

Local Plan – Regulation 24  
Consultation on Housing & Employment Update Papers  
Responses Received  
Responses 1 to 23



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Dear Sirs

SHLAA 16216,

I am writing as me and my co site owner namely Mr Abid Hussain, are the only landowners of this site and we have as previously represented are interested in having our site released for residential development.

We are property developers and we more than willing and able to develop the land for housing if it was released.

We are disappointed to still note that on the updated plan, it still incorrectly states that all the landowners have not expressed interest in release of the land for development. We therefore wish for you to update the comments to record that Abid & I and both interested in having this land released in the SHLAA. We have previously provided land registry documents to evidence the same. We have also engaged the services of Indigo Planning to promote our site for release, which clearly demonstrates our intentions.

Please if you could send an email confirmation that SHLAA will be updated to confirm the same.

Regards  
Jarair Malik

Dear Sirs,

I would like to express concerns and object to the opening up of green belt land in the Cloughfold area, there are plenty of other plots of land within the Urban boundary that are available, perhaps smaller developments, but much more appropriate for use as building land for housing. It is the responsibility of the LPA to investigate further the sites within the urban boundary that are more suitable.

Traffic on Newchurch Road is already extensive and with the addition of the cars for the initial development around Johnny Barn Farm contributing further on a particularly bad part of the road already.

Regards

Michelle Ringland LPA on behalf of Betty Earnshaw, [REDACTED]  
[REDACTED]



Dear Sir/Madam

With reference to the proposed 'Rossendale Development Plan of May 2021', Townsend Fold/New Hall Hey, Rossendale Greenbelt area EL10 Consultation on Housing and Employment Land - I would like to make the following objections;-

- The destruction of Greenbelt land which is enjoyed by local residents and visitors to Rawtenstall for numerous recreational activities.
- The loss of natural habitat of trees, plants, grasses, animals, birds, insects, etc especially in the current climate where the protection of nature and environmental issues are vital to the prevention of global warming, air pollution, climate change, litter, waste, etc etc
- Adverse effect on the residential amenity of neighbours - by reason of noise, disturbance, overlooking, loss of privacy and overshadowing
- Unacceptably high density/over-development of the site, as it involves the loss of the open aspect of the neighbourhood
- Visual impact of the development on local residents and encroachment of the wooded path along the River Irwell which is used by many residents for walking, dog walking, as well as access to and from the retail park at the New Hall Hey Retail Park, The Cobblers Inn, the 19th Century built Rawtenstall Train Station, Buffer Stops pub and Rawtenstall town centre amenities
- Effect of the development on the character of the neighbourhood - the area is made up of many 19th century Georgian stone built dwellings - the proposed housing development does not take this into consideration
- The proposed development is over-bearing, out-of-scale and out of character in terms of its appearance compared with existing development in the vicinity
- The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners
- Adverse effect of the development on the character and appearance of the area
- Adverse effect of the development on the setting of the grade 2 Listed Buildings at Hardman's Mill - originally a woollen mill, then cotton mill, and recent conversion into business units. It is a 4 storey mill built in sandstone and has a long rectangular plan. All the windows have flat heads and 20 panes, a basket archway, 2 turrets and at the East end there is an engine house. There is a 49 metre high chimney also built in sandstone which stands on a cubical plinth
- The development would adversely affect highway safety or the convenience of road users.

I would appreciate your immediate attention to these objections and look forward to your response

Yours sincerely

Mrs Julie White

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██████████  
██████████

## BROWNFIELD SITES SHOULD BE UTILISED MORE EFFECTIVELY

Dear all

With reference to the EL10 planning proposals for housing developments - the residents of Rossendale are in favour of utilising Brownfield sites more effectively in order to prevent the destruction of Greenbelt land.

The residents have been consulted on the Facebook groups 'Rossendale Past Present and Future' (approx 70000 + 2000 members) and 'Save Townsend Fold Greenbelt' (approx 700 members)

The identified Brownfield sites aren't delivering enough. What the plan needs is more intensified usage of brownfield sites which means the odd extra few storeys - achieving the unit count without the need to swallow up much loved Greenbelt sites.

I would kindly ask that Councillor Steve Hughes should request that RBC undertake a revised assessment. If he can identify any major (10+ unit) appropriate brownfield sites to which this idea could be applied - that might help to demonstrate the assessment out for consultation is invalid

The government has recently allocated extra funds for the development of Brownfield sites across the country - with the idea of protecting Greenbelt in order to hit eco targets for 2050 - so please let's take this into consideration and follow their lead

Thank you for your kind considerations

Regards

Mrs Julie White

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██████████  
██████████

Representing the residents of Rossendale and the facebook groups 'Save Townsend Fold Greenbelt' and 'Rossendale Past Present and Future'

[Sent from Yahoo Mail on Android](#)



The Coal  
Authority

## **Rossendale Local Plan (2019 - 2034) Technical Consultation - Housing and Employment Updates**

### Contact Details

Planning and Local Authority Liaison Department  
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200 Lichfield Lane  
Berry Hill  
MANSFIELD  
Nottinghamshire  
NG18 4RG

Planning Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)  
Planning Enquiries: 01623 637 119

### Date

8 June 2021

Dear Forward Planning Team


### **Rossendale Local Plan (2019 - 2034) Technical Consultation - Housing and Employment Updates**

Thank you for your notification received on the 2 June 2021 in respect of the above consultation.

I have reviewed the Housing and Employment Updates and can confirm that the Coal Authority has no specific comments to make.

Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully

  
**Melanie Lindsley** BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI  
**Development Team Leader (Planning)**



Our ref: C190/PN/JS

09 June 2021

Rossendale Borough Council  
Forward Planning Team  
Futures Park  
Bacup  
Rossendale  
Lancashire  
OL13 0BB



Dear Sirs,

**Re: Rossendale Local Plan Examination Housing Update May 2021**  
**Ref: H73 Edenwood Mill, Edenfield**

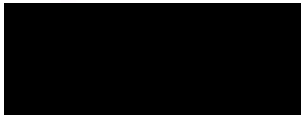
The site is mostly brownfield in nature and incorporates the derelict building known as 'Edenwood Mill', which has been in a derelict condition for over fifteen years.

The site is being combined with adjacent land off Wood Lane to provide a better access and to give sufficient critical mass for the development to be viable.

The reallocation will allow the removal of this eyesore property and I believe that the proposed reallocation is generally backed by local residents.

I thought I should confirm that the above-mentioned site is of strong interest to a number of residential development companies and these companies would be prepared to proceed subject to the site being reallocated out of Green Belt.

Yours faithfully,



**PAUL NOLAN BSc (Hons) FRICS**  
**For and on behalf of Nolan Redshaw Ltd**



Dear Sir/Madam,

Natural England has no comments to make on the Housing and Employment Update consultation.

Kind Regards

Janet Baguley  
Lead Adviser – Greater Manchester & Merseyside;  
Cheshire, Greater Manchester, Merseyside & Lancashire Area  
Natural England  
2nd floor, Arndale House, Manchester Arndale  
Manchester, M4 3AQ

[REDACTED]  
[REDACTED]  
[REDACTED]

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.**



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11<sup>th</sup> June 2021

Richard Gee  
Roman Summer Associates Ltd  
Haweswater House  
Waterfold Business Park,  
Bury,  
BL9 7BR

Dear Richard

**Land at Swinshaw Hall, Loveclough**

Further to our recent discussions, I am delighted to confirm that we have now agreed the terms of an option agreement for the land at Swinshaw, Loveclough with all three sets of landowners. Rowland Homes are now committed to delivering high quality residential development on the land at Swinshaw, Loveclough in the short term, subject to securing a residential allocation.

We are aware that the Local Plan Examination is ongoing and if found sound, it is hoped that the Local Plan will be adopted by early 2022. In order to inform a detailed planning application, we will commit to commissioning detailed investigations and surveys in respect of drainage, ground conditions, ecology etc. We are targeting the submission of a Full Planning Application to Rossendale Council once the allocation for residential development is achieved. We would be targeting a start on site by the end of 2022 and have identified the site to deliver a minimum of 30 dwellings per year.

Rowland Homes are experienced housebuilders with the ability to work alongside other partners to deliver a high-quality development in Loveclough. There is real demand for family homes in Loveclough and I can confirm that this site would be suitable for us to provide a mix of housing types alongside significant public open space and affordable housing provision.

Thank you again for the assistance that you have provided in getting to this important milestone, and please do forward this letter onto the Council and the Local Plan Inspector if you feel there is merit in doing so.

Yours sincerely



David Clifford MRTPI  
**Assistant Land Manager**



Planning Policy  
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SENT BY EMAIL

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16/06/2021

Dear Forward Planning Team,

### **ROSSENDALE LOCAL PLAN: ADDITIONAL EVIDENCE**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Additional Evidence produced as part of the Examination into the Rossendale Local Plan.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

### **Housing Update (May 2021)**

3. The Housing Update has been prepared to address the housing requirement figure in light of the fact that more than two years has passed since the Local Plan had been submitted. As the PPG<sup>1</sup> states that the local housing need calculated using the standard method may be relied upon for a period of 2 years from the time a plan is submitted to the Planning Inspectorate for examination.
4. The Council have calculated the LHN using the standard method as 185 dwellings per annum (dpa). The Council does not consider that there are any circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Therefore, the Council considers that the revised LHN is appropriate and provides a sustainable and achievable housing growth figure for the Borough.
5. The Council do, however, note that it may be appropriate for the Inspectors to consider extending the Plan period from 2034 to 2036 to ensure that there is 15-year period from the date of adoption.
6. The HBF considers that it is appropriate for the Council to update the LHN calculation as set out by the PPG. The HBF considers that the Council have undertaken the calculation

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<sup>1</sup> ID: 2a-008-20190220



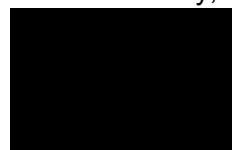
following the standard method and that the 185dpa is the correct figure. The HBF is however, concerned that the Council has not included an uplift to address the affordable housing need or in relation to the evidence provided by Lichfield's in their ELR/SHMA Analysis (April 2021).

7. The 2019 SHMA identified an affordable housing need of between 102 and 170dpa, the HBF is concerned that the currently proposed housing requirement of 185dpa will not address this housing need and will lead to an increase in housing need in the Borough. PPG states that *'an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes'*. Therefore, the HBF recommends that the Council look to increase their housing requirement to ensure that this affordable housing need can be addressed.
8. The Lichfield's ELR/SHMA Analysis (April 2021) report considers the 2018 Experian job growth projections using PopGroup. The jobs growth is identified as 1,400 jobs and using this a housing need of 242dpa is identified, which rises to 268dpa where a partial catch up in relation to headship rates is included. The HBF are concerned that this is another element of evidence that has not been considered appropriately by the Council, and that highlights the potential need for an increase in the housing requirement to ensure an appropriate balance between employment and housing.
9. In conclusion, the HBF considers that the housing requirement should be increased from the 185dpa identified by the standard method, to contribute to meeting the affordable housing need and to ensure an appropriate balance between employment and housing.
10. The HBF considers that it would be appropriate to extend the plan period to ensure that the Plan will cover a 15-year period from adoption.

### **Future Engagement**

11. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
12. The HBF would like to participate at any further examination of this local plan, to ensure we are able to debate the comments made within our representation in greater detail as required and to ensure we are able to respond to any additional evidence provided by the Council or others following submission of the plan.

Yours sincerely,



**Joanne Harding**  
**Local Plans Manager – North**





Mr Michael Atherton  
Rossendale Borough Council  
The Business Centre  
Futures Park  
Bacup  
Lancashire  
OL13 0BB

[REDACTED]  
Our ref: PL00704204

15 June 2021

Dear Mr Atherton

### **Housing and Employment Updates**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Emily Hrycan  
Historic Environment Planning Adviser (North West)



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

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HistoricEngland.org.uk



The Council has responded to the Inspector's request for further information relating to the housing requirement and the implications that the recently published Local Housing Need figure, based on the Government's Standard Method may have on other policies within the emerging Local Plan, for example, the employment land requirement.

We would like to comment on the Council's response re: Employment Update May 2021.

The revised Local Housing Need (LHN) derived from using the Standard Method indicates that the number of jobs required in Rossendale will be much lower than the figure published in the emerging Local Plan.

The Local Plan originally set aside 27 hectares of land for employment – the new figures calculated in the Employment Update results in a gross requirement of 12.81 hectares, plus an additional flexibility factor of 1.67 hectares, resulting in 14.48 hectares.

The Councils preference would be to retain the original Local Plan figure of 27 hectares of Employment Land – this would give them 12.52 hectares surplus to the calculated need.

Based on the Council's opinion – they believe they would need the 12.52 hectares of land in reserve to ensure businesses a flexible supply of land. They also believe that there is pent-up demand for employment floor space in Rossendale.

The Council is currently before the Supreme Court arguing a case involving the payment of business rates on empty business properties. This would suggest that there are a number of empty properties in the private sector within Rossendale.

Could the Council not utilise these empty business properties. These properties could be available now for new business development and if not suitable, re-develop them for the current business market.

The Council has worked hard over the years trying to facilitate the creation of as many jobs as possible but the employment profile of Rossendale is approximately 20% manufacturing based, which is twice the national average and has lost jobs at a faster rate than the Council has been able to create them.

We do not believe that leaving 12.52 hectares of land un-developed, earmarked only for employment purposes can be justified, when a substantial proportion of the land could be used for housing.

This land in the growth corridor, would be more attractive to developers wishing to build residential properties - housing development would be more economically viable and would improve the sustainability of the plan because houses would be built near the areas of employment.

This would contribute more for affordable homes, infrastructure, and section 106 contributions. It would also enhance the economic case for the re-establishment of the rail link to Manchester, which would be a massive boost to the economy of Rossendale.

Regards,  
John Atherton and Lynne Lomax

The Council has responded to the Inspector's request for further information relating to the housing requirement and the implications that the recently published Local Housing Need figure, based on the Government's Standard Method may have on other policies within the emerging Local Plan, for example, the employment land requirement.

We would like to comment on the Council's response re: Housing Update May 2021.

In the Council's response to the Housing Need at para 3.2 it states:-

*3.2 The NPPG is clear that the standard methodology applies an affordability adjustment to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement specifically to address under-delivery separately. Only where an alternative approach to the standard method is used, should past under delivery be taken into account. The NPPG states that an increase to the total housing figures included in the plan may need to be considered where it could deliver the required number of affordable homes.*

Also in the Council's response at para 3.7 it states:-

*3.7 Any under-delivery of dwellings below 208 dpa in the first two years of the Local Plan period to date (2019 and 2020) would therefore need to be made up later in the Plan period, preferably in the first 5 years of the Plan period (before April 2026). This is unless the case can be made at Examination to deal with under supply over a longer period.*

Although the Council states that the standard method addresses any past under-delivery of dwellings - it also says that under-delivered dwellings would need to be made up later in the plan.

The PPG Paragraph: 031 Reference ID 68-031-20190722 states that:- *Under-delivery may need to be considered where a plan is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing.*

We would respectfully ask the Planning Inspectors to examine the fairness of the Council's intent to double count the under-delivered housing numbers. Under-delivery of dwellings are taken into account using the Standard Method and yet they intend to include the under-delivered figures again, later in the plan period.

We think that the Council should not double count the under-delivered housing from 2019 and 2020 because the Covid pandemic was a one off catastrophe and developers were unable to build houses because of Government mandatory lockdowns and when they could, building sites were restricted to numbers of staff on site and social distancing. Every aspect of development from building to selling was affected by lockdowns and restrictions - hindering builders, solicitors, estate agents, buyers, sellers, etc.

It is difficult enough meeting housing targets, without double counting past un-delivered housing numbers - then adding the 20% buffer (which is required in the 5yr housing land supply, when claiming past under-delivered figures) which would result in an even larger housing target. Achievability is important, Rossendale needs achievable targets.

Regards,  
John Atherton and Lynne Lomax

16<sup>th</sup> June 2021

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**Sent by email: [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)**

### **Rossendale Local Plan Examination Consultation on Housing and Employment Land Updates (EL10 – 2<sup>nd</sup> June 2021)**

We have been instructed on behalf of our client, Taylor Wimpey (UK) Ltd, to provide comments on the updated housing and employment land evidence base published under Examination Library 10. The consultation ran between 2<sup>nd</sup> and 16<sup>th</sup> June 2021.

The **May 2021 Housing Update (EL10.001)** has been prepared in response to the Inspector's request to consider the implications of the latest Local Housing Need (LHN) calculation for Rossendale, given their proposed LHN requirement is now over 2 years old, and can therefore no longer be relied upon as per the PPG.

As confirmed at paragraph 2.1 of the Housing Update Paper, the latest 2021 LHN figure for Rossendale is 185 dwellings per annum. Paragraph 22 of the NPPF is clear that strategic policies should look ahead over a minimum 15-year period from adoption. As confirmed under Option 2, which is the Council's preferred option, the Council are now seeking to extend the plan period to 2036. This results in a 17-year Plan Period (2019-2036), based on an assumption that the Plan will be adopted in 2021 and therefore allows for a 15-year period up to 2036 after this.

In addition to elongating the Plan Period, the Council now also propose to use the reduced LHN figure of 185 dpa in years 3-17. For the first 2 years the previous LHN figure of 208 dwelling will be used, as demonstrated in Table 2 replicated below:

*Table 2: Option 2 - Annual and overall housing requirement for the period 2019 -2036*

Local Plan Period	Annual Housing Requirement (Year 1 to 2)	Annual Housing Requirement (Year 3 to 17)	Calculation of the Overall Housing Requirement	Overall Housing Requirement
2019 – 2036 (17 years)	208	185	$(208 * 2) + (185 * 15)$	3,191

As confirmed at paragraph 3.13 of the Paper, based on the updated calculation of the LHN in 2021 and the new Plan period, the overall housing requirement in the Plan would change from 3,180 dwellings between 2019 and 2034 to 3,191 dwellings between 2019 and 2036. The annual housing requirement will also change from 212 dpa during the period 2019 to 2034 to 208 dpa between April 2019 and March 2021 and 185 dpa between April 2021 and March 2036.

In essence, the proposed change to the requirement and plan period seeks to stretch out the Council's existing housing land supply over a longer period (a further 2 years), as this results in only 11 additional dwellings being required because of the reduced LHN figure of 185 dpa. As we have advocated throughout the Local Plan process and in our Hearing Statements, we are strongly of the view that the Council should be looking to exceed the Government LHN figure, which is a **minimum**

**DESIGN | ENVIRONMENT | PLANNING | ECONOMICS | HERITAGE**

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starting point (NPPF paragraph 60). Therefore, we do not agree with the reduced housing requirement of 185 dpa, nor the use of 208 dpa figure in the first two years of the Plan Period.

This is because the LHN figure alone does not take account of economic growth and means that the borough's housing requirement are not aligned with its employment requirements and aspirations. To date we have consistently advocated the use of an OAN based on the 2019 SHMA, which suggests an employment led OAN range of between 236 and 253 dpa and represents a housing requirement which is aligned with economic growth.

In this regard, we note that Lichfield have prepared an April 2021 update note (contained within the **May 2021 Employment Update (EL10.002)**) to respond to the queries raised by the Inspectors following the initial hearing sessions. One of these requests was to provide modelling of the December 2018 Experian job forecasts to identify the level of housing associated with this level of economic growth. This later data generates a net job growth figure of 1,400 over the slightly longer plan period of 2019-2036. This level of job growth generates a housing need of **242 dpa**, as replicated from the Lichfield Note below:

Table 5.1 Summary of Housing Needs Scenario Experian 2018 – with and without PCU (2019-36)

	1,400 jobs	1,400 jobs with PCU
Job growth	1,400	
Labour Force growth	1,860	
Population change	6,765	
Of which natural change	2,298	
Of which net migration	4,467	
Households	3,970	4,390
Dwellings	4,120	4,556
Dwellings per annum	242 dpa	268 dpa

If a partial catch-up headship rate scenario is applied (which takes into account an adjustment for household suppression amongst younger households in the 15-34 age range, due to affordability issues) the need rises to **268 dpa**. So, the latest Lichfield Note indicates an **employment led housing growth OAN figure of between 242-268 dpa**, which the reduced 185 dpa figure falls significantly short of.

The reduced 185 dpa figure also fails to take account of the growth strategies and strategic infrastructure improvements in Rossendale. The PPG, at Paragraph 010 Reference ID: 2a-010-20201216, outlines circumstances where it may be appropriate to plan for a higher housing need figure that exceeds the standard method, including:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); and*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally*

The Invest in Rossendale Economic Development Strategy (2018-33) looks to create 1,600 new jobs, and support 27 Ha of employment land allocated in the Local Plan.

At the County Level, Lancashire has secured a £320m Growth Deal, specifically designed to address the failure to deliver transport infrastructure, a key barrier to growth, and to establish for the first time a transport investment programme, under the direction of Transport for Lancashire (TfL),



commensurate with Lancashire's economic and housing growth opportunities and challenges. This investment programme will ensure key locations can fulfil their potential as growth corridors and major industrial, commercial and transport hubs for Lancashire as well as neighbouring economies. It will also maximise the connectivity opportunities afforded by new national and regional initiatives, including HS2, Airport City, Media City UK, Northern Hub, Atlantic Gateway and Liverpool SuperPort.

In respect of strategic infrastructure, and particularly transport, Policy TR1: Strategic Transport in the submitted Local Plan sets out a number of strategic transport investments which would help address some of the constraints which have been identified in terms of future development potential including:

- Improving links to Greater Manchester and the M60/M62 and enhancements to the A56; and
- Developing the potential of the East Lancashire Railway for both transport and tourism purposes.

It is clear from the above that there are multiple opportunities and funding streams for improving strategic infrastructure within Rossendale, which is likely to require a more ambitious housing target to ensure that this investment can be secured and these improvements made in the next plan period. The reduced 185 dpa figure hinders, rather than facilitates, economic growth aspirations in Rossendale.

Simply put we are concerned with the proposal to reduce the housing requirement even further, given that we previously highlighted how the previous 212 dpa figure may meet less than half the jobs growth in the borough, which could result in unsustainable commuting patterns, slower economic growth and a lack of labour force mobility. This concern is further exacerbated with an even smaller requirement of 185 dpa.

The proposed housing requirement falls well short of meeting the economic growth needs of the Borough and should be uplifted on this basis. At the very minimum it should revert back to 212 dpa across the whole 17-year plan period (which would equate to 3,604), albeit we suggest this should be higher and utilise the 2019 SHMA employment led OAN figures or the 2021 SHMA updated employment led figure of 242-268 dpa.

Section 6 of the Housing Update report discusses housing land supply matters. It is suggested that if the plan period is extended to 2036 and the requirement reduced to 185 dpa, the housing supply will fall short of meeting the overall requirement by 22 dwellings, which the Council consider to be insignificant at less than 1% of the total requirement.

However insignificant this shortfall may be, it still confirms that the plan as drafted will not meet its needs in full, even with a reduced requirement which the Council's own evidence acknowledges will not fully deliver their employment aspirations.

Notwithstanding our concerns noted above in relation to the lower housing requirement figure, the importance of Taylor Wimpey's two strategic sites at H72 (Edenfield) and H74 (Grane Village) is clearly evident. These two sites are critical in ensuring that the Borough's overall housing requirements are met and we remain entirely supportive of the figures presented in the housing trajectory at Appendix 2 of the report. Being the two largest sites in the emerging Local Plan, it is imperative that they come forward and Taylor Wimpey are fully committed to delivering them as quickly as possible (as evidenced in the live planning application for the Grane Village H74 allocation: Ref: 2019/0335).

In the housing trajectory (Appendix 2 of the report) we note that in the comments section under allocation H72, it is stated that '*Delivery expected to be delayed (see Action 14.3)*'. We reiterate that we are very keen to make progress on the Design Code/Masterplan for the Edenfield allocation and have been seeking to collaborate with the Council to assist them with this process to try and expedite matters. This will ensure that Taylor Wimpey can start delivering their land parcel on the Edenfield allocation as soon as possible, which being the largest allocation in the plan is of strategic importance.

In overall conclusion, we accept that the Standard Methodology is the starting point for assessing housing need in a local authority and that the latest figure by that methodology is 185 dpa. Whilst this

figure has fallen over recent years, that is simply a product of the decreasing trajectory applied by the now rather old 2014 HHP, rather than any increasing level of local affordability generated by a past upsurge in delivery and should therefore be adopted with a point of caution. As we have highlighted, the Council’s economic strategy and own evidence base justifies additional homes being planned for to support sustainable levels of growth. However, it is also entirely fair to point out, as the Council have themselves in the Housing Paper Update, that the Borough of Rossendale is significantly impaired by steep topography and settlement form that restricts the availability of suitable, developable land for housing. Even if the housing need figures were increased in line with the economic aspirations and strategy, we do recognise that it may not be possible to allocate sufficient suitable land to meet such needs. In light of this, it is imperative that this plan does seek to allocate all sites that are suitable and deliverable, which includes our clients land interests at Grane Village and Edenfield.

Given the aforementioned housing land supply matters, it would also be prudent for the Local Plan to include a mechanism for an early Local Plan Review. This provides the flexibility and comfort to allow the current plan to be found sound and adopted as soon as possible, such that the allocated sites can begin delivering and contributing to the 5-year supply; with the Review addressing development requirements in the later years, where it is acknowledged that the supply is more marginal. A Local Plan Review mechanism will also allow for additional strategic sites/housing land supply to be identified should housing land supply issues arise post adoption of the Plan.

