

Edenfield Community Neighbourhood Forum

Housing Land Availability Review

29th August 2019.

Hope View Market Street Edenfield



Edenfield Community Neighbourhood Forum

Housing Land Availability Review

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EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM

Appendix ECNF - HLA 1

An Analysis of Housing Land Availability in Rossendale in the Context of the Submission Version of the Local Plan 2019 - 2034

Overview

Examination of the Strategic Housing Land Availability Assessments (June 2017 and August 2018) and other documents reveals a number of sites which could be developed for housing but which do not appear in the Housing Site Allocation (HSA) list in Table 1 of the Submission Version of the Rossendale District Local Plan (Table 1). In **Appendix ECNF - HLA 2** these are tabulated in Figure 1, after which is a summary for each site of Rossendale Borough Council (RBC)'s reasons for not carrying the site forward and the reasons why Edenfield Community Neighbourhood Forum (ECNF) considers that it is viable and deliverable.

Appendix ECNF - HLA 3 lists at Figure 2 sites where the potential yield of housing units is greater than that shown in Table 1. Figure 2 is followed by a site-by-site explanation of the numerical difference.

In **Appendix ECNF - HLA 4** at Figure 3 is a list of sites that have been wrongly excluded from Table 1, being sites with 'extant planning permissions which have not started or are still being built out, and are not expected to be completed this financial year', *i.e.*, by 31st March 2019. On the other hand, it is noted from RBC's document *EL1.002j(iv) Appendix C - Status of Allocated Sites* that, because of completions prior to 1st April 2019, the number of dwellings to be completed during the plan period will be 78 fewer than shown in Table 1. There might be a further reduction of 17 based on the applications/approvals for sites H12 and H13.

Appendix ECNF - HLA 5 looks at small sites and suggests that small sites alone can be expected to contribute a minimum of 25 dwellings per year, 375 over the plan period.

The additional number of dwellings that the sites in Figures 1, 2 and 3 and **Appendix ECNF - HLA 5** could provide is $918 + 40 + 270$ [minus 78 or 95] + 375 = 1,603 gross [1,525 or 1,508 net].

Appendix ECNF - HLA 6 considers the potential for further development in Bacup if there were proactive resolution of access constraints, which would significantly benefit all local residents and visitors.

This paper identifies sites that could provide 1,603 (gross; 1,508 net) dwellings over and above the 2,853 in Table 1. It deals only with sites that are, or have previously been, considered for housing development. It does not take into account numerous sites which are currently treated as

employment land but which are no longer suitable for employment use. See **Appendix ECNF - HLA 8**, which suggests that these could provide 439 more dwellings during the period of the Local Plan.

Nor does it take account of windfall sites with 5 or more dwellings or a possible contribution from the 1,207 empty homes in the Borough (**see Appendix ECNF - HLA 7**).

There is clearly no justification for claiming exceptional circumstances for the removal of site H72 Land west of Market Street, Edenfield from the Green Belt for residential development, when the supply of land outside the Green Belt that is suitable for housing has not been exhausted. In making a site allocation contrary to the NPPF, the draft Local Plan is unsound (**See Appendix ECNF - SoC, Conclusions 16 & 17**).

27th August 2019

EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM

Appendix ECNF - HLA 2

Sites to be allocated for housing in priority over Green Belt

SHLAA ref. no.	Other reference numbers	Site location	Ward	Yield (dwellings)	Stated reason for rejection	Summary of ECNF comments
18426		Heritage Arcade & 23-27 Bacup Road, Rawtens tall	Long-holme	40	Harm to Grade II church site.	SHLAA (Aug 2018) favoured residential conversion of this heritage asset in a conservation area, but the site was not in the Reg 18 or Reg 19 Local Plan. Conversion would be no detriment to listed building. Would add vibrancy to town centre. Excellent access to services.
16050		Off Coal Pit Lane, Bacup	Irwell	112	Unwilling landowner.	Despite constraints, SHLAA deemed site developable in long term. Adjacent to Urban Boundary. Unwilling landowners can be bought out by CPO.
16072		Lower Old Clough Farm, Weir, Bacup	Greens-clough	62	Landowners' intentions not known.	Despite constraints, SHLAA deemed site developable in long term. Adjacent to Urban Boundary. If the landowners are unwilling to develop, they can be bought out by CPO.
16211		North of Commercial St, Loveclough	Goodshaw	10	Landscape impact.	SHLAA deemed site developable in medium to long term. Site is adjacent to existing housing, and landscape impact could be mitigated.
16215		Opposite 1019 Burnley Road, Loveclough	Goodshaw	21	Landscape impact.	SHLAA deemed site developable in medium to long term. Site is close to Urban Boundary and landscape impact could be mitigated.

16218		South of Goodshaw Fold Road, Loveclough	Goodshaw	94	Retain Mill as existing Employment .	SHLAA deemed site developable in medium to long term. Site is adjacent to Urban Boundary, and landscape impact could be mitigated. Housing could be built on the land not occupied by the Mill, which could be screened.
16174	HS 2.54	Between Newchurch Road & Bacup Road, Higher Cloughfold	Hareholme	55	LCC could not accommodate 55 houses. Badger setts. Valley Heritage and Rossendale Valley Gateway Club object. Highways England want assessment within Highways Capacity Study. Potential land instability.	SHLAA considered access, topography, ecology and land stability and deemed site developable in medium to long term. Access available off Bacup Road or (by demolishing a property) Newchurch Road and would facilitate development of adjacent site SHLAA 16381/18381 (see next following row). Protection of Badgers Act 1992 allows licences to interfere with a sett for development. Nature of VH & RVGC objections not specified in Housing Topic Paper. Site is within Urban Boundary.
16381 18381	HS 2.54	West of Dobbin Lane, Lower Cloughfold	Hareholme	21	Same as for SHLAA 16174 (see last preceding row).	Broadly the same as for SHLAA 16174 (see last preceding row).
16227	HS 2.66	Behind 173 - 187 Haslingden Old Road, Rawtensall	Longholme	13	LCC objection due to unsuitable vehicle access.	SHLAA deemed development viable and achievable in short term. Site adjacent to Urban Boundary. Access issues could be overcome by a joint approach by SHLAAs 16227 and 16229 (see next following row) via Spring Bank Barn, an option LCC seems not to have considered.
16229	HS 2.64	Oakenhead Wood, Rawtensall	Longholme	22	LCC objection due to unsuitable vehicle access.	Same as SHLAA 16227 (see last preceding row).

16184	HS 2.44	South of Hollin Lane, Reedsho lme	Crib-den	24	Access issue via Hollin Lane, which is a narrow single lane with no possibility of widening	SHLAA deemed site developable in medium to long term. Site is adjacent to Urban Boundary. A letter from LCC confirms there is no objection to development subject to improvement and widening of Hollin Lane. Alternatively a joint approach by SHLAAs 16184 and 16392 (see next following row) could secure access by demolition of a property in Downham Avenue.
16392	HS 2.44	North of Hollin Lane, Reedsho lme	Crib-den	27	Access issue via Hollin Lane, which is a narrow single lane with no possibility of widening	Broadly the same as for SHLAA 16184 (see last preceding row). This site actually adjoins properties in Downham Avenue.
16164	HS 2.84	Behind Myrtle Grove Mill, Waterfoot	Hareholme	40	Two versions. <i>Either</i> Access and visual impact <i>or</i> Landowner intentions unknown. 2 resident objections. Access issues.	SHLAA considered the site to be potentially developable in the long term. It is relatively easy to widen Highfield Road for access. Visual impact can be mitigated by quality design. Landowner intentions should be investigated, and CPO considered if landowner is unwilling. The two resident objections are not specified in Housing Topic Paper.
16407	HS 2.98	South of Shaw Clough Road, Scout Bottom, Whitewell Bottom	White-well	32	Two versions. <i>Either</i> Tree planting/min or contamination <i>or</i> EA: main river, flood zone 3 and 2. Some willing landowners.	SHLAA deemed site marginally viable and developable in medium to long term. Site is adjacent to Urban Boundary, SHLAA acknowledged need for flood risk assessment and mitigation measures. CPO could be made against unwilling owners.
16377	HS 2.99	South of Isle of Man Mill, Water	White-well	47	Landscape. Uncertain landowner intentions.	SHLAA deemed site developable in medium to long term. Site is close to Urban Boundary. SHLAA said landscape impact could be mitigated. Landowners' intentions should be investigated, and CPO considered. SHLAA flagged potential access issue on Peers Clough Road, but alternative access could be made from Lower House Green.

16020	HS 2.102	Barlow Bottoms, Whitworth	Facit & Shawforth	35	Removed from list when site allocated for Travellers.	SHLAA deemed site deliverable in next five years. Now that the Travellers allocation has been deleted, site should be restored to HSA list.
16093	EE 30	Toll Bar Business Park, Stacksteads	Stacksteads	38+	Existing employment site EE 30	SHLAA deemed site deliverable in next five years. Site within Urban Boundary. Residential conversion may be the best way to ensure preservation of this listed building.
16139 16385 16386 16387	EE 42	Waterfoot Business Centre, Burnley Road East, Waterfoot	White-well	30+	Existing employment site EE 42	Having regard to the owners' representations and all material facts, a judgment must be made as to whether or not the site or part of it should be re-allocated for housing.
—	EE 20	Wavell House, Holcombe Road, Helmshore	Helmshore	14	Existing employment site EE 20	Having regard to the owners' representations, the residential redevelopment of another part of site EE20 and all material facts (including permitted development rights), a judgment must be made as to whether or not the whole site should be re-allocated for housing.
18424	EE 41	Forest Mill, Water	White-well	16	Existing employment site EE 41	SHLAA deemed site developable in medium to long term, subject to mitigation of flood risk and of any contamination. Site is within Urban Boundary, Having regard to the owners' representations and all material facts, a judgment must be made as to whether or not the site should be re-allocated for housing.
16090		Acre Avenue, Stacksteads	Stacksteads	31	Main landowner does not wish to release it.	Development would enhance the area. Access available. Adjacent to existing housing. CPO could be made.

