan. For Edenfield, Policy SS only allocates a '*Major Site*' and provides no steer on the acceptability or otherwise of brownfield or other development there. It is also a confusing allocation, that relates in reality to several unconnected land parcels, not one.



- j) 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?**

Response:

No, the approach is not justified – because the Plan does not have a vision, does not identify or address strategic priorities, and is not defined by a spatial strategy, its policies cannot effectively distribute development. This is particularly the case for development in the countryside. The first paragraph of Policy SD2: Urban Boundary and Green Belt requires countryside development to ‘need’ to be in the proposed location, and it has to enhance the rural character of the area. The explanation for the policy only refers to farm diversification and tourism uses as meeting the ‘need’ test; unacceptably, no reference is made to policy support for housing developments that reflect local needs in either. This omission is inconsistent with the NPPF and its policies for rural housing. If there are perceived to be local circumstances that justify this inconsistency, they should be explained in the Plan.

- k) 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]

Response:

RBC should respond to these questions.

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

Response:

The Explanation for Policy EMP1: Employment Growth and Employment makes mention of out-commuting into neighbouring authorities and it remaining ‘a major issue for Rossendale’; providing employment land is however the only means proposed for claw-back of out-commuters. While reference is made to cooperation with neighbouring authorities, this is only in the context of ‘effectively’ meeting ‘the needs of business and commuting residents’. With no complementary policy or other reference to incentivising businesses to locate and stay in Rossendale (e.g. in relation to transport infrastructure), it is highly unlikely that the Plan will help achieve any significant shift in commuter travel patterns.



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

Response:

No – cross-referencing the NPPF is not an adequate approach to policy formulation. The presumption itself is a material consideration in the determination of planning applications therefore repetition is not necessary or appropriate.

The Plan itself should include RBC's own policy for promoting sustainable development locally. ECNF once again has to state that without a Plan vision and spatial strategy, it has proved impossible for the authority to draft appropriate policies and as a consequence, it is almost impossible to know what would constitute sustainable development in the Borough. At present, it appears primarily to be the development that is cited in Policy SS.

ECNF would instead expect the Plan to set out exactly how RBC's vision and spatial strategy – and the resulting policies - have been positively prepared to: meet local people's identified needs; encourage economic growth and create employment opportunities; reduce the need to travel; and ensure the protection and enhancement of the built and natural environment. ECNF consider that the Plan should include a Borough-specific 'sustainable development' policy, that would set out a list of criteria that all development proposals in the Borough should take account of and respect, in addition to meeting Plan-defined needs and quality of life aspirations. The sustainable development policy should state that proposals consistent with the criteria will be considered favourably.

The structure and policies of the January 2019 adopted Barnsley Local Plan provide good examples of how to create a vision, generate objectives, formulate a spatial strategy and then draft policies that specifically promote sustainable development locally.

Yours sincerely,

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