I trust the above representations are clear, however should you or the Inspector require any clarification or further information please make contact on the details below.

Yours sincerely,

A solid black rectangular redaction box covering the signature area.

Graham Lamb  
**Director**

Two solid black rectangular redaction boxes covering contact information, one above the other.



15 June 2021

Forward Planning Team  
Rossendale Borough Council  
The Business Centre  
Futures Park  
Newchurch Road  
Bacup  
OL13 0BB

Dear Sir/Madam

**Rossendale Local Plan Examination – EL10.001 - Housing Update May 2021  
Housing Allocation Ref. H74**

In response to the Inspectors' request for comments on the above issue I attach a copy of Grane Residents' Association's Response to the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation which sets out our objections to the change to the Urban Boundary in order to facilitate the allocation of housing development for 131 dwellings plus a further 8 which have been added to the proposed Grane Village development by Taylor Wimpey, without further public consultation.

When it was proposed to move the Urban Boundary in 1991 and allocate the site for employment purposes to adjoin the former Bleachworks site, following a rigorous campaign by Save Grane, a Government Inspector stated in his report in 1994 that, "The elected members of the Council are quite in order to react to the widespread objection from local residents by proposing to reduce the employment site particularly since there are planning reasons for doing so."

Grane Residents' Association is a constituted organisation which has been in existence for 30 years, during which time monthly meetings have ensured that Grane remains a healthy, attractive village in which to live. During this time members and volunteers have undertaken significant environmental enhancement including the planting of 18,000 trees on the hillside overlooking the site, the creation of a safe off-road footpath for walkers, rebuilt drystone walls, erected benches around the Grane reservoirs, cleaned stretches of the River Ogden and planted hundreds of daffodils along Grane Road. These are just a few of many projects which we have undertaken to maintain what we consider to be a very beautiful part of the Rossendale Valley.

This is the third time the Council has endeavoured to snatch from us this patch of green countryside which forms an integral part of Grane, through which a public right of way allows local residents the opportunity to exercise close to their homes.

A short online video produced in November 2020 has so far received 12.3k views, and can be seen on the 'Grane Residents' Association' facebook page. This visually illustrates our response to the Regulation 19 Consultation.

One of the main objections is the effect development will have on Grane Road. The original site entrance was on Grane Road but this was deemed inappropriate and moved to Holcombe Road, which clearly demonstrates that neither the developer nor Rossendale Planners have any idea of the problems faced by residents living on Grane Road, who have no parking facility other than at the front of their homes. Grane Road is also the main route for ambulances to the Royal Blackburn Hospital for the whole of Rossendale.

The danger of Holcombe Road traffic entering Grane Road is highlighted in a letter by Mary Greenwood in which she explains the planner's reason for refusal on 2 August 2013, of her application for a farrier training facility on Grane Road, on 25 days per year, on the following grounds, "the scheme, by reason of the resulting traffic movements using a junction with poor visibility to the busy Grane Road, would result in unacceptable danger to highway safety

Mrs Greenwood states "The road was busy at the time of the application but nowhere near as busy as it is today. I fail to understand the double standards which may now allow the proposed 131 house development where households may have two cars, plus service vehicles to the site, exiting Holcombe Road onto Grane Road on a blind bend, when it was deemed dangerous in 2013, with a straight sightline onto Grane Road, to refuse this application."

The refusal was further based on, "the proposed acoustic measures would be insufficient to protect neighbours from harm," to which Mrs Greenwood states, "It is proposed that many of the houses on the proposed development site will be protected from the traffic noise from Grane Road with acoustic measures. Can you please explain how Rossendale Borough Council proposes to protect existing residents with such measures, to mitigate the effect of increased traffic noise for residents already under great pressure due to the ever increasing volume of traffic using Grane Road."

Lancashire County Council states, "This will undoubtedly result in an increase in vehicular traffic if approved, however, it has been demonstrated that the network can accommodate the anticipated level of increase in a safe manner." In recent weeks two cars have been written off and two walls have been damaged by vehicles running into them. The 30 mph speed limit in the built up area is not upheld and the wellbeing of residents is damaged by the ever increasing volume of traffic using Grane Road.

We have conducted our own review of potential sites suitable for either development or re-development within the area, we have identified a number of vacant sites within this area of the borough which have not been allocated under the plan and a number of brown field sites which are no longer suitable for their original commercial/industrial uses which would provide sufficient land mass for the development as proposed. We as a residents' Association are not averse to development and understand that for any economy to thrive, investment is needed and new homes are needed, however smaller scale developments of 5-10 homes which allow for a natural evolution of the townscape on existing brown field sites add to the local diversity and aid integration.

Large scale developments such as the proposed will result in the destruction of the Greenbelt, a scar on the local landscape and establishment of a Dormitory Commuter Estate which adds little to the local economy or community, offers nothing in the way of design, and fails to reflect the vernacular style and materials of the Valley of Stone.

We are concerned by the lack of affordable homes contained within the proposals, and that the developer's justification for this is based on a viability report provided by Savills to be speculative and significantly lacking in actual detail, with figures based on market performances and not actual cost. The considerable figures provided therein in relation to abnormal costs are not considered fair and reasonable or accurate. The use of piling is an acknowledged cost and requirement of the development and Taylor Wimpey have been aware of this since ground investigation works were undertaken several years ago. Rossendale Borough Council under the terms of its Housing Survey states that the development as proposed for this site fails to meet the affordable housing allocation demand. If we are to accommodate the local first time buyers, affordable housing is essential to give them a step up on the ladder rather than lose all Rossendale's talented young people who cannot afford to buy locally.

Many of the developer's assessments are desk based and several years out of date and as such do not reflect the fact that biodiversity has increased since publication. Proposals to move the Urban Boundary to allow housing development also removes an established IWS from the site which forms a wildlife corridor from the West Pennine Moors SSSI of which Grane Valley forms part and which sits only 800 metres from Holcombe Road. The site, formerly pasture land, has over many years been left to return to nature and as a result is now a rich wetland habitat. It can be confirmed that despite reports indicating a low quality habitat, and that no major species are present, it can be legally declared that there have been regular sightings of water voles, common newt, a variety of frogs and toads, hedgehogs, deer, daily use by both barn and tawny owls and bats, hawks including sparrow hawks and red kites hunting on the field, along with a wealth of butterflies, moths and several species of bees and a variety of song and hedgerow birds, all of which will be displaced and expelled should the development be given approval. If Rossendale Borough Council is serious about its own Climate Change Strategy, is it wise to destroy such habitat, impossible to replicate elsewhere, and the wildlife that depend upon it? How can Taylor Wimpey get it so wrong and how many of their utterances are equally incorrect?

We object to the development on the grounds of poor layout of the estate, the design does not provide any natural wildlife corridor between the Grane Valley Site of Special Scientific Interest and the woodland and native areas along the Helmshore to Haslingden railway lines, which are adjacent to its boundaries, such a block will prevent the free movement of wildlife.

We believe it is important that Grane retains and acknowledges its history. The material proposed for the housing does not represent the vernacular style of the area, bricks and tiles rather than stone and slate.

We know of at least six springs which run into the site along its Grane Road boundary and the dangers of runoff flooding cannot be ignored and we question whether the attenuation tanks suggested would prevent Helmshore and Irwell Vale from being flooded at a later date. We have historical evidence of an animal pit used to dispose of the bodies of a herd of cattle on the site during a foot and mouth outbreak.

St Stephen's Church, adjacent to the site is a Grade two listed building and the Mission Hall was built to carry on services whilst the Church was moved, stone by stone, from Grane Village 1¼ miles further up the valley. This was a momentous, historical undertaking and yet the Mission building, in the development plans, is surrounded by houses, which completely destroys the occupiers' privacy, endangers the open

aspect of this historically important building and will no doubt overshadow and have significant impact upon the residents' peaceful enjoyment of their own home.

Opposite the site in question is the municipal burial ground of Holden Hall Cemetery, the resting place of thousands of the towns dead, the graves of which are marked, as is common practice, with gravestones. Having experienced Taylor Wimpey development of other sites in the past, it is common practice for them to negotiate purchases and planning on the basis of building properties using piling techniques as is the case with the subject site and then at the time of construction change to the cheaper alternative of vibro-compaction, this leads to high levels of noise, disturbance and in this instance ground shake. We have seen nothing within the documentation submitted by the developer to ease our concerns in this regard, and fear that the development may result in movement of the gravestones, many of which have stood there for over 100 years. We have seen nothing to our satisfaction in relation to liability from the builders, that any such problems will be rectified at their expense, as a minimum we would like to see a commitment that a schedule of condition be put in place and funds held by the Council to rectify any such disturbance or movements resulting from the ground works both to the gravestones and houses in the vicinity.

The Association wish it to be placed on record that the whole process we have entered into has been totally one sided. The Council's consultation in relation to the Local Plan's housing allocation for this site was merely to show us what they wanted. Taylor Wimpey's consultation was to merely tell us what they were going to do with those plans. There has been no negotiation with GRASS as the recognised representative for residents in the Grane Valley. The Planners told us what they wanted, Taylor Wimpey what they were going to do and our only rights in this process was to object. The only changes that have been made, despite over 500 written objections and a petition containing 2,411 signatures; have been changes which will ensure their plans are acceptable to the Planners.

Although the Planners have received our objections no responses have been received because the Council has decided that this is the process to be followed. However it is clear that Planners have been discussing/negotiating with Taylor Wimpey about their plans since at least 2015. Taylor Wimpey representatives have met with us on several occasions and noted our objections but have changed very little and as a result have steam rolled over us. If this is consultation it appears very one sided and does not lead us to believe we have any say in protecting the Grane we have lived in and cherished, in some cases for over 40, 50 and 60 years.

Yours faithfully

Michael Murray MBE  
Chairman

**Selection of objections relating to the  
Change to the Urban Boundary/Planning Application 2019/0335**

29.09.18. Grane Residents' Association Response to Rossendale Draft Local Plan Pre-Submission Publication Version, Regulation 19 Consultation (Document sent as an attachment to this letter)

Date logged    Objections  
on website

29.10.19. Comprehensive Overview (Andrew Neil Taylor)  
29.10.19. Small, very settled and stable community (Miriam Hopkinson)  
30.10.19. Flood Risk (Tony Hodbod)  
05.11.19. Traffic, visual amenity, nature conservation, flood risk (Margaret Murray)  
08.11.19. Archaeology and Cultural Heritage Impact Assessment (GRAss)  
17.01.20. Traffic (GRAss)  
17.01.20. Animal Pit (GRAss)  
01.06.20. Flood Update (Tony Hodbod)  
09.10.20. Ombudsman reference (GRAss)  
07.12.20. Civic Trust submission  
10.12.20. Climate crisis (Marie Charlton)  
01.03.21. Boundary change, Net Gain (Marie Charlton)  
16.03.21. Flood Risk update (Tony Hodbod)  
18.03.21. History and Heritage, local importance, Valley of Stone (Margaret Murray)  
30.03.21. Wildlife/Cultural Heritage (Louise Muskett)  
30.04.21. Traffic/wildlife/Urban Boundary (Chris McClung)  
28.04.21. Traffic Survey – historical (GRAss)  
10.05.21. Planning application refusal Grane Road (Mary Greenwood)  
10.05.21. Flood Risk/groundwater (Tony Hodbod)



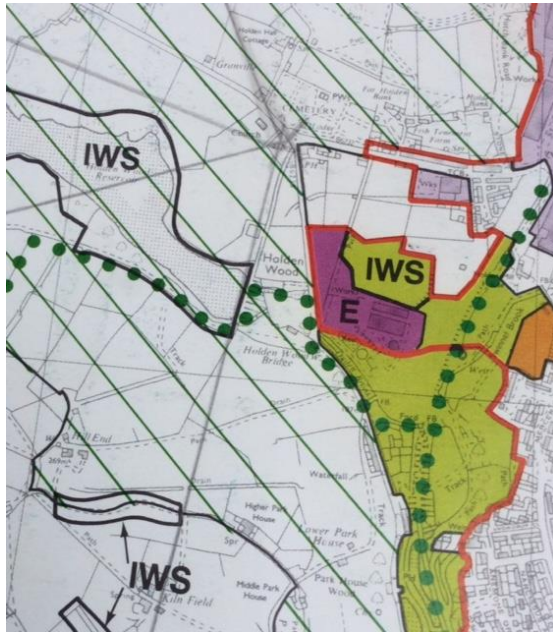
# Grane Residents' Association

Response to

**Rosendale Draft Local Plan  
Pre-Submission Publication Version  
Regulation 19 Consultation**

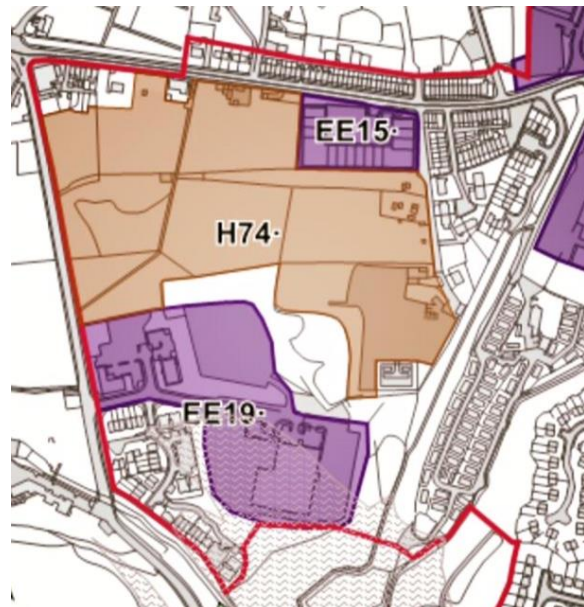


## Rossendale District Local Plan – Adopted 12 April 1995



The above map shows the current urban boundary (in red), the IWS within the proposed site and its proximity to two other protected IWS locations. The IWS and area identified for housing development (right of picture) is currently the habitat for a wide variety of wildlife, mentioned elsewhere in this document.

## Rossendale Draft Local Plan Pre-Submission Publication Version, Regulation 19 Consultation



The above map shows the proposed changes to the urban boundary which would allow the allocation of 174 houses (H74). Note the IWS and its constraints have now been removed. The map looks neater but the impact on wildlife and residents will be immense.

# Haslingden Grane



The above photograph shows a section of the proposed housing development site in the foreground. The Holcombe Road boundary can be seen in the centre of the picture where lamp posts are situated which separates the site from the Grane Valley. It is not surprising therefore that this site has an abundance of wildlife owing to its proximity to the countryside beyond.





**A blast from the past!**

Deer once roamed freely in the Forest of Rossendale. Site H74 is currently habitat for deer as these two recent photographs illustrate.



# Grane Residents' Association

## A Brief History

In 1991 we discovered that the green fields of Grane were to be covered with industrial units. Graners being Graners decided that their locality should not be covered with industrial units and mobilised themselves into "Save Grane." The long fight ahead included a 3,000 signature petition which was presented to the House of Commons. Following a Public Inquiry a compromise was reached. It was agreed that the southern end of the site would be regenerated and that industry would continue on the former Bleachworks site and would also include a housing development. The northern end of the site would remain an undeveloped buffer and was designated White Land for the duration of the Plan. The campaign galvanised the local community and "Save Grane" would later become Grane Residents' Association. For the past 27 years the Association has undertaken many ambitious environmental projects in the Grane area and meetings have continued throughout this period to identify the needs of the community, raise funds and monitor local planning applications.

The Council and Planners are aware of our history, which makes it both frustrating and sad to learn that our requests for surveys relevant to the proposed Grane Village housing development have not been forthcoming. It has therefore been impossible to make a timely response to the Rossendale Draft Local Plan, Pre-Submission Publication Version Regulation 19 Consultation, with the absence of such information. It should be noted that on **2 October** we received an email from Forward Planning stating that the Rossendale Local Plan Highways Capacity Study has now been published together with a reminder that, "If you wish to submit your comments, please note the closing date is Friday **5 October**, any comments received after midnight on that day will not be considered." Our response to Site H74 is therefore contained in the following pages.

# Go Green for Good

The following is an extract from Lancashire County Council's leaflet "Go Green for Good" which was produced a number of years ago but is as relevant today as when published. Grane Residents' Association always strive to follow this advice.

"Do you want to save the world but don't know where to start? This leaflet shows how you can do your bit in Lancashire to help save the planet."

## CARE for your NEIGHBOURHOOD



We can all help look after our everyday surroundings: landscape, wildlife, buildings and greenspaces. We live with them and we can have a greater say in what happens to them.

- If you see a for-sale sign on open space contact the Council Planning Department to find out if development is planned. You can object if you wish.
- Be vigilant - look out for changes. Monitor the newspapers for planning applications. Get a copy of your Local Plan from the District Council.
- Get to know your patch - do a Green Audit of your local area. Find out who's in charge of what.
- Be ready to act if there is a change you don't like. Form a local group, produce a newsletter, write to local newspapers.
- Get in touch with your parish council or community group and ask them what they are doing for the Environment.

## SPREAD the WORD

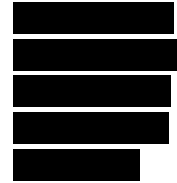


This leaflet describes some of the actions you can take to make your lifestyle greener. If everybody did just a little for the environment, we'd live in a very much greener world.

So spread the word - tell your family and friends. Start with three people. Write their names here and pin this leaflet up to remind you to speak to them next time you see them.

For more information write to:  
 County Planning Officer,  
 Lancashire County Council,  
 P O Box 160, East Cliff County Offices,  
 Preston PR1 3EX.

**GRASS** 'Volunteering for a greener Grane'  
**GRANE RESIDENTS' ASSOCIATION**



29 September 2018

Forward Planning  
The Business Centre  
Futures Park  
Bacup  
OL13 0BB

**Re: Rossendale Draft Local Plan – Pre-Submission Publication Version, Regulation 19 Consultation**

I write as Chairman of Grane Residents' Association (GRAss). As we see it, the Consultation must fall into two areas as determined by the timescale and information available. The first Consultation is in regard to the suitability of Site H74 shown on the Local Plan map and H76 in accompanying documents as to its location, the area available for development and the calculated yield for housing now standing at 174, previously 160. We could not find in the documents any explanation as to why this increase has occurred. The second Consultation must be in regard to the plans for the site submitted by the developer.

In regard to the suitability of the site, consideration must be given to the fact that it is within the West Pennine Moors, the largest new site of special scientific interest (SSSI) notified by Natural England since 2004, covering a total of 76 square kilometres, including Haslingden Grane. This notification of the West Pennine Moors was approved by Natural England's Board on 19 July 2017. This move reflects the natural significance of the area and its combination of upland habitats, moorland fringe grasslands and woodland, which support an impressive array of breeding birds. Indeed presently Barn Owls are frequenting the proposed housing site, using the dilapidated quarry building situated in the centre of the field and using the surrounding area to source food. It should be noted that the proposed housing allocation is on the periphery of the Grane Valley IWS and adjacent to the designated IWS currently situated within the proposed housing development. It should be further noted that deer, newts, bats, frogs and toads are some of the species also present within the site. In our view it is critical that a wildlife corridor is maintained



on this site especially taking into account the potential loss of green space which currently enhances the quality of life of the residents of Grane. Building on this piece of land would do enormous damage to their semi-rural environment.

In relation to flood risk it is clearly stated in the West Pennine Moors Management Plan 2010-2020 that we should be mindful of the following points:

- The need to adapt and mitigate in response to climate change
- Potential for physical impacts on the land and the need for land uses and recreation that does not exacerbate impacts but can help to guide positive change
- Changing habitats and landscape character in response to changing temperature and rainfall patterns
- The risks for and opportunities of upland peat habitats: increased drying and friability from hot, dry summers and erosion due to energetic rainfall
- Potential for increased flooding in valleys and lower-lying areas

In relation to impacts on water and flooding I also quote from Rossendale Regulation 19 Sustainability Appraisal, August 2018:

#### **Cumulative impacts on water and flooding – Exacerbated flood risk**

“As stated elsewhere in this report, the majority of sites allocated for development in the Plan are previously undeveloped greenfield sites. Development of these sites will be expected to result in a net loss of G1 to some extent, which would be likely to exacerbate the risk of flooding (particularly surface water flooding) at some locations in the borough. In particular, greenfield sites on the valley slopes play an essential role in helping to intercept and slow down the flow of surface water.

“It is largely uncertain the extent to which flood risk may be altered by development in the Plan, but it is considered to be likely that where greenfield sites are replaced by built form and concrete with a loss of vegetation and permeable soils, surface water flood risk in the immediate area will be elevated.”

The land bordered by Grane Road and Holcombe road has always been known to be very wet. It is thought that old culverts from the construction of the turnpike road still carry water from the higher land to the north. It has deep peaty topsoil (old moss land) overlaying hill wash. Previous ground tests for proposed commercial development are reported to have found “no bottom.” It is common knowledge that individuals using tractors during many months in the year and more recently JCB’s to gather soil samples have had to abandon their tasks because their vehicles were sinking. The land absorbs rainfall which is released slowly into the Ogden Brook. At the base of the slope is a housing development and office block. Even with major downpours in December 2015 there are no reports of run-off affecting these premises. Allowing the land to be covered with houses would cause major run-off, which we believe would flow into the Helmshore sewer and Ogden Brook and contribute to a major flood risk downstream where we know that houses have

previously been flooded in extreme weather. It must be remembered that the Ogden Brook, which is in close proximity to the proposed housing development, is also the main overflow source from Holden Wood Reservoir adjacent to the site, together with two further reservoirs situated above in the Grane Valley.

So in the event of major thunder storms, should the proposed housing development take place, water will run off the hillside, over the house covered fields, straight into the Ogden Brook. This flow will be joined by run-off from three reservoirs and surrounding land. Can we be sure that the Ogden Brook will be able to cope with such a scenario? Allowing the land to be covered with houses would cause major run-off. This would be contrary to the stated policy of reducing flood risk – Sustainability Appraisal Box 11.1.

- Acreage of site 8.11 @ 4,047 m sq per acre = 32,821 m sq
- 1 mm of rain produces 32.8 cu m of water etc. now completely absorbed
- Covering the site with houses, roads, driveways, roofs etc. would create approximately 75% run-off
- 1 mm rain @ 75% run off = c 24.6 cu m of water etc.
- Worst possible scenario – 50 mm rain 1,200 cu m water would flow into the Helmshore sewer and Ogden Brook causing major flood risk downstream

I must say that at this point in time that we are frustrated, as we are unable to fully question the suitability of the site as we have no figures on traffic volume, traffic flow and air quality on Grane Road, nor statistics on surface water flood risk. Your department has informed me that this information is for the developer to submit in their Planning Application. You state that they have not re-submitted such a Planning Application and we really feel that we are trying to assess the principles of the Plan with one arm tied behind our backs, as it is well-nigh impossible to assess the principles without knowing the true facts on what the developer has found in these areas. It is the Council's responsibility to ensure that any development does not increase the distress caused by traffic pollution. Many reports are currently being registered, which spell out in quite detailed form, the hazards which can be brought about by traffic pollution, ranging from respiratory disease to mental illness. All those living in Grane at the present time are subject to high volumes of traffic, on many occasions in a very restricted traffic flow, which raises the pollution hazard level to an alarming degree. We cannot judge the principles without knowing what the developer has found when investigating this hazard or what his plans are to facilitate the introduction of potentially 350 cars using the proposed site.

Grane Road is notoriously busy, with the traffic travelling its length increasing year on year. GRAss campaigned and achieved the safety measures and improvements implemented to aid road safety, including average speed cameras along the length of Grane Road. We understand that Lancashire County Council is insistent that the

access point for any housing development should not be situated on Grane Road. However, even if the access point should be re-located to Holcombe Road, the development of 174 houses, with an estimated 350 resident cars, plus service and emergency vehicles, will put enormous strain onto the already saturated Grane Road, reducing the quality of life for residents even further. It must be remembered that this area is subject to many visitors accessing the cemetery, who currently wait to cross the road for up to 10 minutes due to the heavy flow of traffic. Current noise and disturbance from use of the road is high. Vibration to residents' houses, caused by passing heavy vehicles is quite substantial and detrimental to properties. An increase in the volume of traffic generated from the proposed development will add further problems in a major way, as the majority of vehicles will still be entering Grane Road from Holcombe Road to access the M65 and A56, if access to the site is changed. Traffic lights at either access point would not be a solution as this would cause disturbance to residents, impact on air quality and health due to idling vehicles waiting at the traffic lights, causing tailbacks at peak periods. It would also take away parking facilities for residential properties and create a hazard for emergency services, particularly ambulances which use Grane Road continually as the main link from Rossendale to the Royal Blackburn Hospital. The Grane Road area cannot cope presently with the levels of traffic and adding more would be utterly irresponsible.

As stated previously we are told that it is for the developer to submit the necessary surveys and yet the Council can set out observations in their current proposals which state that various areas are Adverse, Strongly Adverse, Negligible, Uncertain, Positive or Strongly Positive. How do the Planners arrive at these definitions? We believe that they are arrived at by outside bodies and therefore such surveys which were carried out should be made available to us in order that we can check their validity. If they are not based on sound scientific studies perhaps the Planners should not have made the decision that the land is suitable for 160-174 houses or indeed for any development.

Surely the Council should be carrying out these surveys in order to protect the quality of life of residents, some of whom have paid their Council Tax for 50-77 years. It would appear that we have no choice but to go along with the rules, even though they appear to favour the developer at every turn.

