

LOCAL PLAN EXAMINATION: SCHEDULE OF ACTIONS

14 November 2019

Action Ref. No.	Action	Expected timescale		Exam. Doc. Ref. No.	Comments
		Start	Month Ending		
	MATTER 1 – LEGAL AND PROCEDURAL MATTERS				
1.1	Include the signatures of neighbouring authorities etc. in the appendix of the duty to cooperate.		Nov 2019		
1.2	Assessment of reasonable alternative sites - Sustainability Appraisal (SA): produce a note explaining difference between the 230 SHLAA sites which were considered to be reasonable alternatives (identified in para 3.2.3 Housing Topic Paper) and the figure of 228 sites as assessed in the SA Addendum.	Oct 2019	Jan 2020		
1.3	Produce an SA addendum to include information about: <ul style="list-style-type: none"> i. separate SA testing of a range of reasonable alternative housing numbers, employment land figures and broad spatial strategy options – ensuring the assessment of the three aspects is undertaken separately; ii. the site selection process; iii. clarification about assessing reasonable alternative policies – identify any policies where there could have been reasonable alternatives 	Oct 2019	Jan 2020		Will require input from Lepus Consulting
1.4	Produce a short note about the Visitor Management Plan, setting out how it will be produced and when	Dec 2019	Jan 2020		Meeting of South Pennine authorities 06/12/19. Will require input from Lepus Consulting and Natural England

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1.5	Provide further information about the need for SANGs	30/09/19		EL4.005	Agreed to delete reference to SANG in Local Plan; see also letter from Natural England
	MATTER 2 – VISION AND SPATIAL STRATEGY				
2.1	Check housing supply figure for Edenfield				To be included in future housing land supply update – see Matter 19
2.2	Provide further information about the evidence base for the spatial strategy and produce a new supporting document which clarifies the sustainability / ranking of each settlement.	Dec 2019	Feb 2020		
2.3	Outline the Local Plan's vision, objectives and strategic priorities [see also Main Modifications]	Dec 2019	Feb 2020		
2.4	Revisit policy SS to ensure it establishes a clear overarching spatial framework for the Plan which is not just for DM purposes. This will include changes to the hierarchy, with major sites removed from this and inserted as an exception and ensuring all settlements are included. To ensure all settlements are captured including Edenfield and Rising Bridge.	Nov 2019	Dec 2019		
	MATTER 3 – HOUSING NEED AND REQUIREMENT				
N/A	N/A	N/A			
	MATTER 4 – OTHER HOUSING NEEDS				
4.1	Consider position in relation to the provision of Gypsy / Traveller transit site and provide information to Inspector as soon as possible	Dec 2019	March 2020		Report to be taken to Council on 23/12/19, followed by 6-week consultation (to end Feb 2020)
4.2	Produce evidence relating to the need for the requirements of HS8 in relation to both the optional space standards and the nationally described space standards, in line with PPG on Housing Standards	Mid Nov 2019	Jan 2020		Liaise with RBC Housing

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4.3	Undertake an Open Space Assessment to ensure open space policy / decisions on open space are in line with NPPF (and set out how this will inform the Open Space Supplementary Planning Document - SPD). [This is also a Main Modification].	Oct 2019	May 2020 ¹		Likely to be undertaken alongside Built Sports Facility Assessment (see action 17.1). Will require input from consultants.
MATTER 5 – EMPLOYMENT NEED AND SUPPLY					
5.1	Provide information on job growth since the adoption of the Core Strategy	25/09/19		EB043	Authority Monitoring Report data provided during the hearings
5.2	Confirm information about the employment land supply (including breakdown of different sources of supply)	Jan 2020	Feb 2020		Awaiting confirmation of developable areas
5.3	Provide a cross-reference list of the proposed employment allocations in the Local Plan and the sites assessed in the Employment Land Review		Nov 2019		Will need to add to Examination library
MATTER 6 – PROVISION FOR RETAIL AND OTHER TOWN CENTRE USES					
6.1	R1 Retail and Other Town Centre Uses: Add more detail regarding the function of the hierarchy and the role of each of the settlements within the Borough (this needs to link into the further work being done on the Vision and Spatial Strategy) [see also Main Modifications]	Jan 2020	Jan 2020		
MATTER 7 – INFRASTRUCTURE DELIVERY					
7.1	Engage with United Utilities to seek clarification on their comments at Regulation 19 stage regarding the need for infrastructure upgrades	02/10/19		EL4.007a EL4.007b	Complete
7.2	Produce a note on the Strategy and Action Plan for the Rawtenstall Gyrotory Improvement Scheme. This should set out: <ul style="list-style-type: none"> i. Details, costs and the actions and timetable for implementing Plan A and Plan B if required with the associated triggers points. ii. It should also set out the details of all parties involved in the schemes and the details of any necessary agreements and consents. iii. The action plan should set out what would happen if the funding application is unsuccessful. 	Feb 2020	Feb 2020		Will require input from Lancashire County Council (LCC) Highways