16300		South of Edinburgh Road (former Cam Mill), Helmshore	Helmshore	19	Far from bus route. Flood risk. Woodland stepping stone and TPOs. High pressure gas pipe. Poor access. Proximity to Ancient Monument.	As regards the NE corner of the site, adjoining the Urban Boundary, the negative comments in the SHLAA are inapplicable, exaggerated, unsupported by facts or wrong.
16302		Rear of Edinburgh Road, Helmshore	Helmshore	7	Distant from local services. Covenants and easements. Access needs improvement. HSE approval and flood risk and landscape assessments required.	Contiguous and developable in conjunction with SHLAA 16300. Adjacent to existing housing.
16306		The Orchard, adj to Helmshore Rd/ York Avenue, Helmshore	Helmshore	8	Protected trees.	Site in urban boundary close to bus routes, shops and schools. It could yield up to 60 dwellings, if protected trees were felled. Should trees be preserved at expense of Green Belt?
16088	HS 2.29	West of Sow Clough, Stacksteads	Stacksteads	32	LCC highways objection and landowner intentions unknown.	Site adjoins Urban Boundary. The obvious option of access over garden land at 39/41 Tunstead Road, by CPO if necessary, has not been addressed. The site itself could be acquired by CPO if the landowners were unwilling.
16243	HS 2.68	West of Lomas Lane, Rawtensall	Longholme	41	No express reason.	Site adjoins Urban Boundary. Scope for early development of 5 dwellings, with potential for 36 more subject to resolution of flooding, contamination and ecology issues. Two potential access routes, one requiring traffic management.

16350		Northfield Road, Rising Bridge	Worsley	7	No express reason.	Site within Urban Boundary.
16354	Planning application 2019/0170	Bacup Conservative Club, Irwell Terrace, Bacup	Irwell	6	None	Planning application decision awaited.
— — —	Planning application 2019/0101	Village Pine, Glen Top Works, Stacksteads	Stacksteads	14	None	Planning application decision awaited. Proposal would enhance appearance of site
			TOTAL	208 + 227 + 483 = 918		Green - sites deliverable in 1 - 5 years Amber - sites deliverable in 6 - 10 years Red - sites deliverable in 11 - 15 years

Figure 1: Sites that could be allocated for housing in the Local Plan.

SHLAA 18426. Heritage Arcade & 23-27 Bacup Road, Rawtenstall.

Source: Brownfield & Mixed Sites Assessed in the SHLAA - 26 June 2018 and SHLAA (August 2018).

Site within Urban Boundary. [40 Apartments.](#)

RBC's comments in SHLAA (August 2018):

Justification comments: The Landowner has expressed an interest to re-develop the site for residential use. The site is currently vacant and considered available now. The site is situated within Rawtenstall Town Centre and is in close proximity to a range of services including a bus station. The site is however within flood risk zone 2 and adequate mitigation will need to be provided to protect the safety of future residents. The buildings are within the Rawtenstall Conservation Area and the Heritage Arcade is a non designated Heritage Asset playing an important role within the townscape. The demolition of the building would constitute severe harm and a conversion into apartments would be preferred. Subject to flood risk mitigation approved by the Environment Agency and LCC and a focus on the reconversion of the buildings, the site is considered suitable for residential use in the short term.

Viability and achievability summary: Achievable now.

Justification summary: The site is situated in a medium market area. The conversion of the building into residential use is preferred, unless a viability assessment demonstrates that this would not be viable. The site is considered to be achievable in the short term.

Conclusion: Deliverable in the next five years.

Justification conclusion: The properties are currently vacant and the Landowner has expressed an interest to develop the site for Residential use. The site is considered suitable for Residential use

subject to flood risk mitigation approved by the Environment Agency and LCC. The conversion of the Heritage Arcade into Apartments is the preferred option due to the importance of the building in terms of heritage and its location within Rawtenstall Town Centre Conservation Area.

Other RBC comments: (Source : Brownfield and Mixed Sites Assessed in the SHLAA - 26 June 2018). Site within the Town Centre. More appropriate for non-residential use.

ECNF General Comment: We questioned the Forward Planning Team with regards to their decision to remove their support for this application when in their Brownfield and Mixed Sites Assessment (received from RBC on 22nd May 2018) their preferred option was to develop the site. We were advised in writing that their change related to the possibility of "Substantial Harm to the Grade II Church Site", yet they comment that the site is suitable for non-residential use. They have ignored the fact that they previously supported the use of these buildings and others close by for "Late Night Clubs". Additionally, RBC are now proposing to build apartments in proximity to the Chapel (*Local Plan Submission Version site reference M2 Spinning Point*; planning permission reference 2017/0617). Good quality residential conversion should enhance rather than have an adverse impact on the conservation area or the Grade II Chapel building. Additionally, development for housing (close to the new Bus Station) would bring vibrancy to the Town Centre. (Note the site is not on the Employment Land List.)

SHLAA 16050. Off Coal Pit Lane, Bacup.

Source: Brownfield & Mixed Sites Assessed in the SHLAA - 26 June 2018 and SHLAA (August 2018).

Gross Site Area 5.38ha; Net development Area 3.74ha.

Site adjoins

Urban Boundary but is not in the Green Belt. [112 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comments: The site is in multiple ownerships and landowners owning 30% of the site are not willing to release the site for development. The intentions of the other landowners are unknown. Therefore site is not available now but part of the site can become available in the future. There is a slope gradient on the site thus land engineering is likely to be required on the site. The access from Coal Pit Lane is poor, however the access via Hazel Grove is good but will require improvements. The site is situated further than 5.5km/3.5 miles away from a strategic road but within proximity to a bus service to Bacup and Todmorden. Local services are accessible by walking except the secondary school and GP Surgery. The public footpaths would need to be maintained. Further assessments are required including a coal risk assessment, a land contamination and land stability assessments due to the mining history of the site. The site is considered suitable in the medium term subject to the constraints identified being adequately addressed.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: There are extra costs associated with the development and the site is situated in a low value market area. If it is demonstrated that the site is unviable, then the affordable housing requirement and planning obligations can be negotiated. The site is considered viable in the medium

term. The site is not currently achievable, as the owners intentions are unknown, but the site can become achievable in the long term.

Conclusion: Developable in the medium to long term (within six to ten years, or after ten years.)

Justification conclusion: The site is considered to be developable in the long term.

Other RBC comments: (Source: Brownfield and Mixed Sites Assessed in the SHLAA - 26 June 2018). The site is considered to be developable in the long term. Unwilling landowner. A previous version of that document received from RBC in May 2018, stated only: The site is considered to be developable in the long term.

ECNF General Comment: This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered. The “Unwilling Owner” comment should be disregarded on the basis that the Council can instigate Compulsory Purchase procedures.

SHLAA 16072. Lower Old Clough Farm, Weir, Bacup. Source:
Brownfield & Mixed Sites Assessed in the SHLAA - 26 June 2018 and SHLAA (August 2018). Gross Site area 3.31ha; Net Development Area 2.07ha. [62 dwellings](#).

This site is Countryside adjoining the Urban Boundary but not in the Green Belt.

RBC’s comments in SHLAA (August 2018):

Justification comments: The intentions of the landowners are unknown, therefore the site is not available now, but can become available in the long term. The vehicular access requires improvements. The site is situated further than 5.5 km. to a strategic road. The bus service is infrequent even if situated at proximity of the site. The future residents will rely heavily on private cars to commute and use local services such as the Secondary school, GP Surgery and Bacup town centre. The primary school and play area are situated within the medium range in terms of accessibility. The trees should be maintained on site and the treed area has been excluded from the area available for development. There is a Woodland Stepping Stone Habitat adjacent to the site that should not be negatively affected by the development. The public footpaths present on site and along the site’s boundaries should be maintained. The site is situated within the Enclosed Uplands landscape character type, therefore a landscape assessment will be recommended. The site is not currently suitable for development but can become suitable in the medium to long term provided that the constraints identified are adequately addressed.

Viability and achievability summary: Achievable now.

Justification summary: There are extra costs associated with the developments (e.g. access improvements, landscape assessment), however the site is within a medium value market area, therefore the development is considered viable. The development is likely to be achievable in the medium to long term, as no developer has expressed an interest.

Conclusion: Developable in the medium to long term (within six to ten years, or after ten years).

Justification conclusion: The site is developable in the long term.

Other RBC comments: (Source: Brownfield and Mixed Sites Assessed in the SHLAA - 26 June 2018). The site is developable in the long term. Intentions of the landowners unknown. A previous version of that document received from RBC in May 2018, concluded only: The site is developable in the long term.

ECNF General Comment: This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered. If the landowners are unwilling to develop or cannot be identified, it is open to the Council to instigate Compulsory Purchase procedures. The lane off Burnley Road could be widened or alternatively access could be via Heald Lane.

SHLAA 16211. North of Commercial Street, Loveclough. Source: Brownfield & Mixed Sites Assessed in the SHLAA - 26 June 2018 and SHLAA (August 2018). [10 dwellings](#).

This site is Countryside outside the Urban Boundary but immediately adjacent to existing terraced housing. It is not in the Green Belt. Gross Site Area 0.71ha; Net development Area 0.33ha.

RBC's comments in SHLAA (August 2018):

Justification comments: A small parcel of land was proposed for housing development (2 houses) in the call for sites exercise in 2011. The landowner owning 67% of the site (southern section) is interested to release the site for development in the future. After exclusion of the land used as private gardens / smallholding / allotments, 0.33 ha of land is available for development. The site gently slopes westward and is accessible from Burnley Road. It is situated further than 4 miles from a strategic road, but has good access to a half-hourly bus service. The local park is accessible by walking. The other local services are not within walking distance but can be accessed by bus. The public rights of way will need to be maintained. Also, the presence of waste water infrastructure beneath the site can constrain the development layout. Overall, the site is considered suitable based on the above criteria.

Viability and achievability summary: Achievable now.

Justification summary: The development is considered viable and could be delivered in the short term.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years).

Justification conclusion: 46% of the site (0.33ha) is available for development in the future. The site is also considered suitable for development based on the above criteria. The development is viable and is likely to be achieved in the short term. Overall the site is considered developable in the medium term.

Other RBC comments: A version of the Brownfield and Mixed Sites Assessed in the SHLAA received from RBC in May 2018 contained the same as the 'Justification conclusion' above. So did the version dated 26 June 2018, but with the addition of Landscape impact.