This is the second Consultation we have been subjected to and we have compared the documentation which the Planners issued in the first Consultation i.e. the Draft Local Plan Consultation to the Planners' second Consultation i.e. Rossendale Draft Local Plan Pre-Submission Publication Version. There are differences which we could not find explanations for in the massive pile of documents presented to the general public in Haslingden Library. We set out excerpts from both sets of the Planners' Consultative documents, which we are at a loss to understand.

## **LOCAL PLAN**

The first Consultation document sets out a number of observations relative to Schools, Doctors Surgeries, Town Centre, Sports facilities etc. Residents of Grane will

always point out that the Doctors' Surgeries and Schools have difficulty coping with the current population, buses are far from regular or on time and provide a totally inadequate service. As for Sports facilities the Council has closed down our local baths, and as far as we can see there is little likelihood of this facility again being provided in our area.

As far as we can see a comparison between the provision in Consultations 1 and 2 is indeed enlightening in that a number of the Planners' requirements in Consultation 1 seem to be omitted or devalued in Consultation 2. We fail to understand how in such a short period of time, and on what basis, this has occurred; it does not fill us with confidence as to the safeguarding of Grane and its residents. We set out below a comparison of the main points:

#### **Consultation 1**

##### **Landscape Value**

High landscape impact.

Comments – Mainly within Settled Valleys and partly within Reservoir Valleys and Suburban Landscape character types.

#### **Consultation 2**

##### **Landscape Value**

Comments: Minor adverse impacts L2, L4 and L5.

#### **GRAss Comments**

***What has changed on this site? Where has the definition "Minor adverse impacts" come from, it certainly isn't in the guide to the terms used in the Significance Matrix.***

#### **Consultation 1**

##### **Heritage Assets**

Site does not contain or adjoin a listed building and site is not within or adjoins a Conservation Area.

Comments – St Stephen's on Grane Road is situated 85 m to the North West and Higher Mill Textile Museum is an ancient scheduled monument situated 500 m to the south and No 250-264 Holcombe Road are listed buildings situated also approximately 500 m to the south.

#### **Consultation 2**

##### **Cultural Heritage**

Minor adverse impact CH3.

#### **GRAss Comments**

***In whose view/what is, the "Minor adverse impact CH3" as Minor is not in the Significance Matrix. Grane has a rich cultural heritage and in 2006 GRAss and Groundwork Rossendale obtained substantial funding through the Local Heritage Initiative to construct a safe access route along a heritage trail from Heap Clough to Clough Head Visitor's Centre. This project was part of the "Valley of Stone"***

*initiative supported by United Utilities, Aggregate Industries, The Countryside Agency and Lancashire County Council. Indeed, the old railway cutting through which Ginny Wagons ran transporting stone from the quarry is still evident today and can be seen from the Public Right of Way running through the centre of the proposed site. This is a feature of our cultural heritage which we do not regard as "Minor."*

#### **Consultation 1**

##### **Ecological Value**

Located in a biological heritage site, local Geodiversity Site or Core Area or Stepping Stone Areas.

Comments – a small strip of land is within the woodland and grassland Stepping Stone as identified on the Lancashire Ecological Network maps (0.19 ha).

#### **Consultation 2**

##### **Biodiversity and Geodiversity**

Comments: Minor adverse impacts BG1 and BG4

##### **GRAss Comments**

*Changing the heading leads to more confusion, again the use of the word "Minor" and the brevity of information in Consultation 2 are misleading.*

#### **Consultation 1**

##### **Flood Risk**

Less than 50% in Flood Zone 2 or affected by medium surface flood risk.

Comments – less than 10% of the site is at a high risk of surface water flooding and less than 50% of the site is at medium risk of surface water flooding.

#### **Consultation 2**

##### **Water and Flooding**

Flood Zone 1

##### **GRAss Comments**

*In relation to water/flood risk we are at a loss to understand why the site is classified as Flood Zone 1 in the Local Plan when water is shed from the hillsides directly onto the site. Indeed gardens of the houses adjoining the site, situated below the Holden Arms, become saturated after any period of rain. Indeed we believe that the Developer took samples using a JCB last year. Half way through the process the JCB sank into the ground making it totally disabled, but not to be put off chose to take further samples this year at the end of the hottest summer on record. We wonder which report will be used when submitting their plans to the Council.*

*There is nothing in Consultation 1 which deals with Natural Resources, Climate Change Mitigation and Climate Change adaptation. Suffice it to say all three are shown in Consultation 2 to be Adverse and again the word "Minor" is in liberal use. However there is a major point to note that all these items have received an*

***Adverse definition and yet the difference between Consultations 1 and 2 is that it has gone from Flood Zone 2 to Flood Zone 1, why?***

***As of April 2015 a change in National Policy requires that developments of more than 10 units (including residential, industrial, commercial and mixed use sites) review the potential use of sustainable drainage strategies (SuDS) to achieve betterment on brownfield sites or restrict run-off rates to greenfield. It may also be necessary to provide a surface water drainage strategy if increasing the footprint of an existing site. If development is within an area designated as Flood Zones 2 and 3, or in an area identified as having a surface water flooding problem, the need for a drainage strategy is likely to be required.***

***Even if a development doesn't meet these criteria, Local Planning Authorities have the final say on who needs a strategy. It is our view, that the Planning Authority should insist that the developer must provide a drainage strategy as outlined in the SuDS criteria. The Council under no circumstances should accept the developer's claim that it is not necessary. It is too late when 174 houses have been built to find out that such a strategy was vital.***

***It should be noted at this stage that the Environment Agency (AE) in 2016 devised guidance for Flood Zones to be used by developers, Councils and communities. It states:***

***Flood Zone 1 – low probability***

***Land having a less than 1 in 1000 annual probability of river flooding***

***Flood Zone 2 – medium probability***

***Land having between a 1 and 100 and 1 in 1000 probability of river flooding***

***These guidelines were in existence when Consultation took place and yet there is a difference between Consultations 1 and 2. Why?***

**Consultation 1**

**Health**

There is no category in Consultation 1 under this heading

**Consultation 2**

**Health**

Location will be likely to help facilitate healthy and active lifestyles.

***GRAs Comments***

***We would welcome sight of the report from which these comments have been derived. With the prospect of 174 houses, assuming at the least two cars per house together with services and visitors to the properties, there is likely to be in the region of 350 vehicles using the site on any given day. Take into account that they will all be using one entrance to the site with a more than likely disastrous increase in traffic flow adding to high levels of pollution, to say nothing of the noise and***

***disturbance to all those living in Grane, how does this scenario improve the health of current residents, many of whom suffer from chest and breathing problems?***

#### **Consultation 1**

##### **Mineral Sterilisation**

Entirely or partly within high risk development area.

Comments – about a quarter of the site is situated within the Coal Authority high risk development area.

#### **Consultation 2**

##### **Mineral Sterilisation**

There is no category in Consultation 2 under this heading

##### ***GRAss Comments***

***There is no reference to the high risk development area mentioned in Consultation 1 nor the fact that towards the bottom end of the site there was the Bleachworks' lodge, into which was dumped all the waste from the factory in its long years of production. Residents cannot forget the JCB which stirred for days and weeks on end the resultant sludge in an attempt to dissipate the years of contamination, the results of which we are uncertain.***

#### **Consultation 1**

##### **Housing**

There is no heading in this category.

#### **Consultation 2**

##### **Housing**

Comment – Major net increase in housing

##### ***GRAss Comments***

***We would have difficulty in disagreeing with Consultation 2's conclusion. It will be a major net increase in housing! One would have to question the word "Major" considering the housing stock in Rossendale and whether we are just building houses for building sake to meet Government targets. It cannot be right to merely identify a piece of land, allocate it for housing and ignore all its deficiencies. The developer appears to favour traffic lights in the vicinity of The Courtyard opposite the terraced houses on Grane Road. Almost all these houses have vehicles and would have nowhere to park should traffic lights be installed as they have no access at the rear. It is our understanding that Rossendale Councillors and Lancashire County Council are against this proposal and favour entry/exit to the Grane Village development from Holcombe Road.***

#### **Consultation 1**

##### **Employment Location**

There is no designation under this heading.

## **Consultation 2**

### **Employment Location**

Comments – Good access to employment opportunities for new residents.

#### ***GRAss Comments***

***It would be interesting to learn how this conclusion has been reached. We have lost the Cotton Industry, we have lost the Footwear Industry which has resulted in migration of labour away from Rossendale. Indeed the Council has stated previously that there is sufficient housing for people wishing to work in Rossendale. If we accept this fact then we are merely disturbing and distressing local residents to build housing for the benefit of Manchester and the surrounding towns. This in itself would create more strain on the transport network and create more pollution by commuter vehicles.***

## **Consultation 1**

### **Employment Skills**

There is no designation under this heading.

## **Consultation 2**

### **Employment Skills**

Comment – Within the target distance of Secondary Schools.

#### ***GRAss Comments***

***This is a comment which is easy to write but difficult to justify. Surely skill shortages would have to be identified to make the above comment viable and taking into account that the Secondary Schools are either full or near to capacity. We come back to the point that we are in danger of destroying the quality of life for the residents of Grane in order to skill the offices and factories of Manchester and neighbouring Boroughs.***

## **Consultation 1**

### **Transport**

There is no designation under this heading.

## **Consultation 2**

### **Transport**

Comment – Good access to bus services and PRoW.

#### ***GRAss Comments***

***The bus service is far from frequent, far from regular and in winter many times none existent due to the closure of Grane Road because of bad weather. We are at a loss to understand the argument relative to the Public Rights of Way. We cannot see how this is connected to transport and one wonders what the developer plans to do with the Public Right of Way running through the site.***



## **Consultation 1**

### **Conclusion**

#### **Suitability Summary**

Suitable in medium to long term.

Justification – Small part of the site is affected by high and medium risk of surface water flooding. The area at high risk of surface water flooding has been excluded from the area available for development, but since the site is over 1ha, a flood risk assessment is recommended. A small strip of land within the south east part of the site has high ecological value as it is identified as a woodland and grassland Stepping Stone area on the Lancashire Ecological Network Maps. Those areas have been excluded from the area available for development. The public right of way running through the site should be maintained. The site is mainly within the Settled Valleys landscape character type, however part of the site is also within the Reservoir Valleys type, therefore a landscape impact assessment is recommended. The site has potential land contamination in relation to previous uses therefore a land contamination survey is required, and if land contamination is found it should be adequately remediated. Approximately a quarter of the site is within the Coal Authority high risk development area, so a coal mining risk assessment is required to understand the impact of the coal mining legacy on potential development. Furthermore a fifth of the site is within an HSE middle consultation zone, this area has been excluded from the area available for development and consultation with HSE and Cadent is required. Active employment sites are situated to the north and to the south of the site, so appropriate landscape screening is important for the amenity of future residents. Overall, the site can become suitable in the future provided that the constraints are adequately addressed. It is to be noted that since a developer has expressed an interest in developing the site, the issues can potentially be addressed in the short term.

#### **Viability and achievability summary**

Achievable now.

Justification – Extra costs have been identified in relation to the development of the site (e.g. coal mining risk assessment, land contamination survey), however since the site is within a high value market area, the development is considered viable. A developer has expressed an interest in developing the site, therefore the delivery of the houses can start in the short term, but the completion of the entire site 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).

## **Consultation 2**

### **Conclusion**

There does not appear to be a Conclusion in Consultation 2 other than the comments in the Significance Matrix. Out of 13 Categories there are 7 Adverse factors, 5 Positive and 1 Strong Positive.

### ***GRAss Comments***

#### **Conclusion**

- ***The timescale for development has changed from medium to long term to 0-10 years, how has this transpired when the land has become more waterlogged and is no longer suitable for grazing sheep?***
- ***Why is the flood risk of 50% in Flood Zone 2, referred to in Consultation 1, not mentioned in Consultation 2? Why has the South East part of the site, stated as having high ecological value and excluded from the area allocated for development in Consultation 1, not been referred to in Consultation 2?***
- ***The Public Right of Way should be maintained according to Consultation 1 but there is no mention of this in Consultation 2. Is this for the benefit of the developer or the residents of Grane?***
- ***Consultation 1 states that as the site is within the Reservoir Valleys type a landscape impact assessment is recommended. This has been omitted in Consultation 2.***
- ***Consultation 1 states that the site has potential land contamination therefore a land contamination survey is required. No reference to a survey is indicated in Consultation 2.***
- ***In Consultation 1 a quarter of the site is within the Coal Authority high risk development area and a coal mining risk assessment is required. No reference of this is made in Consultation 2.***
- ***In Consultation 1 a fifth of the site is within an HSE middle consultation zone and the area had been excluded from the area available for development. Consultation with HSE and Cadent is required. This is not mentioned in Consultation 2.***
- ***In Consultation 1 appropriate landscape screening for the amenity of future residents. No mention of this in Consultation 2.***
- ***Consultation 1 states that overall the site can be suitable in the future provided that the constraints areas are adequately addressed. No mention of this in Consultation 2.***
- ***GRAss believes that any developer should, at the very least, meet these requests. We think it is of vital importance as we have past experience of a developer completely flouting Planning requirements in relation to the Courtyard development on Grane Road.***

These observations are the result of many discussions at Grane Residents' Association's monthly meetings and were also discussed at a Public Meeting of residents on 25 September 2018 when the following decision was unanimously agreed:

That we object to the boundary changes which would allow the allocation of housing on site H74 in its entirety on the following grounds:

- That any future plan should include the continuation of a substantial buffer at the northern end of the greenfield site bordering Grane Road, currently undesignated as “white land,” in line with the recommendations of the Inspector following the Public Inquiry when he also recommended that, “There be no modification to the Greenlands and IWS allocations in this area.” A continuation of such a buffer would:
  - (a) Protect the existing habitat and facilitate a wildlife corridor from the Grane Valley IWS to the currently designated IWS situated within the site.
  - (b) Retain an open green space currently enjoyed by local residents whose properties overlook the site, in order to maintain their health and well-being.
  - (c) Prevent the creation of an access route to the site on Grane Road which would have the disastrous effect of increased traffic and difficult parking conditions for residents, stated elsewhere in this document.
- That the building of 174 houses would pose a substantial flood risk in light of Climate Change warnings of future weather patterns, the effects of which are already being experienced. Such a buffer would assist in absorbing water run-off from the hillside

We trust that this document meets the criteria for the current Consultation. It constitutes Grane Residents’ Association’s and the community’s objection to the proposed housing development.

Yours faithfully

**Michael Murray MBE**  
**Chairman**

Dear Committee

Ref; EL10.001 H24

With reference to the above area, not within the urban boundary, and application 2019/0335, I have like many others great concerns about the unfortunate choice of this particular piece of land for building for many reasons.

It seems that Taylor Wimpey have now suggested putting 139 houses on this site which would have a devastating effect on the area in so many ways. It is unlikely that these properties would be purchased by people already residing in the Rossendale area but more likely those who would commute generating more traffic, more carbon emissions and more accidents and in total contradiction to actions which are needed to bring about climate cooling. More brown field sites should be used with less ambitious projects so that houses and habitants can be assimilated into existing communities.

It is proposed that what would probably amount to about 300 cars would exit this estate by Holcombe Rd and then onto Grane Rd at what is already a dangerous junction. Grane Rd is judged to be the most dangerous road in Rossendale, described by the police as a death trap and by Sabre as not fit for purpose. (also closed 3 or 4 times a year due to snow) and closed many more times due to accidents.

<https://www.sabre-roads.org.uk/wiki/index.php?title=B6232>

This is also an ambulance route to Blackburn hospital from Rossendale with obvious implications.

Putting more cars on this road at this point is deliberately putting lives at risk and residents of Grane Road will be put in more danger than they are already in.

There is of course significant lack of infrastructure to support this many extra people in this area; doctors, school places and dentists being at a premium.

This area of land is described in part in reports as swamp habitat and often ground readings cannot be taken due to the amount of water on the land. The consequences of preventing this land from acting as a sponge due to building over it are unknown and run off is indeterminable. Preventing this land from absorbing the hill water and run off implications put all areas of this valley at risk. After heavy rain Holcombe Rd can become impassable now and flooding occurs further down the valley so despite suggestions this can be dealt with cannot allay fears when surveys suggest the consequences are unknown.

Because this ground has been allowed to become wild and natural peat formation has occurred it means that it is also a very effective carbon sponge so valuable at this critical time in climate warming. To dig up this land would not only prevent it from doing this invaluable job but would release massive amounts of CO2 into the atmosphere.

Along with this we are unsure what hazardous materials lie beneath the surface of this ground and what could be released into the atmosphere should it be dug up. Living on Holcombe Rd I am still subjected to spasmodic toxic or gas odours and dread to think what we might suffer should this land be disturbed.

**While this land seems highly unsuitable for human homes and no survey seems enthusiastic about the proposal, many demanding many more tests and investigations**

**and offering no carte blanche to proceed the area has been adopted by nature to the benefit of us all. The land is now very specialised in composition and as a boggy marshland attracts specialised flora and fauna and this land and its flora and fauna cannot be replicated in any other area and its disturbance can only result in NET LOSS (on a huge scale) and absolutely NO NET GAIN. (Schedule of actions matter16 - 3.3.1 Emerging local plan policy)**

An ancient Hawthorne Hedge not only a thing of beauty in itself but shelter for so many mini beasts birds and mammals runs along Holcombe Rd and is likely to be lost should this land be taken for building which again seems diabolical when last week was **National Hedgerow Week** encouraging the preservation of these beautiful assets. When nature is being lost at an unacceptable rate, damaging our ecological systems and ultimately our world every attempt should be taken to preserve valuable rich ecological habitats such as this.

Surveys state that trees hedges etc should not be disturbed from March to September because of nesting birds and neither between October and March because of hibernating mammals. The site supports toads, newts, hedgehogs, deer and possibly badgers etc etc. Many red listed birds use and nest on the site and it is home and breeding ground for a myriad of fauna which on adulthood move along the adjoining green corridor to the benefit of all.

We now know from current research that mitigations such as nest boxes and newly planted trees etc (Biodiversity enhancements) are not effective in preserving wild life and that wildlife is dependent on the the mysterious aged worlds of mature vegetation.

**The ecological surveys for this area are now out of date (being completed in 2019 and some being desk top studies depending on information pre 2018) and the area will now be richer in wild life than it was then. The bat survey was insufficiently thorough but even so presented evidence of less common bats that should not have their roosts (feeding-breeding- resting) disturbed. We know from the reluctance of LCC to make repairs to the bridge to the rear of Holcombe Rd that protected bats inhabit the area and that they feed roost and rest in the corridor of land to the right of Holcombe Rd.**

The land lies next to a conservation area of massive importance where red listed birds and mammals live. Fears have been expressed that inevitably this area will be greatly disturbed by putting so many people and obviously their dogs, cats and children in such close proximity.

Quite recently an area of land next to this green area has become available for building due to the demolition of an old mill. This land seems to be judged by residents in the vicinity as more acceptable as building land than the the H24 area and that housing replacing a high over bearing mill would be preferable The ground offers no hazards or dangers in terms of composition since it has already been used for building purposes. Consensus appears to be that houses here as opposed to on an area outside the urban boundary would save a precious ecologically rich area which contributes so much in terms of nature. Whilst traffic (the exit would fortunately be nearer to the bypass) and infrastructure problems would still have to be resolved this area would not present a further flood risk or be problematic in terms of hazardous pollutants and would preserve our valuable natural irreplaceable habitat for so much nature that residents fully appreciate and which is of so much value to our precarious world

We are at a climate change tipping point. Our world is in a precarious position. Nature preservation to support our threatened ecological system is beyond valuable. Please let us act wisely if we are to save this world for future generations.

Yours faithfully  
Marie-Louise Charlton

Marie-Louise Charlton B.A.(Hons) M.Ed.  
A.C.P.  
Education Consultant and Wri

16 June 2021

**Delivered by email and post**

Anne Stora  
Rossendale Borough Council  
The Business Centre  
Futures Park  
Bacup  
Rossendale  
OL13 0BB

Ref: PEEM2067

Dear Ms Stora

## **EMERGING ROSSENDALE LOCAL PLAN – CONSULTATION ON HOUSING AND EMPLOYMENT LAND UPDATES (EXAMINATION LIBRARY 10)**

We write on behalf of our client Peel L&P (“Peel”) in respect of the ongoing Examination in Public (EiP) of the emerging Rossendale Local Plan.

Rossendale Borough Council (RBC) is currently undertaking a consultation exercise in respect of two documents dated May 2021 – *Housing Update* (EL10.001) and *Employment Land Update* (EL10.002). These documents are published within Examination Library 10. They have been prepared by RBC in response to requests for information from the Planning Inspectors in respect of these matters. This letter sets out Peel’s comments on those documents.

It is noted at the outset that this is the third consultation undertaken by RBC over a period of c.20 months since the EiP hearing sessions were held. As referenced in our letter to the Inspectors in July 2020, Peel remains of the view that the Schedule of Actions is not comprehensive and fails to pick up key strategic points that were discussed as part of the Hearing Sessions in October 2019. The Council’s response to the Actions has generally been to retrospectively justify their approach rather than taking due consideration of the matters and making relevant and necessary modifications.

Peel has also highlighted previously that the staged and piecemeal approach to the publication of new evidence base documents and modifications to Plan policies prevents meaningful consideration of all evidence and the soundness of the Plan in the round. This is particularly the case given the lack of understanding about how and when the examination might be progressed and concluded. This third consultation proposes, inter alia, a significant modification to one of the most important strategic policies in the Plan – the housing requirement (Policy HS1) – as well as yet further evidence concerning the supply of new homes. **The significance of these changes and the regularly changing position increases Peel’s very significant concerns about the soundness and fairness of the plan-making and examination process in Rossendale.** This matter is discussed in further detail below.

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## The plan period

Peel's representation to the second tranche consultation (dated March 2021) identified the need to extend the plan period, mindful of the requirement in the NPPF that Local Plans should cover a plan period lasting for "...a minimum 15 year period from adoption..." (paragraph 22). The *Housing Update* sets out RBC's proposal to extend the plan period to 2035/36. This is insufficient to address the requirement of the NPPF in this regard.

The NPPF is clear that Local Plans must cover a period lasting at least a full 15 year period from the point of adoption. If the Local Plan is adopted in the current year (i.e. 2021/22) and ends in 2035/36 as proposed by RBC in the *Housing Update*, it will cover a period of only c.14 years. It would therefore be too short by at least one year and would not be consistent with the requirement of the NPPF in this regard, such that the Local Plan would be unsound.

The plan period must therefore be extended to at least the end of 2036/37, with a commensurate increase in the scale of development which is planned for and the quantum of housing/employment land which is allocated.

## The standard method and the housing requirement

The submitted version of the Plan proposes an annual housing requirement of 212 dwellings per annum (dpa). This figure was in line with the LHN figure calculated at the time.

The examination Inspectors have noted that over two years have elapsed since the submission of the Plan for examination, such that the Local Housing Need (LHN) figure referenced as the outcome of the standard method in the submitted version of the Plan has now expired (in line with paragraph 008 of the PPG on Housing and Economic Needs Assessment). The *Housing Update* sets out RBC's re-calculation of the LHN figure for the Borough using the current standard method and the latest data. RBC has identified that the LHN has declined by c.13% to 185 dwellings per annum and it proposes that the housing requirement in the Plan is modified to reflect this figure.

## The LHN figure will not support RBC's economic growth objectives

The PPG makes clear that the LHN figure is only the minimum "starting point"<sup>1</sup> in determining the number of homes needed in an area. Peel strongly dispute RBC's claim that this lower figure is reflective of the Borough's full housing need or that it represents a sound housing requirement. Such a statement clearly contradicts the evidence base published alongside the Plan and even RBC's own comments during the examination hearings on this topic, during which RBC clearly stated that a higher level of housing provision is needed in Rossendale to realise the strategic economic objectives of the draft Local Plan.

In this regard, Peel's representations to the consultation on the "second tranche" of documents dated 19 March 2021 highlighted RBC's representatives stating – at the hearing session in Autumn 2019 – that an increased requirement of at least 236 dpa would be appropriate to align with the Plan's policies on employment land. The examination Inspectors' acknowledged this concession in a letter to Peel dated 4<sup>th</sup> September 2020, which confirms as follows in respect of the housing requirement:

*"this was the subject of extensive discussion at the hearing session, and the Council did suggest at one point that a higher housing figure would be appropriate."*

RBC's proposal to substantially reduce the housing requirement contrasts with its intention – expressed at paragraph 4.7 of the *Housing Update* – to "...maintain an employment land requirement of 27 ha in the Plan...". In effect, RBC is seeking to retain its ambitious level of employment land provision and job growth, whilst seeking to further reduce the scale of new homes being delivered. The inconsistency and imbalance of this an approach is

<sup>1</sup> Planning Practice Guidance, paragraph 10, Reference ID: 2a-010-20201216

clearly captured in the note provided by Lichfields and appended to the *Employment Land Update*, which confirms at paragraph 4.4 that:

*“If the Council were to pursue a labour-supply led figure of 185 dpa, this might be expected to require an employment land figure of around **14 hectares – a significant reduction from the 27 hectares previously proposed in the emerging Local Plan**”*

RBC’s own evidence therefore makes clear that a housing requirement in line with the minimum “starting point” LHN figure of 185 dpa will support half of the amount of employment land proposed.