¹ This is the expected date of the final report, further work will be needed to assess implications

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	MATTER 8 – APPROACH TO SITE ALLOCATIONS AND GREEN BELT RELEASE				
8.1	Produce a list of omission sites which were suggested during the Regulation 19 consultation stage and undertake a short technical assessment and SA (particularly for non-Green Belt sites)	<i>Dec 2019</i>	<i>Jan 2020</i>		Might require input from Lepus Consulting, RBC Conservation Officer and LCC
8.2	Provide update on the Flood Risk Topic Paper which clearly sets out how the Exception Test has been met during site selection (and possibly commentary on the Sequential Test if considered necessary)	<i>Dec 2019</i>	<i>Jan 2020</i>		Seek advice from JBA Consulting
8.3	Check how the density of sites was identified and if this is net or gross (with particular reference to comments on density provided in Hearing Statements)	<i>Jan 2020</i>	<i>Jan 2020</i>		
8.4	Provide additional evidence to show how the Council optimised density on sites, with reference to policy HS7 and the list of allocated sites	<i>Jan 2020</i>	<i>Jan 2020</i>		
8.5	Sensitivity check the removal of Purpose 4 from the Green Belt study and see whether this makes a difference to the outcome of the assessment	<i>Oct 2019</i>	<i>Nov 2019</i>		To be undertaken by LUC consultants
8.6	Provide evidence for all Green Belt (GB) parcels which were recommended for release in the GB study and the reasons why some were not fully assessed for potential development	<i>Nov 2019</i>	<i>Nov 2019</i>		
8.7	Produce clearer site selection evidence which clarifies why there are differences between SHLAA results and final conclusions on sites and provides clearer reasons for the overall conclusions (relating to rejected options). This should include setting out the assessment process for every potential GB site which was assessed for development and how the Council reached the conclusions on suitability and reasons for selection or rejection; within this need to explain why for some small GB site options it was deemed that harm to GB was not outweighed by the need to deliver identified development needs.	<i>Dec 2019</i>	<i>Jan 2020</i>		
8.8	Council to reflect on proposed GB boundary amendment GB(Major)1 and produce a note explaining justification for the release, in the context of NPPF para 139b.	<i>Nov 2019</i>	<i>Nov 2019</i>		

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8.9	Produce a note to state if GB(Major) 2 was considered for housing.	Nov 2019	Nov 2019		
8.10	Produce a paper setting out a strategy and list of potential sites/schemes which could provide compensation for GB loss i.e. how/where/when/what	Nov 2019	Dec 2019		
8.11	Include costs of GB loss compensatory measures in Viability Assessment	Jan 2020	Jan 2020		Provide information to Keppie Massie consultants to produce revised assessment
8.12	Produce a note on exceptional circumstances for GB release for housing and employment site allocations	Jan 2020	Jan 2020		
	MATTERS 9 – 14 HOUSING SITES ALLOCATIONS	Oct 2019	Dec 2019 (April 2020)		Evidence on some sites dependent on findings of Open Space Assessment
	MATTER 9 – HOUSING SITE ALLOCATIONS: RAWTENSTALL, CRAWSHAWBOOTH, GOODSHAW AND LOVECLOUGH				
9.1	H5 – Swinshaw Hall Provide correspondence between landowners and RBC re. deliverability of site and add to Examination webpage				
9.2	H7 – Land adj. to Laburnum Cottages, Goodshaw i. Produce a note to demonstrate suitability of development on this site in relation to paragraph 97 of NPPF (justification of loss of open space) – potentially propose a modification to prepare a specific policy on the site; ii. b. RBC to identify landowner of strip of land on Church St. and produce a note to state whether this could affect access.				Include in open space assessment
9.3	H12 – Reedsholme Works, Rawtenstall a. Confirm to Inspector if conditions have been discharged on Reserved Matters permission				