ECNF General Comments: This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be allocated for development in priority to existing Green Belt. The scale of the development proposed (10 +) would not have a big impact on the landscape, particularly as the site is significantly lower than the dwellings on the opposite side of Burnley Road, and it could easily be mitigated by screening with hedges or such other measures as might be identified in a landscape assessment. The weekday daytime bus service frequency is actually 15 minutes, with additional peak period journeys.

SHLAA 16215. Opposite 1019 Burnley Road, Loveclough. Source: Brownfield & Mixed Sites Assessed in the SHLAA - 26 June 2018 and SHLAA (August 2018). [21 Dwellings](#).

The site is Countryside on the west side of the A682, close to the Urban Boundary which runs along the east side of the A682. The land is not in the Green Belt. It is mixed greenfield and brownfield {grassland and garage colony}. Gross Site Area 0.81ha; Net Development Area 0.72ha.

RBC's comments in SHLAA (August 2018):

Justification comments: The landowner has submitted a planning application for the erection of 15 dwellings in 2014. The site is available for development. Planning application for 15 dwellings has been refused and the appeal dismissed in 2015. Less than 10% of the site is within the Coal Authority high risk development area therefore the impact is minimal. The site is situated within the Settled Valleys landscape character type however a independent landscape assessment concluded that the site is not suitable for development on landscape grounds. The site is not suitable now but can become suitable in the medium to long term provided that the landscape issues are adequately addressed.

Viability and achievability summary: Achievable now.

Justification summary: No extra costs have been identified as a land contamination report has already been submitted during the application 2014/0427. The site is located in a high value market area, therefore the development is considered viable. The site is likely to be delivered in the short term.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years).

Justification conclusion: The site is available for residential development, but not currently suitable due to its landscape value. It can become suitable in the future if the constraint is adequately addressed. The development is considered viable and achievable in the short term. Overall, the site is developable in the medium to long term.

Other RBC comments: A version of the Brownfield and Mixed Sites Assessed in the SHLAA received from RBC in May 2018 contained the same as the 'Justification conclusion' above. So did the version dated 26 June 2018, but with the addition of Landscape impact.

ECNF General Comment: This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered. The scale of the development proposed (15) would not have a big impact on the landscape, particularly as the site is significantly lower than the dwellings on the opposite side of Burnley Road. Any impact could be mitigated by screening with hedges or such other measures as might be identified in a landscape assessment. The weekday daytime bus service frequency is actually 15 minutes, with additional peak period journeys. There are opportunities to increase the size of this development by including the neglected site between the proposed site and Burnley Road and there is also a possibility for development of the land to the south of this site. All of these developments will provide an opportunity to enhance the area. Hourigan Connolly have submitted representations on behalf of Mr. Ken Howieson about this site. See Appendix 1, pages 1 to 17, to RBC's November 18 collection of Regulation 19 responses.

SHLAA 16218. Land South of Goodshaw Fold Road, Loveclough. Source: Brownfield & Mixed Sites Assessed in the SHLAA - 26 June 2018 and SHLAA (August 2018). [94 dwellings](#).

The site is 4.78ha in total of which 3.15ha were considered to be developable with a high quality design scheme. Countryside adjoining the Urban Boundary but not in Green Belt.

RBC's comments in SHLAA (August 2018):

Justification comments: The landowner expressed an interest to release the site for housing development during an e-mail received in December 2016. The site is available now. There is a pronounced slope on the site; however it does not prohibit development. The site is situated 3.7 miles away from a strategic road but has good access to a half-hourly bus service. The local store and playground are situated within 800m and are accessible by walking. The primary school, secondary school and doctor surgery are situated further away and can be accessed by public transport. More than 10% of the site is at high risk of surface water flooding especially along Limy Water, therefore a flood risk assessment is required. The public right of ways should be retained as part of the development. The site adjoins Goodshawfold Conservation Area; therefore a high quality design and natural materials are expected to contribute positively to the local character of the area. About a third of the site is within a Coal Authority high risk development area, therefore a coal-mining risk assessment is recommended. Overall, the site is not currently suitable for housing development but can become suitable in the future provided that the constraints such as surface water flooding and coal mining legacy are adequately addressed. Also, the scheme should be of high design and proposing to use high quality material to enhance the local character of the adjoining Conservation Area.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: Extra costs have been identified; however the site is within a high value market area, so the development is considered viable. No developer has expressed an interest. Due to the size of the development, the delivery is likely to be within the medium to long term.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years).

Justification conclusion: The site is available now, however it is not currently suitable for housing development. Indeed, the surface water flooding issues and the coal mining legacy need to be adequately addressed. Also, since the site adjoins Goodshaw Conservation Area a high quality design scheme is requested to enhance the character of the local area. The site can become suitable in the medium to long term. The development is considered viable as it is situated in a high value market area. However no developer has expressed an interest, so the site is likely to be achievable in the medium to long term. (Within 6-10 years, or after 10 years.)

Other RBC comments: A version of the Brownfield and Mixed Sites Assessed in the SHLAA received from RBC in May 2018 contained wording similar to the 'Justification conclusion' above. So did the version dated 26 June 2018), but with the addition of Retain Mill as existing Employment.

ECNF General Comment: This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered. The comments relating to the Mill presumably refer to the Kenross Site which is within and next to the western boundary of the site but which does not appear as an Employment Site in the Employment Land Review. There is no issue in retaining the Mill, it can easily be screened from the rest of the site and it would continue to minimise any surface water flooding. This site should be developed prior to any development on Green Belt land. The weekday daytime bus service frequency is actually 15 minutes, with additional peak period journeys.

SHLAA 16174. HS 2.54. Land between Newchurch Road & Bacup Road, Higher Cloughfold. Source: SHLAA (August 2018). Gross Site Area 4.91ha, net development area 1.83ha. Greenfield site, designated as Greenland within the Urban Boundary. (Owned by RBC.) [55 dwellings](#).

RBC's comments in the SHLAA (August 2018):

Justification comments: The site is in public ownership and is available for development. There is a pronounced slope on site, but it can be mitigated to allow development. There is potential vehicular access from Co-operation Street and Lambton Gates. The site is situated 1.8 miles from a strategic road and has good access to public transport. A GP surgery, play area and local convenience store are available within walking distance, but other local services such as a primary and secondary school are situated further away and residents will be reliant on public or private transport to access them. Three quarters of the site are identified as woodland Stepping Stone Habitat, therefore the development should aim to preserve or mitigate the site's important ecological value. The area available for development has been reduced by 50% to allow for protection of part of the habitat. The public right of way along the southern boundary should be retained. The site adjoins the former St. John's Church which is a listed Building Grade II; therefore a heritage impact assessment will be required. The site is

also situated 50m away from Cloughfold Conservation Area, therefore high quality design and materials are expected to preserve the character of the local area. Small pockets of land have potential land contamination issues thus a land contamination survey is recommended. Also, some comments were received regarding the land stability of the site; therefore a land stability investigation is likely to be needed. The site has some constraints, however the site is considered suitable provided that the issues are adequately addressed.

Viability and achievability summary: Available now.

Justification summary: There are extra costs associated with a housing development on the site, however the site is within a medium market value area and thus the development is considered viable. The development is considered achievable on this site in the short term.

Conclusion: Deliverable in the next five years.

Justification conclusion: The site is available and suitable for a housing development provided that the constraints have been addressed (i.e. topography, ecological value, heritage assessment, potential land contamination and instability). The development is considered viable and can be achieved in the medium to long term.

RBC comments in Housing Topic Paper (August 2018 and March 2019):

LCC: could not accommodate 55 houses. Badger setts present on site. Objection from Valley Heritage, Rossendale Valley Gateway Club. Highways England state should be assessed within Highways Capacity Study. Potential land instability.

NOTE: The Housing Topic Paper deals with this site and site reference SHLAA 16381/18381 together under reference HS 2.54 and applies to both the one summary of reasons for not taking the sites forward.

ECNF General Comment: The comments from RBC's SHLAA are dated August 2018, yet RBC decided to withdraw the site from the Housing Site Allocation list in the Pre-Submission Version of the Local Plan for the reasons in the Housing Topic Paper. The SHLAA acknowledged the constraints of *inter alia* topography, ecological value and land stability and concluded that development of part of the site was viable. Licences to interfere with a badger sett for the purposes of development may be granted under the Protection of Badgers Act 1992. Highway capacity issues require detailed examination. Access can be achieved via Co-operation Street off Bacup Road or from Newchurch Road through the purchase of a property and would facilitate development of the adjacent site (SHLAA 16381/18381, noted below). This development would create an opportunity to significantly improve the character of the area. This site is not in the Green Belt; it is within the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16381/18381.HS 2.54. Land to the West of Dobbin Lane, Lower Cloughfold. Source: SHLAA (June 2017). Site Area 0.9 ha. [27 dwellings](#).

The Gross Site area was reduced to 0.7 ha with Net Development Area of 0.7ha in the SHLAA (August 2018) and reduced to [21 dwellings](#). It is a greenfield site within the Urban Boundary.

RBC's comments in SHLAA (August 2018):

Justification comment: The owner of the site has expressed interest in developing the site. The site may be deliverable in the shorter term however resolving the access and design constraints may take a considerable period.

Viability and achievable summary: Achievable in medium to long term.

Justification summary: The additional costs of building on a steep site and creating a suitable access to the satisfaction of the Highway Authority will impact on viability and bringing the site forward.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years.)

Justification conclusion: The site is appropriate for development but there are a number of constraints that are likely to mean that it may not be possible to deliver in the 0-5 year timeframe.

RBC comments in Housing Topic Paper (August 2018 and March 2019):

LCC: could not accommodate 55 houses. Badger setts present on site. Objection from Valley Heritage, Rossendale Valley Gateway Club. Highways England state should be assessed within Highways Capacity Study. Potential land instability.

NOTE: The Housing Topic Paper deals with this site and site reference SHLAA 16174 together under reference HS2.54 and applies to both the one summary of reasons for not taking the sites forward.