RBC notes at paragraph 3.1 of the *Housing Update* that the PPG makes clear that there are circumstances where it may be appropriate to plan for a higher level of housing need than that indicated by the standard method<sup>1</sup> (e.g. growth strategies, strategic infrastructure improvements, taking on unmet need from neighbouring authorities). RBC has incorrectly interpreted these circumstances as a ‘closed list’ and seeks to make the case within the *Housing Update* that there are no such circumstances in Rossendale which justify a housing requirement which exceeds the baseline LHN. However, RBC’s justification for retaining the higher employment land requirement – set out in the accompanying *Employment Land Update* (May 2021) – actually serves to contradict and undermine this; in particular, RBC justifies its retention of the higher 27ha employment land requirement in order to satisfy “...pent-up demand...”, stating that:

*“The proposed allocations in the west of the Borough make up the **Rossendale Valley Growth Corridor, a key strategic infrastructure programme** to improve road and accessibility and open up employment sites” (p5)*

This clearly aligns with the statement in the PPG that growth strategies and strategic infrastructure improvements are circumstances which may require a level of housing delivery above the minimum starting point figure calculated via the standard method. Moreover, the *Employment Land Update* goes on to confirm that:

*“The Rossendale Valley Growth Corridor is **embedded in the Council’s Corporate Plan, the 2018 Economic Development Strategy for Rossendale and the associated 2021 Business Recovery Plan**, developed as a response to the pandemic”*

Finally, in this context it goes as far as stating that:

*“This initiative is a **crucial part of the levelling up agenda and supports the ambitions of the Pennine Lancashire Growth and Prosperity Plan 2016-2032, the delivery of the Lancashire Industrial Strategy, Greater Lancashire Plan and the Lancashire Strategic Development and Infrastructure Plan**”*

It is therefore evident that the 27ha employment land requirement and associated job growth is significantly higher than that which has been delivered in the recent past, but is considered by RBC to be a critical component of its own and other strategies for growth at the local and sub-regional level. Accepting the above as a deliverable growth strategy, it is reasonable to assume that the purpose of the investment – noting its reference to the national agenda – is to support above-trend growth in the economy of the area. This is considered to be ever more critical in the context of the economic decline experienced over the last 12 months as a result of the Covid-19 pandemic.

Significantly, however, the analysis presented by Lichfields (appended to the *Employment Land Update*) indicates that there is a reasonable prospect that a housing requirement of only 185 dpa (and 208 dpa over the first two years) will facilitate a change in the area’s demography that would support only 471 jobs over the extended plan



period from 2019 to 2036<sup>2</sup>. This equates to an average of only 28 new jobs each year. The apparent acceptance of such a modest level of job growth does not stand up to scrutiny in the context of RBC's stated economic ambitions, and it is wholly unjustified given that the same evidence recognises that substantially more jobs, in the order of 1,400, could be expected under even a baseline forecast<sup>3</sup>.

Lichfields' evidence further shows that supporting this baseline forecast (1,400 jobs) would require more pronounced growth in the population and labour-force, in turn generating a higher need for between 242 and 268 dpa<sup>4</sup>. This broadly aligns with the analysis previously submitted to the examination by Lichfields in EL4.004, which indicated that around 236 dpa would be needed to support the 1,100 new jobs that RBC then expected to be generated through its proposed supply of employment land. It was this level of housing need that was apparently accepted by RBC as being more appropriate and aligned with its economic strategy at the examination hearing in 2019, as referenced earlier.

### ***The comparison to adjacent areas is inappropriate***

Within the *Housing Update* RBC seeks to describe its approach (i.e. adopting a low housing requirement in line with its minimum LHN figure despite an economic strategy which targets growth significant above past-trends) as being consistent with that taken by other emerging Local Plans. Specifically, it suggests at paragraph 4.10 that the Greater Manchester Spatial Framework (GMSF) is following a similar methodology. No weight can be given to any such alignment, given that the GMSF has not been independently examined, is the subject of outstanding objections in respect of these very matters (i.e. the imbalance between the scale of housing and employment provision), and is now defunct following the withdrawal of one of the member authorities from the joint plan-making process, such that that Plan is being re-drafted to reflect a change in its basis and geography.

In looking for precedent, it would be more relevant for RBC to acknowledge that there are, in accordance with Government expectations, many examples of Local Plans – particularly in the North – where a higher housing requirement figure has been evidentially justified. This includes Plans that are currently at examination, such as St Helens and Halton, both of which seek to meet levels of housing need that are respectively 15% and 48% higher than the minimum LHN figure implied by the standard method. In both cases, the higher level of need is largely justified on the basis of supporting job growth arising from their planned provision of employment land.

### ***The LHN figure will not deliver the affordable homes required***

Peel fundamentally disagrees with RBC's assertion that a lower requirement figure can be justified where it will still fail, just by a greater amount, to meet the significant and acute need to deliver affordable housing. In this regard it is noted that RBC continues to reference the need for between 102 and 170 affordable homes per annum<sup>5</sup>, calculated in the 2019 SHMA Update. It is understood to be a matter of fact that during the course of the examination such a level of need has not been matched by supply. Indeed RBC's latest Housing Delivery Test Action Plan, published in February 2020, confirms at paragraph 6.18 that there has actually been "...a reduction in affordable housing delivery..." in recent years where it is equally noted that between 2010 and 2018 only 256 affordable homes were delivered (32 per annum)<sup>6</sup>. Where the affordability adjustment applied as part of the standard method does account for overall undersupply, the same is not true of the more immediate need for affordable housing where it is necessary to reset and recalculate the need to demonstrate the implications of historic under-provision. As a result, where supply has reduced and fallen short of need over the last two years a further shortfall will have arisen to which the absence of a positive plan-led approach has contributed.

<sup>2</sup> Table 2.1 of Appendix 1 to EL10.002

<sup>3</sup> Table 5 of Appendix 1 to EL10.002

<sup>4</sup> Table 5.1 of EL10.002

<sup>5</sup> Paragraph 5.1 (5) of EL10.001

<sup>6</sup> EL4.006

### **Additional sources of land supply are available**

Finally, in its attempt to justify the reduction of the housing requirement – in the context of an evidence base which is unsupportive of such an approach as explained above – RBC makes reference to the “...*physical constraints of the Borough*”... (paragraph 3.4 of EL10.001). It is nonetheless clear that these constraints were previously deemed surmountable in RBC’s submission of a Plan that it considered to be deliverable, in which it was to provide for 212 homes per annum over an admittedly shorter time period. More importantly, the PPG is explicit that it is necessary for RBC to first calculate need and then assess factors such as these in deriving a requirement. RBC has failed to adequately make this distinction in its attempt to use perceived constraints as justification for not exploring whether a higher need for housing exists. It is also evident that Peel has promoted the release and allocation of various areas of land which are suitable and sustainable for residential development. It is therefore evident that there are additional areas of land which could be brought forward in the Borough to help meet the delivery of a higher housing requirement.

Peel continue to promote land at Haslam Farm (see Matter 9 Hearing Statement) and Moorland Rise (see Matter 11 Hearing Statement) for allocation in the Local Plan. The Hearing Statements were submitted alongside comprehensive technical information, including on highways and landscape and provide evidence to show the sites are developable. Peel considers RBC’s existing assessment / justification for the inclusion and exclusion of sites is substandard and unclear. The provision of transparent and accessible evidence is fundamental to the soundness of the Local Plan.

### **Implications for soundness**

Local Plans must:

- Identify the authority’s strategic priorities for the development and use of land in its area.
- Establish strategic policies to address these priorities.

These requirements are set out in the legislation<sup>7</sup> and are made clear in the NPPF (paragraph 7). When setting strategic policies, the NPPF makes clear that achieving sustainable development is the overarching objective of the planning system in England (paragraph 7). It sets out that sustainable development is comprised of social, economic and environmental objectives, and that these are interdependent and must be “...*pursued in mutually supportive ways*...” (paragraph 8). The identified objectives cannot therefore be delivered in isolation from each other; they must be pursued collectively. This legislative and policy context is critical when determining the soundness of emerging Local Plans.

RBC has identified a strategic objective to support above-trend economic and job growth in the Borough. It proposes to achieve this through a strategic policy and associated land allocations to deliver 27ha of employment floorspace. It is however evident – as outlined above – that it will not be supported by the strategic housing policies of the Plan.

Mindful that the baseline LHN figure of 185 dpa will not support the Borough’s economic growth, its adoption as the housing requirement figure would result in an ineffective housing policy which is not aligned with from the economic policies of the emerging Local Plan and would not support the delivery of the planned jobs and employment floorspace. Rather, it would create a disconnect between the social and economic delivery objectives of the Plan, and would not therefore be consistent with the objective in NPPF to achieve sustainable development via mutually supportive policies. It cannot therefore be considered sustainable, effective or consistent with national policy.

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<sup>7</sup> In accordance with section 19 of the Planning and Compulsory Purchase Act 2004.

Peel also considers that:

- The scale of the difference between the level of need consistently evidenced by Lichfields in line with established growth strategies and the housing requirement now proposed by RBC fundamentally undermines RBC's attempts to claim that its Local Plan has been positively prepared.
- The housing requirement now proposed by RBC will not be effective at supporting the delivery of new affordable homes required; and
- RBC's claim that a higher housing requirement are not achievable because of the physically constrained nature of the Borough is not justified, given that there are additional sources of development land which could be brought forward.

As a result, and in line with Peel's own submissions throughout the examination, Peel is strongly of the view that the newly proposed requirement is unsound and further hearings must be convened to resolve the issue (see below for discussion).

### **Housing land supply**

The *Housing Update* includes a revised housing land supply position which reflects its proposal to reduce the overall housing requirement to 185 dpa. Peel comments on this land supply as follows:

- The updated housing land supply information confirms there has been a significant shortfall in completions for years 2019/20 and 2020/21, where only 64% of the requirement was met (shortfall of 114 dwellings for 2019/20 and a projected shortfall of 119 dwellings for 2020/21). RBC are correct that a 20% buffer is therefore to be applied to the requirement and shortfall, and the shortfall reiterates the need to identify new sources of deliverable housing land.
- Peel's statements to the examination hearings (specifically in respect of Matters 2 and 19) identified the need to include a 'lapse rate' in the supply, typically between 10% and 20%<sup>8</sup>. RBC has not applied a lapse rate, with the effect being that the supply is over-estimated by c.10-20%. It will therefore fall significantly short of even the low requirement proposed by RBC.
- The updated housing land supply information makes clear that there is a significant over-provision of new housing sites within the eastern parts of the Borough, most notably at Bacup and Whitworth, at the expense of stronger market locations such as Rawtenstall which are proven to be the most sustainable locations to accommodate growth. RBC's own evidence (in form of the 2016 Keppie Massie Viability Study) indicates that the spatial distribution of allocations as proposed could undermine the delivery of the Local Plan's housing requirements and will fail to optimise the level of affordable housing provided during the plan period.
- RBC's viability evidence demonstrates that development viability in Bacup is marginal. As such, affordable housing is not viable in Bacup in contrast with stronger market areas in the west of Borough. The spatial strategy advanced therefore undermines the achievability of the sites within the Plan in placing an over-reliance on development being brought forward in locations where viability is marginal. RBC has therefore failed to identify enough sites which are suitable, available and achievable to meet even the reduced requirement as calculated by the standard method.
- Peel's written statements to the examination in respect of Matters 9, 10, 11, 12, 13 and 14 identify several sites which are not considered to be deliverable or developable due to unresolved physical constraints,

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<sup>8</sup> DCLG Presentations to the HBF Planning Conference (September 2015)

land ownership or viability issues (not exhaustive); for brevity we have not updated these site assessments but consider many of them to still be relevant in the absence of further evidence from RBC.

- The proposed supply includes 50 dwellings from the land at Manchester Road and Clod Lane site. Peel opposes the inclusion of this site within the supply; its representations to the “second tranche” consultation in March 2019 identified that RBC’s justification for the development of this site is legally flawed and that its proposed release is unsound. No response to these representations has been provided.

Peel therefore considers that the updated housing land supply information set out in the Housing Update does not address concerns raised previously, that the supply is over-reliant on smaller sites in weaker market areas which will not deliver affordable homes and in conflict with the proposed spatial strategy. This is particularly the case given that RBC’s identified supply amounts to 22 dwellings less than the minimum requirement housing requirement proposed, even before the effects of a lapse rate and other issues raised by Peel above and in previous statements are taken into account. **This is wholly unacceptable and unsustainable, particularly given that there has been a c.40% shortfall in housing delivery over the last two years since the examination hearings in Autumn 2019. In effect, the identified supply will be wholly ineffective at delivering the new homes that the Borough’s communities urgently need.**

Critical ambiguities in relation to the Spatial Strategy, housing land supply and the housing requirement present significant and fundamental concerns regarding the soundness of the Local Plan at this late stage of the adoption process. Without a transparent approach to the identification of the housing requirement, the Local Plan cannot be relied upon or found sound.

### **The resumption of examination hearing sessions**

Peel has serious concerns over the preparation and soundness of the Local Plan which are detailed in Peel’s representation to the “second tranche” consultation in March 2021 identified that further EiP hearing sessions will be required to enable thorough examination of the additional evidence made available by RBC and to resolve numerous outstanding matters, including in respect of:

- The scale of the employment land supply and shortfall against the Plan requirement (i.e. supply of c.23.5ha versus a requirement for c.27ha).
- The scale of housing needs in the Borough and its alignment with the economic objectives of the Plan.
- The inclusion of the Clod Lane site in the housing land supply.
- Various disputes in respect of the RBC’s Economic Viability Assessment Update Report.

The representation was accompanied by a Counsel Advice Note from John Barrett which addressed the need for further Hearing Sessions in full. It noted that the Procedure Guide for Local Plan Examinations acknowledges that further Hearing sessions should be held “*where essential in the interests of fairness or in order to clarify or resolve substantial new issues arising from the representations*”. The scale of unresolved issues and volume of additional evidence base documents requires further discussion at Hearing Sessions to ensure the evidence and emerging Plan is appropriately tested and to give opportunity to interested parties to resolve any new issues arising from the updated evidence.

Peel considers that the need for further Hearing Sessions is heightened by RBC’s proposal to reduce the housing requirement, despite the clear evidence and its own concession during a previous hearing that an increase was needed. Whilst RBC seeks to argue that the effect of the reduced requirement is minimal given that the overall amount of new homes planned for is unchanged, this is due only to an extension of the plan period (which is itself still insufficient to meet the NPPF requirement that plans cover a period of at least 15 years from adoption – see

above). However, the effect of the change is that c.13% fewer homes will be provided in Rossendale every year, creating an even bigger imbalance with RBC's economic growth strategy and further undermining the sustainability of the Plan.

Peel therefore considers that further Hearing Sessions are essential to enable RBC's strategy to be tested, to clarify the substantial new issues arising from the latest evidence, and in the interests of fairness given the lack of debate about these issues to date.

## Conclusion

Peel has raised significant concerns about the plan-making process and the soundness of the emerging Plan in various consultations that have taken place since the examination hearings in 2019. **The *Housing Update* and *Employment Land Update* which are the subject of this consultation raise further issues which significantly undermine the sustainability and soundness of the Plan.** Peel considers that further hearing sessions are required in respect of these and numerous other matters which remain unresolved. Peel encourages RBC to make swift progress in this respect given the significant delay which has already elapsed since the initial hearing sessions in Autumn 2019.

Yours sincerely



Nick Graham  
**Associate Director**



**HOURIGAN CONNNOLLY RESPONSE ON BEHALF OF:  
RESPONDENT REFERENCE: 5195 – HASLINGDEN CRICKET CLUB AND B&E BOYS LTD**

Dear Forward Planning.

Thank you for notification of the above consultation.

I write on behalf of my client in respect of the proposed housing allocation on Land to the Rear of Haslingden Cricket Club; Housing Allocation Reference H52.

The contents of the Housing Land Update (EL10.001) is noted. We confirm that we continue to agree with the Council's conclusions in respect of the quantum of development attributed to site Reference H52, insofar as we concur that the estimated yield of 30 dwellings is expected to be delivered in full within years 1 – 5 of the Plan.

However, to provide the Inspectors with an update, a very positive meeting was held at the end of May between the Council, Sport England, the ECB, and ourselves along with Haslingden Cricket Club and their chosen development partner B&E Boys Ltd. The conclusion from that meeting was that all parties would be agreeable to a new mixed-use policy being included in the Local Plan, to replace site H52, which relates specifically to the delivery of 30 dwellings in conjunction with the retention and improvement of the existing sports facilities at Haslingden Cricket Club. The precise wording of that site-specific policy has been drafted by ourselves and agreed with both Sport England and the ECB. The policy is now with Rossendale Council and discussions are ongoing between all parties to refine it with the view to this being presented to the Inspectors very soon.

We do however, wish to put on record that the Council (and other statutory partners) must be mindful that any proposal for new housing on the subject site will be intrinsically linked to the costs associated with the delivery of the improvements to Haslingden Cricket Club's sports facilities. The financial viability and associated costs with delivering those improvements should be regarded as abnormal costs, and full account will therefore need to be taken of these when the Council is considering the details of any scheme for the new housing. Revenue generated by the construction and sale of the housing will be used to deliver the improvements to the sports facilities, which will bring about significant benefits for the local community and wider Borough. On behalf of our client we have consistently made the Council aware that viability will play a role in the delivery of the draft allocation H52 given the intrinsic link between the housing and the cricket club. This is why we remain confident, with the agreement of Sport England and the ECB, that a site-specific mixed-use policy will not only deliver the housing which forms part of the Council's housing delivery strategy, but will also result in the safeguarding, and much-required improvement of, the existing sports facilities.

I trust the above will be forwarded to the Inspectors for their consideration as part of this current consultation.

Kind regards,  
Beverley

**Beverley Moss BA(Hons) Mplan MRTPI**

Associate

**Hourigan Connolly**



Chartered Town Planners



## HOURIGAN CONNOLLY RESPONSE ON BEHALF OF: DEVELOPMENTS SOUTH WEST LIMITED

Dear Forward Planning.

Thank you for notification of the above consultation.

I write on behalf of my client in respect of part of the land which forms the proposed housing allocation on Land off Todmorden Road, Bacup; Housing Allocation Reference H40.

The contents of the Housing Land Update (EL10.001) is noted.

To provide the Inspectors with an update, Hourigan Connolly has submitted a planning application for the development of part of the H40 allocation; the application was registered by the Council in May 2021 (Application Reference: 2021/0289). The submitted Location Plan is attached. The application was made in outline and demonstrated through an illustrative layout that the eastern portion of Allocation H40 is capable of delivering in the order of 63no. houses. The target date for a decision by the Council is on 12 August 2021.

With the above in mind, we continue to agree with the Council's conclusions in respect of Reference H40 insofar as we concur that housing can indeed be expected to be delivered full within years 1 – 5 of the Plan.

However, the Council propose that the whole of the H40 allocation is capable of delivering 53no. houses. The current planning application on my clients' site demonstrates that part of the allocated site is capable of delivering in the order of 63no. new houses without any reliance whatsoever on the neighbouring land. This neighbouring land is also subject to a current (wholly separate) outline planning application for 29no. houses. This therefore demonstrates that the whole of the H40 allocation is capable of delivering in the order of 92no. dwellings; an increase of 39no. houses on the Council's calculations.

As part of this current consultation, we also wish to put on record that the Council (and other statutory partners) must be mindful that any proposal for new housing on my clients' part of the allocation (i.e. that shown on the attached Location Plan) will be intrinsically linked to the abnormal costs associated with the ground conditions at this location. Given the site-specifics and the historical coal mining in the locality, full account of the financial viability and associated costs with delivering any housing at this site will need to be taken of when the Council is considering the details of the current outline scheme (and any other subsequent submissions and approvals) for housing development at Allocation H40.

I trust the above will be forwarded to the Inspectors for their consideration as part of this current consultation.

Kind regards,  
Beverley

**Beverley Moss BA(Hons) Mplan MRTPI**

Associate

**Hourigan Connolly**



Chartered Town Planners





**SITE LOCATION PLAN**  
**AREA 5 HA**  
**SCALE 1:1250 on A4**  
**CENTRE COORDINATES: 387679, 423625**



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DRAWING REFERENCE: TOD\_001\_LP  
DATE: 06/05/2021  
PLAN: LOCATION PLAN  
CLIENT: DEVELOPMENTS SOUTH WEST LTD  
SITE: LAND NORTH OF TODMORDEN ROAD,  
BACUP, OL13 9TY



**From:** Gillian Fielding [REDACTED]  
**Sent:** 16 June 2021 16:00  
**To:** Forward Planning <forwardplanning@rossendalebc.gov.uk>; [REDACTED]  
**Subject:** 'Rossendale Housing Development Plan MAY 2021

Dear RBC Forward Planning Dept

I write to object to the proposed development at Townsendfold, in advance of the 5pm deadline today. Reference: ' Townsend Fold/New Hall Hey Greenbelt - EL10 Consultation on Housing and Employment Land.

I object to the development of this land for housing and/or employment and reference my earlier emails for alternative suggestions.

Housing built on this land, next to a river, risks flooding of the area and those properties. Indeed building on it increases the risk of flooding. Added to this, should houses be build, the worry of flooding for residents could likely cause mental stress. Nb there is an increasing body of research on the mental stress on residents in flood areas, ie at the prospect of, floods and of being flooded.

I also wish to raise two process/administration points:

- I did sign up for information to be emailed to me on the Local Plan twice but have never received those emails.
- The website containing the Local Plan information is so bad it is unusable. I spent 2 hours trying to locate information on Townsendfold, and then wonder if I have found the correct information and found nothing on the process. Luckily, someone in the Save Townsendfold Group posted about today's deadline and a direct link, otherwise I would have missed this. FYI I am digitally capable and do not have any disabilities. How anyone who is less digitally capable and has disabilities manage is beyond me. In fact, I am sure the website breaks (dire navigation, unnecessary links, etc) the EU Public Sector Bodies Accessibility Regulations and the council should look at this to make it more usable and avoid litigation.

<https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps>

Please do add me to the database to be kept informed on the Local Plan and email to confirm this has happened.

Many thanks

Gillian Fielding



The countryside charity  
Lancashire, Liverpool City Region  
and Greater Manchester

Acres Brook, Sabden Road  
Higham, Lancashire, BB12 9BL

[www.cprelancashire.org.uk](http://www.cprelancashire.org.uk)

Patron  
Her Majesty the Queen  
President  
Emma Bridgewater  
Chair  
Debra McConnell

FAO: Forward Planning Team  
Rossendale Borough Council,  
The Business Centre,  
Futures Park,  
Bacup,  
OL13 0BB

By email: [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)

16 June 2021

Dear Forward Planning Team,

I am responding on behalf of the Campaign to Protect Rural England Lancashire, Liverpool City Region and Greater Manchester (CPRE) to the Rossendale Local Plan Examination: Housing and Employment Land Updates Consultation.

### **CPRE, the Countryside Charity**

CPRE wants a thriving, beautiful countryside for everyone. We're working for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency.

With a local CPRE group in every county, we're advocating nationwide for a countryside we all aspire to: one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before.

We stand for a countryside that enriches all our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate. For more information, please visit [www.cprelancashire.org.uk](http://www.cprelancashire.org.uk).

### **Rossendale Local Plan Examination Housing Update**

#### **Introduction**

CPRE understands the need for an update of the housing requirement position in light of the Government's further revised update in standard method, and important impacts of the pandemic and Brexit. In our previous letter dated 19 March, CPRE set out against Matter 3 that the housing need requirement was too high when considering the revision to the standard method in 2020.

#### **Revised calculation of the Local Housing Need (LHN) for 2021**

We have considered the calculations set out in Appendix 1 - Calculation for the base period 2021-2031 as set out in the Housing and economic needs assessment PPG (Paragraph 004 revised 16 12 2020).

We welcome a reduction in the identified housing requirement to 185 dwellings per annum. This is because while we do support the need to build enough houses to respond to identified need, we are concerned about the negative consequence of local planning authorities failing the Housing Delivery Test, which causes further greenfield land loss for development further undermining the deliverability of brownfield land for housing.

### **Implications for the housing requirement in the Plan**

We think the commentary set out under this sub-heading is generally acceptable but consider the figure of 208 dpa to be high. As said, failure against the Housing Delivery Test has harmful consequences (as described above), which should be avoided wherever possible. We note only 94 houses were completed in the 2019/20 period. A shortfall of 114 dwellings exists. CPRE would like to understand how the market will add to its capacity. Brexit means that there is a shortage of labour to build houses in the short term, and unless the Government is to relax immigration laws there is no obvious source of required construction skills.

We acknowledge Option 1: Plan period from 2019 to 2034 for housing requirement of 2,821 dwellings during the Plan period (2019 -2034) which is a reduction of 359 dwellings from the overall housing requirement of the Publication version of the Local Plan (3,180 dwellings).

We acknowledge Option 2: Plan period extended to 2036 (2019 –2036) identifies a housing requirement of 3,191 dwellings. This is an increase of 11 dwellings from the overall housing requirement in the publication version of the Local Plan (3,180 dwellings) but looks at a longer period (2019 –2036) instead of the original Local Plan period (2019 -2034).

CPRE notes the Council's preferred Option would require additional houses to be built. .

### **Implications for the employment land requirement**

Although CPRE supports the use of Pop Group software, we are concerned that the assumptions fed into the model may have led to over ambitious jobs figure of 428 jobs net. We note refinement of the figure downwards to take account of recent job creation data which is comparatively low and query whether this has reflected job losses associated with Covid and Brexit.

