



HOUSE OF COMMONS

LONDON SW1A 0AA

The Planning Inspectorate
Temple Quay House , 2 The Square
Bristol
BS1 6PN
(by email)

Our Ref: JB50172

3 June 2020

Dear Inspectors,

Re: Emerging Rossendale District Local Plan 2019-2034

I recently met some members of the Management Committee of the Edenfield Community Neighbourhood Forum (ECNF) to review progress in the development of their Neighbourhood Plan.

We also discussed the Rossendale Borough Council Local Plan and I became concerned when they brought to my attention some aspects relating to their challenges raised during the Examination Hearings.

Their concerns primarily revolve around the use of Green Belt land both in Edenfield and elsewhere, when there are many alternative sources available. I understand that there is three times as much Countryside land as Green Belt in the Borough and I also note that under the Regulation 18 Plan there was a housing requirement for 3,975 dwellings, which was reduced to 3,180 dwellings in the Regulation 19 Plan.

This reduction of 795 was greater than the 786 that were planned for construction in the Green Belt at Regulation 18 stage, and therefore even at this early point it would have been expected that all proposals for construction in the Green Belt would be eliminated in line with Paragraph 137 of the National Planning Policy Framework (NPPF).

The ECNF were surprised to note that the Council had not included as an allocation in the Plan the Lindon Park Development off Manchester Road in Haslingden before considering other Green Belt sites as this has extant planning approval. On its own this site would create the balance of development for the South West of the Borough for which the Council were striving and which in fact they were claiming as an exceptional circumstance to justify removal of land from the Green Belt in Edenfield.

The view of the ECNF is that under the current proposals the developments planned for Edenfield are totally disproportionate, creating growth for the village of close to 50% against the 10% for the Borough as a whole.

The ECNF have examined the Schedule of Actions agreed between the Inspectors and the Council and are disappointed to note the Council do not appear to have been instructed to look at the majority of the alternative sites that were highlighted by the ECNF to ensure that all other sources of supply have been exhausted before they resort to the use of Green Belt land. I would therefore request that the Council be requested to assess and report on these sites.

I have noted below comments from the ECNF on some of the ~~Matters~~ 'listed by the Inspectors:

1 – Employment Land Requirement: Originally the Council were showing a requirement of 27 hectares for a twenty year period, but during the Examination Hearing this was increased by retaining the 27 hectares but reducing the period to fifteen years in line with the Local Plan period. It is simply wrong for the Council suddenly to increase the requirement in the course of the Examination.

The ECNF advised in their Hearing Statement that some of the assumptions made in the The Council/Lichfields calculations were incorrect, and that the gains over the period selected had been ignored as had the changes in Employment Land Policies introduced in 2011 which were designed to reduce Land Loss. The ECNF pointed out that the figure for land losses at 23.66ha was the main contributing factor (88%) in the Employment Land requirement and that it was grossly overstated. The Forum submitted a Land Loss figure of 9.25ha for the 15 years of the Plan with full supporting evidence.

The ECNF also highlighted, with supporting evidence, the fact that many Employment sites were omitted from the list prepared by The Council/Lichfields and that the majority of sites on the list were shown as having zero room for expansion, although this was not always correct. Without full and accurate baseline information no accurate assessment of the employment land requirement can be made. I am concerned that the Schedule of Actions does not specifically require the Council to identify all the existing employment sites and provide that information along with accurate assessments of the remaining net developable area in each case.

The ECNF recently rechecked the Land Loss figure by examining the Employment Land that will be lost to Residential use by checking all the sites in the Updated Housing Trajectory List issued in October 2019 and the List of Other Committed Sites in the Housing Land Supply as of 01/04/19 and these highlight the actual land loss at 10.61ha, not the 23.66ha The Council requested. The Council also advised that the latest Experian projection indicates a reduction in the numbers of jobs that will be created, which gives a negative figure for the growth requirement for employment, reducing the overall figure even further.

Having received this information they examined the Schedule of Actions but were unable to find an action point that would require the Council to correct these errors which would as a very minimum reduce the employment land requirement by half and eliminate the use of any Green Belt land for employment purposes.

The final issue the ECNF wish to raise under Employment Land relates to the Policies the Council are proposing which will severely restrict the use of any employment site for other purposes. If you travel through the Borough you can see dilapidated factory buildings which are no longer fit for purpose that Landlords struggle to rent in areas that are not considered suitable to prospective Tenants. In view of this the ECNF believe these Policies need to be reviewed to produce a more balanced approach with respect to

the redevelopment of these buildings.

2 – Housing Need and Supply. The ECNF's understanding is that the number of dwellings required was stated in the Submission Version of the Local Plan for the Borough as 3180 and the Council issued an updated Housing Land Supply list in October 2019 which initially identified 3,353, corrected to 3,367, dwellings.

The ECNF issued a response to this on 28th October 2019 which increased the number to 3,622 through the inclusion of a more realistic Small Site allowance, a contribution from the Town Centre Regeneration programmes and other committed dwellings that had been omitted. Additionally, in their response the ECNF again highlighted other sources of supply which would provide close to 2000 further dwellings over and above the Council's updated List, none of which required the use of any Green Belt land.

It is noted from the Schedule of Actions that only one of the sources of supply highlighted by the ECNF was included: the 'Sites with Extant Planning Approval' and the majority of these were subsequently included in the Housing Supply Updated list referred to above proving the Forum comments were valid.