ECNF General Comment: The comments from RBC's SHLAA are dated August 2018, yet RBC decided to withdraw the site from the Housing Site Allocation list in the Pre-Submission Version of the Local Plan for the reasons in the Housing Topic Paper. The only significant constraints raised in the SHLAA were the slope of the land and the access. Licences to interfere with a badger sett for the purposes of development may be granted under the Protection of Badgers Act 1992. Highway capacity issues require detailed examination. There is a possibility that access to this site could be gained through development of adjacent site SHLAA16174 (noted above). This development would create an opportunity to significantly improve the character of the area. This site is not in the Green Belt; it is within the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16227. HS 2.66. Land behind nos 173 to 187 Haslingden Old Road, Rawtenstall. Source: SHLAA (August 2018). Site Gross Area 0.51ha, Net Development Area 0.45ha. It is a greenfield site in Countryside adjoining the Urban Area but not in the Green Belt. [13 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: The landowner has responded to a letter sent on the 15th November 2016 via a phone call stating his interest in releasing the site for a housing development. The site is considered

available in the short term. The vehicular access to the site requires improvements. The access can either be via a lane to the east of Spring Bank Barn situated on Haslingden Old Road which is a narrow lane or via the lane leading to Cribden View and Spring Bank Farm but likely to be subject to a ransom strip. The access will need to be approved by LCC Highways. Traffic around the schools is severe at school time. The site is situated 1.9 miles away from a strategic road and has access to an hourly bus service. The primary school and Local Park are within walking distance. Other services such as the secondary school, GP surgery and local store are situated further away, although there is an hourly bus service to Rawtenstall and Haslingden. The site is in proximity to Rawtenstall Town Centre and is considered to be in a sustainable location. The site is considered suitable for housing development, provided that the current single track road vehicular access is improved and approved by LCC Highways.

Viability and achievability summary: Achievable now.

Justification summary: The vehicular access requires improvement and this will incur extra costs. However, since the site is within a high value market area, the development is considered viable. The development is achievable in the short term.

Conclusion: Deliverable In the next five years.

Justification conclusion: The site is likely to be available in the short term, and is considered suitable for development. The development is viable and considered achievable in the short term.

ECNF General Comment: The comments noted above from RBC's SHLAA are dated August 2018, yet RBC decided to withdraw the site from the HSA list by reason of "LCC objection due to unsuitable vehicle access" (Housing Topic Paper, August 2018 and March 2019). The access issues could be overcome through a joint approach with SHLAA 16229 via Spring Bank Barn, which appears to be an option that LCC has not considered. This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16229. HS 2.64. Land at Oakenhead Wood, Rawtenstall. Source: RBC SHLAA (August 2018). Site Gross Area 0.84 ha, Net development Area 0.75ha. It is a greenfield site in Countryside adjoining the Urban Area but not in the Green Belt. [22 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: The new landowner has expressed an interest in developing the site. The site is accessible via a narrow lane off Haslingden Old Road. If the lane could be widened, this would greatly improve the access. Future residents will be able to access an hourly bus service for commuting and to access local services situated further away (e.g. secondary school, GP surgery and local store). However, residents are likely to rely on private car if the frequency of the bus service is not increased. The site is considered suitable for a housing development provided that the access can be improved and is then approved by LCC Highways.

Viability and achievability summary: Achievable now.

Justification summary: The vehicular access is via a narrow lane and would require improvements. The site is within a high value market area, so the development is considered viable. The development can be achieved in the short term.

Conclusion: Deliverable in the next five years.

Justification conclusion: The site is available now and is considered suitable for a housing development provided that the access can be improved and then approved by LCC Highways. The development is viable and can be achieved in the short term.

ECNF General comment: The comments noted above from RBC's SHLAA are dated August 2018, yet RBC decided to withdraw the site from the HSA list by reason of LCC's objection due to unsuitable vehicle access. The access issues could be overcome through a joint approach with SHLAA 16227 via Spring Bank Barn, which appears to be an option which LCC has not considered. This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16184. HS 2.44. Land South of Hollin Lane, Reedsholme. Source: SHLAA (August 2018) Site Gross Area 1.27ha, Net Development Area 0.81 ha. This is a greenfield site in Countryside adjoining the Urban Boundary but not in the Green Belt. [24 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: The landowner is willing to develop the site for residential use. The site is available now. The land is flat but vehicular access is an issue that requires significant improvements. The site is situated close (2.2 miles) to a strategic road but further than 400m from a bus stop (510m). Most local services are available within walking distance, except for a play area. A small part of the site is at high and medium risk of surface water flooding, while a larger part of the site is at low risk of surface water flooding. A flood risk assessment would be required prior to the development. The southern strip of the site is within a Woodland Stepping Stone. This habitat should be protected and has therefore been excluded from the area available for development. The public rights of way would need to be retained. Although no listed buildings adjoin the site, 3 heritage assets are located on the hill surrounding the site, thus the view from those properties might be affected by the development (Higher and Lower Chapel Hill Farm, Friends Burial Ground). A heritage impact assessment is recommended. The site is considered suitable in the future provided that the access is improved, the woodland habitat is protected and that the development does not affect the setting of the listed buildings.

Viability and achievability summary: Achievable now.

Justification summary: There are extra costs associated with the development (i.e. making the vehicular access suitable for a housing scheme), however the site is within a high value market area, therefore the development is considered viable. Once the barriers to development have been addressed, the site could be delivered in the short term.

Conclusion: Developable in the medium to longer term (within 6 to 10 years, or after 10 years.)

Justification conclusion: The site is available now. However it is not currently suitable due to vehicular access issues (narrow lane). The site can become suitable if the access is improved, if the woodland habitat situated along the southern boundary of the site is protected and if the development does not affect the settings of the listed properties situated further up the hill. The development is considered viable & achievable within the medium to long term.

ECNF General Comment: The comments noted above are from RBC's SHLAA dated August 2018, yet RBC decided to withdraw the site from the HSA list because of 'Access issue via Hollin Lane which is a narrow single lane with no possibility of widening' (*RBC Housing Topic Paper, August 2018 and March 2019*). This appears to be incorrect. The access issues can be overcome by a joint approach with SHLAA 16392. Emery Planning are representing Mrs L. Bower about this site - see Appendix 3, pages 1 to 181, to RBC's November 2018 collection of Regulation 19 responses. In particular they include two letters from Lancashire County Council Highways Development Control (pages 93 to 99) confirming that LCC had no objection to a proposal for development subject to the Hollin Lane improvement and widening works being designed to provide a safe and suitable access in accordance with Manual for Streets to accommodate the development traffic and the existing farm traffic and pedestrian movements. In any event, by a joint approach with a developer of the site north of Hollin Lane reference SHLAA 16392, an alternative access could be achieved through the purchase of a property in Downham Avenue. As regards the listed buildings, RBC's Heritage Impact Assessment of Housing Sites (September 2017) suggested that the effects of development could be mitigated. This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16392. HS 2.44. Land North of Hollin Lane, Reedsholme. **Source:** SHLAA (August 2018). Site Gross Area 1.24ha, Net Developable Area 0.9ha. This is a greenfield site in Countryside adjoining the Urban Area but not in the Green Belt. [27 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: The landowners are supportive of the land being released for development. The development of the site is dependent on access issues being resolved to the satisfaction of the Highways Authority. This may take some time to resolve. The land is distant from public transport services.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: The site is in a high value area with proven demand. The road improvement is considered financially feasible especially if shared costs with SHLAA site 16184.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years.)

Justification comment: The deliverability of this site is dependent on an acceptable solution being found to the highway issue.

ECNF General Comment: The comments noted above are from RBC's SHLAA dated August 2018, yet RBC decided to withdraw the site from the HSA list because of 'Access issue via Hollin Lane which is a narrow single lane with no possibility of widening' (*RBC Housing Topic Paper, August 2018 and March 2019*). This appears to be incorrect. The access issues can be overcome by a joint approach with the developer of site reference SHLAA 16184, in respect of which Emery Planning are representing Mrs L. Bower - see Appendix 3, pages 1 to 181, to RBC's November 2018 collection of Regulation 19 responses. In particular there are two letters from Lancashire County Council Highways Development Control (pages 93 to 99) confirming that LCC had no objection to a proposal for development subject to the Hollin Lane improvement and widening works being designed to provide a safe and suitable access in accordance with Manual for Streets to accommodate the development traffic and the existing farm traffic and pedestrian movements. In any event an alternative access could be achieved through the purchase of a property in Downham Avenue. As regards the listed buildings, RBC's Heritage Impact Assessment of Housing Sites (September 2017) suggested that the effects of development could be mitigated. This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16164. HS 2.84. Land behind Myrtle Grove Mill, Waterfoot. Source: SHLAA (August 2018). Site Gross Area 3.57ha, Net Development Area 1.35ha. The site is mixed greenfield and brownfield in Countryside adjoining the Urban Boundary but not within the Green Belt. [40 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: The intentions of the landowner are unknown therefore the site is not currently available but can become available in the long term. The site is steep and is likely to require land engineering works to allow development. Access via Highfield Road or Lench Road is poor as both are single lanes. The site is situated 2.3 miles from a strategic road and has good access to a quality bus route. Only the local store is within walking access. Other local services are situated further away and are accessible by public or private transport. The site is adjacent to a woodland stepping stone habitat therefore it is important that the development does not have a negative impact on the ecological value of the adjoining site. Several public rights of way are going through the site and should be maintained. There is a small pocket of land with potential contamination issues and thus a land contamination survey would be required. There is an active employment area to the north of the site which is currently screened by trees. Some waste water infrastructure is present on site that would need to be taken into consideration. The site is considered to be developable in the long term provided the access is improved, the ecological value of the adjacent woodland is preserved and a land contamination survey is undertaken for the area at risk.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: Extra costs are associated with the development of the site and the land is within a medium value market area. The development is considered marginally viable. No developer has expressed an interest to develop the site therefore it is not likely to be achieved in the short term and is rather a long term prospect.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years.)

Justification conclusion: Overall the site is potentially developable in the long term.