We note the content of Table 3 setting out 7 scenarios leading to a range of between 14 and 17 hectares of gross employment land. Consequently, we query the robustness of the Council's position to maintain an employment land requirement of 27 ha in the Plan as this amount is more than is necessary.

We think the impacts of the pandemic and Brexit are not yet fully understood. We disagree with the content of para 4.7, as in the past 12 months there have been significant business losses and change in online retail causing existing land and premises to no longer be required.

The extent of the vacancies arising from economic uncertainty needs to be fully known, the market is likely to continue with uncertainty with additional windfalls to the land supply for housing and employment forthcoming. Whilst it is true there is an increase in online retail, overall, less quantum of bricks and mortar is required overall as there is significant space saving from centralising stock.

Furthermore, the Gross Value Added of large format B8 warehousing needs to be better understood as some economies dominated by logistics have comparatively low value economic activity. Crucially,

logistics is reliant on unsustainable road-based haulage using heavy goods vehicles, causing high levels of greenhouse gas and air pollution, among other harms. The value to employment and jobs is debated as low density employment results, increasingly so as automation increases. This needs to be balanced with harmful impacts with substantial best and most versatile farmland loss, Green Belt harms, degradation of ecology, landscape character harm and from excessive traffic levels on local road networks.

In addition, the impact of permitted development rights allowing commercial premises to be used for housing without the need for proper planning consent as a result of the Government's relaxation of planning rules needs to be better understood and anticipated. CPRE disagrees with such relaxing of planning controls preferring a more robust approach to living standards and the use of land.

We urge the use of latest Office of National Statistic data to inform future estimates as a best practice. We note the Government is not following its own best practice by mandating the use of 2014 ONS data, now out of date.

We note for the reasons set out in para 4.9 and 4.10 that the Council will proceed with 208/185 dpa annum. As mentioned, we think a more precautionary approach should be relied upon as failure to impose high housing numbers causes failure against the Housing Delivery Test and all the problems associated with that.

### **Implications for other parts of the Plan**

CPRE is generally supportive of the modifications proposed in Section 5.

We agree enough affordable housing, particularly for older households and with specialist needs should be planned and therefore support the 30% affordable housing requirement.

### **Housing Land Supply**

CPRE is concerned that too much housing is targeted at the countryside and Green Belt release with 42%, of the overall housing total being developed in these locations. We think the Council can and should do more to focus new development in existing settlements.

The additional 22 dwellings identified in para 6.3 is insignificant and it could be achieved through reliance on higher density development in urban centres where appropriate in accordance with National Planning Policy Section 11 Making Efficient Use of Land. This avoids additional land being identified.

We note the calculation of an 8.2 year supply of land for housing delivery. We think this means some Green Belt sites can be deleted from the local plan.

### **The Housing Trajectory**

We note the Housing Trajectory shown in Diagram 1 and the sites set out in Appendix 2 –Site allocations and planning commitments forming part of the housing land supply. We note the 8.2 year supply of land for housing delivery.

### **Conclusion**

We think the evidence supports progression of the local plan with a reduced housing land requirement, but think there is potential to further reduce the quantum.

## Rossendale Local Plan Examination Employment Update

### Part 1 Employment Land Requirement

The update to the housing land requirement has implications for the employment land requirement, and CPRE has considered the update information. CPRE considers a reduction to the amount of land allocated to employment land use in the future. This is because in addition to lower housing requirement in the future, think the impacts of the pandemic and Brexit are not yet fully understood, but that there been an increase in commercial property vacancy arising. This economic uncertainty is likely to continue in the future and more land will come forward as windfall. This means less land should be allocated or released from the Green Belt.

### Part 2 Employment Land Supply

We note the approach to new employment sites, spare capacity, mixed use sites and outstanding commitments, planning completions and the total supply of 31.02 hectares set out in Table 8.

CPRE is aware of the content of Appendix 1: Lichfield's Briefing Note (19.04.2021) and Appendix 2: Email from RBC's Economic Development Team.

### Brownfield Land

CPRE believes previously developed land, commonly referred to as brownfield, has considerable potential to support the delivery of identified housing and job needs in Rossendale.

The Government has introduced Section 11 Making Effective use of Land in the National Planning Policy Framework with the aim of promoting more regeneration and it sets out policies to protect Green Belt land in Section 13.

It is noted that the Local Plan Core Strategy includes a target of 65% for brownfield development, in line with the previous North West Regional Spatial Strategy.

It is important that the council maintains the Brownfield Register up to date and includes all suitable sites. CPRE has devised a Brownfield Land Register Toolkit to enable our volunteers and members of the public identify sites.

CPRE published important research in 2016 showing that Brownfield Land is quicker to bring forward compared to greenfield sites and this supports delivery via the housing and employment trajectories. Please see Appendix 1 (attached separately) with the email.

The neighbouring Greater Manchester Combined Authority is also pursuing a brownfield preference in the emerging spatial plan now called 'Places for Everyone'.

### Summary

CPRE wants to see local plan enable true sustainable development principles to achieve well designed rural places, with adequate infrastructure to ensure a good quality of life for all in the future.

We need a high quality of life for people and wildlife of Rossendale in the future. Enhancing rural places and urban greenspace is for everyone's benefit, and new development should be planned in a considered way to achieve this.

CPRE wishes the team every success in achieving an adopted local plan that will support sustainable neighbourhoods offering protection and enhancement of rural places, and urban greenspace.

Yours sincerely



**Jackie Copley MRTPI MA BA(Hons) PgCERT**  
Planning Manager



A company limited by guarantee, Registered number: 5291461, Registered charity number: 1107376

EMBARGOED UNTIL 00:01, Monday 21 March 2016

## Brownfield comes first

### Why brownfield development works

CPRE, March 2016

#### Introduction

The Campaign to Protect Rural England (CPRE) has long been a proponent of promoting use of brownfield sites for housing.<sup>1</sup> Brownfield redevelopment is a central focus of many of the Government's current proposals for planning reform, with the Housing and Planning Bill leading to the creation of a new statutory register of brownfield sites, identified locally as suitable for new housing. Two new sources of funding should ensure £2.2 billion will be spent on brownfield regeneration over the next five years. Ministers want to see 90% of suitable brownfield sites with planning permission for housing by 2020.

To investigate the extent to which brownfield is a viable option for development, CPRE commissioned construction analysts Glenigan to compare the speed of residential development on brownfield sites with development on greenfield, once these sites have been granted planning permission.

#### Research process

Glenigan analysed 1,040 development projects that had active planning consent during three years up to March 2015 within a sample of 15 urban and urban-rural fringe local authorities across England (Table 6). Of these sites, 696 were defined as brownfield and 269 as greenfield. Overall the projects were expected to deliver 69,415 houses.

The local authorities were chosen to give a geographical spread. All are outside London (where the market environment is exceptionally buoyant), and yet have relatively healthy building rates and a significant quantity of both brownfield and greenfield land earmarked for development. The 15 authorities were examined as 12 urban and urban-rural fringe areas: Cheshire East; Corby; County Durham; Coventry; Fylde; Leeds; Leicester, Blaby, and Oadby & Wigston; Salford; Southampton and Eastleigh; Stoke on Trent; Swindon; and York.

#### Findings

##### Overall speed of development

Brownfield land accounted for 63% of houses with an active planning consent during the three years to March 2015, but 70% of the houses that had been completed by the end of March 2015.



*Table 1: Average number of weeks taken for projects to be completed following planning approval by size of scheme*

	Brownfield	Greenfield
Below 50 units	80	91
50-99	103	110
100-249	132	164
250+	148	244
Total	92	121

Source: Glenigan

Of the 580 completed projects by December 2015, it was found that both brownfield and greenfield sites took an average of 29 weeks to start after receiving planning permission. However, brownfield sites were then much quicker to develop once work had started: brownfield sites took an average of 63 weeks to be completed in comparison with 92 weeks for greenfield sites.

Looking at the overall average timescales for both types of site from the granting of permission to completion, brownfield sites were developed more than half a year quicker (92 weeks against 121 weeks for greenfield). The finding that brownfield sites were faster from permission to completion was consistent for all site sizes.

### Larger sites

Projects of 50 or more units on brownfield land started on site 14 weeks earlier than on greenfield sites, and were completed 47 weeks earlier. So when the two are combined, larger brownfield sites are being developed, from start to finish, more than a year faster than greenfield sites.

*Table 2: Number of weeks taken for projects of 50 or more units to start on site and be completed following planning approval*

	Start on site		Completion	
	Brownfield	Greenfield	Brownfield	Greenfield
Cheshire East	21	25	107	128
Corby	33	39	183	139
County Durham	18	51	120	229
Coventry	29	57	128	128
Fylde	40	15	68	209
Leeds	22	27	106	198
Leicester Area	27	49	146	147
Salford	25	25	86	127
Southampton Area	24	33	119	122
Stoke-on-Trent	31	-	108	-
Swindon	13	24	132	106
York	21	39	121	156
All areas	24	38	119	166

Source: Glenigan

### Smaller sites

For smaller sites of fewer than 50 houses, brownfield projects took 32 weeks to start on site. This was marginally slower than greenfield sites, which took 23 weeks to see work begin. However, brownfield sites were then built more quickly, taking 80 weeks from approval to completion, in comparison with 91 weeks for smaller greenfield sites. This would suggest that smaller brownfield sites are developed quicker, but there are some issues to overcome in trying to begin work.

### Stalled sites

Across the 15 local authorities studied, there are 33 sites on hold and 32 that have been cancelled. Altogether this is 2,861 houses on stalled sites in the case study areas.

Broken down into brownfield and greenfield, more than 7% of brownfield sites have stalled in comparison with 5% of greenfield. The number of units represented by stalled or cancelled sites is roughly the same proportion for both (around 4%).

Table 3: Sites that have stalled<sup>2</sup>

	Brownfield	Greenfield	Brownfield units <sup>3</sup>	Greenfield units
Sites that have been granted permission	685	263	42,479	23,146
On hold	25 (3.6%)	8 (3%)	1,102 (2.6%)	738 (3.2%)
Cancelled	26 (3.8%)	6 (2.3%)	856 (2%)	165 (0.7%)

### Why brownfield first needs to be strengthened

Some of the local authorities included in Glenigan's research are making efforts to promote brownfield development. An examination of how government policies are undermining these efforts suggests some reasons why brownfield sites stall more frequently than greenfield sites (see Box).

**Box: How developers cherry-pick greenfield sites**

In a Parliamentary debate on 26 February 2016, Housing and Planning Minister Brandon Lewis stated: ‘The [National Planning Policy] framework...makes it clear that local authorities should prioritise suitable brownfield land wherever practicable.’<sup>4</sup> CPRE is pleased ministers are seeking to strengthen planning policy on brownfield because, at present, the NPPF is often not working in the way that Ministers say they intend.<sup>5</sup>

Some of the local authorities surveyed in our research - Cheshire East, Durham, and Salford - have tried to prioritise the redevelopment of brownfield sites in their local area by attempting to prevent the development of greenfield sites in areas close to brownfield sites that have planning permission but where building has not yet started. Yet during the period surveyed by Glenigan, planning inspectors have allowed appeals by developers to build on greenfield sites on the basis that there is no evidence that releasing additional greenfield sites undermines the development of brownfield that has already received planning permission. In that time, just over 2,000 houses have been built on greenfield sites in these areas.<sup>6</sup> Such a loss of greenfield land is arguably unnecessary when Glenigan’s figures (Tables 4 and 5) show that in each area the development that has taken place could have been on further brownfield sites with planning permission instead. In total, uncompleted developments on brownfield land in all three areas could have provided just over 5,000 new houses, in addition to the 6,797 houses that were completed on brownfield.<sup>7</sup>

The picture is starker still in Swindon, where far more greenfield land with planning permission was being developed for housing than brownfield. In Swindon, 77% (or 1,328 houses) of the houses developed were on greenfield land compared with 339 (just under 23%) on brownfield, despite 52% (or 1,837 houses) of all houses with planning permission being on brownfield.

The local authorities that saw a particular emphasis on brownfield included Stoke-on-Trent, where 98% of new residential units were built on brownfield sites. Coventry, the Southampton area and York also saw more than 80% of new residential development on brownfield. In both Coventry and York, major releases of Green Belt are now being planned that could serve to make the remaining brownfield sites less economically attractive to develop in future.

*Table 4: No. of residential units with active planning consent during three years to March 2015 split by type of site*

Local authority area	Brownfield land	Greenfield land	Brownfield and greenfield land	Unknown	Total	Proportion on greenfield land
Cheshire East	3,281	2,638	29	71	6,019	44%
Corby	1,140	1,894	-	-	3,034	62%
County Durham	3,332	3,371	-	256	6,959	48%
Coventry	6,555	551	-	141	7,247	8%
Fylde	1,131	553	87	32	1,803	31%
Leeds	8,388	5,012	81	346	13,827	36%
Leicester Area	5,115	3,122	12	311	8,560	36%
Salford	5,277	2,478	-	27	7,782	32%
Southampton Area	3,983	836	-	1	4,820	17%
Stoke-on-Trent	2,326	231	-	85	2,642	9%
Swindon	1,837	1,836	192	147	4,012	46%
York	1,325	1,366	-	19	2,710	50%
All areas	43,690	23,888	401	1,436	69,415	34%

Source: Glenigan

Table 5: No. of residential units with active planning consent completed by 31 December 2015

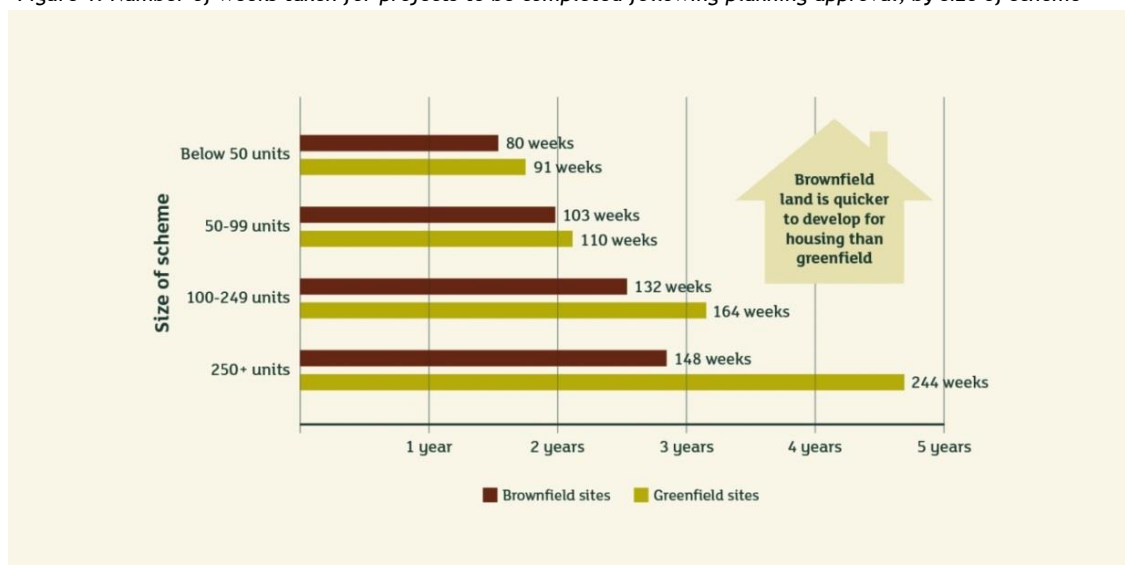
Local authority area	Brownfield land	Greenfield land	Brownfield and greenfield land	Unknown	Total	Proportion on greenfield land
Cheshire East	1,825	803	18	39	2,685	30%
Corby	1,116	1048	-	-	2,164	48%
County Durham	2,301	1,375	-	125	3,801	36%
Coventry	4,953	481	-	141	5,575	9%
Fylde	815	178	87	32	1,112	16%
Leeds	3,377	2,175	11	242	5,805	37%
Leicester Area	1,519	902	12	222	2,655	34%
Salford	2,671	164	-	-	2,835	6%
Southampton Area	2,722	578	-	1	3,301	18%
Stoke-on-Trent	1,598	27	-	46	1,671	2%
Swindon	339	1,328	13	45	1,725	77%
York	475	100	-	19	594	17%
All areas	23,711	9,159	141	912	33,923	27%

Source: Glenigan

### CPRE conclusions

Both brownfield and greenfield projects took an average of 29 weeks to start on site, but brownfield sites were then built out in 63 weeks compared with 92 for greenfield land. This suggests that once a commitment is made to build on a brownfield site, it is often significantly quicker to develop than a greenfield site (see Figure 1).

Figure 1. Number of weeks taken for projects to be completed following planning approval, by size of scheme



It is also clear, however, that greenfield land is being released and developed, often after planning appeals, in areas where local authorities want to see brownfield sites being built on first. Much of the greenfield development that has taken place in these areas is arguably unnecessary when there is more than enough brownfield land with planning permission to provide for what has been built.

A relatively small number of brownfield sites stall after securing planning permission, however, and this happens to a higher proportion of brownfield sites than greenfield. Taken alongside the other findings, this reinforces the idea that investing in these sites to get building going will provide worthwhile returns.

Overall, our findings suggest that the Government's pledge to invest £2.2 billion on brownfield regeneration in two new housing development funds and to establish a brownfield register are necessary and worthwhile investments. It will help speed up the rates of housebuilding as intended, and help minimise the unnecessary loss of countryside. Other proposed Government initiatives, however, such as forcing local authorities to release more sites for development if housing targets are not met, are unlikely to have a direct impact on the overall numbers of new homes provided but will instead lead to developers cherry-picking increased amounts of greenfield land.

### CPRE recommendations

The findings above reiterate the need for a stronger focus on bringing **brownfield land** forward for development.

The Government should:

- amend the NPPF to make the intentions of Ministers clear and prioritise the use of suitable brownfield sites in urban areas over greenfield, including empowering councils not to allocate greenfield sites in local plans and to refuse planning permission on greenfield sites where these would compete with suitable brownfield sites
- commit to seeing development started on 90% of suitable brownfield sites by 2020, rather than just aiming for planning permission on 90% of suitable sites by 2020
- make suitable brownfield sites the first priority for any public funding, and prevent public funding for greenfield sites where these would make competing demands. The New Homes Bonus offers an opportunity to bring more brownfield sites back into use, and the Government should use this alongside its £2 billion Housing Development Fund to prioritise brownfield
- make clear that planning and fiscal policies promoting brownfield development are focused on existing towns and cities and exclude brownfield sites of high environmental and heritage value.

CPRE, March 2016

<sup>1</sup> CPRE, *From Wasted Space to Living Spaces*, November 2014.

<sup>2</sup> Stalled sites are sites on which planning permission has been granted but where Glenigan's data indicates that construction has been cancelled or is on hold.

<sup>3</sup> The sites analysed in the research are primarily residential - however, a very small number of sites also contain some commercial units. The projects included within the analysis for *Table 3* encompass a very small proportion of commercial units as well as residential units. In some cases these could be mixed use (for both residential and commercial) units.

<sup>4</sup> [House of Commons debate](#), 26 February 2016, vol 606, col 654.

<sup>5</sup> See planning appeal decisions from Cheshire East (reference 2141564, dating from 2013); County Durham (reference 3005376, dated August 2015); and Salford (2157433, dated July 2012). All these decisions can be downloaded from <https://acp.planningportal.gov.uk/>

<sup>6</sup> See *Table 5*, column 3.

<sup>7</sup> Compare *Table 4*, column 2 (showing the number of residential units with planning consent on brownfield land) and *Table 5*, column 2 (showing the number of units built on brownfield land).

## Appendix

*Table 6: No. of projects with active planning consent during three years to March 2015 split by type of site*

Local authority area	Brownfield land	Greenfield land	Brownfield and greenfield land	Unknown	Total	Proportion on greenfield land
Cheshire East	80	36	2	6	124	29%
Corby	10	21	-	-	31	68%
County Durham	76	39	-	14	129	30%
Coventry	55	13	-	3	71	18%
Fylde	20	8	2	1	31	26%
Leeds	138	46	2	13	199	23%
Leicester Area	84	40	1	13	138	29%
Salford	61	13	-	2	76	17%
Southampton Area	75	15	-	1	91	16%
Stoke-on-Trent	45	7	-	5	57	12%
Swindon	27	22	4	5	58	38%
York	25	9	-	1	35	26%
<b>All areas</b>	<b>696</b>	<b>269</b>	<b>11</b>	<b>64</b>	<b>1,040</b>	<b>26%</b>

Source: Glenigan

Reference 'Rossendale Housing Development Plan MAY 2021' Townsend Fold/New Hall  
Hey Greenbelt - EL10 Consultation on Housing and Employment Land

Pease find attached the petition from the facebook group 'Save Townsend Fold Greenbelt' we oppose the  
planning proposals on Greenbelt land - we are not against housing developments, but we suggest that  
Brownfield sites should be used instead. GREENBELT SHOULD BE PROTECTED NOT DESTROYED!!

<https://www.ipetitions.com/petition/protect-our-green-belt-holmeswood-townsend>

[Sent from Yahoo Mail on Android](#)





# Homes England

Forward Planning  
Business Centre  
Futures Park  
Bacup  
OL13 0BB

By email: [forwardplanning@rossendalebc.gov.uk](mailto:forwardplanning@rossendalebc.gov.uk)

18<sup>th</sup> June 2021

Dear Sir / Madam,

## **Rossendale Local Plan EiP Technical Consultation – Housing and Employment Update**

### **Homes England Response**

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the Housing and Employment Update.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.

Yours faithfully,



P.P Nicola Elsworth  
Head of Planning and Enabling

Homes England  
1<sup>st</sup> Floor Churchgate House  
56 Oxford Street  
Manchester  
M1 6EU

Please send all Local Plan and related consultations to



0300 1234 500  
[www.gov.uk/homes-england](http://www.gov.uk/homes-england)

## **Examination of the Rossendale Local Plan**

### **Consultation on EL 10.001 Housing Update May 2021**

**Representations by A.G. Ashworth and R.W. Lester with respect to RBC's Paper dated May 2021  
and published on 2<sup>nd</sup> June 2021**

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(*separate spreadsheet*)**

**Page 20 Comments on the Green Belt Site H72**

#### **Key Points**

- **Plan period must be reset to commence in the future, no earlier than 1st April 2022.**
- **Shortfall of delivery in 2019-21 must not be added to housing requirement - this is covered by the 20% buffer.**
- **RBC have introduced confusion about the base date to be used for determining committed sites.**
- **By excluding and minimising sources RBC claim a slight shortage of supply. In reality there is a surplus for both options (15 and 17 years) even when all the Green Belt sites are discounted.**

- RBC's response to EL 10.002 highlights an over-supply of Employment Land thus providing an opportunity to re-allocate land for residential purposes.
- RBC have excluded a contribution from Empty Homes despite accepting 150 dwellings over 15 years in their response to Action Point 8.019.7.
- RBC have excluded a contribution from the Regeneration of Town Centres despite accepting in their response to Action Point 8.019.6 a figure of 9 to 12 *per annum*.
- RBC propose a figure of 20 homes *per annum* from Small Sites and disregard all the evidence we have provided to justify at the very minimum 25 *per annum*.
- RBC have refused to consider a supply from Windfall Sites despite all the evidence we have provided which justifies at the very minimum 20 homes *per annum*.
- RBC make no reference to the 106 homes approved from Small and Windfall Sites in 2020/21 despite their awareness of this source when they prepared the report in May 2021.
- RBC continue to propose sites in the Green Belt in contravention of NPPF principles, despite the Landscape, Heritage, Access and Education issues highlighted by ECNF throughout the Local Plan process.
- RBC confirm that there is 8.17 years' supply and our figures confirm that, if all the allocated Green Belt sites are deleted, there is still at least 7.86 years' supply (9.84 years if shortfall provision is also deleted).
- Various inaccuracies and inconsistencies in Appendix 2 to the Update.

## **Examination of the Rossendale Local Plan**

### **Consultation on EL 10.001 Housing Update May 2021**

#### **Representations by A.G. Ashworth and R.W. Lester with respect to RBC's Paper dated May 2021 and published on 2<sup>nd</sup> June 2021**

### **Representations**

#### **1. Planning for the past**

1.1 It is a contradiction in terms, indeed an impossibility, to plan for the past, but RBC are asking us to suspend disbelief while they attempt to do just that. In June 2021 we are being invited to comment on a Plan including a two-year period that ended on 31st March 2021.

1.2 It is over two years since the Plan was submitted for examination. Local housing need (LHN) calculated using the standard method may not be relied upon more than two years after a Plan is submitted. This is the first time that a Plan submitted under the revised NPPF has faced this issue, and being a pioneer in this respect is not a badge that RBC can wear with pride. This regrettable situation is due to the facts that

(i) the Plan was submitted less than a week before the Plan period began,

(ii) it was in such poor shape that the Inspectors had to call for a large amount of additional information,

(iii) there was considerable delay in providing that information, and

(iv) all those matters were, or should have been, under the control of RBC.

1.3 RBC have been asked "to provide a revised calculation of LHN for the current year" and "to consider what implications this may have on the housing requirement in Policy HS1".

1.4 Accordingly, RBC have recalculated the LHN as 185 dwellings per annum (dpa). However, as well as specifying that figure for the current and subsequent years, RBC seek to add to the housing requirement the shortfall in the delivery of the requirement proposed for the first two years, indeed the last years, of the Plan.