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9.4	H15 – Willow Avenue off Lime Tree Grove Inspector to confirm view on whether the site capacity should be reduced to 4 dwellings as suggested by landowner (in which case, the site would be considered too small to be a specific housing allocation)				
9.5	H18 – Carr Barn and Carr Farm Check whether Public Rights of Way / recreation value on site – if so, may need to be included in Open Space Assessment.				May include in open space assessment
	MATTER 10 – HOUSING SITE ALLOCATIONS: BACUP, STACKSTEADS, BRITANNIA AND WEIR				
10.1	H28 – Sheephouse Reservoir, Britannia Produce a note to demonstrate that site could be delivered in years 1-5				
10.2	H29 – Pennine Road, Bacup Produce a note to demonstrate suitability of development on this site in relation to paragraph 97 of NPPF (justification of loss of open space)				Include in open space assessment
10.3	H30 – Tong Farm, Bacup Produce a note to confirm whether access can be achieved				Consult LCC Highways
10.4	H35 – Shadlock Skips, Stacksteads Inspector to confirm view on whether site is suitable for housing development, particularly in relation to Flood Zone 3 and access to site				Consult LCC Highways
10.5	H36 – Hare and Hounds Garage, Newchurch Road, Stacksteads Produce a note to confirm landowner's current intentions relating to car wash on site				
10.6	H37 – Land off Gladstone Street, Bacup Produce a note to confirm whether access can be achieved				Consult LCC Highways
10.7	H39 – Land off Cowtoot Lane, Bacup Produce a note on its developability given the event of the constraints and the changes in circumstances/site boundary outlined at the hearing. The potential funding position and matters relating to coal, surface water, landscape and access/highways safety should be covered in the note.				Consult LCC Highways Consult Coal Authority

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10.8	H40 – Land off Todmorden Road, Bacup i. Re-consult with Coal Authority regarding suitability of land (especially in relation to historic bell pits) – produce a note to confirm whether a solution can be found; ii. Produce a note to confirm the location of the access to the site and whether this is achievable; iii. Produce a note to demonstrate the site is deliverable in Years 1-5 iv. Produce a note to confirm the correct Heritage Impact Assessment for each relevant SHLAA parcel with the site – and whether this has been taken into account appropriately				Consult LCC Highways Consult Coal Authority Liaise with RBC Conservation Officer
10.9	H41 – Thorn Bank, Bacup Produce a note to demonstrate suitability of development on this site in relation to paragraph 97 of NPPF (justification of loss of open space)				Include in open space assessment
	MATTER 11 – HOUSING SITE ALLOCATIONS: HASLINGDEN AND RISING BRIDGE				
11.1	H47 – Land at Kirkhill Avenue, Haslingden i. Produce a note to demonstrate suitability of development on this site in relation to paragraph 97 of NPPF (justification of loss of open space); ii. b. Re-consult with LCC Highways on access/highways, particularly to check the Highway Assessment which has been prepared by the landowner/developer – produce a note to confirm whether this is acceptable				Include in open space assessment Consult LCC Highways
11.2	H50 – Land adj. Park Avenue/Criccieth Close, Haslingden Confirm potential funding with Together Housing				Liaise with Together Housing
11.3	H52 – Land to the rear of Haslingden Cricket Club Produce a draft specific policy, in consultation with landowner/developer and Sport England, including: reason for needing a mixed use allocation, proposed enhancements to the existing sports facilities and how this relates to the housing development (if found acceptable, amend Policies Map to show a larger mixed use allocation) – Inspector to confirm view on whether this is acceptable				Consult Sport England