ECNF General Comment: We were informed in writing by RBC that this site was being removed from the list because of access / visual impact. The access issue could be relatively easily overcome by the re-design of the car park area to enable Highfield Road to be widened at its pinch point. In terms of visual impact the area would be enhanced by introducing a quality development. The Housing Topic Paper (August 2018 and March 2019) presented differently the reasons for not taking the site forward. This said "Landowner intentions unknown. 2 resident objections. Access issues." If the landowner is not willing to develop the land, RBC as planning authority has compulsory purchase powers. The Topic Paper is silent on the grounds of the residents' objections. This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16407. HS 2.98. Land South of Shaw Clough Road, Scout Bottom, Whitewell Bottom. Source: SHLAA (August 2018). Site Gross Area 2.86ha, Net Development Area 1.08ha. The site is greenfield in Countryside adjoining the Urban Boundary but not in the Green Belt. [32 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: Two thirds of the land is in private ownership and one third in public ownership (RBC). The landowners owning 1.13ha of land within the western section are willing to develop the site. The site within public ownership (RBC) is also available for development, although it is largely covered by trees (0.99ha). The intentions of the landowner owning the central parcel of land are unknown. Part of the site is available now (2.12ha), and the remaining part of the site can become available in the long term (0.74ha).

Viability and achievability summary: Achievable in medium to long term.

Justification summary: Vehicular access is a significant issue as Shaw Clough Street and Piercy Road are narrow lanes. There is a potential to access the site via Shaw Clough Road near the junction with Shaw Clough Street. The site is situated in proximity to a primary school and high school; however other local services such as a convenience store, GP surgery are situated further away. A small part of the site is within flood zone 3 and 2, and Shaw Clough Brook is also situated in the site. A flood risk assessment and appropriate mitigation will be required prior to development. A public right of way goes through the site and should be maintained. Some listed properties adjoin the curtilage of the site, therefore high quality design and materials are expected to enhance the local settings of the listed buildings. There is potential land contamination on site; therefore a land contamination survey is needed. There are active businesses to the north of the site and to the west, so

appropriate screening will be required (e.g. tree planting). The site can become suitable for development in the medium term, if the constraints can be adequately addressed.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10years).

Justification conclusion: Significant extra costs have been identified and the site is situated in a medium value market area. The development is considered marginally viable. It can be achieved in the medium to long term.

ECNF General Comment: We were informed in writing by RBC that this site was being removed from the HSA list because of tree planting/minor contamination, although the SHLAA considered it to be marginally viable. The Housing Topic Paper (August 2018 and March 2019) offered different reasons: "EA: main river, flood zone 3 and 2. some willing landowners." The SHLAA acknowledged that a small part of the site was within flood zones 3 and 2 and that a flood risk assessment and appropriate mitigation would be required. It is not clear why willing landowners would be a reason for delisting the site. The development of this site would significantly enhance this area. This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16377. HS 2.99. Land south of Isle of Man Mill, Water. Source: SHLAA (August 2018). Site Gross Area 2.11ha, Net Development Area 1.58ha. The site is greenfield in Countryside adjoining the Urban Boundary but not in the Green Belt. [47 dwellings.](#)

RBC's comments in SHLAA (August 2018):

Justification comment: Relatively simple greenfield site though gradient, access and landscaping will all require consideration. Availability of the site is unknown. The site is considered as suitable but there would be a number of mitigation issues to address. Landscaping would be essential as the scheme would alter the primarily linear character of the area. The existing single track access is unlikely to be acceptable in its current form and is relatively steep.

Viability and achievability summary: Achievable in medium to longer term.

Justification summary: It may be possible to deliver the site in a faster timetable than this but this takes into account any necessary work required.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years).

Justification conclusion: The site is physically capable of development but some additional work may be required and the intentions of the landowner are unclear. Delivery of this number of units may not be feasible with the existing road access.

ECNF General Comment. RBC subsequently removed this site from the list citing 'Landscape, uncertain landowner intentions'. The Housing Topic Paper is worded similarly.

As regards landscape impact, this would need to be, and was previously considered to be, capable of being mitigated.

The landowners' intentions should be investigated. If the owners are uncertain or unwilling, it is open to RBC as the planning authority to exercise powers of compulsory purchase.

The Peers Clough Road access could be significantly improved by increasing the width of the single track road through the utilisation of unused land at either side of the existing roadway. Alternatively, the development could be extended through site M3 to the Lower House Green site using Countryside (not Green Belt) land that would adjoin the existing Urban Boundary. This option should be given serious consideration - it would allow the site to be extended and enhance the total area.

This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16020. HS 2.102. Barlow Bottoms, Whitworth. Source: SHLAA (August 2018). Site Gross Area 1.29ha, Net Development Area 1.16ha. The site is within the Urban Boundary. [35 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: The Landowners have expressed their support for the allocation of the site for housing development (draft Local Plan consultation summer 2015). The land is considered available now for housing development.

The site is situated more than 5.5km from a strategic road network; however there is good access to public transport. The local services are within good access (within 15 mins walk on average or accessible by bus). There is potential land contamination so this will need to be addressed. There are active businesses some distance away to the south (manufacturing and offices) however it is considered that their activity will not affect the amenity of future residents.

Viability and achievable summary: Available now.

Justification summary: Extra costs are associated with the development regarding the land contamination survey and conservation of the adjacent Woodland Stepping Stone Habitat. The site is situated in a medium market value area and therefore is considered viable. The site is considered achievable in the short term.

Conclusion: Deliverable in the next five years.

Justification conclusion: The site is considered to be available, suitable and achievable now for residential use.

ECNF General Comment: RBC removed this site from the list when they allocated the site for permanent use by Travellers. That allocation was then deleted by resolution of the Council on 11th July 2018 following the responses to the Regulation 18 Consultation. There is no reason why this site cannot be re-allocated to the HSA list. This site is not in the Green Belt; it is within the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16093. EE30. Toll Bar Business Park, Stacksteads. Source: SHLAA (August 2018). Site Gross Area 0.79ha, Net Development Area 0.76ha. The site is within the Urban Boundary. [38+ dwellings.](#)

RBC's comments in SHLAA (August 2018):

Justification comments: The site is in single private ownership and the landowner has expressed an interest to develop the site in the short term for housing use. The vehicular access off Newchurch Road requires approval from LCC Highways. It is situated further than 5.5km / 3.5 miles away from a strategic road network, however, it has good access to a high quality bus route and most local services are accessible by walking except the GP Surgery which can be accessed by public transport. Part of the site is within flood zone 2 and part is at high and medium risk of surface water flooding, therefore particular attention to the layout and design will be required. The site is situated within a Local Geodiversity Site (Stacksteads Gorge). Stacksteads Mill, situated on the site, is a listed building Grade II. A Listed Building Consent will be required and the scheme should include a conversion of the mill that will enhance or maintain the character of the Listed Building and the local area. There is potential land contamination therefore a land contamination report will be needed. The site is in a sustainable location and is considered suitable for a housing development provided that the constraints identified are adequately addressed.

Viability and achievability summary: Achievable now.

Justification summary: Extra costs are associated with the development of the site (e.g. Flood risk mitigation, heritage assessment, Listed Building Consent and land contamination survey). The site is in a low value market area, however it is considered viable for a housing development. The development can be achieved in the next 5 years.

Conclusion: Deliverable in the next 5 years.

Justification conclusion: The site is available now (landowner / developer intentions to develop the site for housing in the short term), suitable provided that the constraints identified are adequately addressed, viable and achievable in the short term.

ECNF General Comment: A representation has been made by Hourigan Connolly on behalf of B & E Boys Ltd - see Appendix 5, pages 26 to 71, to RBC's collection of Regulation 19 responses. Additionally, the development of this site would significantly enhance the surrounding area. The site has been identified as capable of development for housing if the constraints are addressed. A key consideration in determining whether this existing employment site should be re-allocated for housing must be to ensure the continued upkeep of the listed building and preservation of its significant features, both exterior and interior. If re-allocating the site for housing is deemed to be the best way to ensure the long-term protection of the listed building, the site, being within the Urban Boundary, should be designated for housing before any land is taken out of Green Belt.

SHLAA 16139, 16385, 16386 and 16387. EE42. The Waterfoot Business Centre, Burnley Road East, Waterfoot. (includes Dale, Albion and Globe Mills). Source: SHLAA (August 2018). Site Gross Area 1.84ha (per EE42), 2.32ha (per SHLAA) Net Development Area estimate 1ha. The site is within the Urban Boundary. [30+ dwellings](#).

ECNF General Comments: In the SHLAA (August 2018) only part of the site was deemed to be developable. In view of this Hourigan Connolly on behalf of the owners B & E Boys Ltd have prepared a new plan for the whole site. (Refer to Appendix 5, pages 72 to 95, to RBC's November 2018 collection of Regulation 19 responses.) This development would significantly improve the area and the northern approach to Waterfoot. If use of all or part of the site, which is within the Urban Boundary, for housing is deemed appropriate, it should be developed before any removal of land from Green Belt is considered.

EE20. Wavell House, Holcombe Road, Helmshore. Source: Local Plan Regulation 19 representation from Hourigan Connolly on behalf of Brilie Properties Ltd. Site Gross Area 0.48ha, Net Development Area 0.48ha. The site is Brownfield within the urban boundary. [14 dwellings](#).

ECNF General Comments: The site includes offices which are now all vacant and the owner wishes to develop it for residential purposes. The owner considers that there is no reasonable prospect of the site's being used again for employment purposes. There is the possibility to use permitted development rights for a residential conversion, but the owner would prefer to redevelop its entire site, according to a representation by Hourigan Connolly. (Refer to Appendix 5, pages 223 to 262, of RBC's November 2018 collection of Regulation 19 responses.) This would appear to be a sensible solution and further enhance the area. This site is not in the Green Belt; it is within the Urban Boundary and should be developed before any removal of land from Green Belt is contemplated. A part of site EE20 in different ownership is in an advanced state of residential redevelopment.

SHLAA 18424. EE 41. Forest Mill, Water. Source: SHLAA (August 2018). Site Gross Area 0.61ha, Net Development Area 0.55ha. The site is brownfield within the Urban Boundary. [16 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comments: The landowner has expressed an interest to change the use of the site from employment and retail to residential. The site is considered available in the short term. The site is a brownfield site currently in employment and retail use within the urban area. It has good access from Burnley Road East but is situated far away from a strategic road network. The site is situated in proximity to a primary school and local shop. However, the closest medical centre is situated 4.5km

away. There is a high risk of surface water flooding on the site and potential land contamination from previous use. Provided that flood risk can be mitigated and land contamination assessed and adequately mitigated if required, the site is considered suitable for residential use.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: Extra costs are likely due to demolition and flood risk mitigation. The site is within a medium value market area and is likely to be viable. Development is considered to be achievable in the medium to long term.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years).