As noted above, the ECNF are concerned that there was no requirement for the Council to have to check the other sources of supply proposed by the ECNF which would have enabled The Council to avoid the use of any Green Belt land and build a significant supply source for the future. For the record the sources identified by the ECNF and submitted with their Hearing Statements were referenced as follows and we can have made available any supporting evidence you may require:

ECNF – HLA2. The original submission included 29 sites with 918 dwellings, this was updated recently and it now covers 34 sites providing 1310 dwellings. Some of these sites are being pursued by the Landowners /Developers and others have been examined by a qualified Local Planning Expert who considered them to be basically fine with none being considered to be "showstoppers".

ECNF – HLA5. Small Sites – The Council's inclusion of only 18 dwellings per year from this source grossly understates the numbers when an analysis of the last three years shows there have been planning applications for 298 dwellings on small sites, with 169 approved, 26 pending consideration and 17 awaiting appeal. The ECNF proposed 25 per year which in my opinion is very conservative but even at this level based on the calculation method used it creates 84 more dwellings.

ECNF – HLA 7. Empty Homes – It is noted from the LCC website that the MHCLG dwelling stock data confirm there were 1,169 empty homes in Rossendale as of 7th October 2019. A twenty percent contribution from this source would not be unreasonable and would provide 233 additional dwellings.

ECNF – HLA 8 Redevelopment of surplus Employment Land. If half of the surplus Employment Land (6.5ha) referred to in point number 1 were to be re-allocated for residential purposes a further 285 dwellings could be made available. (Based on 43.9 dwellings per hectare achieved by The Council on Brownfield Sites)

Regeneration of Town Centres. The ECNF are aware of the grants that have been made available for the redevelopment of town centres with both Bacup and Haslingden being in line for significant investment. This hopefully will be extended to cover the other town centres such as Rawtenstall and Waterfoot. At a very conservative estimate 150

dwellings could be included from this source.

Windfall Developments. An analysis of the last three years' planning approvals indicates that 60 dwellings per annum could be expected from this source equating to 720 dwellings over the final 12 years of the plan. However, the ECNF understand some Local Plans may need a buffer of approximately 20% and have assumed as this equates to 22.6% of the requirement it possibly explains why no contribution has been assumed.

The availability of housing land from the sources highlighted above demonstrates that there are no exceptional circumstances within the meaning of paragraph 137 of the NPPF to justify the release of site H72 from the Green Belt for housing development.

3 – Infrastructure Issues: The ECNF has two main areas of concern. The first is the need to use additional Green Belt for the possible expansion of Edenfield C of E Primary School. This was not identified for release in the Written Statement of the Local Plan Submission Version, but the Submission Version Policies Map showed within the Green Belt yellow shading denoting school and playing field extension. This at best highlights confusion as to whether the school would be extended or a new school constructed on site H72.

The extension of Edenfield School presents additional safety issues in that there is no drop-off or collection point, and even with existing pupil numbers there is congestion when the school opens and closes. There is also reference to the possibility of expanding Stubbins School, but this too suffers from the same issues at opening and closing times. The second point with respect to Infrastructure relates to the roads through the village which already struggle to cope with the volumes of traffic.

The ECNF arranged a full Transport Study by SK Transport, and this confirmed the capacity issue at the mini roundabout at Market Place which the Mott McDonald study carried out for The Council had already identified. The study carried out for the ECNF also identified serious issues with all the access points to the Main Site H72 that were not commented on in the Mott McDonald Study.

The ECNF are advised that LCC initially stated that the quantum of development proposed for site H72 might have to be reduced because of the Highway Issues, particularly the mini-roundabout, but on attendance at the Examination Hearing they changed their view and announced there was to be a “corridor approach”.

No explanation of this term has been forthcoming and the only transport-related Action Point on the Schedule of Actions for site H72 is for LCC to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3.

The absence of a requirement to review the serious issues raised in the SK Transport Report is difficult to understand.

4 – Heritage Impact Issues. Whilst the ECNF are aware this issue is in the schedule of Actions, they believe it is important that full consideration is given to protecting the setting of Grade II* -listed Edenfield Parish Church and Graveyard.

5 – Landscape Studies. Penny Bennett Associates carried out a Landscape Study on behalf of The Council in 2015 and updated it in 2017. They subdivided the H72 Site into four parts A-D and concluded that Area A which is the main part of the site as “Not suitable for development on landscape grounds”. They commented further stating “The greater part of this site, Area A, is unsuitable for development, because the effects on the landscape would be significant, and would be uncharacteristic of the local landscape character area, 8b Irwell Valley south. Nor could it be effectively mitigated against because of the sites openness. Long views west from {Market Street} and eastwards from the far side of the valley would be affected and there would be significant adverse effects on attractive and well used walks in the area.”

In the draft Neighbourhood Plan the ECNF has identified this as a main Locally Important View following their various consultations with village residents over the past two years. It is the only open grassland with continuous views following the contours along the valley sides with the moorland of Holcombe, Helmshore and Musbury Tor, and of Oswaldtwistle Moor beyond remaining in the main area of the village and should be preserved at all costs.

Having given consideration to the information provided by the ECNF and the issues they have raised, my personal view is that there is no necessity to build on Green Belt Land either in Edenfield or anywhere else in the Borough in line with Paragraph 137 of the NPPF when clearly all other sources of supply have not been exhausted.

I would respectfully urge the Inspectors to conclude that there is a sufficient supply of developable land in Rossendale without having recourse to the Green Belt and in particular to delete site H72 from the allocations.

Yours sincerely

The Rt. Hon. Jake Berry MP

**cc – Neil Shaw, Chief Executive, Rossendale Borough Council,
Tony Blackburn, Rossendale Borough Council Programme Officer**