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	MATTER 12 – HOUSING SITE ALLOCATIONS: WATERFOOT, LUMB, COWPE AND WATER				
12.1	H59 – Land adj. Dark Lane Football Club Confirm updated position re. Reserved Matters approval to Inspector				
12.2	H61 – Hareholme, Staghills Produce a note to demonstrate suitability of development on this site in relation to paragraph 97 of NPPF (justification of loss of open space)				Include in open space assessment
12.3	H62 – Land off Peel Street, Cloughfold Produce a note to demonstrate suitability of development on this site in relation to paragraph 97 of NPPF (justification of loss of open space)				Include in open space assessment
12.4	H63 – Hollin Farm, Waterfoot Get updated confirmation from landowner that there are willing to release the land for development – Inspector then to take a view on whether this site can be considered available				
12.5	H64 – Hargreaves Fold Lane, Lumb Inspector to confirm view on whether site is suitable for housing development, particularly in relation to whether it is in a sustainable location and whether the road running through the site effectively splits it into two separate parcels				
	MATTER 13 – HOUSING SITE ALLOCATIONS: WHITWORTH, FACIT AND SHAWFORTH				
13.1	H65 – Albert Mill, Whitworth: keep Inspector informed of the outcome of the planning application.				
13.2	H69 – Cowm Water Treatment Works, Whitworth: Seek view of Environment Agency should be sought on two issues, as expressed at the hearing: <ul style="list-style-type: none"> i. views on the suitability of the proposed housing scheme (taking into account the recent Whaley Bridge dam incident); ii. view on whether scenarios of reservoir dam failure modelling are needed to inform the allocation (as set out in the SFRA level 2 report). 				Consult Environment Agency

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	MATTER 14 – HOUSING SITE ALLOCATIONS: EDENFIELD, HELMSHORE, IRWELL VALE AND EWOOD BRIDGE				
14.1	H70 – Irwell Vale Mill, Irwell vale i. Add PWA Planning information on flood risk to the library ii. PWA planning to report feedback from Environment Agency about the river widening scheme – add to Library, implications for site capacity			EL4.012	Flood Risk Study now in Examination Library Request PWA to provide further information
14.2	H71 – Land east of Market Street, Edenfield: specific Green Belt assessment to be undertaken for this site				To be undertaken by LUC consultants
14.3	H72 – Land west of Market Street, Edenfield: i. Lancashire County Council to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3 ii. Provision of additional information regarding education requirement in Edenfield – feasibility to expand Edenfield or Stubbins Primary Schools iii. Undertake a Green Belt assessment for the option of the Edenfield School extension – clarify exceptional circumstances iv. Note to confirm if the Green Belt assessment of the whole site allocation would differ from the assessment of the 3 parcels that has been carried out in the study v. Note to confirm the heritage position especially regarding the issue of substantial harm and how this conclusion has been reached? Consider production of mitigation plan showing any areas not to be built on including set back and any impacts on site capacity vi. Note setting out a clear timeline on the delivery trajectory taking account of the different stages (e.g. masterplan agreement, design code, approval of planning application) that would lead to the completion of the first units in 2021; to be done in conjunction with the landowners				Consult LCC Highways Consult LCC Education LUC consultants to provide GB assessment Liaise with RBC Conservation Officer
	vii. Publish Highways England update position statement and invite comments		08/10/19	EL4.010	Comments received and published in folder EL5

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14.4	H73 – Edenwood Mill, Edenfield: i. Consider whether Highways England require specific wording for the slip road ii. Undertake a further Green Belt Assessment for the site iii. Amend boundary to include car park				Consult Highways England LUC consultants to provide GB assessment
	iv. Publish Highways England update position statement (this has now been published on the website)		08/10/19	EL4.010	Comments received and published in folder EL5
	MATTER 15 – EMPLOYMENT AND MIXED-USE SITE ALLOCATIONS	Dec 2019	Jan 2020		Liaise with RBC Economic Development
15.1	For ALL mixed-use and employment sites: Produce a technical note which demonstrates the deliverability of each proposed employment allocation, this should include as a minimum: i. A map showing land ownership ii. Clear statement of intent from the landowners and any developers if known of the intention to develop the site for the uses envisaged and broadly when iii. An overview of the key constraints and how they could be overcome. This should have regard to Landscape and Green Belt impacts iv. Specific development requirements, including compensatory measures for Green Belt losses where appropriate. v. Details of access – where from and what site specific infrastructure would be required vi. High level viability, particularly having regard to the proposed access arrangements.				Consult LCC Highways
15.2	For employment sites only: <ul style="list-style-type: none"> Provide a high-level breakdown of works necessary to bring the site forward which will not be able to be carried out by the developers of the sites. Explain the actions the Council will take to secure funding to facilitate the developments, including details of phasing. 				