Justification conclusion: The site is available for development and is considered suitable subject to surface water flood risk mitigation and a land contamination report. The development can be delivered in the medium term.

ECNF General Comment: A representation has been made by Hourigan Connolly on behalf of Brother Investments Ltd. the owners. (Refer to Appendix 5, pages 263 to 287, to RBC's November 2018 collection of Regulation 19 responses.) They cite the need for costly repairs, the difficulty of attracting tenants and the overall rating of the site as 'Poor' in RBC's Employment Land Review 2017. ECNF consider that redevelopment of the site would significantly enhance the surrounding area. RBC found the site to be suitable for housing, subject to mitigation of flood risk and any contamination. It is within the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16090 . Acre Avenue, Stacksteads. Source: SHLAA (August 2018). Site Gross Area 1.36ha Net Development Area 1.04ha. The site is greenfield. The north-west corner of the site is within the Urban Boundary but is not allocated for a specific use. The remainder of the site is Countryside adjoining the urban area. [31 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comment: Part of the site to the north west was kept as a wooded area as part of the planning permission 1993/541 for the adjacent residential estate. The landowner of this wooded area wishes to develop the site for residential use, however the area is too small to be able to deliver 5 or more houses. The main landowner does not wish to release the land for housing development (letter received in August 2015). Therefore, the site is not available for development. The land is capable of development, although the access is a problem and the narrow and steep nature of the site makes production of a suitable design challenging.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: Extra costs for vehicular access and flood risk mitigation. Design challenging due to the steep and narrow nature of the site. A development would be marginally viable and could be delivered in the medium term.

Conclusion: Not developable or not to be included in the SHLAA.

Justification conclusion: The site is not developable, as the land is not available for housing development. The main landowner does not wish to release the land for housing development.

ECNF General Comments: A representation relating to the part within the Urban Boundary has been made by Hourigan Connolly on behalf of B & E Boys Ltd (Appendix 5, pages 1 to 3, to RBC's November 2018 collection of Regulation 19 responses.) The development of this site would significantly enhance the surrounding area. It is estimated that the north-western corner of the site within the Urban Boundary could accommodate 10 dwellings. It is adjacent to existing housing, and therefore it would be appropriate to develop this area for housing. Access is available via Brunswick Terrace. The landowners' intentions should be investigated. If the owners are uncertain or unwilling, it is open to RBC as the planning authority to exercise powers of compulsory purchase. It is noted that there is additional land between the site and Bacup Cemetery that might also be developed for housing. The whole of the site identified in the SHLAA should be considered for development, before removal of land from Green Belt is contemplated.

SHLAA 16300. Land south of Edinburgh Road (Former Cam Mill), Helmshore. Source: SHLAA (June 2017). Site Gross Area 2.71 ha, Net development Area 1.36ha. The site is Countryside adjoining the Urban Boundary but not in the Green Belt. 41 dwellings.

In their Regulation 19 representations (reference 5196) the owners now propose developing 0.63ha. At 30 units per hectare, that would yield 19 dwellings.

RBC's comments in SHLAA (June 2017):

Justification Comments: The site is available now. The agent stated that there is a covenant associated to the land title but that it does not affect the development of the site. Access improvement is required. The site is situated far away from bus services (760m) and future residents will probably rely on the car to commute and access services. There is flood risk both from the river and surface water on the site. The net development area excludes the river (flood zone 3) and mitigation should be put in place to reduce risks associated with the flood risk. The woodland has a high ecological value (Stepping Stone) and several trees are protected by TPO. A high pressure gas pipeline adjoins the site to the north west, therefore consultation with HSE is required prior to the development. The site is not considered suitable for a housing development due to its high ecological value, flood risk, vehicular access issue and proximity to a Scheduled Ancient Monument (Higher Mill, Helmshore).

Viability and achievability summary: Achievable in medium to long term.

Justification summary: Significant extra costs are associated with access improvement, flood risk mitigation and ecological impact mitigation / compensation. The site is within a high value market area so the site is considered viable.

Conclusion: Not developable or not to be included in the SHLAA.

Justification conclusion: Although the site is available now, it is not considered suitable for a housing scheme. However, under delivery it states 11 to 15 years.

ECNF General Comment: A site visit revealed that the negative comments in the SHLAA were significantly exaggerated. There is obvious potential to develop the field in the north-east corner of the site at the end of Edinburgh Road and it is difficult to understand why this has been removed entirely from the latest SHLAA. It does not have any particularly high ecological value, it is easily accessible if a small private garage were acquired and removed, and it is remote from the high pressure gas pipeline. A representation has been made by Hourigan Connolly on behalf of Mr & Mrs Ward. See *Rosendale Draft Local Plan Pre-Submission Publication Version Regulation 19 Consultation Comments Received reference 5196 Pages 879 to 887 December 2018*. They suggest that 0.63ha of the site, being the part adjacent to Edinburgh Road and Mercer Crescent, should be allocated for development. At a density of 30 units per hectare, that would yield 19 dwellings. That part of the site is less than 760m walking distance from the hourly 11 and half-hourly X41 bus services on Helmshore Road, which the SHLAA of 2017 neglects to mention, referring only to the hourly 11 and what is now the hourly 481 on Grane Road. Any dwellings that were to be built on the site to the east of the River Ogden would be further from Higher Mill than numerous modern dwellings on Cotton Way, Hyacinth Close and Anemone Drive, and dwellings in the north-eastern area of the site would also be further away from Higher Mill than modern properties on Snowdrop Close and Crocus Close. The conclusion that the site is not developable or not to be included in the SHLAA is simply unsupported by the facts, and the reasons for the conclusion are spurious. It was wrong not to carry the site forward to the SHLAA of August 2018 and wrong to exclude it in its entirety from the Housing Site Allocations in the various iterations of the emerging Local Plan. The site is Countryside adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16302. Land to Rear of Edinburgh Road, Helmshore. Sources 1. SHLAA (June 2017) and 2. SHLAA Errata (July 2017). Site Gross Area 0.66ha, Net development Area 0.25ha. The site is Countryside adjoining the Urban Boundary but not in the Green Belt. 7 Dwellings.

RBC's comments in SHLAA (June 2017):

Justification Comments: The site is in RBC ownership and is therefore available for development subject to covenants and easements (no building over the sewers and drains). There is potential access to the site via Edinburgh Road but it requires improvements. There is no bus service within 400m and the local services are not situated within walking distance apart from the nearest play area. Future residents are likely to rely on the use of their private cars to access services and commute to work. A flood risk assessment is required as part of the site is within flood zone 3 and at medium risk of surface water flooding. About 10% of the site has important ecological value therefore this area should be preserved (the area has been excluded from the area available for development). The site is within the Reservoir Valleys landscape character type although it adjoins a suburban landscape character type. A landscape assessment is recommended. The HSE should be consulted prior to

development as half of the site is within a middle consultation zone. The area within the HSE middle consultation zone has been excluded from the area for development. Overall, the site is not considered suitable now, but can become suitable in the long term provided that the constraints can be addressed and subject to HSE approval.

Viability and achievability summary: Available in medium to long term.

Justification Summary: Extra costs have been identified, however since the site is within a high value market area, the development can still be viable. No developer has expressed an interest in developing the site, but due to the level of constraints, the development is likely to be delivered in the medium to long term.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years).

Justification conclusion: The site is available now but attention should be drawn to the covenants and easements associated with the land title. The site is not currently suitable for a housing development. If the constraints can be adequately addressed the site can become suitable subject to HSE approval. The development is considered to be viable and achievable in the medium to long term. Overall, the site is developable in the long term.

ECNF General Comment: This site is contiguous with SHLAA 16300 and could be developed on its own or in conjunction with that site, perhaps on a phased basis. The SHLAA fails to mention the bus services on Helmsshore Road, which are more frequent and nearer to parts of the site than those on Grane Road. The site is Countryside adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered. The SHLAA accepts that the site is developable in the long term.

SHLAA 16306 The Orchard, Land off Helmsshore Road, Helmsshore. Source - Strategic Housing Availability Assessment General Information Sheet dated 07.06.2017.

This site is in the Urban Boundary. Gross Site Area 2.14ha; Net development Area 0.27ha. [8 dwellings.](#)

Regulation 18 RBC's Comments from their General Information Sheets:

Justification comments: The site is in RBC ownership and is available for development. The vehicular access is an issue as the potential access from Helmsshore Road would incur the felling of protected trees while the access of York Avenue is narrow. There are two public rights of way going through the site that should be maintained. The site is informally used by local residents for recreational uses, however Flax Moss situated on the other side of Helmsshore Road provides an alternative space for recreational uses. The trees and wooded area protected by TPO significantly reduce the area available for development. This area is situated to the south of the site can become suitable for housing development providing the access is improved and also approved by LCC Highway Department.

Viability and achievability summary: Achievable now.

Justification Summary: The vehicular access needs improvement and this will add extra cost to the development. However, since the site is within a high value market area, the development is considered viable. No developer has expressed an interest in developing the site, but due to the small scale of development [8 houses], it is expected to be delivered in the short term.

Conclusion: Developable in the medium to long term (within six to ten years, or after ten years.)

Justification Conclusion: The site is available now and part of the site can become suitable for a small residential scheme provided that the vehicular access that can be created from York Avenue is approved by LCC Highway Department. The development is considered viable and achievable in the short term. Overall, part of the site is developable in the medium term.

ECNF General Comment: The site is in the urban boundary, close to bus routes, shops and schools, and should be developed in the short term. The part of the site with protected trees, which might yield in the region of another 50 dwellings, should be considered for development before any Green Belt is used. Without diminishing the value of the protected trees, the question of preservation priorities arises: the trees or Green Belt.