1.5 We submit that that is wrong. It is wrong because, if the Plan were being prepared afresh, it would not have to add in the shortfall in previous years' delivery under the Core Strategy. All it would have to do would be to ensure a 20% buffer of deliverable sites in the first five years. It is wrong for a Plan that is being patched up on the hoof, as this one is, to use a different methodology and set a different requirement from a clean Plan being made today.

1.6 It is wrong also because it is not possible to plan for the past. The requirement of 208 dpa was never established in an adopted plan and cannot be retrospectively asserted now as the figure to be applied for the two-year period that ended on 31st March 2021.

1.7 We therefore disagree fundamentally with paragraphs 3.6 to 3.13 on pages 4 and 5 of the Update, and paragraphs 6.2 and 6.3 on page 10, to the extent that they include a requirement of 208 dpa in the years beginning 1st April 2019 and 1st April 2020, and with the addition of 233 dwellings

(the estimated shortfall in delivery between 1st April 2019 and 31st March 2021) to the housing requirement in paragraphs 6.6 and 6.7 and Table 6 of the Update (pages 11 and 12).

1.8 We note the Inspectors' wish to deal with the issue in a pragmatic manner, and, whilst not wanting to fall into the trap of the sunk costs fallacy, we are conscious of the time and effort that all parties have devoted to the Examination so far. Now that the need to recalculate the LHN has arisen, we submit that it is necessary to reset the Plan Period, which should begin no earlier than 1st April 2022.

## 2. Housing Land Supply

2.1 RBC claim there is a slight shortage (Update, page 10, Table 4) when in reality there is an abundant supply. For Option 1 (2019-34) there is a surplus of 918 homes if the **allocated** Green Belt sites are included and a surplus of supply of 422 when these are removed. The figures for Option 2 (2019-36) are similar being + 682 and + 186 respectively. Those figures increase to 915 and 419 respectively if the shortfall provision of 233 is deleted. In addition non-Green Belt sites, all deemed suitable by a local Chartered Town Planner could yield 2,760 dwellings. **Refer to Appendices 1 and 2.**

2.2 RBC have highlighted in EL 10.002 that there is a surplus of land identified for Employment. Some of this should be re-allocated for Housing before any Green Belt Land is so allocated. **Refer to the ECNF response to EL 10.002.**

2.3 At Appendix 3 below we show amended versions of Tables 5 and 6 (Update, pages 11 and 12).

2.4.1 Appendix 2 to the Update records Site allocations and planning commitments forming part of the housing land supply and shows against an orange background changes from the last trajectory published in October 2019 (document EL4.014). There is immediately a problem with this, linked to the fact, noted at section 1 of this response, that the Plan is purporting to plan for years that have passed.

2.4.2 Table 1 in Appendix 2 is entitled 'Site Allocations - Updated trajectory (May 2021)' and comes with a warning 'PLEASE NOTE: Dwelling completions are as *sic* 31 March 2020. Also Years 1-5 refer to 2021 to 2026'. The confusion is limitless.

2.4.3 The first item in Table 1 is site H1, which is struck through and about which we learn that 'The site has been purchased by a business and will be used for employment.' RBC do not say when this happened, but the local press reported it in February 2021. What cut-off or base date applies to this information? The Housing land loss must be an Employment Land gain - is the Plan recording this as a new or existing employment site? It should. We need to know but are not told.

2.4.4 For H3 Table 1 tells us 'The site will be fully built as of 31st March 2021. Being dated May 2021, Table 1 needs to confirm the position, not make predictions for a date in the past.

2.4.5 H19 - Table 1 states: 'The site benefits from a Lawful Development Certificate (2016/0273)'. Actually, it does not, because no LDC has been issued - the purported decision notice is nothing like the relevant prescribed form and not even a certificate.

2.4.6 H33 - Table 1 states: 'None complete in 19/20 - all dwellings expected to be completed in 2020/21 according to Building Control records.' Being dated May 2021, Table 1 needs to confirm the position as at 31st March 2021. However, the trajectory shows 37 dwellings to be delivered in 2027-29, which is hard to reconcile with the statement.

2.4.7 We note that for H65 the yield has increased to 85 following a planning approval, but it begs the question 'What base date is being used?'

2.4.8 We do not accept the stated area of H72 or that 10 dwellings have already been delivered at that site or that any part is the subject of planning permission - please refer to paragraph 5) of Appendix 7 to this response.

2.4.9 For H74 it would have been helpful to add that 2020/0314 has been approved. Again, what is the relevant base date?

2.4.10 In Table 2 in Appendix 2 to the Update, Tippet Farm is noted under reference 14/86/296, but the relevant reference is planning approval 14/82/273.

2.4.11 In Table 2 approval reference 2016/0143 is wrongly struck through. That it is extant was confirmed by a LDC granted on appeal. We pointed this out in a letter dated 28th April 2021 to the Planning Manager and are therefore particularly dismayed to see it struck from Table 2.

2.4.12 In Table 2 the entry for Hollin Lane Farm under 2018/0559 ignores a potential additional yield of two. Approvals 2018/0063 and 2018/0064 are for 1 and 2 dwellings respectively, as an alternative to 2018/0559. Approval of 2021/0027 (identical to 2018/0063) confirms that the proposals for 3 dwellings are still realistic. We advised the Planning Manager of this in our letter of 28th April 2021. (He replied by letter on 28th May 2021:

*'The most recent application approved (2018/0559) for 1 dwelling was considered most likely to be implemented, although it is acknowledged that applications 2018/0063 (for 1 dwelling) and 2018/0064 (for 2 dwellings) could still be implemented as of 31st March 2019. Based on current permission granted as of 31st March 2019 the number of dwellings that could be brought forward on this site ranges from 1 to 3 dwellings. The latest application 2021/0027 was approved on 25/02/2021 and cannot be considered in this 5YHLS report.'* )

### **3. Empty Homes**

3.1 RBC accepted in their response to Action Point EL 8.019.7 that 10 homes per annum and 150 during the Plan period could be provided from this source. **Refer to RBC's response to Action Point 8.019.7**

### **4. Regeneration of Town Centres**

4.1 RBC accepted in their response to Action Point 8.019.6 that, if an allowance from this source were to be made, it could amount to 9-12 homes per annum. Please note that we have included a contribution from this source for only 12 years as with Small Sites. **Refer to RBC's response to Action Point 8.019.6.**

## 5. Small Sites allowance

5.1 We have challenged RBC over the inadequacy of their allowance for this from the outset of the Local Plan process and whilst they have now increased it from 18 to 20 it still does not reflect the actual numbers being provided from this source. In 2020/21 50 small sites were approved and after two months of the current year 2021/22 22 applications have already been received. **Refer to Appendix 4 for supporting evidence to justify a minimum of 25 homes per annum.** Please note we have included these for only 12 years of the Plan period.

## 6. Windfall Allowance:

6.1 Although RBC's practice has been to disregard Windfall Sites (i.e., those yielding more than 4 dwellings and not allocated in the development plan) as a source in the 5YHLS, we respectfully submit that this should be reviewed.

6.2 We have raised this matter with RBC's Planning Manager, who, in a letter dated 28th May 2021, replied:

*"The Critical Friend Review of the Rossendale SHLAA , conducted by ARUP in 2016, explains why Rossendale Borough Council is not adopting a Windfall Site allowance. This is summarised below :*

1. *In regards to Windfall Sites, national policy and best practice show that:*
  - *Evidence should be based on historic delivery rates to demonstrate a 'reliable source of supply'.*
  - *Garden sites should be excluded from the allowance as this is contrary to national policy.*
  - *A windfall allowance needs to be supported by a compelling case demonstrating that windfall sites will consistently become available and there is evidence that local circumstances prevent specific sites being identified.*
2. *In 2016, RBC planning officers acknowledged that there had been a relatively high number of completions from windfall sites over the last few years; however, this was reflective of the withdrawn status of the Current Local Plan and the amount of remaining allocations.*
3. *As RBC has conducted several Call for Sites and has an updated SHLAA, as well as the emerging Local Plan containing site allocations following a review of land supply across the district, it is expected that most potential housing sites are already identified within the SHLAA and consequently are unlikely to come forward as windfall sites.*
4. *Ultimately, the Critical Friend Review of Rossendale SHLAA concluded that a windfall allowance is not considered appropriate for RBC."*

6.3 The difficulty with the Critical Friend Review is that it is some five years old and as such does not take account of the recent history of windfall sites.

6.4 As regards the requirement for a compelling case to be made for windfalls to be considered as a reliable source, we provide in Appendix 5 historical data to support a windfall allowance, which we have previously supplied to RBC.

6.5 RBC also claim that following their calls for sites and updated SHLAA and allocations in the emerging Plan they expect that ‘most’ potential housing sites are already identified. That may be so but that is not to say that windfalls will not arise. We note below that none of the applications received in 2021/2 had been identified in the planning process.

6.6 Appendix 5, based on published completions lists, attempts to show the recent contribution of Windfall Sites to the housing land supply. It is qualified by the fact that it is not always clear when a Windfall Site transitions to an Allocated Site.

6.7 Appendix 5 suggests that over five years ending 31st March 2020 161 dwellings were completed on Windfall Sites, at an annual average of 32.

6.8 Appendix 6 shows that 50 dwellings were approved on Windfall Sites in the year commencing 1st April 2020.

6.9 Already in 2021/2 planning applications for 70 dwellings have been received from windfall sites that are not in the SHLAA lists:

Planning Reference	Address	Description	Number of dwellings to be created.
2021/0220 & 0221. (01.04.21.)	41, Bury Rd Haslingden	Conversion of Offices to Residential Apartments	18
2021/0271 (20.05.21)	Slingco Ltd Facit	Demolition of employment unit & erection of 38 dwellings	38
2021/0268 (17.05.21)	New Bridge House, Manchester Rd, Haslingden	Change of dwelling + construction of 8 Apartments on the former Car Park	8
2021/0196 (16.06.21)	Holly Mount, Rawtenstall	Construction of 3 pairs of semi-detached dwellings	6
Total			70

6.7 We therefore submit that it would be entirely reasonable and realistic to assume an annual contribution of 20 from this source.

6.8 As with Small Sites we have only included this allowance for 12 years of the Plan period.



6.9 The reality is that windfall sites are historically a significant source of supply and show every sign of continuing to be such. **Refer to Appendices 5 and 6.**

## **7. Additional Committed Sites in 2020/21**

7.1 RBC have avoided making any reference to the 106 homes from Small and Windfall sites that were approved during 2020/21 as they only included data up to 31<sup>st</sup> March 2020 despite preparing the Update after 31<sup>st</sup> March 2021.

7.2 This effectively means that none of the 106 homes that were approved on these sites during 2020/1 appear in their Housing Supply list. Whilst we accept that the data provided are to 31<sup>st</sup> March 2020 it seems inconceivable that no comments have been made with respect to the expected significant contribution from these newly committed sites. **Refer to Appendix 6.**

7.3 We are aware that not all Planning Approvals come to fruition but on a very prudent basis we believe fifty percent of this source should be included under 'Additional Committed Sites'.

## **8. Green Belt Sites**

8.1 RBC's refusal, in contravention of NPPF principles, to remove sites in Green Belt from the proposed Plan allocations despite having a surplus of sites to meet their needs in both Options 1 and 2 is a very serious cause for concern particularly with respect to Site H72 where there are severe constraints related to the development of the site. **Refer to Appendix 7.**

## **9. Implications for the Employment Land Requirement**

9.1 Section 4 of the Update considers the employment land requirement and notes that that is considered in more detail in the Employment Update (EL10.002). Accordingly, our comments on this aspect are contained in our response to the latter document.

## **10. Implications for other Parts of the Plan**

10.1 With reference to section 5 of the Update, we submit, as noted at paragraph 1.8, supra, that it is necessary to reset the Plan Period, which should begin no earlier than 1st April 2022.

## **11. Conclusion:**

11.1 We submit that because of delay it is necessary to reset the Plan Period, which should begin no earlier than 1st April 2022. The housing land requirement should exclude delivery shortfalls in preceding years.

11.2 RBC confirm in their Housing Update dated May 2021 that they have identified sufficient homes to meet the housing needs for Option 1 and Option 2 with the allocation of sites for 496 homes on land in the Green Belt.

11.2 However, when we examine the details in their document we find that the numbers from some sources have been omitted and others are minimised. The sources omitted include the contributions from the Empty Homes, the supply from the Regeneration from Town Centres, the additional committed sites and the Windfall sites. The source which is minimised is the Small Sites where the levels of contribution remains understated.

11.3 We have covered all the sources in our response and together they would yield 684 more homes thus allowing deletion of the Green Belt allocations and enabling the Plan to comply with NPPF requirements.

11.4 We look forward to the confirmation that RBC will instigate this action prior to reviewing the Main Modifications with the Inspectors.

11.5 We have responded separately with regards to the Employment Land Update (EL10.002) but there again, owing to the surplus of supply, the allocations of Green Belt land can be deleted and some of the additional land re-allocated for other uses including residential.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th June 2021

## Appendix 1

**Table 1: Updated Sources of Supply based on 2019/20 – 2033/34 Plan Period.**

Sources of Supply	Years 1-5 (2019/20-2023/4)	Years 6-10 (2024/5-2028/9)	Years 11-15 (2029/30-2033/4)	Totals
Dwellings Completed in Year 1 (2019/20)	94	N/A	N/A	94
Remaining Dwellings on Allocated Sites:				
In Urban Boundary	603	481	78	1162
In Countryside	450	408	0	858
Remaining dwellings on other committed sites.	245	54	0	299
Small Site Allowance	25	125	125	275
Windfall Allowance	20	100	100	220
Empty Homes	50	50	50	150
Town Centre Regeneration	12	60	60	132
<b>Sub Total</b>	<b>1499</b>	<b>1278</b>	<b>413</b>	<b>3190</b>
Remaining dwellings on allocated sites in Green Belt.	115	307	74	496
<b>Totals</b>	<b>1614</b>	<b>1585</b>	<b>487</b>	<b>3686</b>
Addition of 50% of Committed Sites approved in 2020/21.**				53
<b>Totals</b>				<b>3739</b>
Deletion of all allocated Green Belt Sites *				-496
<b>Grand Total:</b>				<b>3243</b>

\*As there is a considerable surplus of supply and there is a reserve of 2760 homes on non-Green Belt land deemed suitable by a local Chartered Town Planner there can be no justification for allocating sites in Green Belt.

\*\* RBC approved 106 Planning Applications in 2020/1 none of which has been included as the data are based on the period to the 31<sup>st</sup> March 2020. However RBC were aware of these 'committed sites' and consideration should have been given to making some reference to them.

**Table 2: Updated version of RBC's Table 4.**

<b>Local Plan Period</b>	<b>Overall Housing Requirement</b>	<b>Overall Housing Supply</b>	<b>Shortfall (-) / Surplus (+) to Requirement</b>
2019-34 (15 years)	2821	3739	+ 918
2019-34 After deletion of all allocated Green Belt Sites	2821	3243	+ 422

## Appendix 2

**Table 1: Updated Sources of Supply based on 2019/20 – 2035/36 Plan Period.**

Sources of Supply	Years 1-5 (2019/20-2023/4)	Years 6-10 (2024/5-2028/9)	Years 11-17 (2029/30-2035/6)	Totals
Dwellings Completed in Year 1 (2019/20)	94	N/A	N/A	94
Remaining Dwellings on Allocated Sites:				
In Urban Boundary	603	481	78	1162
In Countryside	450	408	0	858
Remaining dwellings on other committed sites.	245	54	0	299
Small Site Allowance	25	125	175	325
Windfall Allowance	20	100	140	260
Empty Homes	50	50	70	170
Town Centre Regeneration	12	60	84	156
<b>Sub Total</b>	<b>1499</b>	<b>1278</b>	<b>547</b>	<b>3324</b>
Remaining dwellings on allocated sites in Green Belt.	115	307	74	496
<b>Totals</b>	<b>1614</b>	<b>1585</b>	<b>621</b>	<b>3820</b>
Addition of 50% of Committed Sites approved in 2020/21.**				<b>53</b>
<b>Totals</b>				<b>3873</b>
Deletion of All Allocated Green Belt Sites *				<b>-496</b>
<b>Grand Total:</b>				<b>3377</b>

\*As there is a considerable surplus of supply and there is a reserve of 2760 homes on non-Green Belt land deemed suitable by a local Chartered Town Planner there can be no justification for allocating sites in Green Belt.

\*\* RBC approved 106 Planning Applications in 2020/1 none of which have been included as the data are based on the period to the 31<sup>st</sup> March 2020. However RBC were aware of these 'committed sites' and consideration should have been given to making some reference to them.

**Table 2: Updated version of RBC's Table 4.**

<b>Local Plan Period</b>	<b>Overall Housing Requirement</b>	<b>Overall Housing Supply</b>	<b>Shortfall (-) / Surplus (+) to Requirement</b>
2019/36 (17 years)	3191	3873	+ 682
2019/36 After deletion of all allocated Green Belt Sites	3191	3377	+ 186
2019/36 After deletion of all allocated Green Belt Sites and of shortfall provision for 2019-21	2958	3377	419

### Appendix 3

#### Five Year Housing Land Supply

Table 5 is updated as follows:

Sources of Supply	Calculation	Number of dwellings
Dwellings remaining on site allocations currently in:		
Urban Boundary	184 + 206 + 169 + 254 + 114	927
Countryside	157 + 160 + 133 + 210 + 153	813
Dwellings remaining on other committed sites.	79 + 71 + 50 + 4 + 20	224
Small Site Allowance	25 + 25 + 25	75
Windfall Allowance	20 + 20 + 20	60
Empty Homes	10 + 10 + 10 + 10 + 10	50
Town Centre Regeneration	12 + 12 + 12	36
Additional Committed Sites	Dates not available	Nil
Sub Total		<b>2185</b>
Dwellings remaining on site allocations in Green Belt	Assume all removed due to surplus of supply	
Total 5 Year Housing Supply		<b>2185</b>

Table 6 is updated as follows:

<b>Local Plan Period</b>	Option 2: 2019-2036
<b>5 Year Period.</b>	2021-2026
<b>Annual Housing Requirement for this 5 year period.</b>	185
<b>Shortfall from Previous years in the Plan.</b>	$(208-94)+(208-89^*)= 233$
<b>20% Buffer Calculation</b>	$((5*185)+233)/100*20 = 232$
<b>5 year Housing Requirement Calculation including 20% buffer and shortfall.</b>	$(5*185) +233 + 232 = 1390$
<b>5 year Housing Requirement Calculation including 20% buffer but excluding shortfall.</b>	$5*185 + 20\% = 1110$
<b>5 Year Housing Supply.</b>	2185
<b>Annual Housing Requirement Including shortfall and 20% buffer.</b>	$185 + (233/5) + 20\% = 278$
<b>Annual Housing Requirement Including 20% buffer but excluding shortfall</b>	$185 + 20\% = 222$
<b>Number of Years of Supply, including shortfall provision</b>	<b>7.86 Without homes from any Green Belt Land.</b>
<b>Number of Years of Supply, excluding shortfall provision</b>	<b>9.84 Without homes from any Green Belt Land.</b>



## Appendix 4

### Small Sites Allowance

**The small sites allowance is too low at 18 per annum; a more realistic figure would be 25.**

- 1) **RBC rightly makes an allowance for small sites.** In considering the historic contribution of small sites there is no point in disregarding dwellings built on garden land. Applications continue to be received from this source and provide valuable housing.
- 2) Table 5 in paragraph 4.5 of the RBC Five Year Housing Land Supply Report 2020/21 - 2024/25 (5YHLS) shows that in the four-year period 2016-2020 106 dwellings (net) were completed on small sites, at an average annual rate of 26.50 with the number increasing each year.
- 3) Appendix C to RBC's 5YHLS shows that small sites under construction at 1st April 2020 are expected to deliver some 90 dwellings in the 5-year period ending 31st March 2025. Permissions for some 80 dwellings on small sites were unimplemented. Over 50 more dwellings were approved during 2020/21 taking the total dwellings available on committed small sites to more than 200. This indicates that up to 40 dwellings per annum is achievable.
- 4) Already in 2021/2 after the first two months 22 dwellings on small sites have been applied for indicating the number available will continue to increase. This reinforces the point that an annual contribution of 25 dwellings from small sites is achievable for the foreseeable future.
- 5) Analysis as at 31st March 2021 of planning applications to RBC from 1st April 2017 to the end of March 2021 shows that the number of dwellings on small sites for which approval was sought was 404, of which 221 were approved, 19 await RBC's decision and 6 are under appeal. (Refer to table below.) Whilst not all the approved schemes will proceed to completion, the figures do not suggest a significant imminent reduction in the contribution from small sites.

Period	Dwellings Applied For	Approved	Pending Consideration	Awaiting Appeal
2017/8	88	40	0	0
2018/9	117	89	3	0
2019/20	93	34	0	0
2020/1	106	58*	16	6
<b>Totals</b>	404	221	19	6
<b>Average</b>	<b>101</b>	<b>55.25</b>		

\*Number liable to increase when pending applications are determined.

- 6) We therefore submit that 25 dwellings per annum is a realistic projection of the contribution from small sites to the 5YHLS.

## Appendix 5

### Dwellings delivered on Windfall Sites 2014-2020

'Windfall site' defined here as site providing more than 4 dwellings and not identified in the Local Plan process.

Dwellings completed on Windfall Sites total 161 over the five years to 31st March 2020, an annual average of 32. In the 3 years to 31st March 2020, the total was 68, an average of 22.

Appli- cation Number	Plan- ning History	Site Name	Net Dw'gs App- roved	Dw'gs Built in the Year:	Total Dw'gs Built	Site Comp- leted	Green or Brown field	Comments
				2015/ 2016				
2012/ 0210		Millgate Rd/ East Parade/ Higher Mill St, Rawtenstall	12	12	12	Yes	B	
2013/ 0041		Woodland Rise, opp 449- 457 Bacup Rd, Rawtenstall	17	1	17	Yes	?	Former United Utilities depot
2013/ 0081		Cherry Tree, Dean Road, Haslingden	6	6	6	Yes	B	
2013/ 0455		Land to S side of Bacup Hub, Burnley Rd	20	20	20	Yes	G	
2013/ 0497		Land adjacent K Supplies, Hill End Lane, Cloughfold	5	5	5	Yes	?	Last used as builders store, <i>per</i> application.
2014/ 0341	2013/ 0580	Garage Colony Rear of the Parade, Broadway, Haslingden	7	7	7	Yes	B	
		<b>Total 2015/16</b>		<b>51</b>				

Applica- tion Number	Plan- ning History	Site Name	Net Dw'gs App- roved	Dw'gs Built in the Year:	Total Dw'gs Built	Site Comp- leted	Green or Brown field	Comments
				<b>2016/ 2017</b>				
2011/ 0568		Former Holden Vale Hotel, Holcombe Rd, Helmshore	15	15	15	Yes	B	
2012/ 0520		7 John Street, Haslingden	5	5	5	Yes	B	
2014/ 0297 Prior no- tification	2013/ 0426	Wavell House Holcombe Road, Helmshore	42	10	10			
2014/ 0494	2012/ 0538	Land adj to 368 Rochdale Road, Bacup	12	12	12	Yes	B?	
		<b>Total 2016/17</b>		<b>42</b>				
				<b>2017/ 2018</b>				
2014/ 0297 Prior no- tification	2013/ 0426	Wavell House Holcombe Road, Helmshore	42	18	28	No	B	
2016/ 0630	2013/ 0470 2012/ 0544 2014/ 0168	Land at Hurst Platt, Waingate Rd, Green Street, Rawtenstall	8	4	4	No	G	
		<b>Total 2017/18</b>		<b>22</b>				

Appli- cation Number	Plan- ning History	Site Name	Net Dw'gs App- roved	Dw'gs Built in the Year:	Total Dw'gs Built	Site Comp- leted	Green or Brown field	Comments
				<b>2018/ 2019</b>				
2014/ 0297	2013/ 0426	Holcombe Rd, Helmshore	42	7	35	No	B	Prior notification
2017/ 0237		Edenfield Meth. Church	8	8	8	Yes	B	
2017/ 0273	2015/ 0329 2012/ 0141	Greensnook Cottages, Greensnook Lane, Bacup	7	6	6	No	B	Please see Comment about this site under 2019/2020
		<b>Total 2018/19</b>		<b>21</b>				
				<b>2019/ 2020</b>				
2014/ 0297	2013/ 0426	Holcombe Road, Helmshore	42	7	42	Yes	B	Prior notification
2016/ 0228		Croft End Mill, Bolton Rd N, Rams.	11	11	11	Yes	B	Still in employment use - DC Comm report 17/01/17
2017/ 0257		The Hollies, 2 Rising Bridge Road, Hasl'en	6	6	6	Yes	B	
2017/ 0273	2015/ 0329 2012/ 0141	Greensnook Cottages, Greensnook Lane, Bacup	7	1	7	Yes	B	Farm buildings demolished 2012, <i>per</i> officer report for 2015/0329. Was the site 'Brownfield'? The only buildings were apparently farm buildings = relating to farming = agricultural build- ings, excluded from NPPF definition.
		<b>Total 2019/20</b>		<b>25</b>				
		<b>Grand Total</b>		<b>161</b>				

## Appendix 6

### Residential Planning Approvals on Small Sites - April 2020 to March 2021

Please refer to attached spreadsheet.