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15.3	M1 Waterside Mill, Bacup – Note to clarify the ownerships and that constraints can be overcome. Provide evidence that the site is developable at the point envisaged in line with NPPF and PPG. Preparation of a note which provides evidence the site is available and developable, to include cabinet report and what else the Council notes as being supportive towards the site being available and developable in years 6-10. Update on CPO				
15.4	M2 Spinning Point - Note to clarify the owner's intentions to bring forward 28 dwellings. Review Policy R2, to ensure it is linked to EMP2. The Council needs to produce a note on the potential scheme to come forward – residential, hotel or both and confirm number of dwellings.				
15.5	M3 Isle of Man Mill, Water – Note to clarify that there is a reasonable prospect of 16 dwellings being delivered when envisaged.				
15.6	NE1 – Extension to Mayfield Chicks Produce note on how landscape impact to be addressed, Green Belt compensation and ecology; Review net developable area				See also 8.10
15.7	NE2 – Land north of Hud Hey i. Clarify point of access is from Blackburn Road and exactly what is required; ii. Address Green Belt compensation and landscape impacts; iii. Review developable area.				See also 8.10
15.8	NE3 Carrs Industrial Estate i. Clarify access is to be from Commerce Street; ii. Agree with Highways England scope of geo-technical and access strategy evidence necessary to potentially remove their objection; iii. Confirm with Highways England that their land will be made available for development; iv. Address landscape and heritage concerns; v. Review developable area.				Consult LCC Highways Consult Highways England Liaise with RBC Conservation Officer

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15.9	NE4 – Extension of New Hall Hey i. Clarify the point of access being from the A682; ii. Clarify the relationship/any phasing with sites either side of the river, i.e. bridge dependency; iii. Address Green Belt compensation and Landscape impacts; iv. Review the net developable area in light of constraints, particularly landscape study.				Consult LCC Highways See also 8.10
15.10	NE5 – Baxenden Chemicals Produce note on any barriers which could prevent this site from coming forward				
	MATTER 16 – ENVIRONMENT				
16.1	ENV5 Green Infrastructure: Produce a note to the Inspector explaining how this policy would be applied and justify the requirements, including the viability implications of development providing 20% net gain and how the various ecological designations identified in the Lancashire Ecological Network Study are to be incorporated into the policy.	Jan 2020	Jan 2020		Provide Keppie Massie with information for revised Viability Assessment
16.2	ENV6 Wind Turbines: Include further detail on de-commissioning of wind turbines, setting out what a de-commissioning scheme would be expected to contain [see also Main Modifications]	Jan 2020	Jan 2020		
	MATTER 17 – LEISURE AND TOURISM				
17.1	LT1 Protection of Playing Pitches, Existing Open Space, Sport and Recreation Facilities: carry out Built Sports Facilities Assessment in line with Sport England requirements	Oct 2019	May 2020 ²		See also 4.3
	MATTER 18 – TRANSPORT				
18.1	TR4 Transport - Provide further evidence to justify having maximum parking standards e.g. explain the negative consequences which would arise if maximum standards were removed	Jan 2020	Jan 2020		
	MATTER 19 – HOUSING SUPPLY AND DELIVERY				
19.1	Produce a paper to confirm latest housing land supply position (broken down by sources of supply) – invite comments by 28/10/19	09/10/19	28/10/19	EL4.014	Comments received and published in folder EL5

² This is the expected date of the final report, further work will be needed to assess implications