SHLAA 16088. HS 2.29. Land west of Sow Clough, Stacksteads. Source: RBC's comments in SHLAA (August 2018). Site Gross Area 1.2 ha, Net development Area 1.08ha. The site is Countryside adjoining the Urban Boundary but not in the Green Belt. [32 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification Comments: The intentions of the landowner are unknown, therefore the site is not considered to be available now. However it can become available in the long term. Access is a major constraint and a new access is required. The site is situated further than 5.5km / 3.5miles away from a strategic road. There are no bus stops within 400m; however the closest bus stop is within 430m, which is accessible by walking. The primary school, play area and local centre are available within walking distance. Other local services like the secondary school and medical centre are not accessible by walking. Future residents are likely to rely on private cars as the bus service situated on the main road runs every hour. The site is within the Local Geodiversity Site of Stacksteads Gorge and there are public footpaths along its western and northern boundaries that should be maintained. The access to the site is via a private road and is considered by Lancashire County Council Highways Department to be insufficient in width to accommodate any development traffic. The site is not considered suitable for residential development.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: There are significant extra costs associated with the development of the site (e.g. new access requirement) and the site is within a low value market area. It is considered that the site is marginally viable. The site can be achieved in the medium term.

Conclusion: Not developable and not to be included in the SHLAA.

Justification conclusion: The site is not currently available; however it can become available in the long term (subject to Landowners). The site is not suitable due to vehicular access issues.

The Housing Topic Paper (March 2019) summed up the reasons for not taking the site forward as "Lancashire County Council highways objection and landowner intentions unknown."

ECNF General Comments: The comments noted above from RBC's site assessment dated 16th August 2018 are different from those in the previous SHLAA dated 7th June 2017. The option of achieving access by extending Tunstead Road over some of the garden land between numbers 39 and 41 needs to be examined by LCC. This site is not in the Green Belt; it is adjacent to the Urban Boundary and should be developed before any use of Green Belt is considered. The comment about the unknown intentions of the landowner does not mean that they are not capable of being ascertained. The planning authority has the power to instigate Compulsory Purchase procedures, if necessary.

SHLAA 16243. Land west of Lomas Lane, Rawtenstall. Source: SHLAA (August 2018). Site Gross Area 1.84 ha, Net development Area 1.38ha. The site is Countryside adjoining the Urban Boundary but not in the Green Belt. [41 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comments: The parcel of land in the north west part of the site is available for development (0.19ha), while the remaining part of the site is not currently available. The estimated yield has been reduced to consider only the north west section of the site. The site has an important ecological function as it is identified as a grassland stepping stone on the Lancashire ecological network map. The grassland area continues to the south. An ecological impact assessment is needed to understand whether development can occur on the north western part only preserving the grassland habitat on the rest of the site. There is potential land contamination but situated in the part of the site that is not currently available for development. The site adjoins Balladen Brook and there is a narrow strip of land at high and medium risk of surface water flood risk along the brook. A Flood Risk Assessment is recommended. The small part of the site available for development is considered suitable, while development of the larger remaining part would be subject to an ecological impact assessment and flood risk assessment.

Viability and achievability summary: Achievable in medium to long term.

Justification summary: Although some extra costs have been identified, especially regarding the development of the larger part of the site (e.g. a flood risk assessment and ecological impact assessment), the development is considered viable as the site is situated in a high value market area. The small area available for development is considered achievable in the short term, while the remaining part of the site is likely to be achieved in the medium to long term.

Conclusion: Developable in the medium to long term (within 6 to 10 years, or after 10 years).

Justification conclusion: 10% of the site is available now. This parcel can be suitable for housing development. The development is considered viable and achievable in the short term. However, the remaining larger part of the site is not currently available and can become suitable provided that the constraints (e.g. flood risk and ecological impact) are adequately addressed. This remaining part is likely to be achieved within the medium to long term.

ECNF General Comment: This site is countryside adjoining the urban boundary. It is not in Green Belt, and therefore it should be considered for development before Green Belt land. There is scope for early development of at least 5 dwellings, with potential for 36 more subject to satisfactory

resolution of the flooding, contamination and ecological issues. Access is available from Lower Clowes Road or, with appropriate traffic management, Clayton Avenue.

SHLAA 16350 Northfield Road, Rising Bridge. Source SHLAA dated August 2018. Site Gross Area 0.41 ha, Net development Area 0.23ha. The site is within the Urban Boundary. [7 dwellings](#).

RBC's comments in SHLAA (August 2018):

Justification comments: The allotments should be retained as part of the development (or a replacement site found elsewhere) and a tree survey undertaken to determine which trees should be retained. The HSE should be consulted prior to development as half of the site is within the HSE middle consultation zone. The allotment gardens and the HSE middle consultation zone have been excluded from the area available for development, reducing the potential dwellings on site to seven. The site is considered to be suitable now, subject to approval by the HSE.

Viability and achievability summary:- Achievable now.

Justification summary:- It is considered that the necessary mitigation could be achieved within the short term.

Conclusion:- Deliverable in the next five years.

Justification conclusion:- Part of the site is available now and suitable for a residential scheme. The development is considered viable and achievable in the short term.

ECNF Comments:- The site is listed in the SHLAA of August 2018 but not in the Housing Site Allocation list in the Local Plan Submission Version. Being within the Urban Boundary, the site should be considered for development ahead of any Green Belt land.

SHLAA 16354 Bacup Conservative Club, Irwell Terrace, Bacup

Conversion to 4 flats began on 4 February 2019 pursuant to planning approval 2015/0085. Planning permission for 2 additional flats is now sought under application 2019/0170, which awaits determination. [6 dwellings](#).

ECNF Comment: The outcome of the planning application is awaited. Whilst a development of 4 dwellings is not big enough to appear in the HSA, a development of 6 would qualify for the list.

Village Pine, Glen Top Works, Stacksteads.

Planning application 2019/0101 has been submitted for the change of use and conversion of a commercial unit to 14 apartments. It awaits determination. The application refers to receipt of pre-application advice. [14 dwellings](#).

ECNF Comment: The proposal would enhance the appearance of the site, which is in the Green Belt. The outcome of the planning application is awaited.

27th August 2019

EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM

Appendix ECNF - HLA 3

Sites with greater housing yield than shown in draft Local Plan

SHLAA ref. no.	Site ref in draft Local Plan	Other reference numbers	Site location	Ward	Reason for increasing draft Local Plan yield	Yield (dwellings) in draft Local Plan	Maximum yield (dwellings)	Increase in yield (dwellings) from number in draft Local Plan
16098	H 32	HS 2.28	Booth Road / Woodland Mount, Stacksteads	Stacksteads	Representation by Hourigan Connolly on behalf of B & E Boys Ltd for yield of 16. See Appendix 5, pages 4 to 25, to RBC's November 2018 collection of Regulation 19 responses	10	16	6
16159	H 59	HS 2.82 Planning application 2016/0563	Dark Lane Football Ground, Newchurch	Hareholme	Development Control Committee minded on 28 February 2017 and 26 February 2019 to approve. Outline permission for up to 100 dwellings issued on 9 Aug 2019.	80	100	20
16005	H 68	HS 2.107 Planning application 2018/0318	Former Spring Mill and land off Eastgate, Whitworth	Healey & Whitworth	Planning application 2018/0318 (undetermined as at 11 June 2019) for 119 dwellings: Development. Control Committee on 21 March 2019 minded to approve. See also Appendix 4, pages 420 to 424, to RBC's November 2018 collection of Regulation 19 responses	111	119	8

16397	M 3	HS 2.97	Isle of Man Mill & Garage, Water	White-well	SHLAA (August 2018) calculated yield of 22, excluding the part in employment use	16	22	6 (+ more if the employment area were allocated for housing)
								TOTAL 40

Figure 2: Sites with greater housing yield than shown in Local Plan.

SHLAA 16098 HS 2.28. Booth Road/Woodland Mount, Stacksteads. Source: SHLAA (August 2018). Site Gross Area 0.34ha, Net Development Area 0.34ha. The site is greenfield within the Urban Boundary. It is in the HSA list for 10 dwellings, but there is a representation for it to be increased to 16. 6 additional dwellings.

Representation: Increase from 10 to 16 dwellings (+6). Representation by Hourigan Connolly on behalf of B & E Boys Ltd. See Appendix 5, pages 4 to 25, to RBC's November 2018 collection of Regulation 19 responses.

Conclusion: Developable in the next 5 years.

ECNF General Comment: This site is not in the Green Belt; it is within the Urban Boundary and should be developed before any use of Green Belt is considered.

SHLAA 16159. H59. HS2.82. Dark Lane Football Ground, Newchurch. Source Housing Topic Paper dated March 2019 and planning application 2016/0563. Site Net Development Area 1.95ha. Table 1 lists this site for 80 dwellings, but there is outline consent for up to 100. Table 1 therefore omits 20 additional homes.

ECNF Comment: Table 1 should be corrected.

SHLAA 16005. HS 2.107. H 68. Former Spring Mill and land off Eastgate, Whitworth. Source: SHLAA (August 2018) and representations by Hayley Knight, SAT-Plan.co.uk. (Refer to Appendix 4, pages 420 to 424, to RBC's November 2018 collection of Regulation 19 responses.). Site Gross Area 5.89ha, Net Development Area 3.70ha. The site is within the Urban Boundary. 111 dwellings. Planning application 2018/0318 (approved in principle by RBC's Development Control Committee) seeks permission for 119 (8 additional dwellings).

ECNF Comment: Table 1 should be corrected to take account of the new figure.

SHLAA 16397. HS 2.97 M3. Isle of Man Mill and Garage, Water. Source: RBC's comments in SHLAA (August 2018). Site Gross Area 1.06ha, Net Development Area 0.74ha. The site is a "Mixed Use Site" within the Urban Boundary. The Local Plan Submission Version includes the site M3 with a yield of 16 dwellings. The SHLAA calculates a yield of 22, excluding the part of the site in employment use. Additional 6 dwellings but could increase further.

ECNF General Comment. A higher number than 22 dwellings could be anticipated, as the owners have expressed a desire for demolition of the employment area, which could provide at least 8 more. Only the increase of 6 can be taken into account at this time - this figure must be added to Table 1. The site is within the Urban Boundary and should be developed before any use of Green Belt is considered.