**Appendix 6: Small Site Planning Approvals Published by RBC. 2020/1**

Windfall sites in Blue Listed at the end.							
<u>Validation Dates</u>	<u>Reference</u>	<u>Address</u>	<u>Comments</u>	<u>Decision</u>	<u>Date</u>	<u>Net Gain</u>	
14.04.20	2020/0132	1A;1B;1C & 1D ' Bank St. Rawtenstall	Change of use from Nightclub to 2*1Bed Apt.	AWC	08.07.20	2	
20.04.20	2020/0179	93, Burnley Road, Bacup	Full new build, house connect to end of row.	AWC	08.09.20	1	
27.04.20	2020/0142	1, Chapel Villas, Tod Road, Bacup	Const of 1 dwelling in principle.	A	03.07.20.	1	
09.04.20	2020/0165	Clough Head Barn, Dean Lane, Water	Prior approval Agricult bdg to dwelling.	A	04.06.20	1	Prior approval not required
07.05.20	2020/0197&9	Queens Arms, Rawtenstall	Conv pub to Rest, +4 * 2 Bed Apts	AWC	01.07.20	3	Net 3 as PH included living quarters.
18.05.20	2020/0198	Land south of Holme Cottages, Cowpe.	Erection of 4 new dwellings.	AWC	30.07.20	4	
19.05.20	2020/0194	35-37 Deardengate Haslingden.	Commercial Ground Floor + 2 Apartments.	AWC	07.07.20	2	
08.05.20	2020/0203	Former Anacapri Restaurant	Conv to 2 dwellings + 3 on Car park	AWC	02.09.20.	4	Net 4 as restaurant included a flat.
25.05.20	2020/0219	1218, Burnley Rd, Rawtenstall.	Outline Applic for erection of 4 dwellings.	AWC	17.07.20	4	

03.06.20	2020/0053	208, Newchurch Rd, Stacksteads.	Conv of A1 shop to 2 C3 dwellings.	AWC	30.07.20	2	
08.06.20	2020/0213	393, Market Street, Whitworth	Conv of basement/Groundfloor to 2 Apts.	AWC	30.07.20	2	On CSL under 2018/0150
19.06.20	2020/0045	29, Burnley Rd East, Waterfoot.	Change of use to Retail +Flat	AWC	03.08.20.	1	
12.06.20	2020/0248	Crown Inn, Greave Rd, Bacup	Change Upper Floor to 5 Flats	AWC	04.09.20.	3	Converted from 2 to 5 flats
18.06.20	2020/0253	The Barn, 105 Gincroft Lane, Edenfield	Change Barn to Dwelling.	AWC	22.09.20	1	
22.06.20	2020/0265	3, Greenfold Cottages, Goodshaw	Conv outbuilding to dwell. (Prev 2019/0551-R.)	AWC	30.07.20.	1	
15.07.20	2020/0200	Foresters Arms,12,Pleasant St. Haslingen.	Pub to 4 Apartments.	AWC	09.09.20	3	Net 3, allowing for existing living quarters.
10.07.20	2020/0267	2, Ashworth Rd. Edgeside.	Const of 2 two-storey terraced dwellings.	AWC	04.11.20.	2	
23.07.20	2020/0262	2, Oak Close Shawforth.	Erection of Bungalow in rear garden.	AWC	16.09.20	1	
07.08.20	2020/0358/9	26, Tong End, Whitworth.	Conv of Barn to Dwelling.	AWC	16.11.20	1	
29.07.20	2020/0290	97A-97B, Bank St. Rawtenstall.	Conv of First Floor to 2 Flats	A	28.08.20	2	
17.08.20	2020/0364	6, Rose Vale Street, Rawtenstall.	Conv of dwelling to two Apts.	AWC	12.10.20	1	

28.08.20	2020/0402	1, Rock View, Market St, Shawforth.	Refer to previous application 2020/0216	AWC	14.10.20	1	Resubmission of 2020/0216.
08.09.20	2020/0399	432, Bacup Rd, Rawtenstall.	Change from Office to Dwelling.	*	27.10.20	1	*Prior Approval not required.
10.09.20	2020/0439	Bdgs to rear of Goodshawfold Farm	Conv of 2 Barns to 3 dwellings.	AWC	02.11.20	0	Included in 2018/9 figures under 2019/0004.
28.08.20	2020/0367	Land of Back Lane, Rising Bridge.	Conv Agricult Bdg to Dwelling.	AWC	22.10.20.	1	
21.09.20	2020/0414	81-83, Deardengate, Haslingden	Conv of Social Club to 2 Shops + 1 APT.	AWC	27.11.20	1	1 more than 2018/0468 in CSL.
01.10.20	2020/0454	Acre Nook Farm, Edenfield.	Alteration, existing Dwelling into 2.	AWC	10.11.20	1	
02.10.20	2020/0456	Duke of Wellington, Grane Road.	Conv to 2 Dwellings.	AWC	18.12.20	1	Net 1 as PH included living quarters.
06.10.20	2020/0462	Land of Goodshawfold Rd. Loveclough.	Const of 1 Three Bed Dwelling.	AWC	20.01.21.	1	

16.10.20	2020/0484	40, Tonacliffe Rd, Whitworth.	Erection of 1 Detached Dwelling.	AWC	02.12.20	-3	Replaces 2018/0255 which was +4 in CSL. CSL number to be amended.
27.10.20	2020/0500	46, Clegg St. Haslingden (M.R. HQ.)	Conversion of M.R.C. to dwelling.	AWC	11.12.20	1	
06.11.20	2020/0517	11 Pinfold Mews, Edenfield	Erection of 4 Bed Dwelling.	AWC	29.01.21.	1	
05.11.20	2020/0514	Brow Edge, Ending Rake, Whitworth	Conv of Stables to Dwelling.	AWC	30.30.21	1	
13.11.20	2020/0521	Lower Calf Cote Meadow Park I.V.	Sub division of dwelling.	AWC	22.03.21.	2	Dwelling into two and Garage to a dwelling.
20.11.20	2020/0551	75-77 Newchurch Rd, Stacksteads.	Conversion from 1 to 2 dwellings	AWC	02.02.21	1	
14.12.20.	2020/0599	110, Bury Rd. Edenfield, Refer 2017/0618. Erection of dwelling in garden. Resubmission		AWC	02.01.21.	0	Resubmission, counted previously.
15.01.21	2021/0027	Hollin Lane Farm, Hollin Lane	Resubmission of 2018/0063.	AWC	25.02.21	0	Resubmission, counted previously.



04.11.20	2020/0448	Goodshawfold Farm, Goodshaw	Conv of partly converted Barn	A	28.01.21.	1	
03.02.20.	2020/0092	31 Kay Street, Rawtenstall.	Dwelling to an attraction extension.	A	10.06.20.	-1	
05.02.20.	2019/0583	47/51 Kay Street, Rawtenstall	Conv of 1st Floor to 2 Flats.	AWC	23.04.20.	2	
07.02.20.	2020/0033	Land south of Daisy Isle Cotts/Bacup	Erection of 3 dwellings.	AWC	05.11.20	2	Only 2 approved.
09.03.20.	2019/0513	Land off Mill Fold Facit.	Erection of 3 dwellings.	AWC	17.09.20.	1	CSL included 2 from 2016/0074
25.03.20.	2020/0144	12, Burnley Rd East Waterfoot.	Conv of Townhouse into 3 Apmts.	AWC	15.07.20.	2	
14.08.19	2019/0349	Barn 3 Gincroft, Edenfield.	Agric Bdg to dwelling.	AWC	06.07.20	1	Mistakenly included in 5yHLS 2020/21-2024/25.
14.08.19	2019/0350	Barn 2 Gincroft, Edenfield.	Agric Bdg to dwelling.	AWC	20.06.20.	1	Mistakenly included in 5yHLS 2020/21-2024/25.
06.11.19	2019/0522	Windy Ridge, Helmshore Rd.	Erection of 1 dwelling.	AWC	12.06.20.	1	
12.03.20.	2020/0126	Edgeside House	Conv of dwelling into 4 Apartments.	AWC	05.05.20.	0	

26.11.19	2019/0559	2, Tonacliffe Way, Whitworth.	Erection of 1 dwelling.	A	17.04.20	0	In CSL, resubmission of 2018/0410.
03.02.21	2021/0059	Irwell Inn, Bacup	Conv of 5 Apmts to 1 dwelling.	AWC	23.03.21	-4	Refer to 2017/0454.
						<b>58</b>	Discounting approvals similar to those counted in previous years.
20.08.19	2019/0341	Albert Mill Whitworth		AWC	02.11.20	36	11 to be built in the 5 Yrs from 2020/1-2024/5.
		Added to ensure included in 5 Yr HLS.					
Windfall Sites:							
17.07.20	2020/0314	Newbuild Kingsway Haslingden.	8 Detached was 9 under 2019/0598	AWC	03.11.20	8	
31.01.20.	2020/0018	Heritage Arcade,Rawtenstall	Conversion to 42 Apartments.	AWC	21.01.21.	42	
						<b>50</b>	
<b>Grand Total</b>						<b>144</b>	

## Appendix 7

### Comments on the Green Belt Site H72.

#### 1) Area Analysis of Land Types and Location of Green Belt

With Countryside being nearly three times the size of the Green Belt it is difficult to understand why RBC would ever contemplate using any of the valuable and irreplaceable Green Belt for housing or employment purposes. (See Green Belt Topic Paper, Section 1 Page 3.)

Additionally, it is difficult to understand why RBC would choose to allocate 87% of the houses being built on Green Belt to Edenfield and inflict growth of close to 50% in contrast to the 10% for the Borough as a whole. It is equally difficult to comprehend why 96% of the homes being proposed on Green Belt are being allocated to the south west.

#### 2) National Planning Policy Framework (NPPF).

All of the land involved in H72 meets the majority of the five purposes which the NPPF says Green Belt serves.

**Paragraph 134:** Site H72 plays an important role in restricting the sprawl from Greater Manchester and provides an attractive gateway to the Borough. It prevents the neighbouring town of Ramsbottom merging with either Rawtenstall or Haslingden and safeguards the countryside from encroachment.

**Paragraph 136 of the NPPF** states that Green Belt boundaries should only be altered in “exceptional circumstances”, be fully evidenced and justified and done as part of a Local Plan. RBC have been unable to provide any exceptional circumstances to justify the allocation of this site.

**Paragraph 137** indicates that Councils should look at all other reasonable options for meeting their housing needs. RBC have not exhausted the supply of land from other sources. Non-Green Belt sites deemed suitable by a local Chartered Town Planner could yield 2,760 more dwellings.

**Paragraph 138** indicates that if Green Belt is to be released Councils should give priority to sustainable sites, i.e. those which have been previously developed and/or have good access to public transport. It also identifies that Councils should identify how removal of land can be compensated through improvements to the remaining Green Belt. RBC have failed to meet either of these conditions. Note that none of the individual parcels that actually make up H72 - see paragraph 5) below - has been developed previously.

#### 3) Background Evidence.

**a) Green Belt and Landscape Studies.** RBC have disregarded the studies carried out by Penny Bennett Landscapes in 2015 & 2017 and replaced them with those prepared by LUC in 2016 which are at the very best controversial. **(Refer to EL 2.066g ECNF - GBP - 4.2, EL9.002 at pages 217 to 220 and EL9.006 at pages 719 and 720.)** RBC have been selective as to which parts of the studies they adopt and overruled conclusions which do not justify the use of Green Belt in the main area of H72. RBC’s reason for disregarding their Consultants’ proposals was that they had “used . . . planning judgement in coming to an opinion on the impact on Openness” (Green Belt Topic Paper, page 12). The Green Belt Topic Paper, page 10, claims that the release of Green Belt has been considered first

and foremost in the context of “Exceptional Circumstances” yet RBC fail to provide any cogent evidence to justify their decisions.

**b) Housing Land Availability.** The housing land supply data submitted in RBC’s Housing Update confirms there is an abundant supply of non-Green Belt land for housing despite RBC’s claims to the contrary.

**c) Employment Land Study.** The evidence provided by RBC / Lichfields in the Employment Update (EL 10.002) confirms there is a surplus of Employment Land irrespective of whether the requirement is RBC’s 27ha, Lichfields’ 14.3ha or ECNF’s 10ha. Some of the surplus land could be used for residential purposes in the future.

**d) Highways Study.** The Highways evidence base provided by RBC and the Site Promoters fails to assess the impact of the H72 development proposals, or consider the deliverability of access strategies and identify a robust mitigation package. There are significant issues with the Market Place mini-roundabout and all three proposed accesses to site H72, which were highlighted by our consultants SK Transport Planning. (Refer to ECNF – GBP 4.3 and ECNF-SKT and their subsequent submissions, including EL9.006 at pages 733 *et seq.*)

We would observe that the cumulative effect of actual and proposed housing development in Edenfield since 1st April 2019 would be to introduce at least 480 dwellings. If each dwelling had two cars, some 960 additional vehicles would be travelling through and around the village.

**e) Heritage Impact Assessment.** RBC’s original assessment concluded that approximately 50% of SHLAA 16262 should be excluded from development which provided further support for removing site H72 from the Housing Site Allocation list and retaining it as Green Belt. RBC decided to have a second study carried out with a company with ‘close connections’ to the Council and their findings were unbelievable! (Refer to EL9.006 at pages 720 to 729.)

**f) Education:** There are issues with respect to the availability of primary schools with both the existing schools operating at capacity. There are reputedly options to extend both Edenfield and Stubbins Schools but in the case of Edenfield it involves an extension into even more Green Belt land. The increase being considered for Edenfield is 80% and there is already traffic chaos with the School having no drop-off or pick-up points. (Refer to EL9.006 at pages 718 to 719.)

**g) Duty to Co-operate.** It is noted that adjoining authorities are unable to assist, but this of itself is no justification for building in Green Belt. (See Green Belt Topic Paper, page 26.)

**4) Exceptional Circumstances.** It is clear that RBC is unable to provide any cogent evidence or justification for taking Green Belt for housing purposes.

**5) Proposed Green Belt changes.** The changes to the Green Belt for housing involve five sites, four of which have significant brownfield content. Additionally, these four also have an element of enhancing their respective areas either through the demolition of dilapidated buildings or tidying up its appearance.

The only exception is site H72 where RBC seem unable to accept that it is entirely greenfield. This is despite RBC issuing an Erratum (document SD024) on 3rd September 2018 to confirm that H72 is entirely greenfield. For some reason they have now reverted to including in H72 SHLAA 16358 which was completed in 2019/20, to enable them to classify the site as “Mixed”. Further proof that SHLAA 16358 was never in H72 comes from the number of homes involved. H72 was originally noted as

having 406 homes made up from SHLAA 16256 with 63; SHLAA 16262 with 273 and 16263 with 70 and no reference to number of homes from SHLAA 16358. This was subsequently rounded by the Forward Planning Team to 400 and confirmed at one of our meetings with them. We rehearse again the reasons why the Horse & Jockey site is not part of allocation H72:

1. *The description of site H72 in Table 1 in Policy HS2 in the emerging Local Plan was rightly amended to 'Greenfield' from 'Mixed but largely greenfield' (Local Plan document SD024), because it was accepted that it did not include the 'Horse & Jockey' site. Regrettably, the Policies Map was not corrected.*
2. *H72 was always understood to comprise three SHLAA references: 16256 (net developable area 2.09ha, yield 63), 16262 (9.12ha, 273) and 16263 (2.32ha, 70), giving a total net developable area of 13.53ha (yield 406, rounded to 400).*
3. *The SHLAA 16262 [EB 004 Appendix E - Sites Assessment (2018), page 648] boundary follows the field boundary seen on the map of GB(Major)9 (EL1.002dd(i), page 36) so as to exclude the house called Alderwood and the former Vicarage. The SHLAA included Mushroom House within its 'red edge' and noted that the site's development area was reduced by "dwelling house, private garden (0.34ha)" (presumably Mushroom House).*
4. *The H&J site was a discrete allocation, H88, in RBC's consultation draft of Rossendale Local Plan Part 2 "Lives and Landscapes" - Site Allocations and Development Management Policies 2015, which was withdrawn on 24th February 2016. As long ago as 6th October 2015 RBC's Development Control Committee resolved that planning permission 2015/0238 should be granted for the development that has taken place, although its issue was deferred pending completion of a planning obligation.*
5. *The H&J site is SHLAA 16358. It has yielded ten dwellings, since 1st April 2019, and should be a separate allocation in Table 1 in Policy HS2 of the eLP. Clearly, those ten are in addition to the 406 from the other three SHLAAs.*
6. *A complication arises from the way the Policies Map has been drawn. It shows Alderwood, the old Vicarage, and other land outside SHLAA 16262, as included in H72 and washed over in orange. In contrast Mushroom House is excluded from the orange wash. This demonstrates inconsistency of treatment of the properties.*
7. *It means also that the description of H72 as greenfield is inconsistent with the Map, which, whilst it excludes Mushroom House, covers the old Vicarage, Alderwood etc, which are self-evidently previously developed land.*
8. *The foregoing does not detract from the crucial point that the H&J site must be treated as distinct from H72. The history of the SHLAAs and the total yield of 406 from the three component sites rounded to 400, together with the correction to H72 in Table 1 (document SD024), whereby RBC accepted the true position, confirm that this is the case. So too do the*

*sites' planning histories.*

9. *H72 was and is a Greenfield site. It is not 'Mixed' or 'Mixed but mainly Greenfield'. Accordingly, it is the Policies Map that requires correction so as to omit the H&J site and the other land outside the three SHLAAs. It would not be appropriate to amend Table 1 again to make it conform with an incorrect map.*

**6) Summary** There can be no justification for allocating Greenfield land in the Green Belt for residential development, when it has been proved that there is an abundant supply of land suitable for housing which has not been exhausted.

*END*

## **Examination of the Rossendale Local Plan**

### **EL 10.002 Employment Land Update May 2021**

**Representations by A.G.Ashworth and R.W.Lester with respect to RBC's Paper dated May 2021 and published on 2<sup>nd</sup> June 2021**

#### **Contents**

<b>Page 1</b>	<b>Key Points</b>
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#### **Key Points**

- **Plan period needs to be reset to commence not earlier than 1st April 2022.**
- **Insufficient data supplied to enable Lichfields' net growth figures to be cross-checked.**
- **RBC claim they still require 27ha employment land as proposed in the Plan but do not dispute (Update, page 1, second paragraph) Lichfields' updated calculation of 14.3ha. In the Briefing Note (para 4.4, page 23) Lichfields identify a figure around 14ha.**
- **Lichfields include in their calculations all the Employment Land Losses but none of the Land Gains from other sources.**
- **Lichfields' land requirement figures based on the generation of 471 jobs are inflated.**
- **ECNF provide evidence for an Employment Land Requirement of 10ha with a range from 3.0 to 17ha dependent upon the timeframe and the range of options considered. A reasonable range is considered to be 8 to 12ha. Refer to section 8 below.**

- **RBC continue to promote a need for 27ha but fail to back this with credible evidence.**
- **RBC claim to have identified over 31ha of Land for Employment. Some of this is Green Belt and in view of the surplus should be removed from the allocations.**
- **Despite Lichfields' best efforts to assist RBC in their quest for 27ha, they go no further than estimating the employment land requirement as around 14ha.**
- **RBC have failed to identify all existing employment sites with available developable area and to assess accurately the available developable area on such sites as they have identified.**
- **It is no longer clear what base date RBC are using in the emerging Plan.**
- **RBC need to review their Policies protecting old employment sites no longer fit for purpose and facilitate other uses including residential, in view of the abundant land supply.**



## Examination of the Rossendale Local Plan

### Consultation on EL 10.002 Employment Land Update May 2021

Representations by A.G. Ashworth and R.W. Lester with respect to RBC's Paper dated May 2021 and published on 2<sup>nd</sup> June 2021

#### Representations

**1. Planning for the past** As explained in our Response to Housing Update EL10.001, we submit that the Plan period should be reset to commence not earlier than 1st April 2022.

**2. Inability to cross-check Lichfields calculations for net growth:** We are unable to cross-check the net growth figures in the recalculation table (Table 4.1 on pages 3 and 23 of the Update) produced by Lichfields for the 2019-2036 Plan period for types B1a/b; B1c/B2 and B8 as RBC have not provided the necessary background data.

We refer particularly to the employment numbers in terms of specific job projections, both gains and losses, on an individual category basis. We therefore reserve the right to comment on this in the future as and when we see the full Lichfields review / calculations.

**3. Lichfields continue to overstate the Employment Land Requirement:** There are questions as to why Lichfields have chosen to use 15 years of historical figures (Briefing Note, section 3) when previously they used only 10 years. The obvious answer to this is that it vastly inflates their land loss figures for the 17-year Plan period. On their basis of excluding any gains and using the 15-year historical data they calculate 14.6ha (Briefing note, paragraph 4.1), whereas if they used the 10-year historical data and still ignored the gains this figure would reduce to 6.59ha. **Refer to Appendix 1.**

**4** We note Lichfields' figure in their previous submission was 1.346ha per annum for land loss; they now claim (Briefing note, paragraphs 3.3 and 4.1) 0.859ha per annum which is still exaggerated. ECNF claimed in their previous submission that a figure of 0.616ha per annum was appropriate and have now amended this to 0.764ha based on the 15-year period, 0.247ha based on the 10-year period and 0.248ha based on the 5-year period. **Refer to Appendix 1.**

**5.** Lichfields use a figure for completions of 0.835ha (Briefing Note, Table 4.1) which differs from the 15-year average of 0.805ha and inflates their flexibility factor. In Table 4.1 it is the flexibility factor of 1.67 which is for two years. If the period chosen to calculate the average were the last 10 years it would be only 0.43ha *per annum* and if it were based on the last 5 years it would be 0.314ha per annum. **The calculations for the ECNF figures are explained in Appendix 1.**

**6. Lichfields include all the Employment Land Losses but none of the Land gains from other sources.**

We can challenge Lichfields' land loss figure as they use a figure of 0.859ha per annum which includes all the land losses but none of the gains. If the gains are included, the figure reduces to 0.764ha *per annum*. We have highlighted this error at every stage of the Plan's progress but, as it does not assist RBC's case, they have chosen to disregard it. **Refer to Appendix 1.**

**7. Lichfields claim the generation of 471 additional jobs results in a gross requirement of 12.81ha, increased to 14.48ha inclusive of the flexibility factor.** In reality when the land gains are included in their calculation the figures are 11.2 and 12.81ha respectively, and, if the timeframe is reduced to 10 years, the figures are 2.4 and 3.26ha. **Refer to Appendix 2 for the detailed calculation – Option number 6.**

**8. Evidence to support ECNF’s claim that the Employment Land Requirement is 10ha with a reasonable range considered to be 8 to 12ha.** Appendices 1 and 2 list the historical Land Loss and Completion figures and provide all our detailed calculations. When the land gains are included, the figure for the 17-year Plan period is 12.99ha using the 15 year data average, 4.19ha based on the 10-year average and 4.22ha for the 5-year average. The 5- and 10-year figures are virtually the same, suggesting this would be a good base to use.

Similarly, the 15, 10 and 5 year figures for completions are 0.805, 0.43 and 0.314ha *per annum* respectively.

In Appendix 2 we have taken these figures and added them to the unchecked net growth figures for the seven options to produce the total employment figures for all the options.

This information clearly challenges Lichfields’ results as indeed our figures did through the various stages involved with the progress of the Plan.

**9. RBC continue to promote a need for 27ha but fail to support this claim with credible evidence.**

**9.1** Table 1 on page 4 of the Update suggests that sources of Employment Land would provide at total of 31.02ha. Using the word ‘therefore’, RBC cite that supposed availability as a reason for retaining an employment land requirement of 27ha. That is nonsense - the availability of land cannot be a reason for requiring it.

**9.2** RBC claim there is a pent-up demand; they list the enquiries over a 24-month period, make reference to a Growth Corridor and state that the loss of floorspace to alternative uses is likely to escalate going forward due to proposed changes to PD rights in the future. We respond to these comments and state that they are not supported by any meaningful evidence.

**9.3** They claim a pent-up demand but supply no evidence. Lichfields no longer support 27ha. RBC summarise in Table 2 (Update, page 4) enquiries received but do not advise if any were satisfied from existing stock. They do not state if the enquirers are from within or outside the Borough or if any requiring larger sites already have existing sites that will then be free. It does not say how RBC answered the enquiries or how the enquirers decided to proceed or what factors influenced those decisions. As such, Table 2 and Appendix 2 to the Update are of no evidential value in determining RBC’s employment land requirement and must be disregarded.

**9.4** The first and second paragraphs of Update page 5 are evidence of aspiration rather than of a land requirement.

**9.5** The third paragraph on that page is pure speculation rather than evidence of need. One might equally speculate that warehouse providers would prefer a location close to the M62 or M65 corridors, from which Rossendale would still be accessible. Bearing in mind the physical, topographical and environmental constraints acknowledged at paragraph 3.4 of the Housing Update (EL10.001), it can be strongly argued that Rossendale’s workforce would be better served by

businesses which do not 'require a disproportionate amount of land for a given number of jobs' than by warehouses.

**9.6** The fourth paragraph on that page is mere speculation and no basis for increasing the land loss replacement figure.