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19.2	Check through Mr Lester's list of planning applications provided at the Hearing and provide commentary on each site (taking account of further comments after 28/10/19)	<i>Oct 2019</i>	<i>Nov 2019</i>		
19.3	Consider how the overall housing land supply will be reflected in the Local Plan	<i>Nov 2019</i>	<i>Nov 2019</i>		Will also be a Main Modification
19.4	List of extant permissions in housing land supply paper – addition of Land off Manchester Road and Clod Lane, Haslingden – Produce a note setting out justification of why this should be included in the housing land supply and provide further evidence to demonstrate that the site will resume delivery in year 6	<i>Dec 2019</i>	<i>Dec 2019</i>		To be undertaken alongside actions in Matters 9-14
19.4	H12 Reedsholme Works, amend site capacity to 110 dwellings in updated housing supply paper	<i>Oct 2019</i>	<i>Oct 2019</i>		
19.5	H39 Cowtoot Lane, provide an updated site area for housing supply paper (to be included in note with other actions – see 10.7)	<i>Oct 2019</i>	<i>Dec 2019</i>		See also 10.7 Will also be reflected in HS2
19.6	Potential residential opportunities in town centres – Produce a note to Inspector setting out the potential number of dwellings that could be provided in town centre (informed by the Bacup and Haslingden Vision/Masterplan documents which have been added to the Examination Library)	<i>Jan 2020</i>	<i>Jan 2020</i>		Liaise with RBC Economic Development
19.7	Produce a note to the Inspector to explain why empty homes have not been included in the housing supply	<i>Jan 2020</i>	<i>Jan 2020</i>		Liaise with RBC Housing
19.8	Note on developable sites (i.e. year 6 onwards) setting out information on: <ul style="list-style-type: none"> land ownership, commitment from landowners including the date at which the commitment was made and timescale for delivery evidence that a start could be made at the date anticipated 				See Matters 9-14
19.9	Consider options re. demonstrating 5 year housing land supply after adoption of the Plan (e.g. possibility to use an Annual Position Statement)	<i>Ongoing</i>	<i>Post adoption</i>		
MATTER 20 – PLAN VIABILITY AND MONITORING					

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20.1	<p>Monitoring</p> <p>Revise the monitoring framework so that it can effectively monitor the delivery and effectiveness of the plan. It should include the minimum requirements for a monitoring report as set out in the local planning regulations including the SPD's which should also be set out in an Local Development Scheme.</p> <p>The framework should allow monitoring of the implementation of all policies and specify measures to be taken if policies are not being implemented.</p> <p>It should set out the information the Council will produce in its monitoring report and should cover:</p> <ul style="list-style-type: none"> • Duty to Cooperate • Neighbourhood Planning • Infrastructure • SPDs • Relationship with the Housing Action Plan • Trigger points for local plan review 	<i>Jan 2020</i>	<i>March 2020</i>		

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20.2	<p>Viability Undertake an update to the viability assessment, which is dependent on justification through notes and main modifications. It will need to cover:</p> <ul style="list-style-type: none"> • New updated open space/sports requirements • Compensatory improvements for Green Belt • Custom and Self build housing • Green infrastructure 20% net gains <p>In addition the updated report should include the following:</p> <ul style="list-style-type: none"> • An appendix with a selection of Base appraisals and cashflows • Clarification of exactly what the £1000 per dwelling for infrastructure covers – does it cover education contributions or highway contributions? <ul style="list-style-type: none"> ○ If it does not cover education or highways, the idea of accounting for these in a “Surplus” should be fully explained. As discussed there does not appear to be much surplus. ○ The report should include details of the amounts of sections 106 contributions historically collected in Rossendale over an appropriate historical period. • Clarification of the construction costs <ul style="list-style-type: none"> ○ Explain why the RICS BICS costs figure have not been used and instead relied on QS and Keppie Massie – Include details from the KP data source in appendix to make the costs included in the report more transparent. ○ Explain what the £220 for an electric charging entails (spec) – also explain the approach charging points per apartments. ○ Check and make clear that costs for open space/SUDS are not double counted in constructions costs ○ Include an explanations of construction costs for garages • Include figures regarding site coverage in various density scenarios • Clarify the Benchmark land values – justify the figures used by an explanation based on the evidence in the report • Clarify sales values - Include the market evidence on sales values provided at the hearing. 	Nov 2019	Jan 2020		RBC to provide any additional information and Keppie Massie to undertake revised Viability Assessment