27th August 2019

EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM

Appendix ECNF - HLA 4

Sites with extant planning consent, wrongly omitted from Table 1

SHLAA/ Reg 18 refs	Site	Dwell- ings	Planning ref	Full/O utline	Dev Control Comm Approv al	Decision Notice Issue Date	Remarks
— — —	Lindon Park Road, Ewood Bridge (Ward - Greenfield)	187 See note below	13/2/2600 LA & 13/2/2758	Full	pre-RBC	1972, for 231 dwellings (44 built)	Developer has made Reg 19 reps. Easy access. Close to strategic road network, schools and big Tesco store.
16298 EMP 22 (Reg 19 ref EE20)	Wavell House, Holcombe Road, Helmshore (Ward - Helmshore)	7	Ref 2013/0426	Equi- valent of full	Officer decision	15 October 2013	Approval after prior notification of change of use of offices to 48 apartments. 41 dwellings completed by 31 March 2019. Approvals 2014/0297, 2015/0218 and 2016/0202 for approval of external works.
16371	The Hollins, Hollin Way, Reedsholme (Ward - Cribden)	3	Ref 2014/0291	Full	Officer decision	7 October 2014, for 9 dwellings (6 built)	Also, similar approval 2014/0128.
16358 HS 2.71	Horse & Jockey site, 85 Market Street, Edenfield (Ward - Eden)	10	Ref 2015/0238	Full	6 October 2015	16 October 2015	In build at, but no dwellings completed by, 31 March 2019

SHLAA/ Reg 18 refs	Site	Dwell- ings	Planning ref	Full/O utline	Dev Control Comm Approv al	Decision Notice Issue Date	Remarks
— — —	14 Dearden- gate, Haslingden (Ward - Worsley)	6	Ref 2016/0001	Full	Officer decision	24 March 2016	Construction of 3 x 1-bed & 3 x 2-bed apartments in loft space. In build at, but no dwellings completed by, 31 March 2019
16273 HS 2.72	Croft End, Bolton Road North, Stubbins (Ward - Eden)	11	Ref 2016/0228	Full	17 January 2017	29 March 2017	In build at, but no dwellings completed by, 31 March 2019
— — —	Pleasant View Farm, Helmshore Road, Haslingden (Ward - Helmshore)	5	Ref 2016/0424	Full	Officer decision	3 Novembe r 2016	Conversion of agricultural buildings to 5 dwellings
— — —	Cedar Works, Market Street, Waterfoot (Ward - Whitewell)	9	Ref 2016/0306	Outlin e	Officer decision	12 Sept 2016	Approval for demolition of factory; construction of 1 detached & 8 semi-detached houses
— — —	The Hollies, 2 Rising Bridge Road, Haslingden (Ward - Worsley)	6	Ref 2017/0257	Full	Officer decision	31 August 2017	Change of use from nursing home to 3 x 1-bed & 3 x 2-bed apartments. Under construction - July 2019
— — —	Alma Street Chapel, Alma Street, Bacup (Ward - Irwell)	7	Ref 2017/0256	Full	Officer decision	5 Septemb er 2017	Change of use of former chapel to 7 x 2-bed apartments
— — —	Weir Hotel, Weir, Bacup (Ward - Greens- clough)	6	Ref 2017/0640	Full	27 February 2018	28 February 2018	Approval for demolition of hotel and building 6 houses

SHLAA/ Reg 18 refs	Site	Dwell- ings	Planning ref	Full/O utline	Dev Control Comm Approv al	Decision Notice Issue Date	Remarks
— — —	Hawthorn House, Rochdale Rd, Edenfield (Ward - Eden)	8	Ref 2018/0126	Outline	23 May 2018	24 May 2018	Approval for demolition of 1 dwelling and building up to 9
— — —	21 - 23 Burnley Road East, Waterfoot (Ward - Whitewell)	5	Ref 2019/0139 Application made after Local Plan was submitted.	Full	18 June 2019	19 June 2019	Approval for conversion from A1 to A1 plus 3 x 1-bed, 1 x 2-bed and 1 x 3-bed flats
	TOTAL	270					

Figure 3: Sites with extant planning consent that should be added to Table 1.

13/2/2600LA & 13/2/2758 1972 Planning Permission. Lindon Park Road, Ewood Bridge, Haslingden. Original planning permission was for 231 homes, of which 44 were constructed around 1974. [187 dwellings.](#)

ECNF General Comments. A Regulation 19 representation has been submitted from dpp Planning Ltd on behalf of Lindon Park Developments Ltd to continue the development first started around 1974 on the site and construct the remaining 187 dwellings. The site was taken into the Green Belt some time after the completion of the first 44 dwellings, but it continues to have the benefit of extant planning permission. As such it differs from other Green Belt sites, as the extant permission renders it difficult for the local planning authority to justify refusal of an application for a different housing development on the undeveloped part of the site. The continuation of the development would significantly enhance the whole area and dramatically change the appeal of the existing housing. There are no problems with access. A major advantage of this site is its close proximity (some 800m) to the main A56 roundabout with access and exits going both north and south. Additionally, the schools and a large supermarket are in close proximity. (Refer to Appendix 1 pages 178 to 206, to RBC's November 2018 collection of Regulation 19 responses.)

27th August 2019

EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM

Appendix ECNF - HLA 5

Small sites

The Housing Topic Paper (March 2019) considers small sites at pages 12 and 13. In the period of eight years ending 31st March 2018, on average 20 dwellings per year were completed on small sites. It is reasonable to assume that this contribution rate will be maintained at the least. Indeed, there is potential for it to increase owing to proposed changes to the Urban Boundary. RBC weekly lists indicate that planning permission or prior approval was given for 74 dwellings on small sites in the 52 weeks commencing 11th June 2018. Another 4 dwellings on a small site received outline permission, and a lawful development certificate was issued for a dwelling disused for 20 years. Document *EL1.002jii Housing completions between 1st April 2018 and 31st March 2019* shows that 35 (gross; 27 net) dwellings were completed on small sites in that year. Document *EL1.002k Response to Programme Officer on 09.07.19 re Q15 of Pre-Hearing Note 1* shows 101 dwellings under construction on small sites. It is reasonable to assume that the majority of these will be completed by 31st March 2020. It is therefore submitted that an annual small sites allowance of 20 is too low and that a reasonable minimum would be 25. Small sites are not counted in the figure of 2,853 in Table 1.

It is reasonable to assume also that there will be windfall sites which are not small sites, that is, windfall sites capable of providing five or more dwellings.

27th August 2019

EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM

Appendix ECNF - HLA 6

Potential development sites requiring improved access

SHLAA 16075. HS 2.11. Land at Huttock Farm, Bacup. Source Regulation 18 Plan Housing Site Allocation General Information List. Site Gross Area 0.83ha, Net Development Area 0.74ha. The site is adjoining the Urban Boundary but not in the Green Belt. (22 dwellings; note not included in total figure.)

SHLAA 16076. HS 2.12. Land at Huttock Top, Bacup. Source Regulation 18 Plan Housing Site Allocation General Information List. Site Gross Area 4.75ha, Net Development Area 2.22ha. The site is adjoining the Urban Boundary but not in the Green Belt. (66 dwellings; note not included in the total figure.)

SHLAA 16077. HS 2.13. Land south of Huttock Top Farm, Bacup. Source Regulation 18 Plan Housing Site Allocation General Information List. Site Gross Area 1.49ha, Net Development Area 1.34ha. The site is adjoining the Urban Boundary but not in the Green Belt. (40 dwellings; note not included in total figure.)

ECNF General Comment: The three above-mentioned sites are not included in our total figure for housing developments. However, there is a real opportunity for RBC to be proactive on behalf of all the residents and businesses accessed via Bankside Lane and provide improved or alternative access to the area. There were 135 pages of objections from local residents at the Regulation 18 Consultation Stage: almost all of them cited the access via Bankside Lane as being inadequate and in several cases dangerous. There are currently three sites suitable for development (SHLAA 16075, 16076 and 16077) which could provide 128 homes. Improving access would help all local residents and visitors to Bacup Golf Club and the Maden Recreation Ground. RBC should prioritise the provision of improved or alternative access and they should not be allowed to take Green Belt when areas like this, either in the Urban Boundary or in Countryside adjacent to the Urban Boundary, are available.

RBC's failure to consider these sites for development in conjunction with better access arrangements renders the draft Local Plan unsound.

27th August 2019

Edenfield Community Neighbourhood Forum

Appendix ECNF - HLA 7

Empty homes

The Ministry of Housing, Communities and Local Government (MHCLG) collects data on the dwelling stock, including details of vacant dwellings: a unit of residential accommodation that is empty at a particular point of time. Vacant dwellings include those that are empty between change of occupants or undergoing refurbishment, awaiting demolition, or newly completed but not occupied.

There will always be a proportion of the housing stock empty to enable the process of buying, selling and letting to work efficiently, whilst some will be empty to allow repairs and improvement. These are known as transactional vacancies and most are brought back into use quickly and without intervention. It is estimated that the effective minimum level of empty homes as a result of these processes is around 2% of the housing stock.

As at 1st October 2018 there were 1,207 vacant dwellings, representing 3.8% of the total dwelling stock of 32,050. **(Source: Lancashire County Council website.)** Of those, approximately 640 might be normal transactional vacancies and 570 might be longer-term. A contribution from this source towards the housing target appears not to have been considered.

14th August 2019

Edenfield Community Neighbourhood Forum

Appendix ECNF - HLA 8

Residential redevelopment of surplus employment land

In our employment land analysis we identify an over-provision of 20.05ha. Of these surplus sites some are more suited to housing. If 50% of the surplus employment land were to be used for housing, this would provide 439 dwellings, based on the current density figures being achieved on brownfield sites. **(See Appendices ECNF - ELR 1-7.)**

This would provide RBC with the opportunity of enhancing areas by the replacement of decaying industrial premises for which there is no longer a demand with attractive residential units.

The National Planning Policy Framework, paragraph 118 c requires planning policies to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

Paragraph 119, NPPF, adds that plan makers should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs . . . using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.

The requirements of paragraphs 118 c and 119 are not reflected in Local Plan Policy EMP3. The Policy appears to obstruct the residential redevelopment of all employment sites, irrespective of their continued suitability for employment. It is thereby unsound and should be deleted.

27th August 2019