**9.7** Paragraph 4.7 of the Housing Update (EL10.001), page 8, notes that 'the acceleration of . . . last-mile logistics has resulted in a much-publicised increased demand for warehousing development nationwide'. To clarify the expression 'last-mile logistics' we reproduce at Appendix 3 a note from CBRE, worldwide specialists in commercial real estate. This suggests that a purpose-built last-mile logistics warehouse would typically be located on the edge of a town/city to reach 'chimney pots' (customers) within an hour. One might therefore expect that, so long as Rossendale was within one hour's reach, the optimal position for such a warehouse serving the Borough would be close to the large conurbations adjacent to the M60, M62 or M65.

**10. It is disturbing to note from paragraph 1.1 on page 6 of the Update that RBC's response to Action 5.2 contained incomplete information**

### **11. Employment Land Supply**

**11.1** RBC's comments (Update, page 7) are at best very confusing and they do not appear to fully respond to the Inspectors' request. We cannot understand in paragraphs 2.1 and 2.2 how they could change net areas to gross areas by adding 20% to the developable area. Although the 'rule of thumb' in paragraph 2.1 does not sound precise in the first place, consistent reverse application of that rule, i.e., from net to gross, requires an addition of 25%, not 20%. However, we understand that to go from net developable area to plot size the multiplier is 2.5 (40% plot ratio).

#### **11.2 New Employment Sites:**

We cannot understand why this category which is by far the largest in terms of land supply has not been fully updated when the other four categories in Tables 1 and 8 have.

The only reference to the New Sites is on page 13; it refers to RBC's response to Action Point 8.015 and specifically points 15.1; 15.2 and 15.6-15.10.

We would request that consideration be given to our response dated 19th March 2021 to that Action Point (document EL9.006 at pages 818 to 822) which highlights that there are still significant issues with each of those sites.

#### **11.3 Spare Capacity on Existing Employment Sites:**

**11.3.1** RBC's response on this (Update, pages 7 to 11) is totally inadequate and obscures the real levels of developable areas on existing sites.

**11.3.2** First of all and crucially, the Update still ignores the sites we highlighted in our ECNF-Employment Land Review in August 2019 that were omitted from RBC'S list, some of which are large sites that have existed for many, many years and no doubt some have additional areas that would be developable. Such sites include Chatterton Hey Mill; Truss-Form; Mount Spring Works; Lancashire Sock and the adjacent 3 Greenway Units; Valmet; and Hargreaves Street Mill.

**11.3.3** Additionally we question the lack of developable area at several of the Employment Sites on their list which were noted as zero despite some having planning applications pending. Despite our efforts to highlight these RBC appears to have disregarded them yet again. One of the best examples

would be the Melba Swintex Site EE37 where RBC agreed in May 2021 that a lawful development certificate was appropriate (yet to be issued in prescribed form) for a proposed factory extension of 0.266ha (2021/0189).

**11.3.4** The imprecision in paragraph 2.7 (Update, page 9) is deplorable in a formal document. 'Signing of a section 106' presumably means 'completion of a planning obligation', but that is not something subject to which planning permission can be granted or which is capable of being a condition of approval.

**11.3.5** As regards paragraph 2.8, the only development of site EE13 has been use for the storage of vehicles, a use that predates submission of the Local Plan. It is therefore difficult to understand either what has changed since submission of the Plan to warrant recalculation of its developable area or, alternatively, why it was ever credited with developable area in the Plan.

**11.3.6** As regards paragraph 2.9 and site EE19, it is astonishing that RBC ever counted the same parcel of land in separate allocations and that it has taken two years or more for them to identify and/or admit their error. It casts further doubt on the general reliability of the information RBC are providing. We respectfully request that RBC provide without delay confirmation of the gross area and net developable area of both sites EE19 and H74.

**11.3.7.1** As regards paragraph 2.10 and site EE24, application 2018/0437 was validated on 28th September 2018 - it is incorrect, not to say misleading, in May 2021 to call that 'recent'. Furthermore, it was approved on 18th December 2018, over three months before submission of the Local Plan. The area of the site was stated in the application as 1.35ha.

**11.3.7.2** The Update fails to explain how the net developable area of Site EE24 changes from 4.37ha (ELR 2017 and Table 3 on Update page 9) to 0.5ha (Plan Submission Version) to 0.1ha (Table 2 on Update page 8). Paragraph 2.10 states that EE24 has been the subject of various applications since the ELR (2017) was published, but the Update does not identify any apart from 2018/0437.

**11.3.7.3** It would appear from Table 7 that the 2018/0437 development was not complete by 1st April 2020. We assume that we are still working to a base date of 1st April 2019 - if that is the case, approval 2018/0437, not being completed, should not affect the net developable area figure. Even if the base date changes to 1st April 2020, the net developable area is not affected by that approval.

**11.3.7.4** Recently RBC removed a Housing Site (H1- 1.26ha) from their Local Plan list of allocated housing sites as it is now to be used for employment (Housing Update EL10.001 at page 15). RBC have so far failed to publish a corresponding adjustment to the Employment Land allocations, although there seems to be no valid reason for not amending the Housing and Employment allocations simultaneously and the acquisition of the site for business was reported in the local press back in February 2021. This is a good example of a large requirement being satisfied from 'existing stock' and freeing up the the business's existing site in the Borough, but there is no reference to anything along these lines in RBC's comments.

**11.3.7.5** We are concerned that RBC appear to be making selected *ad hoc* adjustments to the figures (see also Update paragraph 2.7 re EE2 Henrietta Street, Bacup) without regard to the base date.

**11.3.7.6** At the end of it all paragraph 2.11 and Table 4 show the total estimated gross area available for employment growth on existing sites as 2.57ha rather than 2.67ha. This appears to be due to bringing forward the figure of 0.22ha in Table 3 on page 9 as 0.12ha.

## 12. Mixed Use Sites: Update Page 12

**M3: Isle of Man Mill:** *“It is conceded [by RBC] that the buildings cannot count as part of the future supply as they were in employment use until recently and no change of use have been granted approval since”.*

We submit that, as part of this site is already in the Housing Land Supply List, the whole site should now be included.

**M5: Park Mill Helmsore:** We believe that the Wavell House development was initially included under Park Mill with the development of 14 homes still outstanding as the planning application was withdrawn after discussions with RBC who had noted there was a possibility the number could be increased in the future.

## 13 Outstanding commitments - Update page 13 and Table 6:

1993-518 Stubbins Vale Mill is omitted from, and must be added to, Table 6, as demonstrated by application 2021/0189 (paragraph 11.3.3, *supra*) adding 0.266ha net developable area. The statement in the Plan that EE37 has zero net developable area shows that RBC have an imperfect understanding of employment land availability.

2017/0052 Cuba Industrial Estate, Stubbins. The consent expired on 30th March 2020 but it shows that 0.025ha net developable area was at all material times and is available at EE39, although the Plan shows it as zero.

2019/0266 Former Bus Depot, Knowsley Park Way From 2008 to April 2018 this was a sui generis use with ancillary office use. In April 2018 it became vacant. In the Plan EE18 should therefore have been shown with 0.87ha net developable area.

## 14. Employment Land Supply Summary

**14.1.1** RBC’s figure from the five categories involved is 31.02ha (Update pages 4 and 16, Tables 1 and 8) which is more than double the requirement calculated by Lichfields and three times the ECNF figure.

**14.1.2** Those Tables 1 and 8 are inaccurate any way, because of the error in Table 4, (paragraph 11.3.7.5, *supra*) and because they do not take account of developable area at sites EE18, EE37 and EE39 (section 13, *supra*) and other sites yet to be identified.

**14.1.3** Although the source of Table 1 is oddly stated to be the document in which it appears, the calculation of 22.87ha gross area of new employment sites is not explained in the document.

**14.2** This land surplus clearly highlights that there is no need to use any Green Belt land for Employment purposes and that Green Belt land should be removed from the supply figures.

## 15. Lichfields’ Estimate

**15.1** Although RBC are pursuing their quest for 27ha, Lichfields now go only so far as to estimate the requirement as around 14ha.

**15.2** Lichfields appear to have investigated RBC's Employment Land requirement rather differently than they did previously and have effectively halved their previous recommendation. They have explored all available avenues to them, including timeframes and latest data, to justify RBC's professed need but are unable to argue for more than 14.5ha based on the 471 additional jobs. We have highlighted what we believe to be the areas where they have 'exaggerated the need' and feel confident that our assessment which is similar to the one we put forward previously at 10ha is an accurate one.

## **16. Protection of Old Employment Sites**

**16.1** In view of the abundant supply of employment land, RBC have a need to review their Policies that protect older employment sites that are no longer fit for purpose and to facilitate their release for other uses including residential.

## **17. Conclusion**

**17.1** 8ha to 12ha is more than enough to satisfy RBC's employment land requirement.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th June 2021

## Appendix 1

The following Table lists the Land Loss and Completion figures over the last 15 years, the averages based on 5, 10 and 15-year periods and the calculations of the Land Losses and Completion Factors utilised in Appendix 2

Period	Completions Gross Area Ha	Land Losses Gross Area Ha	Comments
2005/6	2.1	1.8	2005/6- 2013/4 - Source of figures: Lichfields Final Report 17.02.17.
2006/7	0.69	3.6	
2007/8	3.54	2.5	
2008/9	0.89	0.1	
2009/10	0.56	1	
2010/11	0.76	-0.31 Gain	Not included by Lichfields or RBC but total adjusted by ECNF. Source of Gain Annual Monitoring Report.
2011/12	0.27	0.005	
2012/13	0.89	2.6	
2013/14	0.8	0	
2014/15	0.01	-1.07 Gain	Not included by Lichfield or RBC but total adjusted by ECNF. Source of figures: RBC's response to AP EL 10.002. 2014/5 2018/9. Gain source AMR.
2015/16	0	0.1	
2016/17	0.05	-0.03 Gain	Not included by Lichfields or RBC but total adjusted by ECNF. Gain source AMR.
2017/18	0.07	0.68	
2018/19	0.26	0.27	
2019/20	1.19	0.22	Source of figures: A.Storah email dated 11.06.21.
Totals	12.08	11.465	Totals for 2005/6 -2019/20
Totals	4.3	2.465	Totals for 2010/11 -2019-20.
Totals	1.57	1.24	Totals for 2015/16 -2019/20.
Annual Average	0.805	0.764	Annual Average based on 2005/6 – 2019/20.
Annual Average	0.43	0.2465	Annual Average based on 2010/11 – 2019/20.

Annual Average	0.314	0.248	Annual Average based on 2015/6 – 2019/20.
<b>Period</b>	<b>Completions Gross Area Ha</b>	<b>Land Losses Gross Area Ha</b>	<b>Comments</b>
F.F.	1.61		Flexibility Factor calculated from an average from 2005/6 -2019/20 based on 2 years of completions.
L.L.		12.99	Land Losses calculated from an average from 2005/6/-2019/20 based on 17 years of Plan Period
F.F.	0.86		Flexibility Factor calculated from an average from 2010/11-2019/20 based on 2 years of completions
L.L.		4.19	Land Losses calculated from an average from 2010/11 -2019/20 based on 17 years of Plan Period
F.F.	0.63		Flexibility Factor calculated from an average from 2015/6 -2019/20 based on 2 years of completions
L.L.		4.22	Land Losses calculated from an average from 2015/6 -2019/20 based on 17 years of Plan Period

## Appendix 2

The following Table compares the Employment Requirement calculations prepared by Lichfields and ECNF in columns 6 and 7 and demonstrates the huge differences from taking 5-, 10- and 15-year periods to obtain the annual averages for Land Losses and Completions. These are compared in columns 7, 8 and 9.



1	2	3	4	5	6	7	8	9
Option		B1a/b	B1c/B2	B8	Lichfields Total 2019-36	ECNF Total 2019-36 Average of 15 yrs	ECNF Total 2019-36 Average of 10 yrs	ECNF Total 2019-36 Average of 5 yrs
1) Experian 2018 Baseline (+ 1400 jobs)	2019-36 Net	0.49	-4.66	5.59	1.41	1.41	1.41	1.41
	2019-36 Gross				16.02	14.4	5.6	5.63
	+Flexibility Factor				<b>17.69</b>	<b>16.01</b>	<b>6.46</b>	<b>6.3</b>
2) Experian 2016 Baseline (+1600 jobs)	2019-36 Net	0.62	-4.32	5.66	1.96	1.96	1.96	1.96
	2019-36 Gross				16.57	14.95	6.15	6.18
	+Flexibility Factor				<b>18.24</b>	<b>16.56</b>	<b>7.01</b>	<b>6.81</b>
3) Regeneration / Policy On (+1803 jobs)	2019-36 Net	0.78	-4.0	5.66	2.44	2.44	2.44	2.44
	2019-36 Gross				17.05	15.43	6.63	6.66
	+Flexibility Factor				<b>18.72</b>	<b>17.04</b>	<b>7.49</b>	<b>7.29</b>
4) CS Jobs Target (+2704 Jobs)	2019-36 Net	1.14	-3.16	7.66	5.64	5.64	5.64	5.64
	2019-36 Gross				20.24	18.63	9.83	9.86
	+Flexibility Factor				<b>21.91</b>	<b>20.24</b>	<b>10.69</b>	<b>10.49</b>
5) Labour Supply 2012 LHN (185 dpa +428 jobs)	2019-36 Net	0.06	-5.54	3.54	-1.94	-1.94	-1.94	-1.94
	2019-36 Gross				12.67	11.05	2.25	2.28
	+Flexibility Factor				<b>14.34</b>	<b>12.66</b>	<b>3.11</b>	<b>2.91</b>
6) Labour Supply (208+185 dpa, + 471 jobs)	2019-36 Net	0.08	-5.5	3.62	-1.79	-1.79	-1.79	-1.79
	2019-36 Gross				12.81	11.2	2.4	2.43
	+Flexibility Factor				<b>14.48</b>	<b>12.81</b>	<b>3.26</b>	<b>3.06</b>
7) Past Take Up Rates	2019-36 Net	-3.06	2.65		-0.4	-0.4	-0.4	-0.4
	2019-36 Gross				14.2	12.59	3.79	3.82
	+Flexibility Factor				<b>15.87</b>	<b>14.2</b>	<b>4.65</b>	<b>4.45</b>

Note ECNF have been unable to check the Net figure calculations as RBC did not provide the breakdown of job number changes or the recent vacancy figures.

Lichfields add a Land Loss of 14.61ha to get from net to gross based on a 15 year period.  
Lichfields add a Flexibility Factor of 1.67 to get from gross to total based on a 15 year period.

ECNF have provided three Land Loss figures to get to gross from net based on 5; 10 and 15 year periods.  
ECNF have provided three Flexibility Factors to get from gross to total based on 5; 10 and 15 year periods.

Lichfields claim a range of 14 – 19ha excluding Option 4 and select 14.3ha as the requirement, despite claiming 27ha previously.

ECNF claim the following ranges excluding Option 4 based on the different timeframes and conclude the range should be between 8 to 12ha. They claimed 10.72ha previously:

15 year data period from 2005/6-2019/20: 12.7-17ha.

10 year data period from 2010/11-2019/20: 3.1-7.5ha.

5 year data period from 2015/6-2019/20: 2.9-7.3ha.

## Appendix 3

Last Mile Logistics - A Note dated 4th February 2021 by Tim Henman MRICS of CBRE

Source:

<https://www.cbre.co.uk/services/business-lines/valuation-and-advisory/valued-insights/articles/last-mile-urban-logistics-what-is-it>

### **Last Mile / Urban logistics: What is it?**

What is Last Mile / Urban Logistics? These buzz words are more and more common in the Commercial Real Estate world, but rarely are they defined. The terms are used by many in the industry, but are they the same? Even with the internet at our disposal, it is not easy to find a definitive definition for either. However, below are a few of note;

#### **Last Mile Logistics Definition**

*'Last mile logistics refers to the final step of the delivery process from a distribution centre or facility to the end-user' - Cerasis (part of Globaltranz)*

Last Mile Logistics, also sometimes referred to as 'last touch' or 'last leg' logistics, is a process and not strictly a real estate term. As touched on in the definition above, it is the delivery of goods to consumers, or 'chimney pots' as known in the industry. Retailers and/or third-party logistics company will promise to deliver goods within a certain time frame and require a suitably located / specified building to facilitate this process. The location could be urban, and also more peripheral to conurbations to service those who live in rural areas.

#### **Urban Logistics Definition**

*'That part of supply chain management that plans, implements, and controls the efficient, effective forward and reverse flow and storage of goods, services, and related information between the point of origin and point of consumption in order to meet customers' requirements' - Urban Logistics: Establishing Key Concepts and Building a Conceptual Framework for Future Research William J. Rose, John E. Bell, Chad W. Autry, and Christopher R. Cherry*

It is difficult to differentiate between the above two definitions, which is no surprise as in many cases they are one and the same with the terms regularly used interchangeably. One distinction that can be made, is that an Urban Logistics building will be centrally located in an urban area, but not necessarily directly linked to the last mile delivery process. It is a broader term that can encapsulate bulk storage, trade and indeed last mile.

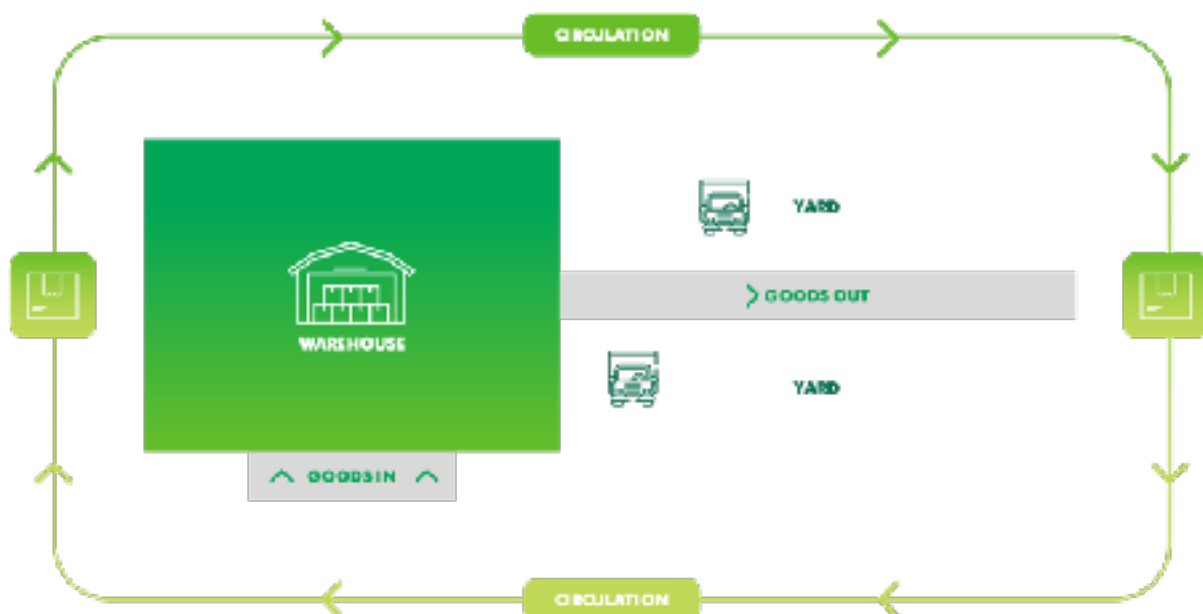
## The Typical Warehouse

Many research papers and press articles seem to gloss over defining exactly what a purpose-built Last Mile Logistics warehouse may physically comprise of. Clearly, this will vary depending on the end user and their exact business model, but it is likely to benefit from some of the following characteristics;

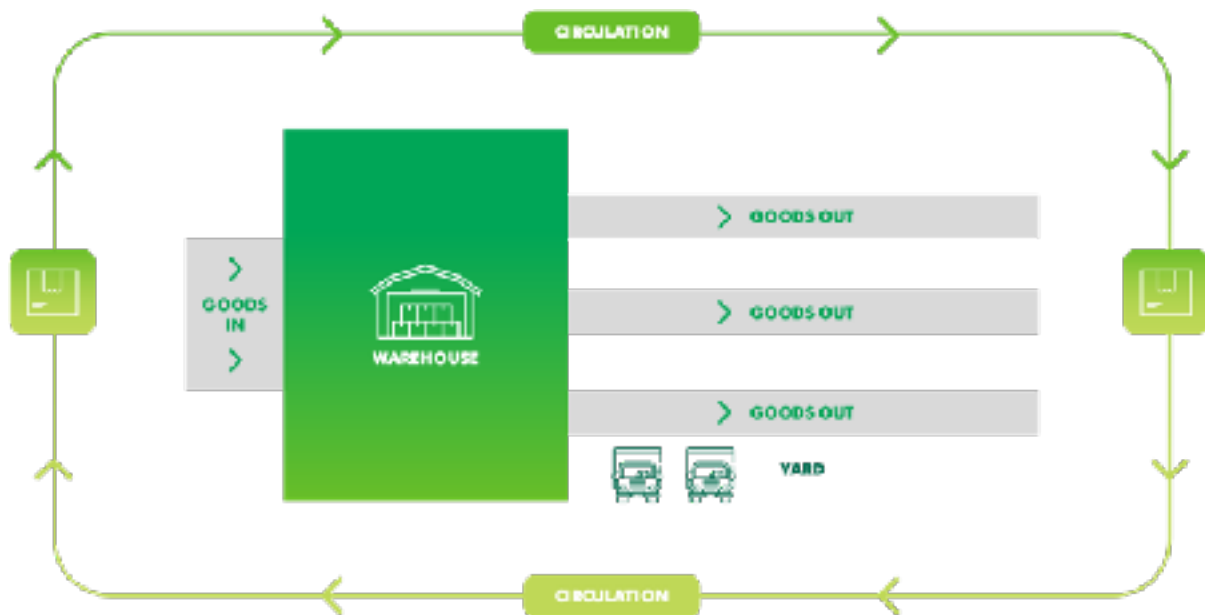
- Edge of a town/city to reach 'chimney pots' within an hour
- Good access to national (for goods in) and local (for delivery) road networks
- E-shape or T-shape configuration (possibly cross docked)
- Circa 30,000 – 50,000 sq ft (definitely sub 100,000 sq ft)
- Low site cover (circa 20-25%)
- 8 – 10 metres eaves (no need for much racking as stock is not held in situ for long)
- Plenty of loading doors and a significant yard
- Good site circulation

In summary, it's a unit that is effectively a hub to load up vans that deliver to individual consumers (chimney pots) with very little stored on site for any length of time. These buildings are like a Royal Mail Sorting Office for instance, where the building is intensively used for short periods every day. Typical purpose-built facilities may comprise either of the below configurations.

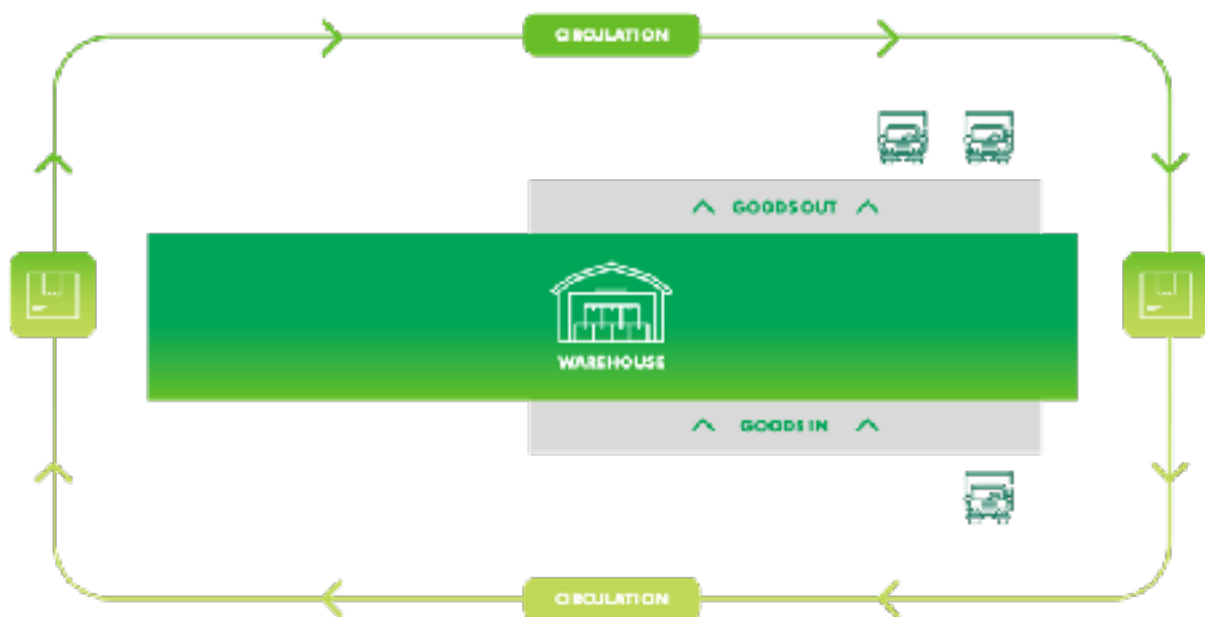
## T-shape Unit



## E-shape Urban Unit



## Cross-docked Unit



### So, what is what?

Taking the above into account, perhaps the cleanest way to make a distinction between the two would be as follows:

**Last Mile Logistics** – The final stage in the process of delivering goods to the consumer.

**Urban Logistics** – The physical property asset needed to ensure the Last Mile Logistics process can be achieved.

However, it should be noted that some fulfilment centres are also able to facilitate Last Mile Logistics despite not occupying urban areas